

**Planning and Compulsory Purchase Act 2004**  
**Town and Country Planning (Local Planning) (England)**  
**Regulations 2012**

**Stratford-on-Avon District Site Allocations Plan**

**Statement of Consultation**  
**(Regulation 22)**

<b>Contents</b>	<b>Page</b>
1. Introduction	2
2. Initial consultation on intention to prepare a Site Allocations Plan	5
3. Further consultation on intention to prepare a Site Allocations Plan - Revised Scoping & Initial Options (Regulation 18)	6
4. Consultation on Draft Strategic Housing Land Availability Assessment	7
5. Consultation on Draft Built-Up Area Boundaries	9
6. Further focused consultation (Regulation 18)	10
7. Proposed Submission consultation (Regulation 19)	11
<b>Appendices</b>	
A. Revised Scoping and Initial Options Consultation (January-March 2018) - Analysis of Comments	
B. Further Focused Consultation (January-March 2019) – Analysis of Comments	

## 1. Introduction

This Consultation Statement sets out how the District Council has engaged with and involved those parties – local residents, communities and organisations, landowners and developers, agencies and specialist bodies – who have an interest in the purpose and content of the Site Allocations Plan.

The Statement covers the various stages that the Site Allocations Plan has gone through during its preparation, the steps taken to inform interested parties, the scope of the responses submitted and how the District Council has responded to them.

The following illustrates the stages that the Plan has gone through in its preparation:

Initial consultation on intention to prepare the Plan  
August (Regulation 18) – October 2014



Further consultation on intention to prepare the Plan (Regulation 18)  
January – March 2018



Consultation on Draft Strategic Housing Land Availability Assessment  
August – September 2018



Further Focused Consultation (Regulation 18)  
February – March 2019



Formal consultation of Proposed Submission Plan (Regulation 19)  
August – September 2019

### Statutory Provisions

The Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations') require a local planning authority, when submitting a local plan to the Secretary of State, to publish a statement of the consultation process that has been undertaken in preparing the document.

Regulation 22(1)(c) requires that the consultation statement should set out:

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18<sup>1</sup>;
- (ii) how those bodies and persons were invited to make representations under regulation 18;
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20<sup>2</sup>, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made pursuant to regulation 20, that no such representations were made.

Regulation 18(2) specifies the bodies and persons who should be invited to make representations on what a local plan should contain:

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying out business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

The outcome of the process for making formal representations on the Proposed Submission Site Allocations Plan (Regulation 19) will be covered in a separate report that will be produced by the District Council in due course.

### **Overall approach to public consultation**

The District Council's approach to engaging with interested parties in planning matters, including plan-making, is set out in its Statement of Community Involvement. The latest version of this was adopted in December 2018.

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<sup>1</sup> Regulation 18 says that a local planning authority must inform consultees who may have an interest in a proposed local plan to be invited to make representations to the planning authority about what a local plan on that subject ought to contain.

<sup>2</sup> Regulation 20 says that any person may make representations about a local plan which the local planning authority propose to submit to the Secretary of State, and that such representations should be received by a specified date.

Because of the broad range of policies and proposals covered by the Plan, the District Council has sought to ensure that a wide range of parties have been informed of and involved in its production.

The Planning Policy Consultation Database comprises an extensive range of individuals and bodies. It is updated on an ongoing basis and in accordance with the General Data Protection Regulation. As well as the specific and general consultation bodies specified in the Regulations, it also includes professional and commercial bodies and members of the general public who have asked to be kept informed of progress on local planning documents.

A variety of methods have been used during the preparation of the Plan to inform interested parties. These include:

- notification of consultation arrangements by letter or email
- public notices in local newspapers
- a Site Allocations Plan page on the District Council's website
- copies of documents available to view at Council offices and libraries

A specific aspect of consultation, introduced by the Localism Act, is the duty to co-operate with neighbouring authorities and other agencies. The NPPF provides further guidance on this requirement to co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities (paras. 24-27).

The process undertaken by the District Council in preparing this Plan will be set out in a separate Statement of Compliance with the Duty to Co-operate.

## **2. Initial consultation on intention to prepare a Site Allocations Plan**

This consultation was intended to be the first stage in the preparation of the Plan. It was undertaken in late summer/early autumn 2014 at the point when the Core Strategy was submitted to the Secretary of State to be examined.

The content of the Plan as intended at that time reflected this context. Its main purposes were:

1. To define, and in some cases amend, Built-Up Area Boundaries for Stratford-upon-Avon, Main Rural Centres and Local Service Villages.
2. To identify site allocations for housing and employment development. It was anticipated that such allocations would be needed to supplement the strategic allocations identified in the Core Strategy.
3. To establish principles to be applied in the identification of sites in the Plan.

To assist the District Council in identifying land, this consultation also included a 'call for sites' invitation. This provided the opportunity for anyone to put forward land for consideration

It was emphasised that this consultation was not an opportunity to comment on the overall development strategy or the categorisation of settlements as these are matters dealt with in the Core Strategy.

A total of 125 responses were submitted during the consultation period.

It was anticipated that this consultation document would inform the preparation of a draft Plan that would be published by late 2014/early 2015 and then progress to submission for examination during 2015. However, the process and timescales involved in getting the Core Strategy adopted meant that circumstances regarding the provision of housing and employment changed substantially. In particular, the supply of dwellings on sites that had been implemented, with planning permission and on proposed allocations in the Core Strategy meant that the District's housing requirements had been met without the need for additional allocations to be identified in the Site Allocations Plan.

As a result, it became clear that the scope and content of the Plan would need to be revised. For this reason, the comments submitted on this consultation document have not been analysed in detail, although the subsequent consultation refers to those points that remained relevant at that time.

### **3. Further consultation on intention to prepare a Site Allocations Plan - Revised Scoping & Initial Options (Regulation 18)**

Progress on preparing the Site Allocations Plan was deferred until the Core Strategy had been finally adopted in July 2016.

Given the significant change of circumstance regarding housing provision, together with other issues that had now arisen, it was appropriate to consult on a revised scoping of the Plan. By doing so, interested parties were made aware of the situation and it provided an opportunity for them to express their views on its intended contents.

Consultation on a revised scope of the Plan, together with the proposed approach to a wide range of sites, took place in early 2018.

The content of the Plan as now intended partly reflected the situation established in the Core Strategy. Its main purposes are now:

1. To set out an approach to the identification of reserve housing sites. The need to do this is established in Core Strategy Policy CS.16.
2. To define, and in some cases amend, Built-Up Area Boundaries for Stratford-upon-Avon, Main Rural Centres and Local Service Villages.
3. To put forward a proposed or, in some cases, revised approach to specific sites for various forms of development.
4. To provide a policy on self-build and custom housebuilding and identify appropriate sites for this specific purpose.

As well as informing parties on the District Council's policy consultation database, a drop-in session was held for Parish Councils to discuss matters relating to the purpose of the Plan.

A total of 312 responses were submitted during the consultation period.

These comments were thoroughly assessed and have informed the contents of the Plan which is to be submitted for examination. See Appendix 1

#### **4. Consultation on Draft Strategic Housing Land Availability Assessment**

At the outset of producing the Site Allocations Plan it was anticipated that it would allocate sites for housing and employment development. When it became clear that further allocations would not be required and its focus should be on identifying reserve housing sites, the scope of the SHLAA which has been produced to inform the SAP was changed to concentrate on potential housing development only.

It should be noted that the District Council has invited sites to be submitted for consideration in the Site Allocations Plan through a 'Call for Sites' procedure. This has been available throughout the process of preparing the Plan over the past five years.

National planning guidance requires local planning authorities to prepare and keep up-to-date a Strategic Housing Land Availability Assessment (SHLAA). Its purpose is to provide information on the deliverability of sites for potential development.

It is important to stress that the identification of a site in a SHLAA does not, in itself, determine whether or not it will be allocated for housing in the Development Plan. Nor does it imply that the site will receive planning permission. It is the role of the SHLAA to provide information on the range of sites which are available to meet need, and a distinction should be drawn between whether a site is suitable for development and whether development is appropriate on a particular site.

The current version of the SHLAA updates and supersedes previous versions that provided an input to the identification of housing allocations in the Core Strategy. This version is also the first to be prepared in accordance with the national Planning Practice Guidance (PPG) and the joint methodology agreed in 2015 by the Warwickshire and Coventry local authorities to provide a consistent approach across the sub-region.

Consequently, this SHLAA does not cover a number of matters that is usually the case, such as assessing the scope for small-scale windfalls or the extent of the urban capacity of the District. This is because such sites are likely to conform to the Core Strategy and could come forward for development in any case. On that basis, they would not be suitable as reserve sites which will only be released for development if certain criteria are met.

It was made clear at the consultation stage that because this SHLAA is being used to inform the selection of reserve housing sites, its focus is on locations established in Core Strategy Policy CS.16; namely, Stratford-upon-Avon, Main Rural Centres, Local Service Villages outside the Green Belt and large freestanding sites. It does not cover other settlements or small greenfield sites in open countryside. Neither does it cover urban and rural brownfield sites because the principle of their redevelopment may be appropriate in any case.

It was also emphasised that the purpose of the consultation was to provide the opportunity to make comments of a factual nature not about the scope and contents of the SAP itself.

As well as informing parties on the District Council's policy consultation database, a drop-in session was held for Ward Members and Parish Councils to discuss matters relating to the SHLAA and how it would have a bearing on the SAP itself.

## **5. Consultation on Draft Built-Up Area Boundaries**

In June 2017 a 6 week consultation was carried out with Parish Councils and Ward Members with administrative responsibility for those Local Service Villages where a draft built-up area boundary (BUAB) had been defined by officers to form part of the Site Allocations Plan (SAP).

The consultation ran from 14 June to 28 July in order to obtain local feedback on the draft BUABs prior to the Regulation 18 Consultation on Revised Scoping and Initial Options for the SAP subsequently undertaken in January 2018.

The consultation included all LSVs as set out in the Core Strategy, except for the following eight villages where a BUAB had been identified through a Neighbourhood Development Plan (NDP) that was in an advanced state of preparation at that time:

- Alveston (included within the Stratford-upon-Avon NDP)
- Brailes
- Harbury
- Long Compton
- Snitterfield
- Tiddington (included within the Stratford-upon-Avon NDP)
- Welford-on-Avon
- Wootton Wawen

The relevant Parish Councils and Ward Members were asked to comment on the appropriateness of the BUABs and to suggest amendments and give reasons why. They were also asked to provide any general comments on the methodology used to identify the draft BUABs.

## **6. Further focused consultation (Regulation 18)**

A further consultation period was held in early 2019 regarding a small number of additional specific topics, as follows:

- Part 1 Birthplace/Gateway Cultural Quarter, Stratford-upon-Avon
- Part 2 Quinton Rail Technology Centre
- Part 3 A46 Safeguarding
- Part 4 Employment Exception Sites

As well as informing parties on the District Council's policy consultation database, two drop-in sessions were held for interested parties to attend to discuss matters relating to these topics.

A total of 95 responses were submitted during the consultation period.

These comments were thoroughly assessed and have informed the contents of the Plan which is to be submitted for examination.

## **7. Proposed Submission Consultation (Regulation 19)**

This version of the Plan is published in order for representations to be made prior to its submission to the Secretary of State for examination.

This stage of the process is not public participation or consultation as such. It is the statutory opportunity for those who are dissatisfied (or satisfied) with the Plan to make formal representations regarding its legal compliance and soundness.

The District Council will assess all of the representations submitted that relate to these matters.

The representations and the Council's response to them will be submitted to the Secretary of State along with the Plan itself.

These will be considered alongside the Plan when it is examined by an Inspector appointed by the Secretary of State.

## **Site Allocations Plan Revised Scoping and Initial Options Consultation (January-March 2018)**

### **Analysis of Comments**

<b>Contents</b>	<b>Page No.</b>
General	1
Introduction	36
Part 1	
Reserve Housing Sites – General	48
Reserve Housing Sites, Question 1.1 – Green Belt	71
Reserve Housing Sites, Question 1.2 – Broad Strategy	105
Reserve Housing Sites, Question 1.3 – Principles	169
Reserve Housing Sites, Question 1.4 – Capacity	189
Part 2	
Built-Up Area Boundaries – General	237
Built-Up Area Boundaries - Question 2.1 Criteria	243
Built-Up Area Boundaries - Question 2.2 Main Rural Centres	255
Built-Up Area Boundaries, Question 2.3 Category 1 Local Service Villages	263
Built-Up Area Boundaries, Question 2.3 Category 2 Local Service Villages	269
Built-Up Area Boundaries, Question 2.5 Category 3 Local Service Villages	282
Built-Up Area Boundaries, Question 2.6 Category 4 Local Service Villages	292

Part 3	
Specific Sites – General	313
Specific Sites - Question 3.1 South of Alcester Road, Stratford-upon-Avon	314
Specific Sites – Question 3.2 Atherstone Airfield	323
Specific Sites – Question 3.3 East of Shipston Road, Stratford-upon-Avon	330
Specific Sites – Question 3.4 Napton Brickworks	334
Specific Sites – Question 3.5 University of Warwick Campus, Wellesbourne	346
Specific Sites – Question 3.6 Priory Square, Studley	350
Specific Sites – Question 3.7 High Street, Studley	353
Specific Sites – Question 3.8 Rother Street, Stratford-upon-Avon	355
Specific Sites – Question 3.9 Rother Street, Stratford-upon-Avon site boundary	360
Specific Sites – Assessment of Land Parcels on edge of Stratford-upon-Avon	362
Part 4	
Self-Build and Custom Housebuilding – General	363
Self-Build and Custom Housebuilding - Question 4.1 Policy	367
Self-Build and Custom Housebuilding - Question 4.2 Sites	384
Sustainability Appraisal Report	391

**Topic: General**

No.	Source	Comment
1	Wellesbourne Allotment Association	<p>Having perused your Site Allocation Plan I wish to express my support for it as it stands. I note that the only plans for Wellesbourne relate to employment opportunities which is needed to avoid us becoming wholly a dormitory town.</p> <p>Incidentally, as the Chair of Wellesbourne Allotment Association I have been very concerned by attempts to build yet more houses in Wellesbourne and in particular plans by the Diocese to develop on the allotment site. I strongly object to this.</p> <p>Thank you for allowing members of the public the opportunity to comment.</p>
2	Highways England	<p>Thank you for forwarding me details of the above referenced consultation. Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The SRN includes all major motorways and trunk roads. The SRN in the vicinity of the District comprises of sections of the A46 trunk road together with the M40 and M42 Motorways.</p> <p>Following our review of the latest iteration of the Site Allocations Plan (SAP) for Stratford-on-Avon District Council, we can confirm that this consultation document does not raise any material impacts on the SRN at this present stage beyond those already indicated during the development of the adopted 2016 Core Strategy. Therefore we have no issues that need to be addressed. However, we recommend continued correspondence when developing the upcoming SHLAA to allow us to confirm our position on any new allocation sites that may arise.</p>
3	Stratford Ramblers	<p>The following sites have significant implications for Rights of Way.</p> <p>Where these areas are built on, consideration needs to be given to maintaining the access to, and character of, any footpaths or bridleways. Developers should be required to show RoW's on their plans, and indicate any proposed changes/diversions.</p> <p><b>Alcester</b> Between A435 and line of old railway to W of town, from Monarch's Way AL51 and including another FP, AL50b, up to B4090/B4089 roundabout. SP 082577 to 083585.</p> <p><b>Bidford-on-Avon</b> Substantial area to W of town, N of Salford Road, and between the road to Broom and the road to Wixford. Heart of England way AL21/3 skirts the site.</p> <p><b>Shipston-on-Stour</b> Substantial area to W of town either side of B4035 up to Mount Farm. FP's skirt the site (SS124a/2, SS124b/1, b/3).</p>

No.	Source	Comment
		<p><b>Stratford-on-Avon</b> Land W of Shottery up to A46 bypass; land on S side of A46 towards Drayton, land between A46 bypass and Bishopton Lane. Effect on FP's from Shottery to Hansel Farm and Drayton Farm SD16b/1, 16b/2, 16a/2, SB42/1, 45/1 and 54/1, and from Bishopton Road to canal SD2/1. A safe and convenient crossing of the A46 is needed, since this path will be a good "escape route" from the development.</p> <p>I understand that the route of the South Western Relief Road has been modified which will reduce the impact on a whole set of paths SB 32/2, 33/1, 34/1, 34/2,35/1, 36/1 and SD 29a/1 and 29a/2. This is welcome. Again there will need to be a safe and convenient crossing of this road.</p> <p><b>Wellesbourne</b> Area to SE of town, N of Kineton Road, currently allotments; and S of Kineton Road up to River Dene. FP skirts allotments. (SD119a/1).</p> <p><b>Local Service Villages</b></p> <p><b>Ettington:</b> substantial extension to SE on N side of A422 from Windy Ridge Farm to Summerfields Farm. Grid Ref SP 272488 to 275483. Affects FP 69/1 to Pillerton Hersey.</p> <p><b>Newbold-on-Stour:</b> substantial extension to SW, to W of Armscote Road. Grid Ref SP 244453 to 247459. Bridleway SS155/1 skirts site, to Berryfields Lane and Ilmington.</p> <p><b>Oxhill:</b> area behind existing houses between road through centre of village and Whatcote Road. Crossed by FP leading to A422, SS14/4. Grid Ref SP 315458.</p>
4	Cannock Chase District Council	<p>Thank you for consulting Cannock Chase District Council on the Regulation 18 consultation for the Site Allocations Plan for Stratford on Avon District.</p> <p>In terms of the Duty to Co-operate email which we received we would agree with the statement that 'at the current time it is considered that there are no strategic planning issues other than housing that may need to be met through the Duty to Co-operate. Further, that in respect of housing, work between our two Councils is on-going in order to plan, monitor and manage successful outcomes across the Greater Birmingham sub-region' although clearly we would need to keep the situation under review in case circumstances should change at any point.</p> <p>In terms of the Issues and Options consultation, we note and support the commitment to helping to contribute to addressing the housing shortfall. However there is very specific reference to the Coventry and Warwickshire HMA, but no specific reference to the Greater Birmingham HMA which is more generally referred to as 'meeting any housing needs arising outside the Coventry and Warwickshire HMA'. Given the ongoing and detailed work in relation to the GBHMA we think this should</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>now be specifically referenced and that allocated sites are appropriately located to serve this HMA. Consideration should be given to the recently published Strategic Growth Study. There also needs to be more explicit reference to review mechanisms given the ongoing work in this respect: South Staffordshire Council is currently consulting on Main Modifications following their recent hearing sessions on their Local Plan Allocations document and this provides a helpful steer <a href="https://www.sstaffs.gov.uk/doc/177192/nam/App2%20%20Proposed%20Main%20to%20SAD%20V2%20160118.pdf">https://www.sstaffs.gov.uk/doc/177192/nam/App2%20%20Proposed%20Main%20to%20SAD%20V2%20160118.pdf</a></p>
5	David White	<p>While agreeing with much of the document, I have certain reservations.</p> <p>1 - The number of homes proposed for the district seems far too high. It ignores the probability of a drop in immigration after the United Kingdom leaves the European Union in 2019. As is stated in the document, most of the need for increased homes comes from migration to the district and, with arrivals from the European Union starting to decline, are such high figures of development needed?</p> <p>2 - The figures in the housing table show an increase of only 5-10% in one-bedroom homes, which provide between 15 and 20 per cent of affordable properties, while one of 15-20 per cent for four-bed homes which provide only 5-10 per cent of affordable homes. The increase of singletons, owing to a variety of reasons, and the fact that most four-bed plus homes are owned by the wealthy - and less likely to be classed as affordable - should result in the reversal of these sections.</p> <p>3 - Why are there still 612 homes in the district which have been empty for six months and over? While not being a massive figure in the complete picture, surely their speedy improvement for habitation should come before new development.</p> <p>4 - I do not believe that the proposed new business park at the end of Alcester Road is necessary. The town's current industrial estates have units which have either never been occupied or empty for long periods. While I applaud plans for the Canal Regeneration Zone, I don't believe that the needs of business cannot be catered for in this area and other empty units elsewhere in the town. To take a further 62 acres of greenfield land for such a venture seems an unnecessary vanity project - especially when unemployment in the district is only 0.3%. Such a costly project ignores the European Landscape Convention and makes the statement Policy AS 1 of an aim to "Improve the quality and appearance of the main corridor and gateways to the town centre" meaningless.</p> <p>5 - I disagree with the decision to remove 41.5 acres of land from the greenbelt. While I can understand the decision relating to Alcester (17.3 acres), I cannot see why Stratford District Council should be accommodating Redditch for the remaining 24.2 acres. If Redditch wants an industrial estate on this site, it should confine it to its own land. If it wants a bigger estate, it should find an alternative site in its own district. If 41.5 acres of land is removed from the greenbelt, then another 41.5 acres should be designated for protection elsewhere in the district - other local authorities have done this without problems in the past.</p> <p>6 - Could more effort not be put into encouraging residential use of the space above shops in Stratford town centre? A walk around the town would indicate there is scope for a more dynamic policy here.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		7 - How many empty industrial or retail units in and around Stratford town centre (e.g. Arden Street) could not be designated for housing. This together with 6 would help with housing needs, cut transport costs, reduce the carbon footprint and bring in extra revenue from the council tax.
6	Southam Town Council	Southam Town Council have considered the Site Allocations Plan for Stratford on Avon District and would advise that Southam, as a MRC has already taken well above the 25% of housing for MRCs and this was acknowledged by the Planning Inspectorate at a recent Planning Appeal, therefore there should be no sites allocated for Southam.
7	Bev Atkinson	<p>SITE STR727 - LAND NORTH OF SHOTTERY HALL</p> <p>The above small site, which lies in between the designated Conservation Area of Shottery and adjoins the Alcester Road, should not go on the reserve list for the following reasons:</p> <ol style="list-style-type: none"> <li>1. There have been 2 planning applications for this medieval ridge and furrow site over the past 18 months and both have been refused. (Planning applications 16/02178/FUL and 17/03028/FUL)</li> <li>2. The reasons for refusal were unambiguous and were based in part, upon a robust assessment by Dr Allen Firth (Conservation and Heritage Consultant for Stratford Upon Avon District Council) and Nicholas Molyneux (Principal Inspector of Historic Buildings and Areas for Historic England).</li> <li>3. The above professionals concluded that the site is of value as a heritage asset in its own right, in addition to contributing to the significance and setting of several adjoining heritage assets, including Shottery Conservation Area. In addition, Nicholas Molyneux points out that: '...the ridge and furrow (within the site) is co-terminous with areas of ridge and furrow within the Conservation Area which together form an historical entity and thus contribute to the significance of the Conservation Area.'</li> <li>4. The decision letter from Planning also included: <ul style="list-style-type: none"> <li>• 'The site is a non-designated heritage asset, comprising ridge and furrow field form.'</li> <li>• 'The site contributes to the setting of several non-designated assets, including the adjoining lodge and the introduction of built form into this setting would be harmful to its significance....this is not outweighed by the public benefits of... proposed housing.'</li> <li>• 'The western boundary of the site forms part of the designated Shottery Conservation Area and is considered to contribute to its strong rural character.'</li> <li>• The Highways Authority raised serious concerns about increased traffic and additional danger/ accidents. This contravenes the Core Strategy (CS26).</li> </ul> </li> </ol>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>It has been shown without doubt that this site is of value as a heritage asset in its own right and as such, should be protected from built form.</p> <p>To place this site on the reserve list would make a mockery of the accepted view that it is a valuable heritage asset, as the site would presumably eventually be built upon.</p> <p>Given that this site was previously an Area of Restraint, I would respectfully request that this site is not only removed from the Reserve List, but is also reinstated as an Area of Restraint in the next Core Strategy review.</p>
8	Paul Dunster	<p><b>Site: STR727 Land North of Shottery Hall.</b></p> <p>I feel this site should not be included in the reserve list because:</p> <p>Planning application 17/03028/FUL for this site has been refused with the following reasons:</p> <ol style="list-style-type: none"> <li>1) This site forms part of the designated Shottery Conservation Area and contributes to its strong Rural Character.</li> <li>2) This site is a non-designated Heritage Asset with Ridge &amp; Furrow.</li> <li>3) Development of this site would have an unacceptable impact on the views into and out of the Conservation Area and also on its inherent tranquillity.</li> <li>4) The site has non-designated assets like the Lodge and buildings would be harmful to the overall significance.</li> <li>5) Cumulatively the proposal would result in harm to the significance of several designated and non-designated Heritage Assets, which in the opinion of the LPA is not outweighed by the public benefits of the proposed housing and therefore contrary to Policy CS 8 of the SonA Core Strategy (2011-2031), Policy BE10 of the SonA Neighbourhood Plan and to para 134 &amp; 135 of the NPPF.</li> <li>6) The submitted Supplementary Transportation Statement, including a Road Safety Audit demonstrates the potential for additional highway danger and therefore the proposals are considered to be contrary to Policies CS9 &amp; CS25 of the SonA Core Strategy (2011-2031).</li> </ol> <p>Also there was a previous Planning application (16/02178/FUL) which was Refused for the similar grounds, therefore as this site has been considered and refused twice it should not be included in the Reserve List.</p>
9	Gillings Planning	<p>I note the scope of the Site Allocations Plan is currently out for consultation. I do not consider the site is likely to be considered as a housing reserve site, but I note it is not included within Part 3 of the document as a Specific Site.</p> <p>Having discussed with your Officers, they advised it would be helpful to ensure the policy team were aware of the site, in order that it can be included within the forthcoming SHLAA and potentially the SAP. Ms Nash advised that an email response would be helpful at this stage, but if you would prefer a formal response to the SAP I will be pleased to provide. I would be grateful for your confirmation of such.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The site is known as Marlborough Works, and has recently been the subject of a planning application for a 60 bed care home and up to 10 residential dwellings (ref 17/03003/OUT). The application was refused at committee on design and parking grounds only on 24<sup>th</sup> January 2018. However, the principle of redevelopment on the site was accepted. All the relevant technical documents were submitted as part of the application.</p> <p>The site is suitable, available and viable for a mix of residential and care provision (C3/C2), with no significant constraints and can come forward within the first five years.</p> <p>An appeal against the refusal will be lodged shortly.</p>
10	Severn Trent Water	<p>Thank you for the opportunity to comment on your consultation. We have provided comments on the potential impact of the sewerage network on the attached document. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p><b>Position Statement</b> As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity, once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p><b>Sewage Strategy</b> Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p><b>Surface Water and Sewer Flooding</b> We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to our foul or combined sewer.</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges</a></p> <p><b>Water Quality</b> Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency’s Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p><b>Water Supply</b> When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p><b>Water Efficiency</b> Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <p>Single flush siphon toilet cistern and those with a flush volume of 4 litres. Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</p>

No.	Source	Comment
		<p>Hand wash basin taps with low flowrates of 4 litres or less. Water butts for external use in properties with gardens.</p> <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges</a></p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>We hope this information has been useful to you and we look forward in hearing from you in the near future.</p> <p><b>SUA.2 South of Alcester Road, Stratford-upon-Avon</b></p> <p><b>Known network constraints</b> There are known hydraulic sewer flooding issues downstream of these developments. Modelling will be required to assess and determine any capacity improvements.</p> <p><b>Assumed connectivity</b> Pumped connection to Alcester Road Development site</p> <p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Medium (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p>SUA.4 Atherstone Airfield</p> <p><b>Known network constraints</b> There are known hydraulic sewer flooding issues downstream of this development. Modelling will be required to assess and determine any capacity improvements.</p> <p><b>Assumed connectivity</b> The site is approx. 1.5km from nearest gravity sewer at Clifford Chambers. Alternatively the connection could be straight to Clifford Chambers SPS approx. 1.9km distance. It is assumed that a pumped connection will be required.</p>

No.	Source	Comment
		<p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Medium (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>SUA.5 Land East of Shipston Road</b></p> <p><b>Known network constraints</b> There are no known hydraulic constraints downstream of this site, however H2S is a known issue in downstream network.</p> <p><b>Assumed connectivity</b> Gravity connection to adjoining development and existing gravity sewer to Old School Pumping station which pumps to 225mm gravity sewer to Bell Inn SPS. Bell Inn pumps to Old Rectory which pumps directly to STWs.</p> <p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Napton Brickworks</b></p> <p><b>Known network constraints</b> There are no known network constraints downstream of this site</p> <p><b>Assumed connectivity</b> Pumped or gravity connection direct to Napton STWs.</p> <p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Warwick University Wellesbourne Campus</b></p> <p><b>Known network constraints</b></p>

No.	Source	Comment
		<p>This is an established campus current served by an existing SPS. No details of future development has been provided so no assessment of constraints is possible</p> <p><b>Assumed connectivity</b> Via existing Sewerage Pumping Station</p> <p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Impact on sewerage infrastructure</b> Unknown</p> <p><b>Priory Square, Studley</b></p> <p><b>Known Network Constraints</b> There are known hydraulic sewer flooding issues downstream of this development. However this appears to be the redevelopment of an existing property.</p> <p><b>Assumed connectivity</b> Existing drainage connection</p> <p><b>Surface water disposal</b> Any redevelopment of this site requires existing surface water run-off to be managed sustainably and every effort made to remove any surface water flows currently connected to the foul sewerage system. Surface water should be managed onsite by SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Studley Enterprise Centre</b></p> <p><b>Known network constraints</b> There are known hydraulic sewer flooding issues downstream of this development. However this appears to be the redevelopment of an existing property</p> <p><b>Assumed connectivity</b> Existing drainage connection</p>

No.	Source	Comment
		<p><b>Surface water disposal</b> Any redevelopment of this site requires existing surface water run-off to be managed sustainably and every effort made to remove any surface water flows currently connected to the foul sewerage system. Surface water should be managed onsite by SUDs</p> <p><b>Potential impact on sewerage infrastructure constraints</b> Any redevelopment of this site requires existing surface water run-off to be managed sustainably and every effort made to remove any surface water flows currently connected to the foul sewerage system. Surface water should be managed onsite by SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Rother Street/Grove Street, Stratford-upon-Avon</b></p> <p><b>Known network constraints</b> There are known hydraulic sewer flooding issues downstream of this development. However it is not known if this this a scheme to convert existing building or redevelopment.</p> <p><b>Assumed connectivity</b> Existing drainage connection</p> <p><b>Surface water disposal</b> Any redevelopment of this site requires existing surface water run-off to be managed sustainably and every effort made to remove any surface water flows currently connected to the foul sewerage system. Surface water should be managed onsite by SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Medium (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Land East of Shipston Road, Alderminster</b></p> <p><b>Known network constraints</b> There are no known network constraints downstream of this site</p> <p><b>Assumed connectivity</b> Nearest potential connection point over 700m away in Seven Meadows Road. Pumping likely to be required. The adjacent Rosebird Centre is thought to have its own treatment facility</p>

No.	Source	Comment
		<p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p> <p><b>Land West of Bush Hearth Lane, Harbury</b></p> <p><b>Known Network Constraints</b> There are no known network constraints downstream of this site</p> <p><b>Assumed connectivity</b> Site may require pumping to the nearest gravity sewer in Park Lane</p> <p><b>Surface water disposal</b> Surface water should be managed onsite by implementing SUDs</p> <p><b>Potential impact on sewerage infrastructure</b> Low (subject to hydraulic modelling confirmation and appropriate surface water management)</p>
11	H Farmer	<p><b><u>Site STR727 Land North of Shottery Hall</u></b></p> <p>This site has been subject to two recent planning applications (17/03028/FUL and 16/02178/FUL) both of which have been refused.</p> <p>The site was also previously an Area of Restraint (for good reasons) and was removed in 2011 based on what appears to be a very general assessment done by a consultant.</p> <p>Both of the planning applications listed above were refused and I believe that the above site should not go on the Site Allocations reserve list for the reasons that were listed in the most recent rejection (17/03028/FUL) as follows: -</p> <ul style="list-style-type: none"> <li>• The western boundary of the application site forms part of the designated Shottery Conservation Area and is considered to contribute to its strong rural character</li> <li>• The development would have an unacceptable impact on views into and out of the conservative Area and on its inherent tranquillity.</li> <li>• The site contributes to the setting of several designated and non-designated assets including the adjoining lodge to the north-west; the introduction of built form into this setting would be harmful to its significance.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Cumulatively, the proposal would result in harm to the significance of several designated and non-designated heritage assets which, in the opinion of the Local Planning Authority, is not outweighed by the public benefits of the proposed housing and is therefore contrary to Policy CS.8 of the Stratford-on-Avon Neighbourhood Plan and to paragraphs 134 and 135 of the National Planning Policy Framework.</li> <li>• The submitted Supplementary Transportation Statement, including a Road Safety Audit, demonstrates the potential for additional highway danger and therefore the proposals are considered to be contrary to Policies CS9 and CS2?) of the Stratford-on-Avon Core Strategy (201 1-2031).</li> </ul> <p>There were a large number of specialist consultations undertaken as part of the recent application and given the resulting conclusion one would not expect the site to be placed on the reserve list.</p> <p>Indeed there is also an argument that this site should be reinstated as an Area of Restraint in the next Core Strategy Review as its original removal in 2011 would appear to have been based on only some of the facts pertaining to the site. The reviews undertaken as part of the recent application appear to be far more thorough and clearly demonstrate the importance of this site as having conservation value, and would therefore negate the reasons for its removal in 2011.</p>
12	Ian Phillips	<p>Site ref. STR 727 Land north of Shottery Hall should not go on to the reserve list because its medieval "Ridge and Furrow" soil formation is an exceptional survival of the local Shakespearian Landscape and like Hall Croft was, would be deliberately destroyed forever.</p> <p>STR 727 is outside the development boundary and should not go on the reserve list. STR 727 was removed from the Area of Restraint even though no specific assessment of its conservation value was done. Following a recent professional assessment which established its heritage asset value it should be reinstated.</p> <p>STR727 is part of the wild life corridor for the area. This habitat should be protected and should not be on the reserve list.</p> <p>Church Lane is part of the conservation area and is part of a pedestrian tourist route. Due to increased traffic it is becoming a high accident risk area and further development should be restricted.</p>
13	Susanne Farmer	<p>Site STR727 Land north of Shottery Hall</p> <p>The above site, which adjoins Alcester Road, should not go on the reserve list for the following reasons.</p> <p>Planning permission for an application on this site has just been refused on various grounds specific to the site itself. (Planning application 17/03028/FUL.) Some of the reasons, as per the decision letter, include the following:</p> <ul style="list-style-type: none"> <li>· The western boundary of the application site forms part of the designated Shottery Conservation Area and is considered to contribute to its strong rural character.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<ul style="list-style-type: none"> <li>· The site is a non-designated heritage asset comprising historic ridge and furrow field form.</li> <li>· Development of the site would have an unacceptable impact on views into and out of the Conservation Area and on its inherent tranquillity.</li> <li>· The site contributes to the setting of several non-designated assets including the adjoining lodge and the introduction of built form into this setting would be harmful to its significance.</li> <li>· Cumulatively, the proposal would result in harm to the significance of several designated and non-designated heritage assets which is not outweighed by the public benefits of the proposed housing and is therefore contrary to the Core Strategy (CS.8), the Neighbourhood Development Plan (BE.10), and the NPPF (134 &amp; 135).</li> <li>· The potential for additional highway danger around the access point for this site was demonstrated by the submitted Supplementary Transport Statement and Road Safety Audit, making it contrary to the Core Strategy (CS.26).</li> </ul> <p>A previous application on this site was refused for similar reasons in January 2017. (Planning application 16/02178/FUL.)</p> <p>Given the number of specialised consultations that have been undertaken as part of these applications - and the resultant conclusions - I would not expect this site to be placed on the reserve list. To do so would throw the validity of such a list into question and spawn criticism from developers.</p> <p>Indeed, the site should be reinstated as an Area of Restraint, since its removal was based only on a general assessment by an independent consultant in 2011 (Landscape Sensitivity Study for Stratford-on-Avon District). There was no specific assessment done on this site's conservation value. However, as part of the two planning applications, the site has now been specifically assessed by Dr Allen Firth, Conservation and Heritage Consultant for Stratford-on-Avon District Council and Nicholas Molyneux, Principal Inspector of Historic Buildings and Areas for Historic England, and found to be of value as a heritage asset in itself and to contribute to the setting and significance of several adjoining heritage assets including Shottery Conservation Area.</p> <p>Now that the site has been properly assessed - and found to make an important contribution to the setting and significance of several heritage assets - a record should be made to reinstate this site as an Area of Restraint in the next Core Strategy review.</p>
14	Miles and Sarah Buttrick	<p>We would wish to object to any consideration of putting "STR727 Land North of Shottery Hall" on this reserve list</p> <ol style="list-style-type: none"> <li>1. The previous application was rejected/refused in 2017.</li> <li>2. It would significantly increase the risk of flooding in our area of Shottery.</li> </ol>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>3. It would increase further traffic congestion.</p> <p>4. Repeated consultants (Dr Firth and Mr Molyneux) have found this site to be of value as a heritage site in itself and to contribute to several adjoining heritage sites (Shottery conservation area for example).</p> <p>5. As we have found in the past, once on a reserve list these sites are invariably built on in future (e.g. Bordon Hill).</p>
15	Caroline Duster	<p>Site: STR727 Land North of Shottery Hall.</p> <p>I feel strongly that the above site, which is adjacent to Alcester Road should not be included on the reserve list because:</p> <p>Planning application 17/03028/FUL for this site has very recently been refused with the following reasons:</p> <ol style="list-style-type: none"> <li>1. On the western side of the site, it forms part of the designated Shottery Conservation Area and is considered to contribute to its Rural Character.</li> <li>2. Development of this site would have an unacceptable impact on the views into and out of the Conservation Area and also on its Inherent Tranquility.</li> <li>3. This site is a non-designated Heritage Asset with historical Ridge &amp; Furrow in the fields.</li> <li>4. The site has non-designated assets like the Lodge and new development would be harmful to the overall significance.</li> <li>5. Cumulatively the proposal would result in harm to the significance of several designated and non-designated Heritage Assets, which in the opinion of the Local Planning Authority is not outweighed by the public benefits of the proposed housing and therefore contrary to Policy CS 8 of the Stratford-upon-Avon Core Strategy (2011-2031), Policy BE10 of the SonA Neighbourhood Plan and to Para 134 &amp; 135 of the NPPF.</li> <li>6. The submitted Supplementary Transportation Statement, including a Road Safety Audit, demonstrates the potential for additional highway danger and therefore the proposals are considered to be contrary to Policies CS9 &amp; CS25 of the SonA Core Strategy (2011-2031).</li> </ol> <p>The above recent refusal follows a previous Planning application (16/02178/FUL) which was refused on similar grounds, therefore as this site has been considered and refused twice it seems inappropriate for it to be included on the Reserve List.</p>
16	Margaret Phillips	<p>Site STR727 should not go on the reserve list because planning has been refused on grounds specific to the site. These include that it is a non-designated heritage asset which has historic ridge and furrow field features. This is medieval and therefore from before Shakespeare. Development would spoil the views into and out of the conservation area. The Western boundary of the site is part of the Shottery Conservation Area and is considered to contribute to its strong rural character. The site contributes to the setting of the lodge and several non designated assets and new building would be harmful to their significance. The proposed housing would harm the significance of several designated and non-designated heritage assets and the public benefit would not outweigh the harm and is contrary to CS8, BE10 and NPPF 134 + 135. Potential additional highway danger around the access point makes it contrary to CS26. A previous application on this site was refused in Jan 17, ref 16/02178/FUL. The site should be reinstated as an area of restraint as it was removed without a specific assessment of its conservation value. A specific assessment has now been done by Nick Molyneux and Dr Allen Firth who found it to be a heritage asset in itself and contributing to the significance of adjoining heritage sites including Shottery Conservation Area.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
17	Carol Allen	<p>Site STR727 should not be on reserved list for following reasons:</p> <ol style="list-style-type: none"> <li>1) Planning permission has already been <u>refused</u></li> <li>2) The western boundary forms part of Shottery Conservation Area</li> <li>3) The site comprises of historic ridge and furrow field</li> <li>4) Access onto Alcester Road is a highway danger</li> <li>5) The site has been found to be of value as a heritage asset by conservation and heritage consultants</li> </ol>
18	Mike Taylor (SHARD)	<p>Although not the subject of a specific question raised in the Consultation, we wish to endorse the policy expressed in the Introduction, page 7.</p> <p style="padding-left: 40px;">“Where a Neighbourhood Plan has been ‘made’ or submitted for examination, the SAP will not deal with issues that have already been addressed, such as the identification of reserve housing sites or the definition of a Built Up Area Boundary.”</p> <p>The recently received Inspector’s Report on the Shipston NP shows that he is satisfied that the Plan has identified reserve sites within the Plan boundaries sufficient to makes a sensible and proportionate contribution to the overall District list of reserve sites. This is against a background both of planning permissions already granted within the Plan boundaries that are in excess of current requirements, and of an adequate District five year Housing Land Supply.</p> <p>We would urge the Planning Authority at all levels to bear this in mind when evaluating any suggestion that it should go beyond current proposals, and when considering policy and specific planning applications.</p> <p>We have no comments to offer regarding the specific queries in the Consultation.</p>
19	Office of Road and Rail	The Office of Rail and Road (ORR) has no comment on the proposals.
20	Godfrey-Payton	Re Napton, there seems to be little logic in drawing the village boundary as proposed, the inclusion of the land identified would produce a sensible village boundary. The site already accommodates a significant range of large buildings and the possible very low density development of the land with up to five dwellings would probably be less intrusive than the current use and result in a lessening of heavy vehicle use.
21	Warwickshire Fire and Rescue	<p>Following on from your email regarding the public consultation for site plans, i have attached the contents of one of the standard response letters we send when we consult on a planning application.</p> <p>I would ask you to consider the contents of the letters and if suitable, use the contents to assist in planning consultations.</p> <p>1. Standard response to compliant application:</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Following notification of the Planning Consultation, Warwickshire Fire and Rescue Authority offers no objection to the application, providing:</p> <p>1. The development meets compliance with Approved Document B, Volume 2, Section B5 - Access and Facilities for the Fire Service. Full details including the positioning of access roads relative to buildings, the arrangement of turning circles and hammer heads etc. regarding this can be found at <a href="http://www.warwickshire.gov.uk/fireguidance-commercialdomesticplanning">http://www.warwickshire.gov.uk/fireguidance-commercialdomesticplanning</a></p> <p>Where compliance cannot be met, please provide details of alternative measures you intend to put in place.</p> <p>Please also note The Warwickshire County Council Guide 2001, Transport and Roads for Developments, Section 5.18, Access for Emergency Vehicles.</p> <p>For Consideration:</p> <p>Warwickshire Fire and Rescue Authority fully endorse and support the fitting of Sprinkler installations, in accordance with the relevant clauses of BS EN 12845 : 2004, associated Technical Bulletins, and or to the relevant clauses of British Standard 9251: 2014, for residential premises.</p> <p>Warwickshire Fire and Rescue Authority ask you to consider and ensure that access to the site, during construction and once completed, is maintained free from obstructions such as parked vehicles, to allow Emergency Service vehicle access.</p>
22	Network Rail	<p>As you are aware Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>Network Rail would comment on the policy as follows based on the allocation of sites for an additional 14,600 dwellings in the council area.</p> <p>(1) Within Transport Assessments there is a review of local needs regarding public transport; this usually focuses on buses. However, Transport Assessments should also take into account their impact upon footfall at railway stations. Developers are encouraged to consider including within Transport Assessments trip generation data at Railway Stations. Location of proposals, accessibility and density of developments should be considered in relation to railway stations. Where proposals are likely to increase footfall at railway stations developer contributions should be considered (either via CIL, S106 or unilateral undertaking) to provide full funding for enhancements at stations as a result of increased numbers of customers.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>(2) Development proposals should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossing(s) with mitigation implemented as required. Network Rail would encourage the council to adopt specific policy wording to ensure that</p> <ul style="list-style-type: none"> <li>a) The impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and</li> <li>b) suitable mitigation incorporated within the development proposals and fully funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.</li> </ul> <p>There is a duty to consult Network Rail as follows on the matter of level crossings: <i>The Town and Country Planning (Development Management Procedure) (England) Order 2015</i> <i>SCHEDULE 4 Consultations before the grant of permission</i></p> <p><i>Development which is likely to result in a material increase in the volume or material change in the character of traffic using a level crossing over a railway.</i></p> <p><i>The operator of the network which includes or consists of the railway in question, and the Secretary of State for Transport.</i></p> <p>The neighbourhood plan team are advised that 'traffic' over a level crossing can be vehicular, pedestrian, cyclists or horse-riders and that proposals do not have to be adjacent to a level crossing to potentially impact the crossing.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>· By a proposal being directly next to a level crossing</li> <li>· By the cumulative effect of developments added over time in the vicinity of a level crossing</li> <li>· By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route</li> <li>· By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway</li> <li>· By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads</li> <li>· By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>· By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing</li> <li>· By any proposal that may cause blocking back across the level crossing</li> <li>· By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes.</li> </ul>
23	NATS Safeguarding Office	NATS has no comment to make on the Site Allocations Plan.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
24	Amec Foster Wheeler on behalf of National Grid	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.
25	Tyler-Parkes Partnership on behalf of James McBride	<p>In brief our Client objects to the SAP on the following basis:</p> <p>Our Client contends that consideration should be given to the identification of potential sites close to the local authority area's administrative boundary where sustainable settlements lie within adjoining local authority areas - in accordance with the legal Duty to Cooperate.</p> <p>The SAP should not exclude the identification and release of Green Belt land for reserve housing sites, particularly smaller sites which could be brought forward quickly without the need for huge investment in infrastructure, land assembly etc.</p> <p>Our Client objects to the SAP's omission of consideration of potential development sites adjacent to the local authority boundary but close to a sustainable settlement within an adjoining local authority area - such as is the case with our Client's site close to Hockley Heath settlement. It is recommended that the SAP includes an additional caveat to promote consideration of cross-boundary site allocations.</p> <p>Our Client objects to the proposal in the SAP not to consider the allocation of any land which currently lies within the Green Belt. This approach is contrary to the spirit of the Duty to Cooperate and the recommendations in the recently published 'Greater Birmingham HMA Strategic Growth Study'. The outstanding housing need and shortfall in identified housing sites means that it would be unsound for the SAP to rule out a Green Belt review and potential removal of some land from the Green Belt.</p> <p>Under the legal Duty to Cooperate our Client commends that part of the site which falls within Stratford-on-Avon District local authority area for removal from the Green Belt and allocation as a housing site. Land in our Client's ownership, both in Stratford and Solihull local authority areas, would provide the opportunity to identify a small sustainable deliverable housing site, in line with emerging national planning policy to allocate smaller sites. Our Client requests that Stratford-on-Avon District Council formally notify Solihull MBC of their support for allocation of our Client's site as an extension to the urban area of Hockley Heath and allocation for residential development.</p> <p>Our Client's site is therefore commended to you for inclusion in the BLR and SHLAA evidence document.</p> <p>This letter is submitted in response to the SAP consultation and also to promote our Client's site for inclusion in the SHLAA and BLR.</p>
26	Environment Agency	The Environment Agency are the main body providing advice on improving resilience and adaptation to the effects of climate change, with particular regard on flood risk, water resources, water quality and aquatic biodiversity.

No.	Source	Comment
		<p>We strive to make a positive contribution through our Statutory Consultee role and are happy to provide comments at this stage of the plan making process.</p> <p><b>Flood Risk</b></p> <p>All sources of flood risk should be taken in to account for all site allocations within the Plan. There should be a presumption that, where possible, sites are located entirely within Flood Zone 1. Where part of the site falls within Flood Zone 2 or 3 there should be no development within these Flood Zones, a sequential approach should be taken to the site layout. The impact of climate change, based on the guidance published in February 2016, on flood extents should be taken in to account at all stages of development.</p> <p>For re-development of Brownfield sites, opportunities should be taken to reduce the rate of surface water runoff from these sites to as close to Greenfield rate of runoff as possible. Where a reduction to the Greenfield runoff rate is not possible, at least a 20% reduction in existing runoff rate should be provided. On any sites where existing watercourses are within culvert, opportunities should be taken to daylight these culverts.</p> <p>The majority of sites proposed are located within Flood Zone 1, however we have particular comments relating to Part 3 (e) - University of Warwick Campus, Wellesbourne. There is an ordinary watercourse which runs through the proposed site allocation and as a result, the site is located within Flood Zone 2 and 3. Policy CS.4 of the Core Strategy states that all development proposals should be located in Flood Zone 1. Development within Flood Zone 2 and 3 will only be acceptable when the Sequential Test and, where applicable, the Exception Test have been satisfied, as set out in the National Planning Policy Framework. Consideration should be given to protect and enhance the river corridor within this area and development must be set back 8m from the watercourses to allow access for maintenance and restoring the natural floodplain.</p> <p>It is noted in paragraph 1.6 on page 9 that work is underway to produce a new SHLAA. We would welcome the opportunity to comment on this assessment as there may be potential locations identified where opportunities could be explored to reduce downstream flood risk, slow water in the upstream catchment, or contribute to maintenance of or improving existing flood defences.</p> <p><b>Biodiversity</b></p> <p>We have the following comments with regards to biodiversity.</p> <p>The proposal SUA.2: <b>South of Alcester Road</b>, Stratford-upon-Avon; There are number of ponds on site connected via hedgerows and the Drayton Brook (a Local Wildlife Site) any proposal will need to ensure that these features can be retained and protected. We would recommend drawing up a surface water management plan that can incorporate these features as part of the greenspaces/network for the site. A survey for Great Crested Newts is also recommended.</p>

No.	Source	Comment
		<p>The proposal SUA.4: <b>Atherstone Airfield</b>; Atherstone Old Gravel Pit SSSI is very close to the site so will need to be protected. A number of ponds nearby are connected via hedgerows these hedgerows will need to be retained in order to retain the habitat connectivity of the ponds.</p> <p><b>The Napton Brickworks</b> is a Local Wildlife Site (Napton Hill &amp; Quarry) with a nearby SSSI (Napton Hill Quarry). The site has high biodiversity value and is located next to the Oxford Canal which is important blue/green corridor for wildlife. We would not recommend this site for built development.</p> <p><b>University of Warwick Campus.</b> Any future development needs to avoid encroachment on the tributary of the River Avon (Local Wildlife Site). We would recommend a buffer of at least 8m from the tributary in order to make space for water and retain the habitat connectivity. Any hedgerows or landscape planting which connects the pond to the tributary or wider countryside needs to be retained, particularly as there are historic records for Great Crested Newts within the pond.</p> <p><b>Groundwater and Contaminated Land</b></p> <p>Please note these comments relate solely to the protection of ‘Controlled Waters’.</p> <p>The area covered by the proposed site allocations are predominantly located on the bedrock of the Mercia Mudstone Formation, which is designated a ‘Secondary (B) Aquifer’ by the Environment Agency. Some areas of superficial deposits are also indicated, in the form of Alluvium (clay, silt, sand and gravel). This is likely to be associated with the River Stour, which is located in proximity to the area.</p> <p>There are no Source Protection Zones identified in the proposed site allocation area.</p> <p>Secondary A Aquifers are capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. Secondary B Aquifers are predominantly lower permeability layers that may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering.</p> <p>The proposed site allocations included locations that have been subject to previous industrial activity, including the former Atherstone Airfield, and Napton Brickworks, that are identified in the plan as known ‘broken-field’ sites. We do not hold any records that indicate that a historic landfill is located on the proposed site locations, however it should be noted that Local Authorities hold the most detailed records of historic landfills and consequently the relevant department of Stratford-on-Avon District Council should be contacted to ascertain if there is any additional information available.</p> <p>If development is to be carried out in areas that are identified as brownfield and contamination is expected, then consideration should be given to any residual risk to ‘Controlled Waters’ receptors and the need for any remedial actions.</p> <p>In planning any development in this neighbourhood plan area, reference should be made to our ‘Groundwater Protection:</p>

No.	Source	Comment
		<p>Principles and Practice' (GP3) document. This sets out our position on a wide range of activities and developments, including:</p> <ul style="list-style-type: none"> <li>• Storage of pollutants and hazardous substances</li> <li>• Solid waste management</li> <li>• Discharge of liquid effluents into the ground (including site drainage)</li> <li>• Management of groundwater resources</li> <li>• Land contamination</li> <li>• Ground source heat pumps</li> <li>• Cemetery developments</li> </ul> <p>Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that 'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'. Consequently should a development site currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any Planning Application must be supported by a Preliminary Risk Assessment. This should demonstrate that the risks posed to 'Controlled Waters' by any contamination are understood by the applicant and can be safely managed.</p> <p>The Environment Agency hopes you find the above comments useful and we look forward to being consulted in the next stage of the consultation process.</p>
27	Natural England	<p><b>The Plan's vision and strategy</b></p> <p>Natural England advises that the Plan's vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. The plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies (amend as appropriate to the local area).</p> <p><b>Sites of Least Environmental Value</b></p> <p>In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.</p> <p><b>Landscape</b></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF),</p> <p>The plan area includes the Cotswolds Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area. For Areas of Outstanding Natural Beauty, the LPA should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).</p> <p><b>Designated sites</b></p> <p>The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites<sup>1</sup>. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.</p> <p>The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.</p> <p>Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.</p> <p><b>Priority habitats, ecological networks and priority and/or legally protected species populations</b></p> <p>The Local Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environment value is chosen for development, and to ensure the mitigation hierarchy is followed.</p> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and</p>

No.	Source	Comment
		<p>species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here <a href="#">Standing advice for protected species</a>. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.</p> <p>(Where NIAs have been identified) The Plan should also reference Nature Improvement Areas (NIAs) and consider specifying appropriate types of development within them. NIAs can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs opportunities to contribute to habitat enhancement should be explored. Planning positively for ecological networks will contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 114 of the NPPF.</p> <p>Where a plan area contains irreplaceable habitats, such as ancient woodland and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.</p> <p><b>Green Infrastructure</b> Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health &amp; well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.</p> <p>A strategic approach for green infrastructure networks should support a similar approach for ecological networks, as outlined above. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included within a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.</p> <p><b>Access and Rights of Way</b></p>

No.	Source	Comment
		<p>Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 75 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 74 of the NPPF.</p> <p>The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 73 of the NPPF. Natural England’s work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.</p> <p><b>Soils</b>                      The Local Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 112 to safeguard ‘best and most versatile’ agricultural land.</p> <p><b>Air pollution</b>                      We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.                      Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.                      The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from <i>local impacts</i> are those within 200m of a road with increased traffic<sup>3</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.                      The ecological effects of diffuse air pollution (2004) English Nature Research Report 580                      Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency</p> <p><b>Tranquillity</b></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 123 of the NPPF.</p> <p>Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan and SEA/SA.</p> <p><b>Water Quality and Resources and Flood Risk Management</b></p> <p>Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 100-104 of the NPPF.</p> <p>The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available here) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.</p> <p>The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on N2K sites, SSSIs and local sites which contribute to a wider ecological network.</p> <p>Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.</p> <p><b>Climate change adaptation</b></p> <p>The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment’s resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.</p>
28	Harris Lamb on behalf of Bovis Homes	<p>Set out below is our response to the questions raised by the Consultation Document. Before responding to these questions, we provide a number of general comments on the approach of the emerging Local Plan.</p> <p><b>How the Site Allocations Plan will be Prepared</b></p> <p>It is noted that the timetable for the preparation of the emerging Plan on page 6 of the consultation document suggests that the Council will not be undertaking Preferred Options consultation. Following the completion of the Revised Scoping and Initial Options consultation the Plan will progress straight to pre-subdivision consultation. There will not, therefore, be the opportunity to comment on the suitability of the proposed Reserve Housing sites until the pre- submission stage. If any comments are submitted to the Council that change the view on the suitability of any of the proposed Reserve Housing Sites</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>it will be difficult for the Plan to be amended prior to submission given the nature of pre-submission consultation. Indeed, if the Council decide to omit or include a site following receipt of representations to the pre-submission Plan it is our view that further consultation will be required.</p> <p>It is also noted that the Council are proposing to produce a new SHLAA to inform the Site Allocations DPD. The most recent version of the SHLAA dates back to 2013. We are advised that the Council have been collecting information on new sites for inclusion within the forthcoming SHLAA on an ongoing basis since the production of the last document. As the emerging SHLAA will not be subject to consultation there will be no opportunity to comment on one of the principal documents that will inform the site selection in the emerging Plan. The document could identify a range of potential development opportunities that have not previously been in the public domain.</p> <p>That being the case, whilst we have no particular objection with the Site Allocations Plan being progressed straight to pre-submission consultation, it must be ensured that the sites that are selected as potential Reserve Housing Sites are done so in a robust and transparent fashion In this regard, if there are any concerns about the role that the land in Bovis control could play as a Reserve Housing Site we ask that HLPC are contacted to see if it is possible to clarify or address these issues.</p> <p><b>How does the Site Allocations Plan relate to Neighbourhood Plans?</b></p> <p>We support the recognition that where a Neighbourhood Plan has been made or submitted for examination the Site Allocations Plan will not revisit issues that have already been addressed by the Neighbourhood Plan, such as the identification of Reserve House Sites.</p> <p>In this regard, we note that the Kineton Neighbourhood Plan identifies two parcels of 'safeguarded land'. We have been advised by Officers that the safeguarded land will be treated as Reserve Housing Sites for the purposes of the Site Allocations Plan and no further Reserve Housing Sites will be allocated at Kineton. We support this approach.</p> <p>Safeguarded Site H6a - Land west of Southam Road, is approximately 17 ha in size. Safeguarded site H6b - Land east of Lighthorne Road, is approximately 2.1ha in size. Once open space requirements and on site Infrastructure is taken into account we are of the view that the capacity of these sites will net down by 50%. As such between them these sites will yield in the region of 66 dwellings, assuming they are built out at 35 dph net.</p> <p>It is also noted that the 'made' Bidford-on-Avon Neighbourhood Plan identifies a village boundary and provides policy guidance on development outside of the village boundary. Policy H1 - Village Boundary, states that all areas outside of the Village Boundary are classed as countryside. New housing development in the countryside will be limited to dwellings for rural workers, replacement dwellings and new housing development supported by Policy H2.</p> <p>The Bidford-on-Avon Neighbourhood Plan was made In July 2017. The Examiners report was published after the adoption of the Core Strategy. In accordance with the requirements of paragraph 184 of the National Planning Policy Framework the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Neighbourhood Plan was prepared in accordance with adopted Core Strategy. It has, therefore, been found to pass the tests in the Framework on the rote and scope of Neighbourhood Plans. This includes reflecting the policies in the adopted Local Plan and not promoting less development than is set out in the adopted Plan or undermining its strategic policies.</p> <p>The Neighbourhood Plan was, therefore, prepared and adopted in the context of a Core Strategy that acknowledges the need to identify Reserve Housing Sites. The Bidford-on Avon Neighbourhood Plan does not, however, identify any Reserve Housing Sites and includes policy HI that seeks to control new residential development outside of the defined settlement boundary. Dismissing the inclusion of Reserve Housing Sites in the Neighbourhood Plan was a clear policy choice.</p> <p>It is noted that there are a number of ‘made’ Neighbourhood Plans and Neighbourhood Plans that have been submitted for examination that also include policies designed to restrict residential development on sites outside of the identified settlement boundaries.</p> <p>The status and policy requirements of the Neighbourhood Plans are clearly a material consideration in the preparation of the Site Allocations Local Plan. The Site Allocations Plan is being prepared in the same policy context as the Neighbourhood Plans, ie. the Site Allocations Plan and Neighbourhood Plans are being prepared to be in conformity with the Core Strategy. It is, therefore, our view that a clear policy tension would arise should the emerging Site Allocations Plan seek to identify Reserve Housing Sites in settlements where a made or submitted Neighbourhood Plan includes a policy that seeks to prevent residential development outside of settlement boundaries. It is our view that the Council should prioritise the identification of Reserve Housing Sites at settlements that do not have a Neighbourhood Plan that restricts development outside of its defined settlement boundaries.</p>
29	Thames Water	<p>For information, from the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. More information regarding this can be found on our website at: <a href="https://developers.thameswater.co.uk/New-connection-charging">https://developers.thameswater.co.uk/New-connection-charging</a></p> <p>Thames cover a number of small villages in Stratford-on-Avon however, from the information available these do not appear to be a focus for development. Should development be proposed within the Thames Water region it will be essential for Thames Water to work closely with the Council and developers to ensure that any network reinforcement works are delivered ahead of the occupation of development. In some circumstances this may result in requirements for phasing conditions to ensure that development is aligned with infrastructure delivery.</p> <p>For any development within the Thames Water region any developers are advised to contact Thames Water Developer Services as early as possible to discuss the infrastructure requirements for their sites. Thames Water Developer Services can be contacted by post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; by telephone on: 0800 009 3921; or by email at: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
30	Star Planning and Development on behalf of Richborough Estates Ltd	<p>Richborough Estates Limited has the following responses to the issues and questions raised in the Site Allocations Plan Revised Scoping and Initial Options (January 2018). It would have been helpful if all the paragraphs of the document had been numbered to enable easier cross referencing.</p> <p><b>Housing Allocations</b></p> <p>Page 5 of the Options document refers to the primary focus of the Site Allocations Plan (SAP) being on the identification of reserve housing sites in accordance with the provisions of Policy CS.16.D of the Stratford-on-Avon Core Strategy 2011-2031. This approach is being adopted because the currently claimed estimate of completions, commitments and allocations more than meets the 14,600 dwellings specified in the Core Strategy.</p> <p>However, the 14,600 dwellings is not expressed in the Core Strategy as either a target or upper limit on the number of new homes to be provided during the period up-to 2031. Instead, Policy CS.16 is unequivocal that 'Provision will be made for <u>at least</u> 14,600 additional homes' (emphasis added). This approach of having a minimum housing provision figure identified in the Core Strategy is consistent with the National Planning Policy Framework's (the Framework) imperative to boost significantly the supply of housing.</p> <p>Although the claimed number of completed, committed or allocated dwellings has been noted by Richborough Estates, in principle at least, there is no specific constraint imposed which precludes the allocation of both housing and reserve sites as part of the SAP. Additional allocations would not depart from the strategic planning context provided by the Core Strategy and would provide additional flexibility should some of the Council's identified strategic sites suffer delays in their progression.</p> <p><b>Relationship to Neighbourhood Plans</b></p> <p>Page 7 identifies that where Neighbourhood Plans have been made or submitted for examination then the SAP will not deal with issues which have already been addressed, such as the identification of reserve housing sites or the definition of Built-up Area Boundaries. However, two matters arise from the exclusion of these locations.</p> <p>Firstly, if a Neighbourhood Plan does not currently address the issue of reserve sites then it is potentially 'unfair' on those locations where such sites have been identified by a Neighbourhood Plan or could potentially be identified through the SAP process. An example of this inequitable situation is the contrast between Kineton and Bidford on Avon which both have made Neighbourhood Plans and are identified Main Rural Centres under Policy CS.15 of the Core Strategy.</p> <p>In the case of Kineton, the Neighbourhood Plan includes reserve housing sites to the north of the settlement in addition to allocations and commitments. However, Bidford does not include any allocations or, more importantly for the preparation of the SAP, any reserve housing sites. Only the extent of the commitments is included in this Neighbourhood Plan.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Therefore, because the Main Rural Centres are 'second' in the hierarchy of settlements and should be treated equitably as sustainable locations for potential development, the SAP should consider the potential for reserve housing sites at those settlements where the Neighbourhood Plan has not included such allocations.</p> <p>As an example of such a site, the Strategic Housing Land Availability Assessment (SHLAA) pro forma assessment form for land at Marriage Hill Farm is attached as Appendix 1. This site is available, suitable and achievable for a residential development of circa 150 dwellings. The key attributes of the site are:</p> <ul style="list-style-type: none"> <li>• The ability to accommodate up-to 170 dwellings varying between 1 and 5 bedroom properties.</li> <li>• Delivery of policy compliant affordable housing, including both rented and shared equity homes.</li> <li>• Extensive Green Infrastructure including retention of the former orchard adjacent to the farm house, biodiversity enhancements and sustainable drainage.</li> <li>• Vehicular access from Salford Road.</li> <li>• No insurmountable technical issues with built forms of development being able to avoid any floodplain associated with the existing watercourse.</li> <li>• A residential scheme which is well related to the built development form and character of Bidford on Avon, including the schemes being undertaken by both Bovis Homes and Persimmon Homes.</li> <li>• A housing scheme which is visually contained by the existing landscape feature around the settlement, including Marriage Hill.</li> <li>• No ecological or biodiversity constraints.</li> </ul> <p>Secondly, it would be sensible that where reserve housing sites are allocated in Neighbourhood Plans, such as at Kineton, this should be reflected in the SAP and the subject of the same policy for release for development. Such an approach would ensure a consistency of approach across the District rather than different Neighbourhood Plans containing differing triggers for release. In incorporating any Neighbourhood Plan reserve housing site into the SAP it is self-evident that it does not need to be assessed against the SHLAA criteria because it has already been accepted as being available, suitable and achievable.</p>
31	Defence Infrastructure Organisation	<p>The statutory explosive safeguarding consultation zone for DM Kineton is situated within the district of Stratford on Avon.</p> <p>There are two explosive safeguarding zones, the Inhabited Building Distance (IBD) and the Vulnerable Building Distance (VBD).</p> <p>The Inhabited Building Distance (IBD) is defined as a yellow line on the statutory safeguarding map. Within this safeguarding zone the MOD monitors the management and use of development to maintain public safety and tends to object to any persons living, working or congregating for long periods of time.</p> <p>The second consultation zone Vulnerable Building Distance (VBD) is defined as a purple line on the statutory safeguarding map. Within this zone all buildings should be deemed as being 'non vulnerable' that is of robust design and construction so</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>that should an explosion occur at the MOD storage facility, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants.</p> <p>Whilst reviewing the SAP Revised Scoping &amp; Initial Options Document Appendices document, it has been identified the village of Temple Herdewicke falls within the Vulnerable Building Distance (VBD) safeguarding zone surrounding Defence Munitions (DM) Kineton.</p> <p>In principle the MOD has no safeguarding objections to proposed developments within this safeguarding zone, however, the MOD request we are consulted on all future planning applications within this area for more detailed safeguarding assessments to be completed.</p>
32	Lichfield District Council	<p>In respect of our two Council areas it can be agreed that there are no strategic planning issues other than housing that may need to be met through the Duty to Cooperate and both our authorities are working effectively with the other partners in the Birmingham HMA in the preparation of the Greater Birmingham HMA Strategic Growth Study.</p> <p>Thank you for the opportunity to comment on the Site Allocations Plan Revised Scoping Consultation. I hope you find the following comments useful as you progress through the preparation of the Plan.</p> <p>As the Plan is prepared it will need to accord with the latest available evidence and will also need to comply with the emerging NPPF growth requirements and not rely on existing policy. The SAP Revised Scoping Consultation document relies on policies within the adopted Local Plan Strategy Policy CS.16D and CS.17 in order to address the strategic matter of the unmet housing needs arising within the Greater Birmingham Housing Market Area. However since the adoption of the Strategy further evidence has been prepared and I consider this emerging plan should consider the recently published Greater Birmingham HMA Strategic Growth Study and consider how the unmet needs arising within the housing market area will be addressed.</p> <p>At present the Plan lacks clarity as to when an early review in response to any unmet need arising from the GBHMA would be necessary, as Policy CS.17 only refers to a need to review the Plan for the needs arising in Coventry and Warwickshire HMA and Policy 16D relates to the release of 'reserve sites'.</p> <p>I appreciate both the NPPF and the Greater Birmingham HMA Strategic Growth Study were published after the consultation began on this document and hope you find the above comments useful. I look forward to our continuing dialogue.</p>
33	The Coal Authority	I have reviewed the documents and can confirm that the Coal Authority has no specific comments to make.
34	Woolf Bond Planning on behalf of	For the reasons set out above, the Site Allocations Plan at this stage risks failing the NPPF tests of soundness for the following reasons:

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
	Rockspring Barwood Southam	<ul style="list-style-type: none"> <li>• Negatively Prepared - Does not plan for appropriate housing delivery having regard to needs within Stratford-on-Avon District or the wider needs occurring elsewhere in the HMA. Further it fails to allocate a sufficient amount of housing land to meet pressing needs.</li> <li>• Unjustified - The proposed housing distribution strategy fails to acknowledge the settlement of Southam as an appropriate location for housing growth and identifies inappropriate potential housing sites when considered against reasonable alternatives.</li> <li>• Ineffective - The plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period. This includes a potential failure to allocate a sufficient level of reserve sites.</li> <li>• Inconsistent with the National Policy - The plan fails to allocate an appropriate amount of housing land or in the right location.</li> </ul>
35	Harris Lamb on behalf of Alamo	<p>It is noted that the timetable for the preparation of the emerging Plan on Page 6 of the consultation document suggests that the Council will not be undertaking Preferred Options consultation. Following the completion of the Revised Scoping and Initial Options consultation, the plan will be progressed straight to pre-submission stage. There will not, therefore, be the opportunity to comment on the suitability of the proposed Reserved Housing Sites until the pre submission stage. If any comments are submitted to the Council that change the view on the suitability of any of the proposed Reserved Housing Sites, it would be difficult for the plan to be amended prior to submission, given the nature of pre-submission consultation. Indeed, if the Council decide to omit or include a new site following receipt of representations to the pre submission plan, it is our view that further consultation will be required.</p> <p>It is noted that the Council are proposing to produce a new SHLAA to inform the site allocations Local Plan. It is respectfully requested that this site is included within the new SHLAA assessment.</p>
36	South Worcestershire Councils	<p>Thank you for providing the South Worcestershire Councils (Malvern Hills District Council, Worcester City Council and Wychavon District Council) with the opportunity to comment on the above consultation document.</p> <p>The content has been noted but at this stage the South Worcestershire Councils have no specific comments to make on the scoping and initial options identified. However the councils look forward to being able to provide more detailed comments at the draft plan consultation stage this coming summer, and if applicable participating in the examination at the turn of the year/early 2019.</p>
37	Public Health Warwickshire	<p>In response to the Site Allocations Plan (SAP) please find attached our Public Health Evidence for Planning and Developers guidance document.</p> <p>We would advise that the design principles within the document are incorporated into any new developments to encourage the growth of healthy, active and sustainable communities.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
38	Richborough Estates Limited	<p>Page 7 identifies that where Neighbourhood Plans have been made or submitted for examination then the SAP will not deal with issues which have already been addressed, such as the identification of reserve housing sites or the definition of Built-up Area Boundaries.</p> <p>It would, however, be sensible that where reserve housing sites are allocated in Neighbourhood Plans, such as at Kineton, this should be reflected in the SAP and the subject of the same policy for release for development. Such an approach would ensure a consistency of approach across the District rather than different Neighbourhood Plans containing differing triggers for release. In incorporating any Neighbourhood Plan reserve housing site into the SAP it is self-evident that it does not need to be assessed against the SHLAA criteria because it has already been accepted as being available, suitable and achievable.</p>
39	Nexus Planning on behalf of CEG	<p>I write on behalf of my client, CEG, in response to the above consultation and in respect of land at Gaydon/Lighthorne Heath, which as you will be aware is largely controlled by CEG.</p> <p>Having reviewed the Site Allocations Plan ("SAP") Issues and Options Consultation, we note that the Council is proposing to make a number of amendments to existing policies within the adopted Core Strategy and for the reasons set out below, we consider that changes to the wording of Policy Proposal GLH: Gaydon/Lighthorne Heath are also appropriate.</p> <p>Policy Proposal GLH allocates, inter alia, 100 hectares at the southern end of the allocation to enable the expansion of Jaguar Land Rover ("JLR") to meet its business needs. An extensive array of appropriate uses are then outlined within the policy. Initially, this land was identified by the Council for housing as part of the new settlement proposal, but the extent of housing was truncated following a request from JLR for land to be identified for its own future growth.</p> <p>In the Core Strategy Inspector's Interim Report, he identified at paragraph 123 that during the examination hearing sessions JLR suggested that the retention of the employment allocation at GLH in the Core Strategy was "...about keeping JLR in the UK". The Inspector also stated the following at paragraph 124:</p> <p><i>"I have no reason to doubt that the firm's existing facility at Gaydon is the largest facility of its type in the UK, where the firm's cars are designed and tested at a unique research and development facility. Strategic Policy AS11, for the existing site, is essentially agreed and I shall comment on the detail in my final report but the proposed allocation is envisaged to replicate that facility. Gaydon is said to have a pivotal role in JLR's business and it is claimed to be the only facility where product development and innovation can take place. In that context there are limited options for where such a large scale facility could be accommodated. Although Gaydon Proving Ground comprises an extensive area of land its form and function would rule it out as a practical option for a plant of the scale being proposed In view of the new link road to Junction 72 of the M40, which is already under construction, the proposed site is the only realistic option."</i></p> <p>Since the adoption of the Core Strategy, JLR appears to have focussed upon the intensification and enhancement of its existing facilities at Gaydon. However, JLR has also obtained planning permission for a significant expansion of its facilities at Whitley in Coventry and also helped fund the delivery of the National Automotive Innovation Centre ("NAIC"), which it is</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>understood will become the largest automotive research and development facility in Europe. Furthermore, since the adoption of the Stratford-on-Avon Core Strategy (almost 3 years ago) CEG has received no clarification from JLR on its aspirations for the land at GLH or a request to advance any land negotiations. This appears to be somewhat at odds with the sentiment of JLR at the Core Strategy examination.</p> <p>This situation is set against the backdrop of what CEG understands to be a significant pent up demand for employment floorspace on the M40 corridor in the sub-region, not only due to obvious connectivity of such land with the strategic highway network but also due to the high level constraints (such as Green Belt) affecting other parts of the strategic highway network in the area.</p> <p>The unusually personalised nature of the employment allocation within Policy Proposal GLH means that my client is currently unable to bring forward any proposals to implement the policy, with no obvious prospect of this changing. The Core Strategy Inspector at paragraph 125 of his Interim Report highlighted that the National Planning Policy Framework (“NPPF”) has a strong emphasis on building a strong, competitive economy and that paragraph 19 stresses that the planning system should do everything it can to support sustainable economic growth, rather than to act as an impediment. Furthermore, the Inspector pointed out that paragraph 20 of the NPPF outlines that local planning authorities should plan proactively to meet the development needs of business.</p> <p>Policy Proposal GLH, as currently worded, is overly restrictive and we consider that there is a danger that such personal allocations for businesses could lead to long term employment land banking, the negative consequences of which are clear. The Council and indeed the Inspector has identified that the southern part of the allocation at GLH is an appropriate location for employment growth in general and personalising this to JLR was considered by the Inspector to be a ‘sound’ approach at that the point in time. However, for the reasons set out above, such a restriction now actually serves to act as an impediment, rather than to encourage, economic growth in a location where significant demand exists. Fundamentally, this is contrary to the originally intended purpose of the policy and to a number of policies contained within the NPPF.</p> <p>Given the above, it is considered that the wording associated with Policy Proposal GLH should be amended to also allow other employment related development that is not directly associated with JLR in the southern part of the allocation.</p>
<p><b>Officer Response</b></p> <p>Many of the comments made under this heading do not need a response as they are of a factual or observational nature, or do not relate to the scope of the Site Allocations Plan. The following comments do require a specific response:</p> <p>No.4/32 – it would be appropriate for the Site Allocations Plan to make reference to meeting the housing needs of the Greater Birmingham Housing Market Area and the findings of the Strategic Growth Study.</p>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Nos.7/8/9/11/12/13/14/15/16/17 – the issues raised have been taken into account in producing the Strategic Housing Land Availability Assessment (SHLAA) and will be considered when identifying reserve housing sites.</p> <p>No.18 – the provisions of ‘made’ Neighbourhood Plans will be taken into account.</p> <p>No.25 – consideration can be given to the redevelopment of this site through the Brownfield Land Register and based on the provisions of the NPPF and Policy CS.10 in the Core Strategy regarding Green Belt.</p> <p>No.28/30/35/38 – careful consideration will need to be given as to whether reserve housing sites should be identified in those settlements covered by submitted and ‘made’ Neighbourhood Plans that have also identified such sites. This should take into account the specific purposes of reserve sites given in each Neighbourhood Plan to gauge whether they are consistent with the purposes of reserve sites as specified in Policy CS.16.</p> <p>No.39 – it may be appropriate to consider alternative employment-related uses on that part of Proposal GLH identified for Jaguar Land Rover’s use given their lack of progress to date in bringing forward an application. This need not necessitate a revision to Proposal GLH in the Site Allocations Plan. A planning application for alternative uses could be considered on its merits in accordance with the provisions of other policies in the Core Strategy, for example the last paragraph in Policy CS.22.</p> <p>Material and comments submitted in relation to specific sites have been assessed as part of the process of identifying proposed reserve housing sites.</p>
		<p><b>Officer Recommendation</b></p> <p>Make reference in the Site Allocations Plan to the Strategic Growth Study for Greater Birmingham and the Black Country and the implications of this regarding the release of reserve sites.</p>

**Topic: Introduction**

No.	Source	Comment
1	Anna Corser	Useful, informative
2	Shipston-on-Stour Neighbourhood Plan Community Team	<p>The Community Team that prepared the submitted Shipston-on-Stour Neighbourhood Plan on behalf of Shipston Town Council supports the principle set out on page 7 that “where a Neighbourhood Plan has been ‘made’ or submitted for examination, the SAP will not deal with issues which have already addressed, such as the identification of reserve housing sites or the definition of a Built Up Area Boundary.”</p> <p>The submitted Shipston Neighbourhood Plan defines a built-up area boundary for the town and identifies and allocates a reserve housing site as Policy HSG6. It also identifies a potential further reserve housing site which it is proposed should be the subject of a Development Brief designed to inform the first review and updating of the Neighbourhood Plan (Consequent Project 2.5). In view of the principle expressed by the District Council, noted above, we would therefore expect that any other tracts of land within the Shipston Neighbourhood Plan boundary which may be offered by landowners and developers as reserve housing sites, in response to the consultation on the SAP, will be disregarded.</p>
3	WYG on behalf of Church Commissioners for England	<p>The introduction to the Site Allocations Plan (SAP) Revised Scoping Document sets out a significant change in approach to the SAP with the focus being on the identification of reserve housing sites rather than sites for non-strategic allocations. The reason given for this change - housing provision which exceeds the 14,600-dwelling requirement set out in the adopted Core Strategy. However, it is not apparent from the consultation strategy documents how this conclusion has been reached. There appear to be no details which set out the supply, how it's derived, and the trajectory which the council considers has more than met the Core Strategy requirement. To be able to comment on such a fundamental change to the scope of the document, it would be envisaged that this information would have been made readily available.</p>
4	Acres Planning on behalf of the Sharples Family	<p>The Introduction explains the purpose of the Site Allocations Plan which is to identify a range of non-strategic sites within the District amounting to at least the 20% proportion of Reserve Sites specified in policy CS.16 to ensure that there is a generous and constant supply of housing for the life of the Local Plan and beyond.</p> <p>The Government has also indicated that it wishes to see local authorities identify at least 20% of its housing provision within smaller sites (although the precise size of these have yet to be defined). The forthcoming National Planning Policy Framework Review which is due very shortly will consult on this commitment.</p> <p>The delivery of 20% of smaller sites is not necessarily consistent with the 20% of Reserve Sites (since the latter may well be larger sites) but we feel the Council's policy of releasing further land, especially in smaller communities on smaller sites is running along the right lines. The important issue is that there is a range and type of smaller sites and that a wider range of small and medium enterprise (SME) builders are able to thrive</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		and other smaller builders are encouraged to enter the market. This has not been the case in the past within Stratford on Avon DC. Moreover, much of Stratford on Avon's current housing supply is tied up in two very large Strategic sites at Gaydon and Long Marston.
5	Hampton Lucy Parish Council	Comprehensive, no further comment.
6	RPS on behalf of Taylor Wimpey	<p>RPS recognises that the context for the Site Allocations Plan is set by the Core Strategy adopted in July 2016. RPS recognises that Policy CS16 Housing Development in the Core Strategy specifies that reserve sites accommodating 20% of the total housing requirement should be identified in the Site Allocations Plan (SAP). This is in addition to the oversupply of around 9% in the Core Strategy (supply pipeline compared against requirement) as established in the Inspector's Report (paragraph 13) and should form the basis for the SAP.</p> <p>As set out in S19(2) of the Planning and Compulsory Purchase Act 2004 (as amended), when preparing local development document, i.e. Local Plans, the Local Planning Authority must have regard to (a) national policies and advice contained in guidance issued by the secretary of state, and (h) any other local development, i.e. Local Plans, which has been adopted by the authority. Therefore, Stratford District Council in producing the Site Allocations Plan must make sure that they have regard to the Core Strategy and the NPPF/ PPG.</p>
7	PJS Development Solutions Ltd on behalf of Gloucester Diocesan Board of Finance	The introduction notes that "Given the significant change of circumstance regarding housing provision, together with other issues that have now arisen, it is appropriate to consult on a revised scoping of the SAP...." This highlights the importance of ensuring that any policy approaches taken in the SAP are flexible and build in contingency for unseen circumstances. It should also be noted that, even since the scoping consultation was launched, a Revised NPPF has been issued for consultation; this will need to be considered and reflected in the SAP's approach, policies and allocations.
8	RPS on behalf of Miller Homes	<p>RPS recognises that the context for the Site Allocations Plan is set by the Core Strategy adopted in July 2016. RPS recognises that Policy CS16 Housing Development in the Core Strategy specifies that reserve sites accommodating 20% of the total housing requirement should be identified in the Site Allocations Plan (SAP). This is in addition to the oversupply of around 9% in the Core Strategy (supply pipeline compared against requirement) as established in the Inspector's Report (paragraph 13) and should form the basis for the SAP.</p> <p>Policy CS15 Distribution of Development of the Core Strategy identifies Bidford-on-Avon as one of the Main Rural Centres and Policy CS16 Housing Development states that at the Main Rural Centres, provision will be made for approximately 3,800 homes.</p> <p>As set out in S19(2) of the Planning and Compulsory Purchase Act 2004 (as amended), when preparing local development document, i.e. Local Plans, the Local Planning Authority must have regard to (a) national policies and advice contained in guidance issued by the secretary of state, and (h) any other local development, i.e.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Local Plans, which has been adopted by the authority. Therefore, Stratford District Council in producing the Site Allocations Plan must make sure that they have regard to the Core Strategy and the NPPF / PPG.
9	Clifford Chambers and Milcote Parish Council	Much time wasted trying to find the proper link to this document. Not very clear!
10	Acres Planning on behalf of Noralle Traditional Country Homes	<p>The Introduction explains the purpose of the Site Allocations Plan which is to identify a range of non-strategic sites within the District amounting to at least the 20% proportion of Reserve Sites specified in policy CS.16 to ensure that there is a generous and constant supply of housing for the life of the Local Plan and beyond.</p> <p>The Government has also indicated that it wishes to see local authorities identify at least 20% of its housing provision within smaller sites (up to 0.5ha in size) The Government's recently published National Planning Policy Framework Review is consulting on this commitment.</p> <p>Noralle feel the Council's policy of releasing further land, on smaller sites especially in smaller communities is running along the right lines. There should be a range and type of smaller sites so that a wider range of small and medium enterprise (SME) builders are able to thrive and other smaller builders are encouraged to enter the market. This has not been the case in the past within Stratford on Avon DC. Much of Stratford on Avon's current housing supply is tied up in two very large Strategic sites at Gaydon and Long Marston. Smaller sites will provide a suitable counter balance to this.</p>
11	Tim Pollard	Introduction section is clear in what the consultation is setting out to achieve.
12	Bloor Homes	<p>The consultation document advances an approach to redefining the scope of the Site Allocation Plan which does not appear to accord with the NPPF's presumption in favour of sustainable development - para. 14 -and the aim to significantly boost the supply of housing - para. 47.</p> <p>With regard to para. 14, the Framework requires Plans seek all opportunities to meet the development and objectively assessed needs of their areas 'with sufficient flexibility to adapt to rapid change'. Similarly Para.47 requires Plans meet the identified needs for market and affordable housing delivery in the housing market area. The alternative approach the consultation document advances - to place consented housing schemes not on allocated sites onto a Reserve Housing Site List for release only under defined arbitrary circumstances - would not accord with these dual requirements of delivery and flexibility to ensure prompt response to changed circumstances. Furthermore the approach would not appear to accord with Footnote 11 which requires Authorities identify deliverable sites sufficient to provide 5 years of housing supply against identified targets and that these sites come forward for delivery when available.</p> <p>Core Strategy CS16 (D) notes that the Housing Trajectory will be reviewed at least annually. However at the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>time of writing only the 2015/2016 Trajectory accompanying CS16 is available. This shows an under-provision of units annually between 2011-2016 (acknowledged by para. 5.2.6). Paras. 5.2.7 and 5.2.19 also refer to the persistent under-provision as the rationale to increase housing completions targets in 'Phase 2' of the Plan to 894 p.a. (2016/17 -2020/21) from 566 p.a. in 'Phase 1'. The increase is stated as required to 'make-up' for the previous 5 years of consistent under-provision. Para 5.2.7 acknowledges that the target is 'ambitious and exceeds by some margin the previous highest rate of annual supply of 806 homes in 2004/05'. It is noted the average annual shortfall in Phase 1 was 240 units p.a. Against this background of under delivery the revised SAP needs to ensure that consented schemes capable of delivery are supported and encouraged to come forward and not held back by placement on the List.</p> <p>However it cannot be assumed that the increased Phase 2 completion rates will be delivered (reference Phase 1 delivery rates) irrespective of whether these units are on allocated sites or not. Therefore each site which comes forward and is deliverable having reference to footnote 11 criteria must be encouraged to be built. Only with this approach can it be reasonably considered possible for the unprecedented Phase 2 delivery targets to be achieved. In contrast consigning consented schemes to the List for release only under controlled arbitrary circumstances will not facilitate flexibility of delivery or indeed encourage delivery.</p> <p>CS16(D) provides just one criteria to be used when determining whether a consented housing scheme will be added to the List - namely whether it and other schemes throughout the District would collectively have capacity to deliver 20% of the District's total housing requirement to 2031. However placement on a List will prevent the delivery of units to meet demand be that demand originating from the local housing market, a demand to increase delivery numbers to achieve annual /5 year targets or to respond to an unexpected factor originating perhaps from changed circumstances in the wider HMA.</p> <p>The List approach also relies on consents being in place where and when demand arises which is unlikely to be manifest in practice.</p> <p>Simply put the control imposed on housing release in the manner advocated would appear to be contrary to paras 14 and 47 of the Framework. This is particularly the case when there is an acknowledged under provision of units in the District and a recognition of needing to build more to 'catch up' in the years ahead.</p> <p>If the revised SAP were to retain this List approach to site release, all consented schemes of any scale not on allocated sites would have to be placed on the List as they would by definition contribute towards the 20% reserve 'stock'. For up to 20% of the housing need to be held back from delivery when they accord with Footnote 11 criteria is considered unworkable in terms of ensuring para 47 housing delivery criteria is met.</p> <p>The brake on deliverability imposed by being on the List would be further compounded by the 4 arbitrary controls for release stated in CS16(D). These controls would all contribute to the high probability that an</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Applicant would be unable to deliver units on time to meet demand/annual targets.</p> <p>It is considered that any consented housing site meeting Footnote 11 criteria is by definition deemed suitable for implementation irrespective of whether it is on an allocated Site or not. In ensuring that the scope of the revised SAP supports this approach would make it simpler for Applicants to work towards ensuring the delivery of units to meet demand as and when demand arises.</p> <p>The removal of these checks is considered particularly important given the evidence of under-provision in the 1<sup>st</sup> phase of the Plan and the declared need to increase figures above history record levels to 'catch-up' during Phase 2. Removing the List and the arbitrary release triggers would result in the revised SAP aligning more with para. 14 and point 2 of para. 47 of the Framework and greatly assist housing delivery generally throughout the District.</p>
13	Turley on behalf of St Modwen	<p>The Introduction (page 5) states that <i>'the context for the Site Allocations Plan is set by the Core Strategy which was adopted in July 2016.'</i> Page 5 also refers to policies CS15 and CS16 in this regard. However the reference to policy CS15 within the SAP is selective, and omits 'large rural brownfield sites' from the list of locations that were identified in Policy CS15 as being sustainable.</p> <p>Furthermore, page 5 refers to Policy CS16 and the housing requirement of 14,600. It is stated that this has been met now via allocations and planning permissions. Policy CS16 refers to the Site Allocations Plan (SAP) as a document that will identify Reserve Housing Sites, providing flexibility that the District can meet its full housing requirement and/or respond to the needs of the Coventry and Warwickshire HMA to 2031. The Policy states that any reserve sites will take account of the settlement pattern and the overall balance of distribution of development as set out within Policy CS15. Meon Vale is a large rural brownfield site (LRBS); is one of the sites therefore within the distribution outlined at Policy CS15 ( e ); and yet is omitted from being considered as a potential specific reserve site within this consultation document or the process that has led to it. The scope (on page 5 of the SAP Consultation document) omits LRBS as stated above.</p> <p>Page 5 of the Consultation document also refers to the need for consulting on the scope of this SAP, is to take account of the <i>'significant change of circumstance regarding housing provision.'</i> If this is the case, it is our view that a significant change in circumstance that has arisen during this consultation process, is the publication of the GL Hearn Greater Birmingham HMA Strategic Growth Study, which has identified four different potential areas of search within the District. Paragraph 3.20 of that Study states that 2,720 dwellings should be identified within the District for meeting the unmet housing needs arising from the Birmingham HMA. The SAP does not identify this as a <i>'significant change in circumstance'</i>- albeit at 19%, (2,720 dwellings out of 14,600) this would represent a significant addition to the Core Strategy. The approach to 'reserve sites' that is within the Core Strategy (at Policy CS 16) is only within the context of meeting needs from the Coventry and Warwickshire HMA. Policy CS17 deals with housing needs arising from outside of the District, such as the Greater Birmingham</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>HMA, and it is therefore a 'change of circumstance' afforded to the evidence within the GL Hearn Study, that this Consultation ignores.</p> <p>The Scoping for the SAP must therefore include consideration of LRBS, to accord with the 'parent' Core Strategy policy CS15, and, take account of the need for additional sites (above 'reserve sites'), to respond positively to the change in circumstances, that policies CS 16 and CS 17 acknowledge. These comments are not directed to, or seeking to change the development strategy within the Core Strategy, or the categorisation of settlements, because Meon Vale is already positively considered for development in Policy CS 15, CS16, and AS11.</p> <p>The SAP has been informed by a Sustainability Appraisal. Paragraph 1.5 of the SA makes the only reference to LRBS, albeit in the context of these being part of the approach taken by the Core Strategy towards distributing development. Paragraph 7.1 does refer to '<i>The Pre-Submission SAP will include the proposed level and location of Reserve Sites, also informed by the completed SHLAA and SA of reasonable alternative site options</i>'. There is reference to a SHLAA being part of the evidence for the SAP. St Modwen have previously submitted their Meon Vale site as part of the SHLAA process. St Modwen would seek to resubmit Meon Vale again, when that process recommences.</p> <p>It is not clear where the reasonable alternative sites will be drawn from. Given that the Core Strategy identifies LRBS as being part of the sustainable locations for distributing development, those sites, including Meon Vale should be part of the SA process too. Meon Vale was promoted through the Core Strategy process as a site with further capacity for accommodating additional residential development. Whilst not an allocated site, the potential for additional homes at Meon Vale (and other LRBS) was identified and acknowledged - see paragraph 5.2.10 and policy AS 11 (2). The Secretary of State has previously endorsed Meon Vale as a sustainable location in July 2014, when determining an adjacent appeal, APP/H1840/A/13/2202364 paragraph 13. This is relevant, given the Core Strategy supporting text at paragraph 6.13.6 that suggests some of LRBS tend not to be the most sustainable. This is clearly not a point that can be attributed to Meon Vale.</p>
14	Kineton Parish Council	The Introduction, and indeed the complete Consultation document, has been made straightforward to consider as a result of the SDC presentation on the 15 <sup>th</sup> of February.
15	Rosconn Strategic Land	<p>The second paragraph on page 5 states that the scale of housing provision now made through completions, commitments and allocations has more than met the 14,600 dwellings specified in the adopted Core Strategy. It should however be acknowledged that the housing requirement is expressed as a minimum under Policy CS.16 in that 'Provision will be made for at least 14,600 dwellings'. This was required by the Inspector (para. 77) in his report on the Core Strategy in order that the Plan is positively prepared and is consistent with the need to significantly boost the supply of housing, as required by paragraph 47 of the Framework.</p> <p>The second paragraph on page 7 states that the SAP does not intend to deal with the identification of reserve</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>housing sites or the definition of a Built-Up Area Boundary (BUAB) at settlements where a Neighbourhood Plan has been 'made' or submitted for examination. Other than stating that there may be potential for overlap in identifying new sites for development, there is no justification as to why this decision has been made unilaterally without consultation. This appears to pre-determine or otherwise severely restrict where reserve sites will be located within the District on the basis of whether or not a Neighbourhood Plan has been produced, which is inconsistent with the Core Strategy and entirely unfair for those communities that have not, for whatever reason, taken up the option of progressing such a Plan. It is also apparent that the majority of communities that have progressed a Neighbourhood Plan are some of the most sustainable settlements within the District where one would logically expect reserve sites to be identified, including the Main Town of Stratford-upon-Avon and the Main Rural Centres (MRC) of Bidford-on-Avon, Kineton, Shipston-on-Stour and Wellesbourne. It is also notable that the Council does not intend to release land within the Green Belt for reserve sites, thereby discounting the possibility of sites being allocated at the MRCs of Alcester, Henley-in-Arden and Studley. This leaves only Southam as a potential location for reserve sites, alongside the Local Service Centres (LSVs). This appears to directly contradict the statement at paragraph 1.7 of the document which states that locations for reserve sites will be consistent with the distribution of housing development established by Policy CS.15 in the Core Strategy, as endorsed by the Core Strategy Inspector.</p> <p>Whilst national planning policy guidance seeks to ensure that Local and Neighbourhood Plans complement each other, it in no way seeks to prohibit a Local Plan from identifying sites within an area where a Neighbourhood Plan is 'made' or is otherwise being progressed. The Neighbourhood Plan should support the strategic development needs set out within the Local Plan and plan positively to support local development (Para. 16, NPPF). The NPPG (Reference ID: 41-009-20160211) also advises that Neighbourhood Plans should consider allocating reserve sites to ensure that emerging evidence of housing needs is addressed, helping to minimise potential conflicts and ensure policies in the neighbourhood plan are not overridden by a new Local Plan. Of the 5 Neighbourhood Plans within the Main Town and MRCs which are either made or at an advanced stage, only 2 of these allocate reserve sites, despite there being a clear strategic need to do so, as identified within the Core Strategy. This accounts for less than 13% of the total Reserve Site allocation that needs to be identified within the SAP. More recent 'emerging evidence' in the form of the Greater Birmingham HMA Strategic Growth Study (February 2018) further indicates the scale of unmet need arising within the HMA, within which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the District Council are obliged to help accommodate. In deciding not to consider potential allocations within the most sustainable settlements within the District that lie outside the Green Belt, the outcome is that housing will be directed to potentially less sustainable locations in conflict with both Policies CS.15 and CS.16, and the NPPF. The District Council are therefore urged to reconsider their position on this matter.</p>
16	Berkeley Strategic Land	The District of Stratford-on-Avon has seen a vast amount of change over the past number of years, and as the District begins to revise its Site Allocations Plan to accompany the Core Strategy that will guide development

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>throughout the plan period 2011 to 2031 it is vital that the SAP identifies reserve sites for the development needs of the District.</p> <p>As per the Stratford-on-Avon Core Strategy policy CS.15, Stratford-upon-Avon has been identified as the main settlement within the District. With a vast range of amenities available to local residents, the Council should seek to identify reserve sites on the urban edges of the town. In order to meet the 2,920 home requirement to support the existing allocations as per the Inspectors report, the council should look in particular to Little Luddington Farm where approximately 360 new homes can be provided to meet the requirement.</p> <p>It is expected that the Council will look to identify sites outside the Green Belt such as Little Luddington Farm in accordance with the anticipated timetable in preparing the Plan.</p>
17	Hunter Page on behalf of Bellway Homes	<p>The scope of the document set out in the introduction is accepted but clear reference should also be made to the Framework and the need to maintain a 5 year housing land supply in order to meet Stratford's Housing Requirement across the plan period. In this regard, it is felt that reference should be included to what is required by paragraph 47 of the Framework.</p> <p>It is felt that appropriate reference to the Framework should be included to ensure that flexibility in housing delivery is accounted for should some of the large sites that the Council are relying on for their housing land supply not come to fruition. In this regard, reserve housing sites in sustainable locations should then be considered.</p>
18	Mr G Cole	<p>Paragraph 2, page 5 states that the scale of housing provision now made through completions, commitments and allocations has more than met the 14,600 dwellings specified in the adopted Core Strategy, (CS). It should be acknowledged that the housing requirement is as a 'minimum' under Policy CS.16 in that 'provision will be made for <i>'at least'</i> 14,600 dwellings'. This was required by the Inspector (para. 77) in his report on the CS in order that the Plan is positively prepared and is consistent with the need to 'significantly' boost the supply of housing, as required by paragraph 47 of the Framework.</p> <p>Paragraph 2, page 7 states that the Site Allocations Plan (SAP) doesn't intend to deal with the identification of reserve housing sites or the definition of a Built-Up Area Boundary (BUAB) at settlements where a Neighbourhood Plan, (NP) has been 'made' or submitted for examination. Other than stating that there may be potential for overlap in identifying new sites for development, there is no justification as to why this decision has been made unilaterally without consultation. This appears to pre-determine, or severely restrict, where reserve sites will be located in the District dependent on the presence of an NP. This is inconsistent with the CS and entirely unfair for those communities that have not taken up the option of progressing a Plan. It is clear that the majority of communities that have progressed an NP are some of the most sustainable settlements within the District where one would logically expect reserve sites to be identified, including the Main Town of Stratford-</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>upon-Avon and the Main Rural Centres (MRC) of Bidford-on-Avon, Kineton, Shipston-on-Stour and Wellesbourne.</p> <p>It is also notable that the LPA does not intend to release land within the Green Belt for reserve sites, thereby further discounting the possibility of sites being allocated at the MRCs of Alcester, Henley-in-Arden and Studley, leaving only Southam as a potential location for reserve sites, alongside the Local Service Centres (LSVs). This seems to directly contradict paragraph 1.7 of the document which states that locations for reserve sites will be consistent with the distribution of housing development established by Policy CS.15 in the CS, endorsed by the Inspector.</p> <p>Whilst national planning policy guidance seeks to ensure that Local Plans, (LP) and NPs complement each other, it in no way seeks to prohibit a LP from identifying sites within an area where a NP is 'made' or is otherwise being progressed. The NP should support the strategic development needs set out within the LP and plan positively to support local development (Para. 16, NPPF). The NPPG (Reference ID: 41-009-20160211) also advises that NPs should consider allocating reserve sites to ensure that emerging evidence of housing needs is addressed, helping to minimise potential conflicts and ensure policies in the NP are not overridden by a new LP. Of the 5 NPs within the Main Town and MRCs which are either made or at an advanced stage, only 2 allocate reserve sites, despite a clear strategic need to do so, as identified in the CS. This accounts for less than 13% of the total Reserve Site allocation that needs to be identified within the SAP. Recent 'emerging evidence' in the form of the Greater Birmingham HMA Strategic Growth Study (Feb 18) further indicates the scale of unmet need arising within the HMA, which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the LPA are obliged to help accommodate. In not considering potential allocations within the most sustainable settlements that lie outside the Green Belt, the outcome being that housing will be directed to less sustainable locations in conflict with both Policies CS.15 and CS.16, and the NPPF. The LPA are therefore urged to reconsider this approach. As such a more diverse approach to allocating appropriate sites for residential development should be adopted.</p>
19	DLP on behalf of Coln Residential	<p>The Introduction to the Council's consultation document clearly sets out the scope of this regulation 18 consultation setting out consideration of the following:</p> <ol style="list-style-type: none"> <li>1. Approach to identifying Reserve Housing Sites</li> <li>2. Definition of Settlement (Built Up Area) Boundaries</li> <li>3. Proposed approach in relation to specific sites</li> <li>4. Provision for Self-Build and Custom Housebuilding</li> </ol> <p>DLP Planning Limited (DLP) have considered the approach taken by Stratford-on-Avon District Council through the preparation of the Site Allocations Plan (SAP), specifically concentrating on the proposed approach to identify Reserve Housing Sites. We are aware that the original intention of the SAP was to identify additional</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>housing sites to supplement those previously identified in the adopted Core Strategy. However, given sufficient housing provision to meet the housing requirement has now already been identified (through completions, commitments and allocations) the plan's scope has changed to now focus on the identification of 'reserve sites' in accordance with Policy CS.16 in the Core Strategy.</p> <p>Future reserve housing sites are intended to provide flexibility to respond to market conditions, ensuring that the District can meet its housing requirement over the Plan period and can also respond to the housing need arising from other Authorities in the Housing Market Area (HMA)/adjoining HMA's if required. DLP welcome this proactive approach to considering the allocation of additional sites to meet unforeseen future need which should avoid unsustainable locations coming forward above more suitable sites through speculative applications and appeals.</p> <p>However, in response to section: How does the Site Allocations Plan relate to Neighbourhood Plans? DLP is concerned over the Council's approach to delivering reserve sites and identifying Built-Up-Area boundaries for those Neighbourhood Plan areas which have reached a certain stage in the Plan process (e.g. examination or have been 'Made').</p> <p>Taking into account our understanding of the approach undertaken by Walton and Wellesbourne Neighbourhood Plan (WWNP) in the identification of Reserve Housing Sites DLP highlight real concern about a reliance on Neighbourhood Plans to deliver the sufficient numbers to appropriately deal with issues raised. Particularly for strategically significant locations such as Wellesbourne, which to be discussed, offers a real opportunity to deliver sustainable options for growth. Paragraph 4.2.1 of the WWNP highlights this when discussing the consultation response in relation to potential additional housing requirements. "The questionnaire survey identified that 79% of respondents preferred not to accept any additional housing in excess of that required by the Local Plan..."</p> <p>As has been highlighted by a number of respondents to the Regulation 16 consultation on the Walton and Wellesbourne Neighbourhood Development Plan - Submission Version, there are significant risks associated with the overall approach to assessing land and the suitability/availability of chosen sites. To the point that DLP consider the Plan is not in general conformity with the Strategic Policies contained within Stratford-on-Avon's Development Plan and therefore does not meet the Basic Conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) required to proceed to Referendum.</p>
20	Sworders on behalf of Mrs Mac	<p>Paragraph 2, page 5 states that the scale of housing provision now made through completions, commitments and allocations has more than met the 14,600 dwellings specified in the adopted Core Strategy, (CS). It should be acknowledged that the housing requirement is as a 'minimum' under Policy CS.16 in that 'provision will be made for 'at least' 14,600 dwellings'. This was required by the Inspector (para. 77) in his report on the CS in order that the Plan is positively prepared and is consistent with the need to 'significantly' boost the supply of</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>housing, as required by paragraph 47 of the Framework.</p> <p>Paragraph 2, page 7 states that the Site Allocations Plan (SAP) doesn't intend to deal with the identification of reserve housing sites or the definition of a Built-Up Area Boundary (BUAB) at settlements where a Neighbourhood Plan, (NP) has been 'made' or submitted for examination. Other than stating that there may be potential for overlap in identifying new sites for development, there is no justification as to why this decision has been made unilaterally without consultation. This appears to pre-determine, or severely restrict, where reserve sites will be located in the District dependant on the presence of an NP. This is inconsistent with the CS and entirely unfair for those communities that have not taken up the option of progressing a Plan. It is clear that the majority of communities that have progressed an NP are some of the most sustainable settlements within the District where one would logically expect reserve sites to be identified, including the Main Town of Stratford-upon-Avon and the Main Rural Centres (MRC) of Bidford-on-Avon, Kineton, Shipston-on-Stour and Wellesbourne.</p> <p>It is also notable that the LPA does not intend to release land within the Green Belt for reserve sites, thereby further discounting the possibility of sites being allocated at the MRCs of Alcester, Henley-in-Arden and Studley, leaving only Southam as a potential location for reserve sites, alongside the Local Service Centres (LSVs). This seems to directly contradict paragraph 1.7 of the document which states that locations for reserve sites will be consistent with the distribution of housing development established by Policy CS.15 in the CS, endorsed by the Inspector.</p> <p>Whilst national planning policy guidance seeks to ensure that Local Plans, (LP) and NPs complement each other, it in no way seeks to prohibit a LP from identifying sites within an area where a NP is 'made' or is otherwise being progressed. The NP should support the strategic development needs set out within the LP and plan positively to support local development (Para. 16, NPPF). The NPPG (Reference ID: 41-009-20160211) also advises that NPs should consider allocating reserve sites to ensure that emerging evidence of housing needs is addressed, helping to minimise potential conflicts and ensure policies in the NP are not overridden by a new LP. Of the 5 NPs within the Main Town and MRCs which are either made or at an advanced stage, only 2 allocate reserve sites, despite a clear strategic need to do so, as identified in the CS. This accounts for less than 13% of the total Reserve Site allocation that needs to be identified within the SAP. Recent 'emerging evidence' in the form of the Greater Birmingham HMA Strategic Growth Study (Feb 18) further indicates the scale of unmet need arising within the HMA, which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the LPA are obliged to help accommodate. In not considering potential allocations within the most sustainable settlements that lie outside the Green Belt, the outcome being that housing will be directed to less sustainable locations in conflict with both Policies CS.15 and CS.16, and the NPPF. The LPA are therefore urged to reconsider this approach.</p>
21	Warwickshire County Council	We support the general introduction section of the consultation document.

No.	Source	Comment
22	Simon Ward (Propernomics)	The SAP and associated policies should remain flexible to accommodate additional housing requirements and to compensate for any shortfalls in supply that may emerge, including from non-delivery of other sites.
<p><b>Officer Response</b></p> <p>Some of the comments made under this heading do not need a response as they are of a factual or observational nature, or do not relate to the scope of the Site Allocations Plan. The following comments do require a specific response:</p> <p>No.2/15/18/19/20 – careful consideration will need to be given as to whether reserve housing sites should be identified in those settlements covered by ‘made’ Neighbourhood Plans that have also identified such sites. This should take into account the specific purposes of reserve sites given in each Neighbourhood Plan to gauge whether they are consistent with the purposes of reserve sites as specified in Policy CS.16.</p> <p>Nos.3/12/13/15/18/20/22 – it will be necessary for the SAP to explain and justify the focus on identifying reserve sites and their purposes. This should include the rationale for their location. Up-to-date information will also be provided regarding the housing trajectory.</p> <p>Nos.6/7/8/12/17 – it will be necessary to ensure that the SAP is consistent with the revised NPPF and consequential changes to the PPG.</p>		
<p><b>Officer Recommendation</b></p> <p>None</p>		

**Topic: Part 1 Reserve Housing Sites - General**

No.	Source	Comment
1	Bruton Knowles on behalf of Nigel Ward	<p>Our client's site which shall be referred to as 'Land at Evesham Road', was submitted for the SHLAA Call for Sites 2017 Assessment. Work on the SHLAA is currently ongoing with publication expected in early 2018. The site was put forward for a proposed allocation of 30 dwellings, which is modest given that the site measures circa 2.49 ha.</p> <p>The site satisfies provisions set out under Policy CS.15 and it should be noted that if the council do not consider the site to be an appropriate allocation then our client is willing to put the site forward as a reserve site.</p>
2	John Brittain	<p>Due to the nature of District geology, ie. clay, I wish to make an observation that not enough or faulty geological tests are not made on any site before planning permission or work starting on site is not carried out. On two sites in Shipston the housing has found to be built on piles. One site, Norgren, Cala Homes built several foundations before they twigged. A second site the hill side is being terraced which gives a low density for given site, plus they are still piling. I would suggest none of this land is suitable for domestic housing. It also brings to mind the effect the diverting of water flow through the clay will have on the existing housing at the bottom of Campden Road due to drying of the clay bed. The Old Workhouse chapel and the meeting rooms have suffered movement over the last year, probably due to the homes built on the old Shipston Workhouse site. A retaining wall for the end house has been partially rebuilt once and is now cracking again.</p> <p>Basically not enough work is carried out on site conditions before plots are considered.</p>
3	Suzanne Farmer	<p>A site should be identified for a further new settlement, using the criteria in the Sustainability Appraisal Report, December 2017.</p> <p>Congestion was identified as a key sustainability issue (Sustainability Appraisal, paragraph 3.13, Table 3.1) and the Neighbourhood Development Plan has already recognised that congestion in Stratford-upon-Avon 'has reached proportions that are already a serious concern to residents and a threat to the local economy.' (NDP paragraph 10.4.)</p> <p>Sites are limited on the periphery of the town and town cramming has an adverse effect on the community and on the attractiveness of the town. Given the traffic congestion problem, there is a limit to how much Stratford-upon-Avon itself should grow. A new settlement could overcome these problems and create more affordable housing with good transport links.</p>
4	Ian Hope (Wellesbourne Allotment Association)	<p>Having perused your Site Allocation Plan I wish to express my support for it as it stands. I note that the only plans for Wellesbourne relate to employment opportunities which is needed to avoid us becoming wholly a dormitory town.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Incidentally, as the Chair of Wellesbourne Allotment Association I have been very concerned by attempts to build yet more houses in Wellesbourne and in particular plans by the Diocese to develop on the allotment site. I strongly object to this.</p> <p>Thank you for allowing members of the public the opportunity to comment.</p>
5	Nolan Tucker (WYG)	<p>The principle of providing a supply of reserve sites which is equal to 20% of the total housing requirement is supported. This is consistent with the NPPF which states that: <i>“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.”</i></p> <p>Furthermore, the Local Plan Expert Group (LPEG) report to Government (March 2016) recommended that Local Plans make provision for, and provide a mechanism for, the release of developable Reserve Sites equivalent to 20% of the housing requirements and that reserve sites should represent land that could be brought forward to respond to changes in circumstances.</p>
6	Acres Land and Planning on behalf of the Sharples Family	<p>The justification for and the approach to identifying Reserve Sites is welcomed. However, the approach to the release of Reserve Sites needs to be viewed more flexibly. The primary trigger point - the maintenance of a 5 year land supply - is a somewhat blunt instrument when addressing smaller communities. Needs already satisfied or land readily available in one part of the District (such as Long Marston airfield) will do little to help people looking for housing in another (such as Napton or Stockton some 20 miles away). Stratford on Avon DC is one of the largest Districts in area in the country in terms of area - the approach to land release therefore needs to be seen more pragmatically.</p> <p>The other criteria, which relate to the needs of Jaguar Land Rover and the Coventry &amp; Warwickshire HMA are less easy to quantify. One doesn't necessarily know who will be occupying a house until it is built and hence it is difficult to control release of sites according to the employment of the ultimate occupant. We therefore suggest a fifth criterion which relates to the need to satisfy local needs within a community - where there is little or no other readily available housing supply.</p>
7	Paul Dunster	<p>Stratford Town is known to be heavily traffic congested and therefore sites to be added to the reserve list should only be considered if there is minimal impact on future traffic.</p> <p>New settlements would be the better way to satisfy the housing need provided suitable infrastructure is put in place at the time to avoid moving the problem from one area to another.</p>
8	H Farmer	<p>A site for a new settlement should be identified by using the criteria set out in the Sustainability Appraisal Report 2017. This report and the Neighbourhood Development Plan have recognised that congestion in</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>Stratford-Upon-Avon “has reached proportions that are already a serious concern to residents and threat to the local economy.”</p> <p>Sites on the periphery of the town are limited and cramming more development onto the periphery has an adverse effect on the attractiveness of the town and on its local community. A new settlement with appropriate transport links would provide the opportunity to overcome these problems whilst at the same time creating significant amounts of new housing together with appropriate affordable housing.</p>
9	RPS on behalf of Taylor Wimpey	<p>Policy CS.16 of the Core Strategy makes it clear 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” (p91).</p> <p>Paragraph 6.14.1 of the adopted Stratford Core Strategy states that “There is an expectation that Bromsgrove District and Stratford-on-Avon District would have to play a role in meeting the future housing and employment needs of Redditch due to capacity constraints within the town itself”. RPS have included a plan (see Appendix 1 of this completed form) entitled ‘Area Constraints Overview’, which shows that surrounding Redditch there are very few allocations that aren’t already allocated which are suitable. RPS therefore proposes Land at Haye Lane, Mappleborough Green Land as a sustainable housing site.</p> <p>The accompanying ‘call for sites’ form includes an up to date appraisal of Land at Haye Lane, Mappleborough Green as a suitable, available and achievable site for residential development within the plan period.</p>
10	Brailes Parish Council	<p>Brailes draft NDP includes allocated sites for future development with the identified house numbers being driven by a current housing needs survey. The draft plan also includes an identified reserve site to be used in case an updated housing needs survey shows a requirement for additional homes.</p> <p>Brailes being an LSV2, its plan's allocated sites are the minimum size to deliver an affordable element to meet the CS thresholds but also the minimum size not to cause harm to the AONB, which washes over Brailes and needs sensitive handling. Brailes PC do not support dispersal of additional reserved sites in the LSV's and believe they should be provided on the much larger future developments in the district to ensure delivery of affordable homes.</p>
11	Stansgate Planning on behalf of Saffron Estates	<p>I am instructed by Saffron Estates Ltd to make representations in respect of the Stratford on Avon District Site Allocations Plan Revised Scoping Consultation (SAP) and to put forward a site for inclusion in the SHLAA and as a reserve site in the SAP.</p> <p>The enclosed SAP response deals only with the first question set out therein, regarding the approach to identifying reserve housing sites. In line with those responses Saffron Estates Ltd is then putting forward a</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>parcel of land on the edge of Welford on Avon for inclusion as a Reserve Housing Site or otherwise for inclusion in the SHLAA to meet the future housing needs of the settlement and the wider District.</p>
12	TDH Estates on behalf of Philip Baker Trust	<p>The SAP seeks comments on a number of issues relating to the identification of reserve sites for future housing should the current permitted and allocated sites fail to maintain a 5 year supply of housing land or for other reasons additional housing sites need to be found. The Trustees support the identification of such sites to provide certainty but consider a number of matters are wrongly addressed or are given too much or too little emphasis.</p> <p>One area where this applies is in relation to Neighbourhood Plans. The SAP on page 7 suggests that</p> <p>“where a Neighbourhood Plan has been made or submitted for examination, the SAP will not deal with issues which have already addressed (sic), such as the identification of reserve housing sites...”</p> <p>It is not clear whether this means the SAP will not consider reserve sites in areas with neighbourhood plans at all, or it means that it will not do so if the neighbourhood plan had explicitly considered reserve sites. If it is the former this seems perverse since it would rule out many parts of the district which, in other circumstances, would actually provide the best reserve sites. Moreover assuming these neighbourhood plans have been produced in accordance with the current development plan, they will of necessity be subject to future changes in the development plan once it is adopted. More specifically the former approach would rule out the potential for reserve sites to be provided at Stratford town, contrary to other important planning principles.</p> <p>Paragraph 1.2 of the SAP notes that the NPPF requires plans to include flexibility to adapt to changing circumstances and this is one reason for the identification of reserve sites. This is supported by the Trustees but it also suggests that a reserve site should be readily developable in terms of physical constraints and planning principles since, if the site is being released, it must by definition be to meet an important need; sites which would take a number of years to deliver new housing would not meet this need. In this context then additional new settlements would not be appropriate given how long these forms of development take to come on stream.</p> <p>On page 10 of the SAP a series of bullet points are presented as to the approach to identifying reserve sites. In the main these summarise the Inspector who examined the Core Strategy’s comments. These are largely agreed with but can be summarised differently - in particular that reserve sites should not be existing allocated sites, might be allocated to larger settlements rather than dispersed, should comprise a range of sites but particularly these should be larger sites as these are more likely to deliver more affordable housing and should not be added on to sites not delivering their current planned level of housing.</p> <p>However the SAP goes on to summarise the Inspector’s view that given the imperative to identify reserve sites this does not mean that the SAP <u>must</u> (Inspector’s emphasis) be informed by a green belt review. The SAP</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>interprets this to mean that reserve sites should not be green belt. This is a mis-reading of the Inspector's Report - what the report is actually saying is that identification of reserve sites need not necessarily await a full Green Belt review. Accordingly Question 1.1 is not agreed with.</p> <p>This conclusion also follows for an examination of the approach to reserve sites - that is, sites in/around Stratford may have strategic advantages which should be considered in the round before dismissing all sites within a neighbourhood plan area or which may be green belt. It is not necessary to repeat much of the current and previous advice regarding green belts other than to say that, given the development plan is the appropriate forum for the review of green belt boundaries, it must be implicit that there are circumstances in which it is appropriate to change them.</p> <p>A submission in relation to the SHLAA will be made identifying land owned by the Trust, north east of the Wildmoor Roundabout, which is currently within the green belt.</p> <p>Paragraphs 1.11 to 1.13 of the draft SAP refers to this process. Paragraph 1.11 refers to Policy CS15 but states that part 1 of the policy is not relevant to the identification of reserve sites - part 1 of the policy stating that the number of houses proposed should be consistent with the overall scale of development identified for the settlement. No explanation is given as to why this is said to be the case but in any event this is considered to be wrong - it must be relevant if the SAP is looking for a reserve site for say 500 dwellings whether the site is adjacent to a small hamlet or conversely is adjacent to Stratford or one of the major service centres.</p> <p>Question 1.4 asks if the SAP should look to identify sites for 2920 dwellings (20% of the Plan period requirement) or 1320 dwellings (the existing over-provision of dwellings having been deducted) or some other number. The Trust supports the requirement to identify sites for 2920 dwellings since the whole purpose of the reserve sites is to provide for flexibility then there is merit in maximising that flexibility.</p>
13	RPS Planning & Development on behalf of Miller Homes	<p>Policy CS.16 of the Core Strategy makes it clear that <i>"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 CS15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031"</i> (p91).</p> <p>Policy CS15 sets out that Bidford-on-Avon is one of the rural market centres that <i>"is identified as suitable locations for housing and business development and the provision of local services"</i> (p83). This is also recognised in the supporting text to the policy, which recognises that Bidford-on-Avon provides <i>"a good range of shops, facilities and jobs compared with smaller villages"</i> and <i>"They also tend to have more frequent public transport services than most of the Districts smaller settlements"</i> (para 5.1.8 at p86).</p> <p>The supporting text to Policy AS.3 Bidford-on-Avon cross refers at paragraph 63.17 to Policy CS16, which <i>"also indicates that Reserve Sites may need to be identified in the village through the Site Allocations Plan..."</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The Inspector in considering the Core Strategy stated that <i>“...the sites at Bidford-on-Avon are a sustainable option and will doubtless need to be considered as reserve sites in the SAP...”</i></p> <p>To enable the Council to meet the requirements of policy CS.15, RPS therefore proposes Land to the east of Jacksons Meadow and to the north west of Waterloo Road appeal site as a sustainable housing site at Bidford-on-Avon, as can be seen in Appendix 1 of this comment form.</p> <p>The accompanying ‘call for sites’ form includes an up to date appraisal of Land to the east of .Jacksons Meadow and to the north west of Waterloo Road appeal site as a suitable, available and achievable site for residential development within the plan period.</p>
14	Redditch Borough Council	<p>Redditch Borough Council (RBC) welcomes the opportunity to comment on the above consultation document and to continue to engage constructively with Stratford-on-Avon District Council (SOADC) in the best interests of positive plan-making.</p> <p>At this early stage in the plan-making process, this represents an informal officer response. Our comments primarily relate to: Part 1 - Approach to identifying Reserve Housing Sites.</p> <p>The Site Allocations Plan (SAP) will represent a mechanism to react to potential housing delivery shortfall within SOAD and may also offer some level of contribution towards meeting the housing shortfall from the West Midlands conurbation. This approach is welcomed by RBC officers, however, an explanation of how the release mechanism for the allocated sites needs to be explicitly set out in the Plan.</p> <p>RBC appreciates that the preparation of a Site Allocations Plan is underpinned by Core Strategy policies and has the support of the Inspector who examined the Core Strategy. However, it is mindful of the ever shifting nature of planning guidance, policy and evidence based documents, which may influence the plan-making process. RBC is particularly mindful of the recent publication of the revised NPPF (Draft text for consultation) on 5 March 2018 and the Strategic Growth Study into the Greater Birmingham and Black Country Housing Market Area (February 2018) (the GL Hearn Report).</p> <p>I trust the above comments offer a positive contribution to our continuing engagement with SOADC in the plan-making process.</p>
15	Bromsgrove District Council	<p>Bromsgrove District Council (BDC) welcomes the opportunity to comment on the above consultation document and to continue to engage constructively with Stratford-on-Avon District Council (SOADC) in the best interests of positive plan-making.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>At this early stage in the plan-making process, this represents an informal officer response. Our comments primarily relate to: Part 1 - Approach to identifying Reserve Housing Sites.</p> <p>The Site Allocations Plan (SAP) will represent a mechanism to react to potential housing delivery shortfall within SOAD and may also offer some level of contribution towards meeting the housing shortfall from the West Midlands conurbation. This approach is welcomed by BDC officers, however, an explanation of how the release mechanism for the allocated sites needs to be explicitly set out in the Plan.</p> <p>BDC appreciates that the preparation of a Site Allocations Plan is underpinned by Core Strategy policies and has the support of the Inspector who examined the Core Strategy. However, it is mindful of the ever shifting nature of planning guidance, policy and evidence based documents, which may influence the plan-making process. BDC is particularly mindful of the recent publication of the revised NPPF (Draft text for consultation) on 5 March 2018 and the Strategic Growth Study into the Greater Birmingham and Black Country Housing Market Area (February 2018) (the GL Hearn Report).</p> <p>I trust the above comments offer a positive contribution to our continuing engagement with SOADC in the plan-making process.</p>
16	Wilmcote Parish Council	<p>The Parish of Wilmcote is within the Green Belt, the NPPF sets out clearly defined conditions for any development. The parish council considers that no Reserve Housing Sites can be identified in the parish. Indeed its Neighbourhood Development Plan did not identify any specific development sites for that reason although the NDP did identify some limited need for specific types of homes identified through a village questionnaire and a housing survey. We support the Site Evaluation Criteria which recognises the NPPF conditions.</p> <p>The parish also has a well-defined Conservation Area where any development is subject to further conditions which aim to preserve its special significance. We support the recognition of these special areas in your Site Evaluation Criteria.</p>
17	Caroline Dunster	<p>Relating to Site STR727 Land North of Shottery Hall, the 2 previous planning applications have included a number of specialised consultations that have concluded in Refusal on both occasions. Therefore for the site to now be placed on the Reserve List would call into question the validity of these consultations. Instead, the site should be reinstated as an Area of Restraint as it is valuable as a heritage asset and contributes to the Shottery Conservation Area.</p> <p>Stratford-upon-Avon suffers from ever increasing traffic congestion and so sites should only be added to the reserve list if there is strong evidence that they will have minimal impact on future traffic.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
18	Acres Land and Planning on behalf of Noralle Traditional Country Homes	<p>The justification for and the approach to identifying Reserve Sites is welcomed. However, the approach to the release of Reserve Sites needs to be viewed more flexibly. The primary trigger point - the maintenance of a 5 year land supply - is a somewhat blunt instrument when addressing smaller communities. Needs already satisfied or land readily available in one part of the District (such as Long Marston airfield) will do little to help people looking for housing in another (such as Napton or Stockton some 20 miles away). Stratford on Avon DC is one of the largest Districts in area in the country in terms of area - the approach to land release therefore needs to be seen more pragmatically.</p> <p>The other criteria, which relate to the needs of Jaguar Land Rover and the Coventry &amp; Warwickshire HMA are less easy to quantify. One doesn't necessarily know who will be occupying a house until it is built and hence it is difficult to control release of sites according to the employment of the ultimate occupant. We therefore suggest a fifth criterion which relates to the need to satisfy local needs within a community -where there is little or no other readily available housing supply.</p>
19	Solihull Metropolitan Borough Council	<p>SMBC welcomes the intention to deliver on the commitment in the adopted Core Strategy to allocate reserve sites to address any shortfall in housing land, including meeting any needs arising outside the Coventry &amp; Warwickshire housing market area. It is recognised that this will provide additional robustness to the District's Plan in the context of the shortfall in land for new housing in the Greater Birmingham housing market area.</p>
20	Tim Pollard	<p>In general, the approach to identifying reserve sites appears to be sensible. However, I am surprised that there is not an additional principle, which would state that for sites where planning permission has previously been refused, specifically for heritage, environmental or safety reasons, e.g. dangerous site access, that these sites would automatically be excluded from being designated as 'reserve' sites.</p>
21	Bloor Homes	<p>Neither CS16(D) or para 1.5 of the SAP consultation document provides robust criteria to be used for the identification of Reserve Housing Sites. The single qualifying measure advanced is that Reserve Sites collectively will have the capacity to deliver 20% of the District's total housing requirement to 2031. Whilst touching on elements of Para.47 of the Framework, the selection criteria is so loose as to be rendered meaningless as by implication any consented site not on an allocated site meeting footnote 11 criteria would automatically qualify for the List. This cannot be the intent of CS16 and must not be the intent of the revised SAP given housing trajectories, sustainability criteria and under provision during the Plan period to date.</p> <p>The SAP should instead be written to ensure that all sites which meet footnote 11 criteria are not side-lined for release only when 1 of the 4 arbitrary occurrences cited in CS16(D) is triggered. Side-lining sites which are deliverable would also run counter to the requirements of para 47 to significant boost the supply of housing. The List would effectively place a 'brake' on the deliverability of housing sites.</p>

No.	Source	Comment
		<p>Of equal importance to the criteria used to justify the placement of consented schemes on the List, is the aforementioned 4 criteria used to determine the 'release' of sites from the List (para. 1.2 &amp; 1.5). These two aspects of CS16(D) are intrinsically linked to the deliverability of units.</p> <p>On point 1, it is considered that all deliverable sites assessed against Footnote 11 should be accepted as ready for commencement be they on allocated sites or not. The under-provision of units and unprecedented annual completion forecast sought under Phase 2 of the Local Plan, warrants this approach. A holding List is not needed as by definition any consented site added will meet Footnote 11 criteria and should be delivered without further encumbrance.</p> <p>Points 2, 3 and 4 are very wide ranging triggers. In practice any one of these 'trigger events' could quickly generate a need for significant uplift in completions. However this would not in all likelihood be met given the realities of housing delivery where lead-in times are such that years can pass before units are completed (even on sites already having consent - witness ongoing development on the SOU.1 site). The necessity for trigger events before the release of up to 20% of available housing supply would prevent the Reserve Sites contributing usefully to completion numbers and would certainly prevent delivery across the lifetime of the Plan. The trigger points must be removed to ensure unencumbered housing delivery.</p> <p>Furthermore if a consented Site were on a List, it is highly unlikely that Applicants would invest the significant resources necessary to 'prime' a consented scheme ready to implement when demand arises. Certainly there can be no assumption as CS16(D) infers that Applicants will immediately be able to commence build. Post consent costs are substantial whilst site preparation time is lengthy. Accordingly without the guarantee of a return an Applicant is most unlikely to commit the significant resource necessary unless the site is 'burden' free. Placing an implementable consent on the List could potentially lead to consents lapsing, fewer sites being available for release when required and reducing the number of sites generally in the 20% reserve 'pot'.</p> <p>The implications of the above on the delivery of up to 20% of forecast units completions is considerable and the revised SAP and CS16(D) must respond accordingly. Indeed it is considered that the Reserve Housing Site identification process should be deleted entirely or modified significantly so as to recognise that all consented sites meeting footnote 11 criteria are to be encouraged for delivery without delay.</p> <p>During the Phase 2 Housing Trajectory period Bloor Homes will be able to commence delivery of additional housing and community sporting facilities on the remaining land within the SOU.1 allocation and land to the south of the same sandwiched between SOU.1 and safeguarded HS2 land. As noted elsewhere in this submission, the case for extending the Southam BUAB southwards to enclose all of the SOU.1 land and adjacent land to the south is manifestly sound, justifiable and will assist ensure housing delivery.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Finally it is considered essential that the revised SAP clearly set out that development proposals which have local support and/or provide local community facilities will be strongly supported by the Authority and approved without imposing any timing constraints which might otherwise hinder deliverability (such as being placed on a Reserve List). In the case of SOU.1 there has been strong community support for the consented scheme in part as Bloor Homes are providing replacement and additional community facilities.</p>
22	Turley on behalf of St Modwen	<p>We object to the approach taken within the SAP in respect of Reserve Sites.</p> <p>Firstly, the SAP approach is to only identify Reserve Sites, and only where these are within the scope of Policy CS16. It is important, as highlighted above, that Policy CS 17 is now triggered, given the evidence base within the GL Hearn Study. The approach of the SAP is therefore limiting the quantum of development and constraining housing delivery. This is contrary to the aims of Government, who place housing delivery at the highest priority, in addition to a new draft section on the effective use of land within the draft consultation NPPF. The direction of travel is not changing and Meon Vale represents a suitable, available brownfield site to address this.</p> <p>Secondly, paragraph 1.2 of the SAP states that '<i>reserve sites would only be brought forward for development within the plan period if monitoring were to show a shortfall in housing supply that could not be met elsewhere</i>' [our underlining]. It is unclear whether this sentence is suggesting that when a shortfall exists (having deducted deliverable sites with planning permission or deliverable allocated sites (where delivery is within 5 years), from the five year requirement, then housing could be considered elsewhere, before Reserve Sites. In this circumstance, 'elsewhere' could be LRBS – if the SAP scope continues to exclude LRBS from the Site Allocations process. The intention is unclear. Equally, if it is only Reserve Sites that are triggered by the shortfall in housing land supply, the scope and thus approach to such sites must be widened to include LRBS, so that the SAP can be consistent with Policy CS15.</p> <p>Paragraph 1.2 of the SAP also states that Reserve Sites would also be brought forwards if specific circumstances arose that required the provision of more housing. The Reserve Sites Policy (Policy CS16) is only focused on the Coventry and Warwickshire Housing Market Area, as noted above. Therefore if the only time that such sites will be brought forwards is when CS16 is triggered (paragraph 1.5 reinforces this), the SAP fails the Core Strategy, because Policy CS17 is now relevant following the GL Hearn Study.</p> <p>Paragraph 1.7 states that the focus of the process is on locations which are consistent with Policy CS15. As previously stated, LRBS are listed as such locations. The bullet point list of principles that is intended to guide the identification of Reserve Sites are all consistent with future growth being identified at sites such as Meon Vale.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
23	Rosconn	Paragraph 1.1 does not acknowledge that the housing requirement set out within the Core Strategy is expressed as a minimum, in that at least 14,600 dwellings need to be provided by 2031. This is to ensure that the supply of housing is significantly boosted, as required by paragraph 47 of the NPPF.
24	Hunter Page on behalf of Bellway Homes	The broad strategy for identifying sites within the SAP is supported as this accords with the adopted Core Strategy and the settlement hierarchy identified therein that sees Stratford as the focus for further housing development across the plan period. In this regard, sites within or adjacent to the urban edge of Stratford should be the first to be considered should additional sites need to be released for development.
25	G Cole	<p>Paragraph 1.1 does not acknowledge that the housing requirement set out within the CS is expressed as a minimum, in that 'at least' 14,600 dwellings need to be provided by 2031. This is to ensure that the supply of housing is significantly boosted, as required by paragraph 47 of the NPPF.</p> <p>As such a more diverse approach to allocating appropriate sites for residential development should be adopted.</p>
26	Savills on behalf of David Wilson Homes	<p>In this response we will set out how we consider that there is a significant issue in Main Rural Centres meeting their housing need due to their Neighbourhood Plan's ('NP') failing to meet their proportion of the reserved sites requirement. If the Stratford-on-Avon Site Allocations Plan ('SAP') does not address this issue then there is a significant possibility that it will be found unsound at Examination.</p> <p>Policy CS.16 of the adopted Stratford-on-Avon Core Strategy ('CS') sets out that "reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031 "and 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 CS15". As one of the Main Rural Centres within the District, paragraph 6.6.21 of the CS states that a minimum of 510 dwellings are to be provided in Shipston-on-Stour over the plan period (2011 - 2031). This figure is considered to be a minimum in the CS.</p> <p>Policy CS.16 also highlights that reserve sites may need to be identified in the town in the SAD or NP. Policy HSG6 of the Submission version of the Shipston-on-Stour NP (October 2017) has proposed one reserve site on the edge of the settlement boundary for between 25-30 dwellings. In paragraph 278 of the CS Inspector's Report it states that "identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise". We do not consider that one reserved site in Shipston-on-Stour is in accordance with this statement. We are aware that in the NP Examiner's report, he considers that the minimum 510 requirement figure is indicative and that the proposed dwelling figures (which only amount to 9.3% of the envisaged requirement) is sufficient at this stage. We strongly object to this conclusion. Only providing 9.3% of the required housing will not provide the range of dwellings required to meet local needs and it will only increase the pressure on other Main Rural Centres in the District to meet this shortfall. In our response to Question 1.3 we set out how not meeting their proportion of the reserved sites</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>requirement in Shipston-on-Stour and other Main Rural Centres with 'made' NPs will put significant pressure on the Main Rural Centres without a 'made' NP to meet this shortfall. If the remaining Main Rural Centres do not meet the shortfall then the SAP will likely be found unsound at examination. It is imperative that the District Council address this issue in the SAP and allocate further reserved sites in Main Rural Centres, such as Shipston-on-Stour, which have failed to meet their proportion of the requirement in their NPs.</p> <p>In summary, allocating our client's land to the south west of Shipston-on-Stour will assist in providing a range of sites around the town to meet local housing needs and reduce the pressure on other Main Rural Centres (which may also involve Green Belt release) to provide dwellings which will not be provided in the Shipston-on-Stour if additional reserved sites are not allocated. If additional land is not identified and allocated as reserved sites in the Main Rural Centres then the District Council will face the possibility that the SAP will not be found sound at examination.</p>
27	DLP Planning on behalf of Coln Residential	<p>DLP approve of the approach to identify reserve housing sites in order to provide the LPA with flexibility and the ability to adapt to changing circumstances. Identifying such reserve sites will help the Council meet its agreed housing requirement, address unmet need arising in the Coventry and Warwickshire Housing Market Area (HMA) and/ or respond to the wider unmet need of the Greater Birmingham and Black Country HMA.</p> <p>As set out in paragraph 1.3.8 of the Core Strategy whilst neighbouring authorities plan to meet in full their identified housing needs within their own areas there are exceptions including both Birmingham and Coventry. For these LPA's evidence shows that identified housing needs over the period 2011-2031 will exceed capacity within each city. The Council acknowledges within the Core Strategy that, given the overlap between the HMAs, Stratford-on-Avon has a role to play in meeting the needs arising from the two areas.</p> <p>Stratford-on-Avon's adopted Core Strategy Policy CS.16 Housing Development states that the 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"> <li>• Stratford-upon-Avon: approximately 3,500 homes</li> <li>• Main Rural Centres: approximately 3,800 homes</li> <li>• New Settlement at Lighthorne Heath: approximately 2,300 homes</li> <li>• New settlement at Long Marston Airfield: approximately 2,100 homes</li> <li>• Local Service Villages: approximately 2,000 homes</li> <li>• Large Rural Brownfield Sites: approximately 1,245 homes</li> <li>• Other Rural Locations: approximately 750 homes</li> </ul> <p>As above, the strategy currently proposes 25.6% of future housing development to be located in the eight Main Rural Centres (MRC's) of Alcester, Bidford-on-Avon, Henley-in-Arden, Kineton, Shipston-on-Stour, Southam,</p>

No.	Source	Comment
		<p>Studley and Wellesbourne. Of those eight MRC's Wellesbourne has the largest population at 6,966 (Census 2011), with the other MRC's ranging between 2,074 (Henley-in-Arden) to 6,083 (Alcester). Considering Wellesbourne is the largest in terms of population, the Core Strategy has only specifically allocated 830 dwellings which represents just 5.1% of the overall planned housing growth to 2031.</p> <p>In terms of reserve sites Policy CS.16d states that "<i>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</i>". DLP would contend that the provision of reserve sites should be focused to those larger settlements in the hierarchy. It is understood from our discussions with officers at the Council that Stratford itself and other MRC's are likely to be the focus of reserve site allocations and therefore the percentage of housing identified on reserve sites in these locations will need to be larger than the proportion currently allocated e.g. greater than 25.6% for MRC.</p> <p>We have concern that some emerging Neighbourhood Plans are not identifying sufficient reserve sites and that the SAP should remedy this situation. This is not the case for all MRC as 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 and therefore does not appear to need further reserve sites allocated through the SAP.</p> <p>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 with a provisionally assessed capacity to support 342 dwellings. On this basis the WWNP is considered to be identifying insufficient reserve sites given its scale and position as one of the largest MRC's. This issue is further compounded by the availability and deliverability issues of the three identified reserve sites discussed in the following paragraphs.</p> <p>Review of Allocated Reserve Sites in the WWNP</p> <p>In our response to Walton and Wellesbourne's Neighbourhood Plan Regulation 16 Consultation DLP have further considered the issues surrounding the suitability of the currently chosen reserve sites, which further compounds the requirement to find more appropriate land to meet future potential need. A general review of the WWNP's 3 reserve sites has been included below, to demonstrate our concerns and highlight the pitfalls in leaving Neighbourhood Plans which have yet to be Made or fully considered through examination to deal with the</p>

No.	Source	Comment
		<p>significant issues of allocating reserve sites to respond to unmet need from outside the area and in this case Local Authority.</p> <p>Housing Reserve Site Area 1</p> <p>Reserve Site 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.</p> <p>Housing Reserve Site Area 2</p> <p>Reserve Site Area 2 is located to the east of Wellesbourne, adjacent to Area 3. It is clearly expressed in in Neighbourhood Planning Guidance and Legal Judgements that Neighbourhood Plans should not contain policy that arbitrarily restrict 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.</p> <p>The WWNP currently restricts Area 2 from coming forward until post 2030. DLP 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 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.</p> <p>Housing Reserve Site Area 3</p> <p>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 WWNP's own policy (and Stratford LPA's strategic policies) 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:</p> <ul style="list-style-type: none"> <li>• The site's release from allotment use does not support the NP objectives;</li> <li>• Loss of allotments are not supported by those who responded to the WWNP survey;</li> <li>• The loss of well used, valued and in demand allotments are contrary to adopted Core Strategy Policy CS25.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>On the basis of the above analysis it is questionable whether the current sites 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 consider that Land at Walton Road is a more suitable alternative/ addition and is available and developable to make a suitable reserve housing site.</p> <p>As set out in paragraph 1.6 of the Consultation document the SAP does not currently identify any potential reserve sites for which to comment although it does highlight sites will be considered in terms of their availability, suitability and achievability through an ongoing SHLAA Assessment process. With the focus being on the locations which are consistent with the distribution of housing development established in Policy CS.15 in the Core Strategy. DLP would again raise concerns in terms of a potential over-reliance on Stratford-upon-Avon in terms of delivering to the current need (24% of the total) and providing reserve sites.</p> <p>In terms of population Wellesbourne is largest Main Rural Centre (therefore falling just behind Stratford-upon-Avon) in terms of the hierarchy but currently is only considering the allocation of 342 dwellings (of which all are questionable in terms of actual availability and deliverability). Taking out Area 2 which the Neighbourhood Plan itself does not consider coming forward prior to 2030 (and therefore unlikely to respond to any unmet need during the Plan period) the Plan has only identified 92 dwellings as potential reserve sites (3%) of additional 2,920 as required.</p>
28	Hunter Page on behalf of Spitfire Bespoke Homes	<p>Initially, the Site Allocations Plan's main purpose was to identify non-strategic housing sites to supplement the allocations identified in the Core Strategy and meet the objectively assessed housing needs of <u>at least</u> (our underlining) 14,600 dwellings.</p> <p>Since this time as at March 31<sup>st</sup> 2017 the Council has stated that provision has been made for 16,200 homes through completions, permissions and strategic allocations. It is therefore believed that the context for the site allocations plan has changed such that it no longer needs to allocate non-strategic housing sites, but primarily focus identifying reserve housing sites in accordance with <b>policy CS.16 (d)</b> which sets out the phasing and delivery of housing sites within the district. The four issues to be considered as part of the site allocations plan are now:</p> <ol style="list-style-type: none"> <li>1. Approach to identifying Reserve Housing Sites</li> <li>2. Definition of Settlement (Built Up Area) Boundaries</li> <li>3. Proposed approach in relation to specific sites</li> <li>4. Provision for Self-Build and Custom Housebuilding</li> </ol> <p>The soundness of this approach is questioned given that the 14,600 figure is a minimum requirement (our underlining) as identified in the Core Strategy at <b>policy CS.16</b>. In supposedly meeting and going beyond this</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>figure by providing 16,200 homes completions, permissions and strategic allocations have been included. This creates an over reliance on the strategic sites being delivered.</p> <p>Furthermore, in accordance with National Planning Policy at <b>paragraph 47</b>, Local Planning Authorities are required to “boost significantly” and maintain a five year deliverable supply of housing land. The Council should therefore not become complacent in their approach to removing non-allocated housing sites given that the numbers are currently looking healthy. Looking at the Council’s own adopted <b>policy CS.15</b> focuses on the distribution of development in the district and advocates a dispersed approach in accordance with the wide range of sustainable locations within the district. It also particularly recognises that provision should be made for some new houses in villages across the district which will have minimal impact on their character whilst helping to sustain their future offering wider housing choice and competition.</p> <p>By removing the requirement for smaller scale site allocations, this restricts the level of growth identified to come forward at the smaller settlements, reducing their opportunities for growth and in accordance with <b>paragraph 55</b> of the National Planning Policy Framework, reducing their capability to enhance or maintain the vitality of rural communities. This point is reinforced at <b>paragraph 17</b> of the NPPF and the Core Planning Principles one of which seeks to support thriving rural communities within the countryside to meet their housing needs and support development. Therefore, in order for a positively prepared approach to housing delivery to be undertaken, non-strategic allocations particularly in smaller villages should be explored. It is however acknowledged that this position may have been different if the Council had not been subject to such a high number of recent S.78 appeals which have resulted in disproportionate growth in certain areas, removing the capability for further growth in others.</p> <p>In light of the above it is considered that additional sites need to be brought forward and the proposed development on land at Bearley Mill is considered to be a suitable development opportunity.</p>
29	Sworders on behalf of Mrs Mac	<p>Paragraph 1.1 does not acknowledge that the housing requirement set out within the CS is expressed as a minimum, in that ‘at least’ 14,600 dwellings need to be provided by 2031. This is to ensure that the supply of housing is significantly boosted, as required by paragraph 47 of the NPPF.</p> <p>As such a more diverse approach to allocating appropriate sites for residential development should be adopted.</p>
30	Birmingham City Council	<p>We understand the scale of housing provision now made through completions, commitments and allocations has more than met the housing requirement of 14,600 dwellings specified in the adopted Core Strategy. Consequently, the primary focus of the SAP will now be on the identification of reserve housing sites in accordance with the provisions of Policy CS.16(D).</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Core Strategy Policy CS.16 requires the SAP to identify Reserve Housing Sites capable of meeting 20% of the housing requirement to 2031 i.e. around 2,920 homes. The purpose of which is to 'provide flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA).'</p> <p>We agree that it is not within the purpose of the SAP to release strategic Green Belt land for Reserve Housing Sites. A local plan review would be the correct mechanism to review the Green Belt or the need for additional housing growth. It would also be the correct mechanism to consider the findings of the recently published Strategic Housing Growth Locations Study.</p> <p>It will be useful to reference the Strategic Housing Growth Locations Study and other emerging evidence in the SAP in the context for considering a review of the plan.</p> <p>In conclusion, Birmingham City Council supports the overall approach to the SAP and the method for identifying Reserve Housing Sites.</p>
31	Simon Ward (Propernomics)	<p>Agree with para 1.2 that there are always risks that some sites with planning permission will not get built or that additional housing needs arise that need to be met within the District. Furthermore, the NPPF requires plans to include flexibility to adapt to changing circumstances. It is important to avoid an undersupply of housing.</p> <p>Regarding LSVs, Policy CS15D rightly recognises that development may be appropriate within BUABs or otherwise within the physical confines of LSVs. It would not be correct to infer from para 2.8 that development at LSVs should be confined to BUABs; this would fetter the ability of suitable sites to come forward.</p> <p>Policy AS.10 (a) and (b) also recognise that development can occur on land within or adjacent to a village, and whether within the BUAB or within the physical confines of the village.</p> <p>Furthermore, as suggested by para 3 of Appendix 1 (LSV Methodology), there continues to be a role for LSVs to meet both local needs and demand for market housing from new households, including those moving into the District - this remains the case.</p>
32	Margaret Phillips	<p>Congestion was identified as a key sustainability issue (sustainability appraisal paragraph 3.13 table 3.1) The Neighbourhood Development Plan has already recognised that congestion in Stratford-upon-Avon 'has reached serious proportions that are a threat to residents and the local economy (NDP Paragraph 10.4)</p>
33	Carol Allen	<p>New settlements should not be allowed unless they have good transport links.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Traffic congestion in or about towns should not be allowed. Stratford already has a major traffic problem. Town cramming has an effect on the attractiveness of the town and its community.</p>
34	Shipston-on-Stour Parish Council	<p>This is a response to "Part 1-The approach to identifying Reserve Housing Sites" and to "Part 3-The proposed approach towards Specific Sites".</p> <p>Shipston-on-Stour Town Council confirms that the only sites identified and supported for reserve housing, beyond those applications already approved, are as stated in the Submission Version of our Neighbourhood Plan, which is currently with the Examiner. The stated sites are;</p> <ul style="list-style-type: none"> <li>• Land to the south of Oldbutt Road, bordering Hanson Track-Policy HSG6 of the Neighbourhood Plan. It's expected this will deliver between 25 to 30 C3 dwellings. Agents acting for the landowners have proposed that the site be slightly enlarged to accommodate up to 50 C3 dwellings, but no further details have yet been provided.</li> <li>• Land at the Ridgeway, at the south east of Shipston, bordering the London Road. This is an edge of settlement site-Policy HSG7 of the Neighbourhood Plan. It's expected this will deliver 18 C3 dwellings. A planning application has already been made to SDC (17/02741/FUL).</li> </ul> <p>The Core Strategy provides for a minimum of 510 C3 dwellings in Shipston. There are in progress developments for at least 610, which already have approved planning consent, with several pending applications which could take the number as high as 670. In addition, there are approximately 100 C2 dwellings approved, being constructed or completed.</p> <p>At a meeting of Shipston Town Council during 2017, Councillor Chris Saint reported that development sites, previously refused planning consent, wouldn't be included with any updated reserve housing plan. Should this now prove to be inaccurate, we request that any selection criteria rank such sites below others.</p> <p>We believe that stronger weight should be placed on those sites where there are identified contributions to the local infrastructure improvements, over and above the required CIL contributions.</p> <p>As a designated Main Rural Centre, we provide a range of local facilities and services. Our infrastructure is already at or near capacity. Without additional funding to address this key issue, we can't accommodate further development without significant investment above and beyond any local CIL expectations.</p> <p>Should SDC propose that further reserved housing sites are to be allocated in Shipston, we would expect the quantity of dwellings to be adjusted to make allowance for the number already approved, over and above the Core Strategy minimum of 510.</p>

No.	Source	Comment
		<p>In addition, we request that any proposal by SDC which will potentially increase still further the number of dwellings in Shipston, or increase the reserved sites beyond those stated in the draft neighbourhood plan, should be discussed with the town council at an early stage to ensure we have a mutually agreed response.</p>
35	Woolf Bond Planning on behalf of Rockspring Barwood Southam	<p>Adopted Core Strategy Policy CS16 (Housing Development) sets out a requirement for <b>at least</b> 14,600 additional homes to come forward over the period 2011 to 2031. Paragraph 6.7.20 supporting the overarching strategy for the provision of housing states:</p> <p><b>'Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about 1,100 homes are to be provided in the town over the plan period. Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period'</b> (Our emphasis).</p> <p>The housing requirement to be met across the District is clearly expressed as a minimum figure. It follows that the Site Allocations Plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It is relevant that the average number of dwellings delivered in Stratford-on-Avon District over the past six recorded years (2011/12 to 2016/17) comprises 588 dwellings per annum. This compares to the ambitious <b>minimum</b> housing target of 730 dwellings per annum contained in the adopted Core Strategy. It follows that there is a need to insert substantial flexibility into the emerging Site Allocations Plan in order to meet such ambitious housing targets. As drafted the plan fails to identify adequate additional supply to supplement that identified in the Core Strategy and fails both the effective and justified tests of soundness for this reason.</p> <p>Information from the Council (dated August 2017) indicates that 130 dwellings had been completed in Southam between April 2011 and March 2017 with planning permission for a further 950 dwellings. The officer in determining the outline application on part of the site accepted that all 175 dwellings proposed in the outline application were appropriate since the 1,100 dwellings requirement set by the Core Strategy was a minimum. Any delays in delivering homes from currently identified sites will necessitate the identification of further land and given the acceptance that the 1,100 figure was a minimum, it is appropriate that further sites must be allocated in Southam to ensure that the minimum target is achieved. This should include the subject site to the west of Southam lying to the north and south of Welsh Road West.</p> <p>In addition, Core Strategy Policy CS16 (section D) requires:</p> <p><b>'The Site Allocations Plan will identify Reserve Housing Sites providing flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in</b></p>

No.	Source	Comment
		<p><b>the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). 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.'</b></p> <p>Consequently, as well as allocating sites additional housing development to meet the unmet needs of other Local Planning Authorities located elsewhere in the Coventry and Warwickshire Housing Market Area, the Site Allocations Local Plan should allocate sites to meet the unmet needs of other Housing Market Areas. Of particular importance is the unmet need of Birmingham City, especially given the Authorities Monitoring Report 2015/16 (Map 1) clearly demonstrates how the Birmingham Housing Market Area includes parts of Stratford upon Avon District.</p> <p>Therefore, the unmet needs of both the Birmingham and Coventry &amp; Warwickshire Housing Market Areas should be addressed within the Site Allocations Local Plan to ensure it accords with the requirements of the Core Strategy.</p> <p>Stratford-upon-Avon should make a contribution towards the unmet housing need of the Birmingham Housing Market Area given the clear recognition that the district lies within this area. GL Hearn's "Greater Birmingham Strategic Housing Market Study - Strategic Growth Study" (February 2018) provides an assessment of the extent of un-met need within the Birmingham housing market area and it states (table 2) that there is a shortfall of at least 28,150 dwellings (2011-31) or 60,855 (2011-36) across the whole market area, based upon the approach of the study regarding deliverable sources of supply together with un-met needs for Coventry &amp; Warwickshire which also require resolution.</p> <p>The scale of unmet need in Coventry City was acknowledged in the recent Coventry Local Plan 2011 - 2031 Inspector's Report (dated October 2017):  <b>'A Memorandum of Understanding (MoU)4 on the level and distribution of housing across the HMA has also been signed by each of the local authorities apart from NBBC. This Council has committed to reviewing the extent of its land availability as part of an updated Strategic Housing Land Availability Assessment (SHLAA) and may sign the agreement at a later date. The MoU sets out the Objectively Assessed Need (OAN) for housing for each local authority within the HMA. The local authorities accept that Coventry City Council is unable to accommodate its full housing need within its own administrative boundary. As such, the MoU sets out the agreed distribution of the shortfall within Coventry to the other local authorities in the HMA. Each local authority signed up to the agreement is committed to ongoing co-operation and engagement in relation to the delivery of housing for the HMA. The MoU and joint SHLAA have been an important component of the assessment of the capacity of the City to accommodate new housing'</b> (paragraph 14).</p>

No.	Source	Comment
		<p>The above confirms that alongside other Local Planning Authorities, Stratford-on-Avon District is bound to provide a material contribution towards the recently identified unmet needs of Coventry City Council. Paragraph 23 of the Inspector’s Report identifies a need across the HMA for 85,440 dwellings over the 2011 to 2031 period. The same paragraph also makes reference to an individual objectively assessed need for Coventry City Council comprising 42,400 dwellings over the same period:</p> <p><b>‘Taking into account adjustments made to support economic growth and to improve affordability, the C&amp;W joint SHMA 2015 Update identifies a full objectively assessed need (OAN) for housing in Coventry and Warwickshire of 85,440 homes over the Local Plan period of 2011 - 2031 (4,272 homes per annum). At the local authority level Coventry’s full OAN over the Plan period is identified as 42,400 or 2,120 homes per annum’</b> (paragraph 23).</p> <p>Paragraph 58 of the Inspector’s Report goes onto note that Coventry City can only deliver 24,600 homes inside its own boundary:</p> <p><b>‘Policies DS1 and H1 make provision for 24,600 homes but Policy DS2 and the reasoned justification says that the Council will work with its neighbouring authorities within its HMA to support delivery of the development needs that originate from the City. In the case of Coventry, it is anticipated that the full OAN will be met and positively planned for in partnership with the 5 neighbouring authorities within the HMA. This is set out in the Plan and the Coventry and Warwickshire Housing Requirements MOU23’</b> (paragraph 58).</p> <p>Consequently there is a residual unmet need of 17,800 dwellings arising from Coventry City to be met elsewhere in the HMA. In addition, the Government’s recent “Planning for the right homes in the right places: consultation proposals” (September 2017) document consulted on a number of potential changes to national planning policy and guidance. One measure included a consultation upon a new standardised methodology towards calculating local housing need. This identified a yet higher housing need figure for Coventry City when compared to the recently adopted Local Plan although the converse arises for Birmingham.</p> <p>Given Stratford-upon-Avon is within both the Birmingham and the Coventry &amp; Warwickshire Housing Market Areas, in line with Core Strategy policy CS.16, the Site Allocations document must allocate site which will contribute towards addressing un-met needs for both areas.</p> <p>There are three important points that arise from the above discussion. First, the Stratford-on-Avon District Core Strategy housing requirement is a <b>minimum</b> housing requirement. Second, the District housing requirement is an ambitious one when compared to historic delivery rates that are circa 33% lower than the necessary future housing requirement. However notwithstanding these relevant points there is an imperative requirement placed</p>

No.	Source	Comment
		<p>upon the Council to contribute towards the recently identified substantial unmet needs of other authorities as acknowledged in the Core Strategy, including both Coventry City together the with Greater Birmingham housing market area. It follows that in order to meet all four tests of soundness, it is imperative that a substantially increased number of housing allocations are proposed in the emerging Site Allocations DPD. For the reasons discussed logically such additional housing development should occur at Southam (a defined Main Rural Centre).</p> <p>For the above reasons, it follows that a flexibility must be inserted into the resulting identified supply in order to meet these minimum needs. However and in addition, there is a fundamental need to identify a substantial body of additional housing sites so to ensure the Site Allocations document provides for positive planning and responds to the substantial needs occurring from the wider Coventry City and Greater Birmingham Housing Market Area that have only become evident post the adoption of the Core Strategy in 2016. A failure to do so will result in breaching all four tests of soundness.</p>
<p><b>Officer Response</b></p> <p>Some of the comments made under this heading do not need a response as they are of a factual or observational nature, or do not relate to the scope of the Site Allocations Plan. The following comments do require a specific response:</p> <p>Nos. 3/7/8 – a wide range of locations have been assessed, including the suitability of a further new settlement. In respect of Stratford-upon-Avon, traffic and other issues have been considered in relation to identifying reserve sites on the edge of the town.</p> <p>Nos.6/18 – it should be borne in mind that the purposes of reserve sites are identified in Policy CS.16. Provision has already been made to meet the housing requirements of the District up to 2031 as things stand. Housing to meet local needs can be provided on rural exception sites in any case.</p> <p>No.10 - the Core Strategy Examination Inspector acknowledged that LSVs should be considered in identifying reserve sites, although this should take into account their character and the scope to provide affordable housing.</p> <p>No.20/34 – consideration has been given to the reasons why planning permission was refused previously on certain sites. Where these reasons cannot be overcome satisfactorily it would not be appropriate to identify such sites.</p> <p>No.21 – the four purposes of reserve sites were established through the Core Strategy examination process and endorsed by the Inspector. It is emphasised that sites granted planning permission are not counted towards the reserve sites allowance, although an appropriate cut-off date will need to be applied whereby permissions granted after that date do count towards the 20% allowance. It should be recognised that provision has already been made in the District which is well in excess of the housing requirement established in the Core Strategy. A wide range of reserve sites will be identified, in terms of size and location, in order to provide flexibility to deliver more dwellings if needed to meet one or more of the four purposes.</p>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>No.22 - the four purposes of reserve sites were established through the Core Strategy examination process and endorsed by the Inspector and it is clearly not the case that the reserve sites are only focused on the Coventry and Warwickshire Housing Market Area. The District Council has already committed to start reviewing the Core Strategy in 2020 in accordance with Policy CS.17. The role of reserve sites is to provide scope for further housing development if justified against the four purposes specified in Policy CS.16 until the Core Strategy has been reviewed. It should be noted that some provision has been made within the current plan's housing requirement to meet the needs arising from outside the District, including from Birmingham.</p> <p>Nos.23/25/29 – it should be noted that in reality about 15,600 dwellings have already been provided during the plan period (as at 31 March 2018).</p> <p>No.26/27/34 - careful consideration will need to be given as to whether reserve housing sites should be identified in those settlements covered by 'made' Neighbourhood Plans that have also identified such sites. This should take into account the specific purposes of reserve sites given in each Neighbourhood Plan to gauge whether they are consistent with the purpose of reserve sites as specified in Policy CS.16.</p> <p>No.28 – it is acknowledged that not all of the sites contributing to the current housing supply will be delivered. One of the purposes of reserve sites is to be able to respond to a situation where the five year supply is not being maintained. A range of sites have been assessed as potential reserve sites, including many of a small-scale nature on the edge of Local Service Villages.</p> <p>No.30 – it would be appropriate to make reference to the Strategic Growth Study relating to locations for future development associated with Greater Birmingham and the Black Country.</p> <p>No.35 – the purpose and scale of reserve housing sites are clearly established in Policy CS.16. Housing supply continues to be provided over and above the 14,600 homes identified as the housing requirement over the plan period, and it currently stands at over 15,600. It is the role of reserve sites to be available for release if further dwelling provision is justified should one or more of their purposes identified in Policy CS.16 apply at some point. Two of these purposes relate to the unmet needs of areas outside Stratford District. It should be noted that the housing requirement of 14,600 dwellings already includes an allowance for meeting the needs of Coventry and Birmingham. A review of the Core Strategy will address the issue of additional housing needs that derive from outside the District, in accordance with Policy CS.17.</p> <p>Material and comments submitted in relation to specific sites have been assessed as part of the process of identifying proposed reserve housing sites.</p>
		<p><b>Officer Recommendation</b></p> <p>Make reference in the Site Allocations Plan to the Strategic Growth Study relating to Greater Birmingham and the Black Country and any subsequent progress on this matter.</p>

**Topic: Part 1 Reserve Housing Sites - Question 1.1 Green Belt**

No.	Source	Comment
1	David Booth	Maintaining the green belt is of benefit to the country as a whole protecting the environment, stopping the coalescence of built up areas, Visual amenity and providing feel good open space. Just examples not a comprehensive list.
2	Steve Taylor (Set Design)	Housing sites in Green Belt should be identified and allocated, especially where, as in the case of Snitterfield, the Neighbourhood Plan has identified insufficient sites to meet the projected housing numbers associated with its status as an LSV.
3	Anna Corser	We really must hang onto green belt land for future generations
4	Bruton Knowles on behalf of Nigel Ward	This is not required as there are other suitable sites available that are in a sustainable location (ie. Land at Evesham Road).
5	Susanne Farmer	The SAP should not be held up by a Green Belt Review.
6	Paul Clark	Support – no comment
7	Councillor Justin Kerridge	I don't think green belt should be considered for reserve sites.
8	Tim Sharples	Green belt land is valuable but extenuating circumstances can lead to small, permitted development if there is a strong enough case. It should not be used for large developments which could damage the integrity of the area.
9	Stratford Ramblers	Support – no further comment
10	Fenny Compton Parish Council	Support – no further comment
11	Priors Marston Parish Council	Support – no further comment
12	WYG on behalf of Church Commissioners for England	Should it be possible to identify a sufficient level of sites to meet the 20% requirement for reserve sites in the most sustainable locations it may not be necessary to release Green Belt land. However, this will depend on the conclusions of a sustainability appraisal and further site assessment work which, we understand, is to follow initially through the preparation of a strategic housing land availability assessment.
13	Alderminster Parish Council	Alderminster Parish Council agrees that the Site Allocations Plan should not release Green Belt land for reserve housing sites.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
14	Jayne Whitaker on behalf of Mr and Mrs TW Whitaker	The broad strategy states that it is not intended that the SAP will identify reserve sites within the Green Belt, however the allocation of sites ALC3 and REDD.2 and other developments have already contravened this so it is inconsistent to exclude other small suitable brownfield / infilling windfall sites within the greenbelt (such as site STUD703) which are directly adjacent to BUAB and will have very low impact on the surrounding area.
15	Paul Dunster	Where possible brown field sites should be used.
16	Hampton Lucy Parish Council	It is important that the Green Belt is protected from development as far as possible because it forms an important role in the provision of undeveloped land and protects existing farmland from development.
17	H Farmer	The Site Allocations Plan should not be held up by a Green Belt Review.
18	RPS on behalf of Taylor Wimpey	<p><b><u>Assessment of Options for Potential Growth</u></b></p> <p>The recently published Greater Birmingham HMA Strategic Growth Study (February 2018), concluded that there is an outstanding minimum shortfall of 60,900 dwellings to 2036 across the Birmingham HMA (paragraph 1.23). The Study identified 24 areas of search for strategic development, including an area of search referred to in Table 4 of the report as Area) 18 South east of Redditch, Stratford-on-Avon District, for an urban extension.</p> <p><b><u>The need for Safeguarded Land at Redditch</u></b></p> <p>The adopted Redditch Local Plan No 4 (January 2017) recognises that there is limited land availability and little choice about the locations for development within the Borough (paragraph 3.6) and this is reiterated in paragraph 39.6. Due to insufficient land within Redditch Borough to meet housing needs, Policy 4 Housing Provision in the Redditch Local Plan states that some cross boundary growth will be required. As already referenced in the answer to Part 1 of this comment form, Paragraph 6.14.1 of the adopted Stratford Core Strategy states that “<i>There is an expectation that Bromsgrove District and Stratford-on-Avon District would have to play a role in meeting the future housing and employment needs of Redditch due to capacity constraints within the town itself</i>”. There is therefore a need for the Site Allocations Plan to identify safeguarded land now on the edge of Redditch and consider all options for potential growth.</p> <p><b><u>Assessment of Green Belt</u></b></p> <p>When considering potential release of Green Belt land, this should be compared against the purposes of Green Belt as set out in the NPPF. Where sites are at the lower end of the scale in terms of their overall performance against Green Belt purposes, then it may be appropriate to release such land.</p> <p><b><u>Coventry and Warwickshire Joint Green Belt Study (2016)</u></b></p> <p>The Coventry and Warwickshire Joint Green Belt study which was published in April 2016 considered the extent and importance of particular areas to the Green Belt. The site falls within area RE6 on the map extract below.</p>

No.	Source	Comment
		<p><u>Green Belt Assessment of RE6</u></p> <p>As can be seen from this map extract, when compared to the surrounding areas BE6 scores relatively well (low) on its contribution towards the Green Belt which indicates that it would be potentially one of the more favoured areas for development. The document states that area RE6 “scores relatively low due to the limited contribution the parcel makes to purpose 2” (paragraph 4.41). The parcel is not only close to Mappleborough Green but is also only 7.5km away from Henley on Arden. Therefore the document concludes that “the lit residential streets, carparks and commercial buildings have an urbanising influence on the countryside within the western half of the parcel” (paragraph 4.41) and that the area does not contribute to the setting or special character of a historic town (paragraph 4.42).</p> <p><b><u>Assessment of Green Belt as set out in the Greater Birmingham HMA Strategic Growth Study</u></b></p> <p>With regard to the south east of Redditch (Location UE5), the report states <i>“Bordering open countryside to the southeast, development would have no effect on the strategic function of the Green Belt. Whilst largely being defined by the A435, the urban edge in this location is somewhat fragmented with various examples of historic and more modern development intruding into the rural hinterland. An appropriate scale of extension is uncertain at this stage and in any case would require the definition of an external boundary to limit sprawl into open countryside and potential issues with local coalescence (such as with Studley) to be addressed”</i> (paragraph 8.112). <i>“This area is not constrained by any nationally significant constraints, aside from a section of land covered by Flood Zone 3. There are a small number of Scheduled Ancient Monuments in close proximity to the Area of Search. The area is situated on the urban edge of Redditch, in line with the development model criteria set out in Table 43, which provides a range of existing facilities”</i> (paragraph 8.113).</p> <p>The appendix to the report <a href="http://www.solihull.gov.uk/Portals/0/Planning/Greater-Birmingham-HMA-Strategic-Growth-Study-Appendices-Standard.pdf">http://www.solihull.gov.uk/Portals/0/Planning/Greater-Birmingham-HMA-Strategic-Growth-Study-Appendices-Standard.pdf</a> contains some analysis about Purpose 3 of the Green Belt - safeguarding the countryside from encroachment. With regard to the south east of Redditch around Mappleborough Green, the report states <i>“whilst development associated with Redditch is largely contained to the east beyond the A435, the land which is part of wider open countryside to the east (parcel 838) exhibits some evidence of incremental change (particularly at the junction of the A435 and the A4189 Henley Road) (RPS emphasis).</i></p> <p><b><u>Summary</u></b></p> <p>Land at Haye Lane, Mappleborough Green is within an area that is at the lower end of the scale in terms of its performance against Green Belt purposes and has already exhibited some evidence of incremental change. The promotion of the site would be to the east of Mappleborough Green and therefore would not affect the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		coalescence between Mappleborough Green and Redditch. Therefore, the site should be considered as a reserve site.
19	PJS Development Solutions Ltd on behalf of Gloucester Diocesan Board of Finance	Yes. A Sites Allocation Plan should not release Green Belt sites. The need for Green Belt releases, and the merits of specific proposed releases, is a significant strategic Planning issue that sits more appropriately at the Core Strategy level. There exists a wide range of opportunities for smaller scale releases (and reserve sites) at settlements outside of the Green Belt.
20	Long Compton Parish Council	Agree with the decision to exclude Green Belt but urge that AONB should additionally be excluded. Core Strategy is clear that protection of AONB should receive the highest priority in planning decisions; it is unreasonable that a higher level of protection should be afforded to green belt areas - which, definitionally, cover areas of lower national landscape and townscape significance.
21	Paul Quinney	Support – no further comment
22	Priors Marston Parish Council	Yes – no further comment
23	Tyler-Parkes Partnership on behalf of Mr James McBride	<p>1. Our Client does not agree that the SAP should not release Green Belt land for reserve housing sites.</p> <p>2. Recently adopted Stratford-on-Avon Core Strategy Policy CS.16.D states that the SAP will identify 'Reserve Housing sites' to ensure the District can meet in full its agreed housing requirement. The policy explains the circumstances when reserve housing sites will be released, including: 'To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District.'</p> <p>3. The 'Greater Birmingham Housing Market Area (HMA) Strategic Growth Study', published February 2018, explains that North Warwickshire and Stratford-on-Avon Districts 'fall within an area of overlap between the Birmingham and Coventry/Warwickshire HMA' and therefore potential strategic areas of search for urban extensions and/or new settlements have been identified in the study within Stratford-on-Avon as well as in the other local authority areas in the HMA. The Study suggests that there is a need to find land capable of accommodating approximately 60,900 dwellings up to 2036.</p> <p>4. One of the approaches proposed in the study suggests that local authorities should be looking at 'proportionate dispersal' of housing <u>within</u> and beyond the Green Belt and looking at other small-scale development opportunities (our emphasis). The study recognises the importance of identification of dispersed and smaller-scale development sites as well as the strategic opportunities. It recognises that the strategic sites are very much a longer-term potential development prospect and there is also a short and medium term outstanding housing land shortfall and a need to identify and bring new housing allocations in the short-term.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>5. The 'Greater Birmingham Housing HMA Strategic Growth Study', builds on the Housing White Paper, February 2017, proposals to encourage greater use of small sites, and the Budget 2017. The National Planning Policy Framework (NPPF) Draft text published for consultation on 5th March 2018 proposes that local planning authorities should ensure that at least 20% of the sites allocated for housing in their plans are of half a hectare or less.</p> <p>6. Therefore, our Client recommends the following bullet point be added to the broad strategy on page 10:</p> <ul style="list-style-type: none"> <li>• Given the imperative to identify reserve sites for the short, medium and longer-term, it would be appropriate to undertake a Green Belt Review and, where appropriate, identify land for release from the Green Belt for reserve housing sites, particularly smaller and medium sized sites.</li> </ul>
24	Bidford-on-Avon Parish Council	Although we agree with the principle of a Green Belt and that it should be protected, we believe that the current allocation should be reviewed and updated to ensure other town and villages, not protected by the Green Belt, are not subject to urban sprawling and overdevelopment.
25	Stephen Jones	If Built Up Areas do not have a BUAB but are sustainable and appropriate they should not be considered as green belt if the proposed site is infill (i.e. bounded by built on land on three sides for example).
26	Tony Buckingham	<p>There are many LSVs situated in GB that could / should accommodate additional housing by virtue of being defined as such. LSVs are by definition supported in the adopted Core Strategy (CS) as sustainable locations for future development. In many instances (Snitterfield for example) the Neighbourhood Plan has drawn a boundary so tight as to actively preclude future development. This is against the driving principle of the NPPF and undermines the LSV categorisation.</p> <p>Thus, additional sites on the periphery of the village (but still within its physical confines) should be identified to at least meet the minimum requirement for future housing numbers identified in the CS. In effect and as a minimum, reserve sites should be released from GB to meet the appropriate LSV projected numbers.</p>
27	RPS on behalf of Miller Homes	<p>This should be considered in a site or settlement by settlement basis. Where for example settlements are wholly surrounded by Green Belt such as Alcester or land on the edge of Redditch then Exceptional Circumstances exist to warrant removal of land from the Green Belt and safeguarded for suture development.</p> <p>However, where settlements are partially contained by Green Belt (Stratford) then non Green Belt sites should be considered first.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		When considering potential release of Green Belt land, this should be compared against the purposes of Green Belt as set out in the NPPF. Where sites are at the lower end of the scale in terms of their overall performance against Green Belt purposes, then it may be appropriate to release such land. Land to the east of Jacksons Meadow and to the north west of Waterloo Road appeal site is not located within the Green Belt.
28	Kate Bryan	Support – no further comment
29	Martin Grubb	The council should plan to maintain greenfield sites - only consider using them once all brown field sites have been totally expended.
30	Ladbrook Park Golf Club	LPGC consider that such land, within or abutting existing settlements in locations well served by transport and community facilities, should be considered for Green Belt release. The scale of release should be appropriate to the size of the settlement. A policy that is too restrictive, particularly in the LSVs, is not necessarily healthy for prosperity to maintain local facilities whether they be public or private. A reserve site designation provides the Council control to grant planning permission in the future if circumstances become appropriate. Wood End village for example, is near the A435 and M42, also the village is served by Wood End station on the Birmingham to Stratford Upon Avon line. A range of community facilities exist in Wood End and neighbouring Earlswood and Tanworth in Arden. The three settlements are so close that they operate as one settlement.
31	Reuben Bellamy	<p>The final bullet point in the SAP misrepresents the comments of the Core Strategy Inspector. What he actually said in paragraph 279 is: "It follows, noting the imperative to identify reserve sites [69], that it would seem to be unlikely that the SAP MUST be informed by a Green Belt review. Although it is understood that there is a concurrent Green Belt review, it is a matter for the Council to consider rather than it being appropriate to force the Council's hand in the manner that has been suggested." It is therefore a matter for the Council whether or not it decides to undertake a Green Belt review in order to identify sites. No is no Core Strategy requirement NOT to undertake a review. The Core Strategy does not precede Green Belt sites from being allocated as reserve sites, providing they meet the settlement strategy set out in CS15 and CS16. It is our strong opinion that the allocation of reserve sites should be informed by a fine-grain green belt review.</p> <p>The Inspector commented on the concern about dispersal to the LSVs that currently lie outside the Green Belt, and the implied criticism that the quantum of development allotted to and committed in these non-green belt LSVs villages is in danger of conflicting with Policy CS16. This means that the bulk of the reserve sites will be at Stratford upon Avon itself and the Main Rural Centres. Without a Green Belt review that means that the green belt MRCs (Henley and Studley) will not take anything like their fair share. At a high level, the only trainline in the District lies within the Green Belt. Development along this transport corridor would provide an opportunity for non-car based travel for commuters into Stratford upon Avon, Solihull and Birmingham City Centre - all major employment areas and the likely generators of the need for which the reserve sites are required. This cannot be said for Southam or Shipston, for example. Paragraph 30 of the NPPF states that, in preparing local</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>plans, Local Planning Authorities should support a pattern of development which facilitates the use of sustainable modes of transport. Paragraph 35 says plans should protect and exploit opportunities to use sustainable modes of transport for the movement of goods or people.</p> <p>It is also clearly recognised that, for rural communities to thrive, they need managed growth. Paragraph 55 of the NPPF states that promoting sustainable development in rural areas means locating housing where it would enhance or maintain the vitality of rural communities. It is worth considering 2 examples to make the point that under the current policy the needs of the rural communities in the Green Belt are not being met.</p> <p>1) Henley in Arden has a Primary and Secondary School, numerous businesses and shops, and a train station with a high quality service to Stratford and Birmingham. It is also on a high quality bus route. It is smaller than other MRCs due to the application of green belt policies over 30 years but is still sizeable at just under 3000 occupants. Yet, at 2017, it has 125 built and committed dwellings compared to 774 for Bidford, 1080 for Southam and 828 for Wellesbourne, none of which has a secondary school or a train station.</p> <p>2) There are a number of Category 2 LSVs in the Green Belt. Wilmcote has 11 built and committed dwellings, Wotton Wawen 27, Claverdon 8, Earlswood 3. All of these villages are rail connected. In contrast, the figure for Welford is 116, Stockton 101, Fenny Compton 108, Newbold 95 - none of these villages is rail connected.</p> <p>Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. The need for housing land is a common exceptional circumstance. As intimated by the Core Strategy Inspector, simply adding reserve sites to dispersed settlements that have already received a considerable amount of growth will not comply with CS16 and be unsustainable. While there a small number of non green belt villages the have not had their CS16 suggested requirement, these would not meet the number of dwellings required by the reserve site policy. There are huge infrastructure implications of further expansion to Stratford and the non-Green Belt MRCs which the reserve site policy will need to explore. For these reasons, it is not considered that the whole of the reserve site requirement can be accommodated outside the green belt.</p> <p>Paragraph 84 of the NPPF also states that Local Planning Authorities should take account of the need to promote sustainable development patterns when reviewing green belt boundaries. This includes the consequences of channelling development to locations beyond the green belt boundary. Such an assessment will need to be made as part of the SA consideration of options. Given the problems identified in the SA scope of congestion and air quality, it is pretty clear what the implications of ignoring the potential of the green belt will be, given the origin of the need for reserve sites.</p>
32	Richard Robotham	<p>There are many LSVs situated in GB that could / should accommodate additional housing by virtue of being defined as such. LSVs are by definition supported in the adopted Core Strategy (CS) as sustainable locations for future development. In many instances (Snitterfield for example) the Neighbourhood Plan has drawn a boundary so tight as to actively preclude future development. This is against the driving principle of the NPPF and undermines the LSV categorisation. Thus, additional sites on the periphery of the village (but still within its</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		physical confines) should be identified to at least meet the minimum requirement for future housing numbers identified in the CS. In effect and as a minimum, reserve sites should be released from GB to meet the appropriate LSV projected numbers.
33	Rickett Architects on behalf of Mr and Mrs Hartley	There is a need for greater flexibility and Green Belt releases can be highly sustainable.
34	Rickett Architects on behalf of Mr and Mrs Johns	Green Belt sites can provide greater flexibility and sustainability.
35	Clifford Chambers and Milcote Parish Council	Support – no further comment
36	Delta Planning on behalf of AC Lloyd Homes Ltd	<p>We write this representation on behalf of our client A C Lloyd Homes to support a call for sites submission of land at Spernal Lane, Great Alne submitted in November 2017.</p> <p>Within the Core Strategy, Great Alne is classified as a category 3 Local Service Village (LSV) and is regarded as being a suitable and sustainable location for some new housing. Policy CS.16 allocates approximately 2,000 dwellings to LSVs and allows up to 59 new homes in Great Alne between 2011 and 2031. So far there has only been 1 new home built in the village and a residential development of 17 dwellings was permitted in September 2017 (permission ref: 16/03610/FUL). Therefore, Great Alne has capacity for an additional 41 dwellings. The Maudsley Park development (169 C2 units) is not considered to count towards the Great Alne housing figure.</p> <p>It is considered that the Site Allocations Plan should include consideration of the release Green Belt sites such as land at Spernal Lane to provide reserve housing sites. Of the 45 LSVs meet their future housing needs. The SAP should therefore identify suitable reserve housing sites in the Green Belt villages to give local communities and developers a degree of certainty about where future residential development should be located. The SAP does not need to be informed by a fresh Green Belt review in order to identify small reserve housing sites. We note that the Coventry &amp; Warwickshire Joint Green Belt Study was carried out in 2016.</p> <p>Within the Inspector's report into the Core Strategy, the Inspector acknowledges that, <i>"around half of the 400 dwellings in category 4 LSVs have planning permission within the first quarter of the life of the CS, and that identification of Built Urban Area Boundaries might reveal other opportunities... It should however be underlined that this change does not prevent the SAP from allocating reserve sites in LSVs and this is dealt with elsewhere [277]. There is nothing to prevent sustainable sites in LSVs coming forward but the Plan-led approach means that there is no need to identify such sites now."</i></p> <p>At Paragraph 277 the Inspector identifies that within the Local Plan Interim Conclusions concerns were raised about, <i>"the level of dispersal to LSV's, together with raised thresholds for affordable housing that, in contrast to</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p><i>a more focussed approach, might not maximise the delivery of affordable housing, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP."</i></p> <p>However, the Core Strategy is clear that LSVs are suitable locations for new housing development with the allocation of 2,000 homes distributed between 45 villages. The position as at 31 March 2016 is that 1,981 dwellings have planning permission in LSVs. However, the housing requirement outlined in Policy CS.16 is a minimum and it does not impose a cap on housing numbers.</p> <p>Furthermore, although a site is designated as Green Belt land this does not mean that it is not a sustainable location for future residential development. Within villages houses prices are often unaffordable and young people are unable to buy houses in their local area. Subsequently, this has an impact on the viability of village services and facilities, especially schools. For example, in September 2017 the Council allowed the release of Green Belt land to meet local housing needs in Great Alne for a residential development comprising of 7 affordable houses and 10 market houses (permission ref: 16/03610/FUL). This planning permission demonstrates that affordable housing can be delivered in LSVs.</p>
37	Harris Lamb on behalf of Bovis Homes	<p>Yes. Removing land from the Green Belt would not be in conformity with the requirements of the Core Strategy. The Core Strategy's principal policy on guiding development within the Green Belt is policy CS10 - Green Belt, This policy does not allow the Site Allocations Plan to revise the Green Belt boundaries The Strategic Objective of the policy states that the Green Belt will be protected from inappropriate development. There is, therefore, no policy 'hook' in the Core Strategy to allow for the Site Allocations Local Plan to review the Green Belt boundaries. If the Site Allocations Plan were to suggest Green Belt land release it would be in conflict with the Core Strategy.</p> <p>Section 9 of the Framework advises that Green Belt boundaries should only be altered in 'exceptional circumstances (paragraph 83). We are of the view that exceptional circumstances cannot be demonstrated if there are non-Green Belt sites available that are suitable for allocation as Reserve Housing Sites.</p> <p>It is also our understanding that the Council have not undertaken a Green Belt Review. There is, therefore, no evidence base to support Green Belt land release.</p>
38	Steve Taylor (Set Design)	<p>There are many LSVs situated in GB that could / should accommodate additional housing by virtue of being defined as such. LSVs are by definition supported in the adopted Core Strategy (CS) as sustainable locations for future development. In many instances (Snitterfield for example) the Neighbourhood Plan has drawn a boundary so tight as to actively preclude future development. This is against the driving principle of the NPPF and undermines the LSV categorisation.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Thus, additional sites on the periphery of the village (but still within its physical confines) should be identified to at least meet the minimum requirement for future housing numbers identified in the CS. In effect and as a minimum, reserve sites should be released from GB to meet the appropriate LSV projected numbers.
39	Star Planning and Development on behalf of Richborough Estates	It is appropriate for the SAP not to release land from the Green Belt to accommodate reserve housing sites. Land is available outside the Green Belt at sustainable settlements such as Bidford on Avon which include potential sites that are available, suitable and achievable for housing purposes.
40	Andrew Granger and Co. on behalf of Henson Family	<p>It is our view that it is not possible to rule out the release of Green Belt land for reserve housing sites until all options for future development have been fully considered. The Scoping and Initial Options document infers that Green Belt land should not be released by the Site Allocations Plan and this is a view supported by the Inspector's Report for the Core Strategy Examination. We believe that this is an incorrect interpretation of the Inspector's comments. Paragraph 279 of the Report states the following:</p> <p><i>'The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken. It follows, noting the imperative to identify reserve sites that it would seem to be unlikely that the SAP must be informed by a Green Belt review'</i></p> <p>As such, it is our interpretation that whilst the Inspector suggests that a review of the Green Belt is not a necessity of the SAP, it does not infer that it should not be considered as an option.</p> <p>In light of unmet needs arising across the housing market area, we believe that it may be beneficial to conduct a Green Belt review of sites adjacent to settlements identified within the Core Strategy as being sustainable; particularly adjacent to Stratford upon Avon. This would ensure that the preferred option(s) moving forward have been fully justified and appropriately assessed against all alternatives and as such will meet the tests of soundness.</p>
41	Framptons on behalf of HIA Developments Ltd	<p>It is submitted that in the context of the housing crisis, and the severity in the affordability of housing in Henley in Arden, that a focussed review of the Green Belt should be undertaken.</p> <p>The planning system is intended to be socially inclusive. It is simply unacceptable within the social dimension of sustainable development to deny access to home ownership within Henley in Arden consequential upon the Green Belt acting like a tourniquet to housing growth. The constraint on delivery of new housing at a settlement that is highly sustainable in terms of access to urban facilities, and transport links, simply drives up house prices and 'snuffs out' the ability of many households to access home ownership within the town.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Paragraph 1.7 of the SAP Revised Scoping and Initial Options document appears to suggest that undertaking a focussed review of Green Belt is too difficult or too time consuming. Firstly, it is submitted that such a claim is false. Undertaking a review of Green Belt boundaries around Henley in Arden to identify suitable housing sites would not be a major task to undertake. In Henley in Arden there are some fundamental constraints to directions of growth for example a flood plain and the heritage environment. As such the opportunities to identify potential releases of land from the Green Belt are relatively limited.</p> <p>Secondly, it cannot be a sustainable position for a LPA to suggest that the opportunity for households to aspire to home ownership in Henley in Arden should be denied to them - because resisting the release of land from the Green Belt is of paramount importance.</p> <p>The provision of land to meet sustainable development is the master of Green Belt policy - not the slave of Green Belt policy. This Site Allocations Plan should fully recognise the social injustice caused by the failure of the planning system to adequately provide sufficient land to meet housing needs - including affordable housing. This social injustice is particularly acute and unjust at Henley in Arden. The rigid application of Green Belt policies has only well served those who have the resources to have acquired property. Those households who are unable to meet rising housing prices or access to home ownership are left behind. This situation is socially unjust - and is capable of being addresses by a simple planning exercise in reviewing Green Belt boundaries around the town to accommodate some new housing.</p> <p>The plan attached to this submission identifies a site which would be suitable for housing - with a substantial provision of affordable housing which is consistent with the provision of the draft NPPF.</p>
42	Caroline Dunster	<p>Green Belt land should only be used as a last resort. Brown-field sites should be used where-ever possible, as in the majority of cases new development would be an improvement on under-used and derelict brown-field land.</p>
43	Harris Lamb on behalf of Alamo	<p>Yes. Removing land from a Green Belt would not be in conformity with requirements of the Core Strategy. The Core Strategy's principal policy regarding development within the Green Belt is Policy CS 10 - Green Belt. This policy does not allow the Site Allocations Plan to revise the Green Belt boundaries. The Strategic Objectives of the policy state that the Green Belt will be protected from inappropriate development. There is, therefore, no policy "hook" in the Core Strategy to allow for the Site Allocations Local Plan to review the Green Belt boundaries. If the Site Allocations Plan were to suggest Green Belt land release, it would be in conflict with the Core Strategy.</p> <p>Section 9 of the Framework advises that Green Belt boundaries should only be altered in "exceptional circumstances" (Paragraph 83). We are of the view that the exceptional circumstances cannot be demonstrated if a non-Green Belt site is available that is suitable for allocation as Reserved Housing Sites.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		It is also our understanding that the Council have not undertaken a Green Belt review. There is, therefore, no evidence base to support Green Belt land release.
44	Savills on behalf of Magdalen College	<p>The proposed approach of the SAP in respect of Green Belt release is consistent with relevant national policy guidance which clearly states that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. It is supported that, unless exceptional circumstances exist, Green Belt land should not be released for reserve housing sites.</p> <p>The College considers that the release of Green Belt land for reserve housing sites should not take precedence over the release of other available greenfield sites which may otherwise be available for housing delivery across the District. It is also noted that the appropriate mechanism for the release or review of existing Green Belt designations is through a comprehensive review of the strategic policies of the Local Plan for the District, rather than the SAP.</p>
45	Brian Tarmey	<p>The NPPF sets out that there are exceptions to the rule that new buildings are inappropriate in the Green Belt. One exception being for the provision of affordable housing. This point is strengthened in the revised draft NPPF which sets out:</p> <p><i>144. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</i></p> <p><i>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);</i></p> <p>Whilst it is recognised that this policy is only draft it shows a clear direction of travel and intent from the Government and must be given due weight. The Stratford-on-Avon Core Strategy 2011-31 sets out that affordable housing is a priority to enable people to stay in their local area.</p> <p><i>1.2.10 Stratford District is a very desirable area to live and it attracts affluent households particularly from the South-East and from elsewhere in the West Midlands. As a result, property prices are high and many people, especially the young and lower paid, cannot afford to live within or move in to the District. This makes the provision of affordable housing a priority so that people are able to stay in their local area, close to family and jobs. Getting the right balance between the pressure for housing from incoming households and meeting the needs of local people is a key challenge.</i></p> <p>On this basis I believe that it would be appropriate and in line with both local and national policy to release small green belt sites on the edge of settlements for the development of affordable homes.</p>
46	Stansgate on behalf of Mr H Rashleigh	<p>In summary, Green Belt sites should be considered to:</p> <ul style="list-style-type: none"> <li>• Ensure development is directed towards sustainable locations;</li> </ul>

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Meet local needs;</li> <li>• Ensure any overspill from the conurbation is met close to where that need arises;</li> </ul> <p>To embrace the recommendation of the GL Hearn Strategic Growth Study in respect of a new settlement focused on Danzey Green.</p> <p>The aim of the Development Plan is to facilitate the provision of new homes where they are needed in a sustainable manner. A large proportion of the Stratford area is washed over by the Green Belt and within those areas the strategy can currently provide only limited housing in accordance with Green Belt policy (CS10). This is leading to the stagnation of certain settlements and an imbalance in the district contrary to the dispersal strategy along with the closure of local services and facilities, and an increase in house prices in Green Belt settlements. The only way to stem this problem is to provide additional housing to those Green Belt settlements. There is no capacity within their boundaries so reserve site allocations is the best way to achieve this.</p> <p>The Framework seeks to direct housing to sustainable locations. The current policy of avoiding Green Belt locations means that large amounts of housing have been directed to only parts of the District, with little to some of the most sustainable settlements, such as Alcester and Henley in Arden, as well as some of the larger villages. This imbalance needs to be resolved to ensure development is directed to the most sustainable locations in the future and not just those outside the Green Belt.</p> <p>The Core Strategy indicates that reserve sites will be released in four circumstances and the search for sites must relate to these circumstances. One such circumstance is to contribute to meeting any housing need arising from a shortfall beyond the Coventry and Warwickshire Housing Market Area (HMA) that is accepted through cooperation between councils. This is referring to meeting the shortfall of the Birmingham conurbation. Provision of housing to meet a shortfall from another area must be provided close to the area where the need arises, in this case Birmingham and meaning any provision must be in the north of the District, regardless of whether this is Green Belt or not.</p> <p>In February 2018 a Strategic Growth Study by GL Hearn commissioned by the 14 authorities of the Greater Birmingham and Black Country HMA was published. Stratford on Avon is one of the 14 authorities commissioning the Study. The Study recommends a strategy to meet the shortfall which focuses on a number of sites throughout the HMA and identifies one opportunity in the District which is a new settlement 'South of Birmingham', shown on plan as focused on Danzey Green. This is in the Green Belt.</p> <ul style="list-style-type: none"> <li>• In respect of GL Hearn, whilst the district council are under no obligation to accept the recommendations, as one of the commissioning authorities and in accordance with Duty to Cooperate, the opportunity needs to be investigated. The recommendations have been arrived at based on a series of technical studies that</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>highlighted 24 locations for further consideration. In appraising the locations, five key criteria influence shortlisting and prioritisation:</p> <ul style="list-style-type: none"> <li>• Ability to meet housing needs - as the unmet need is particularly that of Birmingham the geographic relationship to and distance of locations from it is an important consideration;</li> <li>• Impact on the Green Belt - making a distinction between locations which are within and outside the Green Belt. The Green Belt study is high level and identifies areas that make a 'principal contribution' or a 'supporting contribution.'</li> <li>• Sustainability - drawing from the SA undertaken to identify the best performing locations, and excluding those with 'significant negative outcomes' against one or more of the SA objectives; New settlements perform best in this assessment. Urban extensions and proportionate dispersal show less positive results. Urban extensions would not support economic self-containment and lead to commuting whilst dispersal would not support employment led development.</li> <li>• Public Transport - for strategic development, the accessibility to public transport and particularly to the rail network, is a particularly important consideration within the wider sustainability of different development options; and</li> <li>• Deliverability - drawing together analysis to comment on the relative market attractiveness and delivery challenges associated with different strategic development locations.</li> </ul> <p>As a result of the appraisal, 11 locations including 'South of Birmingham' are recommended for further investigation. Alongside this submission, a Call for Sites Proforma is submitted with a parcel of land opposite Danzey Green Station.</p> <p>A Green Belt Review is needed to find appropriate Reserve Sites.</p>
47	Tim Pollard	<p>I agree that greenbelt land should be preserved, however, I would not object to redevelopment of 'brownfield' sites within the greenbelt, e.g. farm/agricultural/industrial sites.</p> <p>I also believe that areas of open land within the town boundaries should also be protected with the same rigour as greenbelt.</p>
48	Cerde Planning on behalf of Gervayne Properties	<p>Section 9 of the National Planning Policy Framework sets out the Government's stance in relation to the green belt. Paragraph 79 states that <i>"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</i></p> <p>Paragraph 83 of the NPPF states that ' Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in <b>exceptional circumstances</b>, through the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>Further to the policy above, the Government have reiterated the importance of protecting Green Belts in the 2017 Housing White Paper - Fixing our Broken Housing Market. Despite identifying that there is a significant need to increase the number and delivery of new housing, the Government stated <i>“we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have <b>examined fully all other reasonable options</b> for meeting their identified development requirements”</i>.</p> <p>The Government have continually reiterated that Green Belts are of significant importance and should be protected unless very special circumstances occur when determining planning applications and exceptional circumstances occur when preparing and drafting a local plan.</p> <p>Policy CS.16.D requires the release of reserve sites in a number of circumstances which are addressed as follows.</p> <p>The first circumstance is the release of land in order to rectify a shortfall in housing delivery to maintain a five year housing land supply.</p> <p>The Planning Practice Guidance states at Paragraph:</p> <p>Reference ID: 3-033-20150327 that <i>“Unmet housing need... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”</i>.</p> <p>As releasing land in the Green Belt where a Local Planning Authority are unable to identify a five year housing land supply would not be considered very special circumstances, it therefore could not be considered that reviewing the Green Belt at the local plan stage to meet the aim of maintaining a five year housing land supply, could meet the exceptional circumstances required at Paragraph 83 of the NPPF.</p> <p>The second circumstance for the release of a reserve site would be to contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath.</p> <p>The Green Belt land within Stratford-on-Avon District is located on the western side of district to north and west of Stratford-upon-Avon. Gaydon Lighthorne Heath is located to the east of the district adjacent to the M40. In</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>relative proximity to the employment site are Main Rural Centres, Local Service Villages and alternative development opportunities capable of accommodating various levels of growth to cater for unforeseen housing requirements. Under the second circumstance for the release of reserve land, it would be illogical for this to be located to the west of the district away from the area in which the needs arises.</p> <p>The third circumstances for the release of a reserve site would be to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA.</p> <p>This circumstance seeks to deal with the need arising from the known inability of the existing settlements in the HMA to cater for the required growth. The Coventry and Warwickshire HMA incorporates the eastern side of the district, north of the A422. This area of the district not only forms part of, but is well connected to, the wider areas of the Coventry and Warwickshire HMA by virtue of the M40 and several 'A' classified roads.</p> <p>In close proximity to the M40 are Main Rural Centres, Local Service Villages and alternative development opportunities which could cater for additional housing requirements arising from the Coventry and Warwickshire HMA. In this circumstance, it would be illogical to consider reviewing sites within the Green Belt when there are sufficient sites outside the Green Belt.</p> <p>The fourth circumstances for the release of a reserve site would be to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA.</p> <p>The fourth circumstance seeks to plan for levels of growth derived from the housing need from other housing market areas; primarily Birmingham. Given the lack of assessment and agreement between the authorities of the Greater Birmingham and Black Country HMA so far to identify the most sustainable locations for growth to meet the unmet need of the HMA, it is not possible to demonstrate exceptional circumstances and full examination of all other options that would allow for a Green Belt review.</p> <p>In light of the national policy and Government stance in relation to Green Belt protection and the circumstances in which the SDC would seek to release sites as set out in Policy CS.16.D, there are <b>reasonably available and deliverable sites outside of the designated Green Belt</b> which could meet any previously unidentified need. Therefore, it is considered that a review of the Green Belt at this stage would be unnecessary and unjustified. It is not considered that at this stage the Council have examined fully all other reasonable options which would justify the release of Green Belt land.</p>
49	Cerdea Planning on behalf of Kler Group	<p>Section 9 of the National Planning Policy Framework sets out the Government's stance in relation to the green belt. Paragraph 79 states that <i>"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</i></p>

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		<p>Paragraph 83 of the NPPF states that ' Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in <b>exceptional circumstances</b>, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>Further to the policy above, the Government have reiterated the importance of protecting Green Belts in the 2017 Housing White Paper - Fixing our Broken Housing Market. Despite identifying that there is a significant need to increase the number and delivery of new housing, the Government stated „we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have <b>examined fully all other reasonable options</b> for meeting their identified development requirements“.</p> <p>The Government have continually reiterated that Green Belts are of significant importance and should be protected unless very special circumstances occur when determining planning applications and exceptional circumstances occur when preparing and drafting a local plan.</p> <p>Policy CS.16.D requires the release of reserve sites in a number of circumstances which are addressed as follows.</p> <p>The first circumstance is the release of land in order to rectify a shortfall in housing delivery to maintain a five year housing land supply.</p> <p>The Planning Practice Guidance states at Paragraph:</p> <p>Reference ID: 3-033-20150327 that <i>“Unmet housing need... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt“.</i></p> <p>As releasing land in the Green Belt where a Local Planning Authority are unable to identify a five year housing land supply would not be considered very special circumstances, it therefore could not be considered that reviewing the Green Belt at the local plan stage to meet the aim of maintaining a five year housing land supply, could meet the exceptional circumstances required at Paragraph 83 of the NPPF.</p>

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		<p>The second circumstance for the release of a reserve site would be to contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath.</p> <p>The Green Belt land within Stratford-on-Avon District is located on the western side of district to north and west of Stratford-upon-Avon. Gaydon Lighthorne Heath is located to the east of the district adjacent to the M40. In relative proximity to the employment site are Main Rural Centres, Local Service Villages and alternative development opportunities capable of accommodating various levels of growth to cater for unforeseen housing requirements. Under the second circumstance for the release of reserve land, it would be illogical for this to be located to the west of the district away from the area in which the needs arises.</p> <p>The third circumstances for the release of a reserve site would be to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA.</p> <p>This circumstance seeks to deal with the need arising from the known inability of the existing settlements in the HMA to cater for the required growth. The Coventry and Warwickshire HMA incorporates the eastern side of the district, north of the A422. This area of the district not only forms part of, but is well connected to, the wider areas of the Coventry and Warwickshire HMA by virtue of the M40 and several 'A' classified roads.</p> <p>In close proximity to the M40 are Main Rural Centres, Local Service Villages and alternative development opportunities which could cater for additional housing requirements arising from the Coventry and Warwickshire HMA. In this circumstance, it would be illogical to consider reviewing sites within the Green Belt when there are sufficient sites outside the Green Belt.</p> <p>The fourth circumstances for the release of a reserve site would be to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA.</p> <p>The fourth circumstance seeks to plan for levels of growth derived from the housing need from other housing market areas; primarily Birmingham. Given the lack of assessment and agreement between the authorities of the Greater Birmingham and Black Country HMA so far to identify the most sustainable locations for growth to meet the unmet need of the HMA, it is not possible to demonstrate exceptional circumstances and full examination of all other options that would allow for a Green Belt review.</p> <p>In light of the national policy and Government stance in relation to Green Belt protection and the circumstances in which the SDC would seek to release sites as set out in Policy CS.16.D, there are <b>reasonably available and deliverable sites outside of the designated Green Belt</b> which could meet any previously unidentified need. Therefore, it is considered that a review of the Green Belt at this stage would be unnecessary and unjustified. It</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>is not considered that at this stage the Council have examined fully all other reasonable options which would justify the release of Green Belt land.</p>
50	Cerda Planning on behalf of Braemar Property Developments	<p>Section 9 of the National Planning Policy Framework sets out the Government’s stance in relation to the green belt. Paragraph 79 states that <i>“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”</i></p> <p>Paragraph 83 of the NPPF states that ‘ Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in <b>exceptional circumstances</b>, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>Further to the policy above, the Government have reiterated the importance of protecting Green Belts in the 2017 Housing White Paper - Fixing our Broken Housing Market. Despite identifying that there is a significant need to increase the number and delivery of new housing, the Government stated <i>„we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have <b>examined fully all other reasonable options</b> for meeting their identified development requirements“.</i></p> <p>The Government have continually reiterated that Green Belts are of significant importance and should be protected unless very special circumstances occur when determining planning applications and exceptional circumstances occur when preparing and drafting a local plan.</p> <p>Policy CS.16.D requires the release of reserve sites in a number of circumstances which are addressed as follows.</p> <p>The first circumstance is the release of land in order to rectify a shortfall in housing delivery to maintain a five year housing land supply.</p> <p>The Planning Practice Guidance states at Paragraph:</p> <p>Reference ID: 3-033-20150327 that <i>“Unmet housing need... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt“.</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>As releasing land in the Green Belt where a Local Planning Authority are unable to identify a five year housing land supply would not be considered very special circumstances, it therefore could not be considered that reviewing the Green Belt at the local plan stage to meet the aim of maintaining a five year housing land supply, could meet the exceptional circumstances required at Paragraph 83 of the NPPF.</p> <p>The second circumstance for the release of a reserve site would be to contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath.</p> <p>The Green Belt land within Stratford-on-Avon District is located on the western side of district to north and west of Stratford-upon-Avon. Gaydon Lighthorne Heath is located to the east of the district adjacent to the M40. In relative proximity to the employment site are Main Rural Centres, Local Service Villages and alternative development opportunities capable of accommodating various levels of growth to cater for unforeseen housing requirements. Under the second circumstance for the release of reserve land, it would be illogical for this to be located to the west of the district away from the area in which the needs arises.</p> <p>The third circumstances for the release of a reserve site would be to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA.</p> <p>This circumstance seeks to deal with the need arising from the known inability of the existing settlements in the HMA to cater for the required growth. The Coventry and Warwickshire HMA incorporates the eastern side of the district, north of the A422. This area of the district not only forms part of, but is well connected to, the wider areas of the Coventry and Warwickshire HMA by virtue of the M40 and several 'A' classified roads.</p> <p>In close proximity to the M40 are Main Rural Centres, Local Service Villages and alternative development opportunities which could cater for additional housing requirements arising from the Coventry and Warwickshire HMA. In this circumstance, it would be illogical to consider reviewing sites within the Green Belt when there are sufficient sites outside the Green Belt.</p> <p>The fourth circumstances for the release of a reserve site would be to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA.</p> <p>The fourth circumstance seeks to plan for levels of growth derived from the housing need from other housing market areas; primarily Birmingham. Given the lack of assessment and agreement between the authorities of the Greater Birmingham and Black Country HMA so far to identify the most sustainable locations for growth to meet the unmet need of the HMA, it is not possible to demonstrate exceptional circumstances and full examination of all other options that would allow for a Green Belt review.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>In light of the national policy and Government stance in relation to Green Belt protection and the circumstances in which the SDC would seek to release sites as set out in Policy CS.16.D, there are <b>reasonably available and deliverable sites outside of the designated Green Belt</b> which could meet any previously unidentified need. Therefore, it is considered that a review of the Green Belt at this stage would be unnecessary and unjustified. It is not considered that at this stage the Council have examined fully all other reasonable options which would justify the release of Green Belt land.</p>
51	Cerdea Planning on behalf of Darling Family Trust	<p>Section 9 of the National Planning Policy Framework sets out the Government's stance in relation to the green belt. Paragraph 79 states that <i>"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</i></p> <p>Paragraph 83 of the NPPF states that ' Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in <b>exceptional circumstances</b>, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>Further to the policy above, the Government have reiterated the importance of protecting Green Belts in the 2017 Housing White Paper - Fixing our Broken Housing Market. Despite identifying that there is a significant need to increase the number and delivery of new housing, the Government stated <i>"we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have <b>examined fully all other reasonable options</b> for meeting their identified development requirements"</i>.</p> <p>The Government have continually reiterated that Green Belts are of significant importance and should be protected unless very special circumstances occur when determining planning applications and exceptional circumstances occur when preparing and drafting a local plan.</p> <p>Policy CS.16.D requires the release of reserve sites in a number of circumstances which are addressed as follows.</p> <p>The first circumstance is the release of land in order to rectify a shortfall in housing delivery to maintain a five year housing land supply.</p> <p>The Planning Practice Guidance states at Paragraph:</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Reference ID: 3-033-20150327 that <i>“Unmet housing need... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.</i></p> <p>As releasing land in the Green Belt where a Local Planning Authority are unable to identify a five year housing land supply would not be considered very special circumstances, it therefore could not be considered that reviewing the Green Belt at the local plan stage to meet the aim of maintaining a five year housing land supply, could meet the exceptional circumstances required at Paragraph 83 of the NPPF.</p> <p>The second circumstance for the release of a reserve site would be to contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath.</p> <p>The Green Belt land within Stratford-on-Avon District is located on the western side of district to north and west of Stratford-upon-Avon. Gaydon Lighthorne Heath is located to the east of the district adjacent to the M40. In relative proximity to the employment site are Main Rural Centres, Local Service Villages and alternative development opportunities capable of accommodating various levels of growth to cater for unforeseen housing requirements. Under the second circumstance for the release of reserve land, it would be illogical for this to be located to the west of the district away from the area in which the needs arises.</p> <p>The third circumstances for the release of a reserve site would be to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA.</p> <p>This circumstance seeks to deal with the need arising from the known inability of the existing settlements in the HMA to cater for the required growth. The Coventry and Warwickshire HMA incorporates the eastern side of the district, north of the A422. This area of the district not only forms part of, but is well connected to, the wider areas of the Coventry and Warwickshire HMA by virtue of the M40 and several ‘A’ classified roads.</p> <p>In close proximity to the M40 are Main Rural Centres, Local Service Villages and alternative development opportunities which could cater for additional housing requirements arising from the Coventry and Warwickshire HMA. In this circumstance, it would be illogical to consider reviewing sites within the Green Belt when there are sufficient sites outside the Green Belt.</p> <p>The fourth circumstances for the release of a reserve site would be to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA.</p> <p>The fourth circumstance seeks to plan for levels of growth derived from the housing need from other housing market areas; primarily Birmingham. Given the lack of assessment and agreement between the authorities of</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>the Greater Birmingham and Black Country HMA so far to identify the most sustainable locations for growth to meet the unmet need of the HMA, it is not possible to demonstrate exceptional circumstances and full examination of all other options that would allow for a Green Belt review.</p> <p>In light of the national policy and Government stance in relation to Green Belt protection and the circumstances in which the SDC would seek to release sites as set out in Policy CS.16.D, there are <b>reasonably available and deliverable sites outside of the designated Green Belt</b> which could meet any previously unidentified need. Therefore, it is considered that a review of the Green Belt at this stage would be unnecessary and unjustified. It is not considered that at this stage the Council have examined fully all other reasonable options which would justify the release of Green Belt land.</p>
52	Gladman Developments	<p>Yes. Gladman believe there are an ample number of sites available outside of the Green Belt to meet the current levels of need that the plan will likely need to deal with (including unmet need from Birmingham). Whilst sustainable Green Belt release is an option that should be considered as part of plan making, Gladman contend that the first step should be to ensure that all reasonable non-Green Belt options have first been exhausted. Gladman are aware of a range of sites which could meet the needs of the plan without the need for Green Belt release.</p>
53	Mr N Gasson	<p>Due to the significant demand on housing, brownfield sites are unlikely to supply enough housing to meet this demand. As a result, Greenfield sites on the periphery of villages should be included in order to help meet the high demand.</p>
54	Boyer on behalf of Venta Developments	<p>It is agreed that the Council should exhaust all other options before they release Green Belt land for reserve housing sites. Given that just over one-fifth of the District is Green Belt land, there should be sufficient other land that is not designated as Green Belt to meet the level of reserve housing sites required by the District.</p> <p>This is echoed in draft National Policy where paragraph 136 of the draft National Planning Policy Framework (NPPF), published on 5 March 2018, states that, <i>'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development.'</i></p>
55	Cerdea on behalf of Morris Homes	<p>Section 9 of the National Planning Policy Framework sets out the Government's stance in relation to the green belt. Paragraph 79 states that <i>"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</i></p> <p>Paragraph 83 of the NPPF states that ' Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>established, Green Belt boundaries should only be altered in <b>exceptional circumstances</b>, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>Further to the policy above, the Government have reiterated the importance of protecting Green Belts in the 2017 Housing White Paper - Fixing our Broken Housing Market. Despite identifying that there is a significant need to increase the number and delivery of new housing, the Government stated <i>„we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have <b>examined fully all other reasonable options</b> for meeting their identified development requirements“.</i></p> <p>The Government have continually reiterated that Green Belts are of significant importance and should be protected unless very special circumstances occur when determining planning applications and exceptional circumstances occur when preparing and drafting a local plan.</p> <p>Policy CS.16.D requires the release of reserve sites in a number of circumstances which are addressed as follows.</p> <p>The first circumstance is the release of land in order to rectify a shortfall in housing delivery to maintain a five year housing land supply.</p> <p>The Planning Practice Guidance states at Paragraph:</p> <p>Reference ID: 3-033-20150327 that <i>“Unmet housing need... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt“.</i></p> <p>As releasing land in the Green Belt where a Local Planning Authority are unable to identify a five year housing land supply would not be considered very special circumstances, it therefore could not be considered that reviewing the Green Belt at the local plan stage to meet the aim of maintaining a five year housing land supply, could meet the exceptional circumstances required at Paragraph 83 of the NPPF.</p> <p>The second circumstance for the release of a reserve site would be to contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>The Green Belt land within Stratford-on-Avon District is located on the western side of district to north and west of Stratford-upon-Avon. Gaydon Lighthorne Heath is located to the east of the district adjacent to the M40. In relative proximity to the employment site are Main Rural Centres, Local Service Villages and alternative development opportunities capable of accommodating various levels of growth to cater for unforeseen housing requirements. Under the second circumstance for the release of reserve land, it would be illogical for this to be located to the west of the district away from the area in which the needs arises.</p> <p>The third circumstances for the release of a reserve site would be to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA.</p> <p>This circumstance seeks to deal with the need arising from the known inability of the existing settlements in the HMA to cater for the required growth. The Coventry and Warwickshire HMA incorporates the eastern side of the district, north of the A422. This area of the district not only forms part of, but is well connected to, the wider areas of the Coventry and Warwickshire HMA by virtue of the M40 and several 'A' classified roads.</p> <p>In close proximity to the M40 are Main Rural Centres, Local Service Villages and alternative development opportunities which could cater for additional housing requirements arising from the Coventry and Warwickshire HMA. In this circumstance, it would be illogical to consider reviewing sites within the Green Belt when there are sufficient sites outside the Green Belt.</p> <p>The fourth circumstances for the release of a reserve site would be to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA.</p> <p>The fourth circumstance seeks to plan for levels of growth derived from the housing need from other housing market areas; primarily Birmingham. Given the lack of assessment and agreement between the authorities of the Greater Birmingham and Black Country HMA so far to identify the most sustainable locations for growth to meet the unmet need of the HMA, it is not possible to demonstrate exceptional circumstances and full examination of all other options that would allow for a Green Belt review.</p> <p>In light of the national policy and Government stance in relation to Green Belt protection and the circumstances in which the SDC would seek to release sites as set out in Policy CS.16.D, there are <b>reasonably available and deliverable sites outside of the designated Green Belt</b> which could meet any previously unidentified need. Therefore, it is considered that a review of the Green Belt at this stage would be unnecessary and unjustified. It is not considered that at this stage the Council have examined fully all other reasonable options which would justify the release of Green Belt land.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
56	Kineton Parish Council	An exception to this would be where an area of greenbelt could deliver a sustainable development (e.g. edge of LSV) and an equal area of adjacent/contiguous land that is not currently categorised as greenbelt is substituted for the “lost” land.
57	Rosconn	Whilst in draft, paragraph 136 of the revised NPPF states that a strategic plan-making authority should have examined fully all other reasonable options for meeting its identified housing need for development prior to considering changes to Green Belt boundaries. This indicates the Government’s direction of travel in respect of Green Belt and in the context of this District, there are reasonable alternatives for the identification of reserve sites outside the Green Belt.
58	RCA Regeneration on behalf of Peter Drew Contracts	There are sufficient sites available in the District which can be released to meet housing need in the District without the need to undertake a Green Belt Review.
59	RCA Regeneration on behalf of Duchy Homes	There are sufficient sites available in the District which can be released to meet housing need in the District without the need to undertake a Green Belt Review.
60	RCA Regeneration on behalf of Alexander Stevens Construction	There are sufficient sites available in the District which can be released to meet housing need in the District without the need to undertake a Green Belt Review.
61	Berkeley Strategic Land	<p>The starting point of the Site Allocations Plan should not be to release Green Belt land for reserve housing sites, but rather give priority to brownfield land as per points 188(c) and 136 in the emerging NPPF 2018. It is the job of the Core Strategy, as the strategic plan, to amend Green Belt policy and once established, such policy should endure for the entirety of the plan period. Consequently it should not be within the remit of the SAP to amend the Green Belt.</p> <p>The council should seek to explore opportunities to allocate non-greenbelt sites in sustainable locations as alluded to in Core Strategy Policy CS.16. If and when the council has demonstrated that exceptional circumstances exist, as defined in point 134 of the emerging NPPF, then the council should review land within the Green Belt through the comprehensive review of the Local Plan.</p>
62	GVA on behalf of St Philips	We support the protection of Green Belt land for reserve housing sites in the Site Allocations Plan and would, instead, recommend that brownfield sites are reclaimed and redeveloped to help the Council meet its housing need, as outlined in Policy CS.16.D of the Core Strategy.
63	Mr G Cole	Paragraph 136 of the revised NPPF states that a strategic plan-making authority should examine fully all other reasonable options for meeting its identified housing need for development prior to considering changes to Green Belt boundaries. This indicates the Government’s position in respect of Green Belt and in the context of

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		this District, there are reasonable alternatives for the identification of reserve sites outside the Green Belt. As such a more diverse approach to allocating appropriate sites for residential development should be adopted.
64	Savills on behalf of David Wilson Homes	We support this. In accordance with the NPPF, Green Belt should only be released in exceptional circumstances. Shipston is considered to be one of the most sustainable locations in the District and one of few Main Rural Centres not the subject of major constraints such as Green Belt which can provide deliverable sites, such as our client's site, within Stratford-on-Avon which are outside of the Green Belt and adjacent to sustainable settlements which should be allocated first before Green Belt sites are considered.
65	DLP Planning on behalf of Coln Residential	<p>DLP fully support the position taken by Stratford-on-Avon to not allocate reserve housing sites in the Green Belt. This is in conformity with the Strategic Policies in the Core Strategy and wider policies and government stance as set out in the NPPF.</p> <p>Green Belt release required exceptions circumstances and DLP suggest there are sufficient sites available to deliver the required housing without the need to rely on unpopular Green Belt release. This is highlighted in paragraph 4.1.5 of the Core Strategy: "There are no reasons for extending the area covered by the Green Belt within Stratford-on-Avon District. Likewise, there is no justification for making a significant reduction to the current extent of the approved Green Belt. The Core Strategy sets out how the development requirements of the District can be met with only limited effect on the current extent of the Green Belt. No significant locational options affecting land in the Green Belt have been identified to meet the District's development requirements that would result in a more sustainable outcome than that put forward in this Plan".</p>
66	Hunter Page on behalf of Spitfire Bespoke Homes	<p>Spitfire does not agree with this position, where suitable brownfield sites are available within the Green Belt they should be released for housing - in line with the NPPF requirements set out in the core planning principles at <b>paragraph 17</b>, which encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. Furthermore, the partial or complete redevelopment of brown field land within redundant or continuing use which does not have a greater impact on the openness of the green belt, is considered to be appropriate development, as per <b>paragraph 89</b> of the NPPF. This approach is echoed in <b>policy CS.10</b> of the adopted Core Strategy.</p> <p>It is appreciated that there is often more harm associated with development within the open countryside rather than brownfield land within the Green Belt and therefore a bespoke assessment of each site should be undertaken rather than a blanket ban on allocating (reserved or otherwise) all sites within the Green Belt.</p> <p><b>Paragraph 118</b> of the draft NPPF consultation document notes that planning policies and decisions should:</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p><i>c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated and unstable land;</i></p> <p><i>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)</i></p> <p>Therefore, the promotion of brownfield sites within the greenbelt for housing is in line with the current direction of government policy.</p>
67	MJ Thorne	Green belt land often includes brownfield sites. These brownfield sites should be available for reuse. Planning policies should allow their inclusion in local development plans.
68	Framptons on behalf of Gallagher Estates	Gallagher Estates are neutral with regard to the release of Green Belt land for reserve housing sites within Stratford-on-Avon District. It is considered by Gallagher Estates that reserve housing sites should be identified in locations where there is a known demand for market and affordable housing, regardless of Green Belt designation.
69	Sworders on behalf of Mrs Mac	Paragraph 136 of the revised NPPF states that a strategic plan-making authority should examine fully all other reasonable options for meeting its identified housing need for development prior to considering changes to Green Belt boundaries. This indicates the Government's position in respect of Green Belt and in the context of this District, there are reasonable alternatives for the identification of reserve sites outside the Green Belt. As such a more diverse approach to allocating appropriate sites for residential development should be adopted.
70	LRM on behalf of Hallam Land Management	<p>Planning policy for Green Belt is defined in the National Planning Policy. Para 83 states:</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries <u>should only be altered in exceptional circumstances, through the preparation or review of the Local Plan</u>. At that time, authorities should consider the Green Belt boundaries having regard to their <u>intended permanence in the long term</u>, so that they should be capable of enduring beyond the plan period.</p> <p>In the instance of the Stratford-on-Avon Local Plan, the Green Belt was assessed through the Core Strategy process, with amendments made in light of the exceptional circumstances that exist in the District, having regard to the level of Objectively Assessed Need (OAN) and the need to accommodate development from the wider housing market areas.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Having undertaken this review, it is a reasonable expectation that the Green Belt boundary will now endure in the longer term. There is no provision within Policy CS.10 of the Core Strategy, or elsewhere, for the Green Belt to be further amended. The Site Allocations DPD is not a review of the Local Plan and any further amendment to the Green Belt through this process would be fundamentally at odds with Policy CS.10 of the Core Strategy which intends for the Green Belt to be protected from inappropriate development. As the Core Strategy Inspector noted "<i>The SAP was always envisaged to be a subsidiary Plan to the CS that would take a lead from it in terms of the spatial strategy</i>" (para 69); thus it would be wrong for the Site Allocations DPD to propose such a fundamentally different approach to the Green Belt.</p> <p>Para 85 of the NPPF states that:  <u>"when defining Green Belt boundaries, local planning authorities should inter alia where necessary, identify in their plans areas of safeguarded land"</u> between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period";</p> <p>Given this obligation on the LPA, the Green Belt review undertaken in preparing the Core Strategy would have considered the need for safeguarded land in order to ensure its permanence. No such safeguarded land was identified through the Core Strategy process. By implication, it must follow that the established requirement in the Core Strategy for reserve site allocations can be satisfied without the need to amend the Green Belt further.</p> <p>Without prejudice to the above, at Stratford-upon-Avon, the periphery of the town's urban area is subject to both Green Belt and non-Green Belt land. To preserve the permanence of the Green Belt, the preference must be to consider in the first instance those parts of the town that are not subject to the Green Belt policy and do not in any way contribute to the purposes of this designation.</p>
71	Warwickshire County Council	Any site release should accord with the NPPF on Green Belts. However, it is a matter for the District Council as the Local Planning Authority to balance and determine.
72	Pegasus on behalf of Rainier Developments	<p>Paragraph 1.7 of the consultation document notes that the focus of the site allocations process is on locations which are consistent with the distribution of housing development established in Core Policy CS.15 of the Core Strategy. This approach was supported by the examining Inspector, who also recommended several principles to take into account when identifying reserve sites, one of which being that '<i>given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review</i>'.</p> <p>This statement implies that a Green Belt Review will not be undertaken. Rainier Developments agree with the approach of the Core Strategy examining Inspector insofar that the Site Allocations Plan, as a daughter document to the Core Strategy, does not need to release Green Belt land for reserve housing sites. Therefore in line with the findings of the Core Strategy examining Inspector, Rainier Developments consider that there are</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		currently suitable locations for the identification of reserve sites outside of the Green Belt that would satisfy the criteria for releasing the reserve sites that are in general conformity with the adopted spatial development strategy.
73	Nexus Planning on behalf of Richard Mann	As identified within the Site Allocations Plan (SAP), the vast majority of the District is located outside of the Green Belt, including the southern and eastern edges of Stratford-upon-Avon and other sustainable settlements, such as Gaydon. Accordingly, it is considered that more than sufficient capacity is likely to exist within sustainable locations outside of the Green Belt to deliver the reserve housing site requirement. Therefore, until such time that the Council has undertaken a thorough and robust appraisal of all potential development options outside the Green Bel and found that insufficient capacity exists, it would not be possible to demonstrate that exceptional circumstances exist to justify altering the Green Belt boundaries in accordance with Paragraph 83 of the NPPF. To do so would result in the Plan being inconsistent with national policy, and unsound having regard to Paragraph 182 of the NPPF. It should also be noted that the Core Strategy Inspector concluded that it was unlikely that the SAP would need to be informed by the Green Belt review.
74	Nexus Planning on behalf of Mr Brightman	As identified within the Site Allocations Plan (SAP), the vast majority of the District is located outside of the Green Belt, including the southern and eastern edges of Stratford-upon-Avon and other sustainable settlements, such as Gaydon. Accordingly, it is considered that more than sufficient capacity is likely to exist within sustainable locations outside of the Green Belt to deliver the reserve housing site requirement. Therefore, until such time that the Council has undertaken a thorough and robust appraisal of all potential development options outside the Green Bel and found that insufficient capacity exists, it would not be possible to demonstrate that exceptional circumstances exist to justify altering the Green Belt boundaries in accordance with Paragraph 83 of the NPPF. To do so would result in the Plan being inconsistent with national policy, and unsound having regard to Paragraph 182 of the NPPF. It should also be noted that the Core Strategy Inspector concluded that it was unlikely that the SAP would need to be informed by the Green Belt review.
75	Nexus Planning on behalf of CEG and Mixed Farms	As identified within the Site Allocations Plan (SAP), the vast majority of the District is located outside of the Green Belt, including the southern and eastern edges of Stratford-upon-Avon and other sustainable settlements, such as Gaydon. Accordingly, it is considered that more than sufficient capacity is likely to exist within sustainable locations outside of the Green Belt to deliver the reserve housing site requirement. Therefore, until such time that the Council has undertaken a thorough and robust appraisal of all potential development options outside the Green Bel and found that insufficient capacity exists, it would not be possible to demonstrate that exceptional circumstances exist to justify altering the Green Belt boundaries in accordance with Paragraph 83 of the NPPF. To do so would result in the Plan being inconsistent with national policy, and unsound having regard to Paragraph 182 of the NPPF. It should also be noted that the Core Strategy Inspector concluded that it was unlikely that the SAP would need to be informed by the Green Belt review.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
76	Pegasus on behalf of Gallagher Estates	<p>Paragraph 1.7 of the consultation document notes that the focus of the site allocations process is on locations which are consistent with the distribution of housing development established in Core Policy CS.15 of the Core Strategy. This approach was supported by the examining Inspector, who also recommended several principles to take into account when identifying reserve sites, one of which being that '<i>given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review</i>'.</p> <p>Paragraph 1.8 of the consultation document confirms that it is not intended that the SAP will identify reserve sites within the Green Belt, in line with the Core Strategy Examiner's observation. This statement implies that a Green Belt Review will be overlooked wholly on the ground that it is considered to be an unduly lengthy exercise, rather than for any sound planning or sustainability grounds.</p> <p>Gallagher Estates neither supports nor opposes the release of Green Belt land for reserve housing sites within Stratford-on-Avon District. However, it is considered that reserve housing sites should be established in locations where market and affordable housing needs are identified.</p>
77	Barton Willmore on behalf of Taylor Wimpey	<p>We agree with the suggested approach of not releasing Green Belt land for allocation of reserve housing sites. In this instance, it is considered that there is adequate suitable, available and deliverable land without recourse to Green Belt release. The release of Green Belt land at this stage would not be consistent with the Adopted Core Strategy.</p>
78	DLP Planning on behalf of Talbot Homes	<p>In order to comply with Green Belt planning policies at the national and local level, Green Belt land should not be released for Reserve Housing sites.</p>
79	Barton Willmore on behalf of Cemex	<p>We agree with the suggested approach of not releasing Green Belt land for allocation of reserve housing sites. In this instance, it is considered that there is adequate suitable, available and deliverable land without recourse to Green Belt release. The release of Green Belt land at this stage would not be consistent with the Adopted Core Strategy.</p>
80	John Holden	<p>Support - Need to maximise use of brown site land</p>
81	Brodie Planning on behalf of Valefresco	<p>At this stage it is likely that there are sufficient sites available outside the Green Belt to meet the needs until 2031. If the Green Belt is to be considered then it would be a departure from the Core Strategy and a revised Green Belt Study would be required to understand the performance and function of areas of the Green Belt; this could delay the adoption of the SAP document. The Draft revised NPPF sets out that Green Belt boundaries should only be amended where it can be demonstrated that all other reasonable options for meeting the identified development needs have been examined fully.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		In the longer term the Green Belt will need to be examined further to potentially help to address the significant shortfall in the Birmingham HMA up to 2036 as identified in the Greater Birmingham I-II/IA Strategic Growth Study, GL Hearn and Wood Plc, February 2018.
82	Brodie Planning on behalf of Lioned	<p>At this stage it is likely that there are sufficient sites available outside the Green Belt to meet the needs until 2031. If the Green Belt is to be considered then it would be a departure from the Core Strategy and a revised Green Belt Study would be required to understand the performance and function of areas of the Green Belt; this could delay the adoption of the SAP document. The Draft revised NPPF sets out that Green Belt boundaries should only be amended where it can be demonstrated that all other reasonable options for meeting the identified development needs have been examined fully.</p> <p>In the longer term the Green Belt will need to be examined further to potentially help to address the significant shortfall in the Birmingham HMA up to 2036 as identified in the Greater Birmingham I-II/IA Strategic Growth Study, GL Hearn and Wood Plc, February 2018.</p>
83	Margaret Philips	The SAP should not be held up by a green belt review.
84	Carol Allen	Support – no further comment
85	Bev Atkinson	Green belt land should be protected to preserve the countryside.

**Officer Response**

Of the responses to this question, 57 agreed that reserve sites should not be identified in the Green Belt, whereas 23 thought they should be.

Main points made by those who agree that reserve sites should not be identified in the Green Belt:

- It is necessary to protect the environment, prevent the coalescence of settlements and preserve farmland from development
- There are available, suitable and achievable sites outside the Green Belt; on that basis there are no exceptional circumstances for altering Green Belt boundaries.
- The issue is strategic and should be addressed at Core Strategy level through a review of that Plan.
- Current Green Belt boundaries should endure for the entirety of the plan period.
- Identifying sites in the Green Belt would not be in conformity with the Core Strategy.
- A Green Belt Review has not been undertaken to provide a basis for amending its boundaries.

Response:

No.	Source	Comment
		<p>In his Final Report on the Core Strategy Examination, the Inspector inferred that it need not be necessary to identify reserve sites in the Green Belt (see para 279). The Scoping Document made it clear that the District Council did not intend to do so and there remains no apparent justification for changing its approach in this respect on the basis that sufficient provision can be made elsewhere in the District.</p> <p>Main points made by those who argue that reserve sites should be identified in the Green Belt:</p> <ul style="list-style-type: none"> <li>• Sites in Green Belt should be identified particularly where Neighbourhood Plans have identified insufficient sites.</li> <li>• Small sites, including brownfield and infilling, could be appropriate if there is a strong enough case and little impact on local area.</li> <li>• Land within the Green Belt will need to be identified based on the conclusions of the Greater Birmingham HMA Strategic Growth Study.</li> <li>• Would be appropriate where settlements are wholly surrounded by Green Belt such as Alcester or on the edge of Redditch.</li> <li>• Land abutting existing settlements and well served by public transport and community facilities should be considered.</li> <li>• Allocation of reserve sites should be informed by a fine-grain Green Belt review.</li> <li>• Not all of the reserve site requirement can be accommodated outside the Green Belt due to infrastructure constraints.</li> <li>• LSVs in the Green Belt should be considered by virtue of being defined as sustainable locations for development.</li> <li>• Reserve sites should be identified in LSVs in the Green Belt in order to meet required dwelling numbers.</li> <li>• Sites in the Green Belt can be highly sustainable.</li> <li>• Should identify suitable reserve sites in the Green Belt to give communities and developers certainty about future development.</li> <li>• Core Strategy Inspector did not rule out undertaking a Green Belt review to inform the identification of reserve sites.</li> <li>• It would not be too difficult or time-consuming to undertake a Green Belt review.</li> <li>• Restricting housing provision in settlements in the Green Belt creates social injustice by not meeting housing needs.</li> <li>• Small sites on edge of settlements in the Green Belt should be released for affordable homes.</li> <li>• Provision of housing in Green Belt settlements is needed to avoid stagnation, closure of local services and increase in house prices.</li> <li>• Housing to meet needs arising from Birmingham should be provided close to where that need arises regardless of Green Belt.</li> <li>• Greenfield sites on the periphery of settlements should be included to help meet the high demand for housing.</li> <li>• Suitable brownfield sites within the Green Belt should be released for housing.</li> </ul> <p>Response:</p> <p>The Core Strategy Inspector in his Final Report (para 69) acknowledged that the Site Allocations Plan is envisaged to be subsidiary to the Core Strategy rather than reassess the approach to the distribution of development that is established in the adopted Plan. He was of the opinion that there are sufficient sustainable locations available outside the Green belt to meet the required scale of reserve sites and concluded that it seemed unlikely that the SAP should be informed by a Green Belt review to provide the basis for amending its boundaries to facilitate reserve sites.</p> <p>The revised NPPF (para 136) confirms Government policy that Green Belt boundaries should only be altered in exceptional circumstances. On the basis that sufficient dwelling capacity can be provided on reserve sites outside the Green Belt, there is no justification to amend its boundaries in the SAP.</p> <p>It should be noted that provision is made in the Core Strategy for various forms of residential development in the Green Belt (eg. small-scale schemes within the confines of Local Service Villages, schemes within or on the edges of LSVs to meet a local housing need, redevelopment of brownfield sites).</p>

No.	Source	Comment
		<p>While it is acknowledged that the Birmingham Housing Market Area covers the Green Belt within Stratford District, this HMA also covers the whole of Stratford-upon-Avon and land to the east and south of the town. Consequently, there is considerable scope to meet any housing needs deriving from Birmingham on land outside the Green Belt.</p> <p>It is important to understand that the indicative dwelling provision for LSVs takes into account the more limited scope for development in those that are located in the Green Belt. On that basis, it is not expected that each LSV, particularly those in the Green Belt, should provide the notional maximum dwelling figure.</p> <p>It is anticipated that the District Council will undertake a Green Belt review as part of the process of reviewing the Core Strategy to assess whether there are suitable locations for future development that are currently in the Green Belt. However, as stated in the NPPF (para 137), this will need to examine all other reasonable options for meeting the District’s future development requirements.</p> <p>Other points made in response to this question:</p> <p>No.20 - the AONB should also be excluded due to quality of landscape. Response: there is no requirement in national or local planning policy to restrict development within AONBs, although it is recognised that the identification of reserve sites within the AONB should take into account the landscape qualities of the area.</p> <p>No. 24 - settlements not protected by Green Belt should not be subject to urban sprawl and over-development. Response: this is agreed and the identification of reserve sites has taken into account the character of settlements and their landscape setting.</p> <p>No.76 - reserve housing sites should be identified in locations where market and affordable housing needs are identified. Response: the purpose of reserve sites is to respond to the need for market and affordable housing across the District as a whole not just in relation to individual settlements.</p>
		<p><b>Officer Recommendation</b></p> <p>That the District Council should maintain its intention not to identify Reserve Sites in the Site Allocations Plan that are located in the Green Belt.</p>

**Topic: Part 1 Reserve Housing Sites - Question 1.2 Broad Strategy**

No.	Source	Comment
1	David Booth	<p>The proposed wording is vague and does not give clear guidance or create any certainty of future decision making. The current wording:</p> <ul style="list-style-type: none"> <li>• Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP. Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing.</li> <li>• Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise.</li> <li>• It would be perverse to direct more housing to a site that was not delivering.</li> <li>• The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken.</li> <li>• Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.</li> </ul> <p>Should be revised so that it is clear and precise. I suggest a revision below:</p> <ul style="list-style-type: none"> <li>• Due to concerns about the level of dispersal to LSVs, this aspect of the strategy will be revisited and any proposed changes in policy in selecting reserve sites in the SAP will be subject to a full consultation process before the policy is revised.</li> <li>• Reserve sites in LSVs will be only be selected if they can deliver a significant proportion of affordable housing. Significant here means near to the percentage required on large sites; this could be achieved by a voluntary developer agreement.</li> <li>• Identify a broad range of sites that are consistent with the strategy. This allows sites to be released according to future needs not currently anticipated.</li> <li>• Sites that are not delivering housing will not be selected as reserve sites.</li> <li>• Unless there are exceptional circumstances reserve sites will be selected using the work undertaken in the production of the Core Strategy.</li> <li>• Reserve sites will be selected without waiting for the results of a Green Belt review.</li> </ul>
2	Steve Taylor (Set Design)	<p>Reserve sites dispersed to LSVs will still contribute to affordable housing provision through off-site contributions (for small sites) and on site provision for sites over 10 dwellings, therefore it is not correct to say that dispersal will not do so. In addition, small and medium sized sites will attract extortionate CIL contributions in addition to 106 contributions for affordable housing. Large allocated sites built by volume house builders will be exempted from the CIL charges, therefore a continuation of the underlying dispersal strategy in the CS should be supported to maintain the land supply to SME builders.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
3	Anna Corser	I generally agree but have concerns about the dispersal to LSVs which are disproportionate to the size of the existing community especially when there are very limited local facilities.
4	Bruton Knowles on behalf of Nigel Ward	Our client's site (Land at Evesham Road) satisfies provisions set out in paragraphs 1.6 to 1.9.
5	Susanne Farmer	<p>Land identified for housing beyond the Plan period should be used for reserve sites, especially if it is in response to a growth in jobs at JLR.</p> <p>LSV's should have reserve sites to reflect the dispersed settlement pattern of the District, as per the Core Strategy.</p>
6	John Read	Bullet 3 of para 1.7 refers to 'concerns about the level of dispersal to LSV's' and that 'this aspect of the strategy might need to be revisited'. This is unclear. These concerns should be made explicit and the changes to the strategy that might mitigate these concerns should be identified.
7	Paul Clark	Support – no comment
8	Tim Sharples	There are often cases for additional housing, particularly on a local basis when a site is available and a limited number of locally based individuals wish to stay in the area.
9	Priors Marston Parish Council	Yes – subject to clarifying the position of LSVs.
10	WYG on behalf of Church Commissioners for England	We broadly agree with the approach set out in paragraphs 1.6-1.9, however the text within these paragraphs articulate various options rather than one approach. In selecting reserved sites, it is considered appropriate to follow the Core Strategy Policy CS.15 which guides the distribution of new development across the district. It is noted that this approach has been characterised in the Core Strategy as 'balanced dispersal'. Identifying reserve sites widely across the district in sustainable locations is an appropriate response to this need. In doing so, it should also be noted that the development of new settlements, such as Long Marston also provide an opportunity to accommodate reserve sites on adjacent land where they would represent a logical extension and to enable the most effective use of new infrastructure provision.
11	Alderminster Parish Council	The Parish Council has concerns about the levels of dispersal of reserve housing sites to Local Service Villages. There are a number of LSVs which have not yet reached the optimum figure of new dwellings allocated under the Core Strategy. Other villages, such as Alderminster, have now exceeded their optimum number. In the view of the Council, no reserve sites should be identified in LSVs which have met or exceeded their quota until development in all LSVs has reached the allocation figure identified in the Core Strategy.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
12	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	<p>It does make sense to have a broader range of sites as indicated in the plan, however to immediately rule out the use of greenbelt will be limiting. Sensitive, imaginative and sustainable small developments on the edge of greenbelt (urban fringe) could provide additional housing without increasing the housing burden within the BUAB. Main rural centres are increasing in housing density and already short on green space.</p> <p>This high concentration of essential housing is already spoiling the rural character of Studley and other villages.</p>
13	Acres Land and Planning on behalf of the Sharples family	Support – no further comment
14	Hampton Lucy Parish Council	The strategy outlined is broad and therefore difficult to make specific comments. The plan to produce a new SHLAA is important and the possible need to revisit the level of dispersal to LSV's is supported.
15	Stansgate Planning on behalf of K & R Hutsby	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSVs and MRCs as such consideration would accord with the general strategy of the Core Strategy. The inspector who examined the Core Strategy indicated that it may not be appropriate to direct reserve housing sites to all the LSVs however, in the case of Ettington, the settlement is capable of accommodating further housing growth without harm to its character and integrity.</p> <p>There is a suitable and available site within the physical confines of the settlement, namely land to the west of Banbury Road adjacent to No 66 and opposite Nos 93 - 99 and the development presently underway by Spitfire Homes.</p> <p>The land referred to has a gross area of 2.28 hectares and details have been already submitted to the District Council as part of its call for sites (17 January 2018).</p>
16	H Farmer	<p>Land identified for housing beyond the plan period should be used for reserve sites, particularly if in response to a growth in jobs at JLR.</p> <p>Local Service Villages should have reserve sites allocated to reflect the dispersed settlement of the District.</p>
17	RPS on behalf of Taylor Wimpey	<p>Whilst a separate call for sites form has been completed, the following technical considerations apply to the Land at Haye Lane, Mappleborough Green.</p> <p>Flooding The site is not included within any areas at risk of flooding.</p> <p>Ecology</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The Site is not covered by any Local Plan nature conservation designations. Based on an initial assessment, the site as with any greenfield site would need to be appropriately investigated through undertaking Ecological Assessments, although it is considered that there is no obvious in principle constraints in respect of ecological importance at this stage.</p> <p>Heritage The site is located close to a Grade II Listed Building and Common Farm and further to the north the Gorcott Hall (Grade II*). However, appropriate masterplanning of the site would ensure their setting is appropriately protected.</p> <p>Highways Initial indications are that the Site would be able to establish access through a new junction to the surrounding roads including A4189, Henley Road and also to the west onto the A435 Birmingham Road. Further investigation would have to be undertaken in to the capacity of the surrounding areas and access points etc.</p>
18	Stansgate Planning on behalf of A M Ausden	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSVs and MRCs as such consideration would accord with the general strategy of the Core Strategy. The inspector who examined the Core Strategy indicated that it may not be appropriate to direct reserve housing sites to all the LSVs however, in the case of Ilmington, the settlement is capable of accommodating further housing growth without harm to its character and integrity.</p> <p>There is a suitable and available site well-related to the physical confines of the settlement, namely land to the northwest of Back Street.</p> <p>The land referred to has a gross area of 0.8 hectares and details have been submitted to the District Council as part of its call for sites.</p>
19	Stansgate Planning on behalf of Hayward Development	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSVs and MRCs as such consideration would accord with the general strategy of the Core Strategy. The inspector who examined the Core Strategy indicated that it may not be appropriate to direct reserve housing sites to all the LSVs however in the case of Gaydon the settlement is capable of accommodating further housing growth without harm to its character and integrity.</p> <p>There is a suitable and available site well-related to the physical confines of the settlement, namely land to the north east of the development presently underway by Hayward Developments Limited to the south of Kineton Road.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
20	PJS Development Solutions Ltd on behalf of Gloucester Diocesan Board of Finance	<p>We broadly agree with the strategy for seeking to locate reserve housing sites, but it is important that flexibility and common sense is employed. The current CS approach to apportionment to the LSVs appears to be overly formulaic and mechanistic.</p> <p>There are some LSV's where the Council itself has granted permissions for substantially greater levels of housing growth than the Core Strategy ever envisaged. Long Marston is a good example, where the Council has permitted significantly more than the CS limit of 32 (8% of the 400 total for LSV 4 villages). This should <u>not</u> preclude suitable small scale infill reserve sites being considered and identified.</p> <p>The SAP must also respond positively to the Draft Revised NPPF and, in particular, its encouragement and support for small sites.</p>
21	Long Compton Parish Council	<p>1. Whilst you are adopting policies set out by the inspector, the inspector did not take into account circumstances in which reserve sites were sought subsequent to a number of Neighbourhood Development Plans having been made. The NPPF and the Core Strategy are both very clear about the weight which should be attached to Neighbourhood Plans - this is quite apart from the frequent and public commitments given by District Council members and officers during public consultation and Referendum campaigns that, once made, a Neighbourhood Plan represented a firm limit to development within the parishes affected. Reserve sites should neither be sought nor identified within areas covered by made Neighbourhood Plans; and should be avoided where possible within areas whose NDP process is well advanced. This is currently a dangerous omission in your draft process which must be rectified.</p> <p>2. You have carefully explained the four reasons why reserve sites may be required. Only one of these, failure to deliver against the expectations of the existing 5YHLS, would require development across the District; the other three are all geographically specific. It would be a better approach to identify reserve sites specific to the need to use those sites - that is to say Coventry, Birmingham and Jaguar Rover overspill sites should be identified alongside a probably lower number of "general" sites to be used in case of 5YHLS under-delivery. This would enable the Council to respond effectively to the specific demand - and not find itself in a position of having to deal with, say, Birmingham overspill, through sites located in the south of the District.</p>
22	Tyler-Parkes on behalf of Mr James McBride	<p>Our Client does not agree with the broad strategy outlined on pages 9 and 10 of the SAP.</p> <p>It is noted that the current consultation version of the SAP does not identify any potential reserve sites instead the focus is on locations consistent with the distribution of housing development set out in Core Strategy Policy CS.15. Unfortunately, Policy CS.15 does not consider the potential for identification of housing sites which lie on the local authority boundary in a sustainable location close to a settlement which administratively falls within a different local authority area. This is a significant oversight for the SAP in the light of the legal duty to cooperate</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>and the requirement for the local authorities within a Housing Market Area (HMA) to work together towards meeting the objectively assessed housing need.</p> <p>The Draft NPPF consultation document at paragraph 29 states that ‘In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these...’</p> <p>Our Client’s site provides an example of where the Housing Market Area (HMA) as a whole would benefit from a positive proactive approach to cross-boundary cooperation when identifying development sites. Hockley Heath lies within Solihull MBC local authority area but close to the administrative boundary with Stratford-on-Avon. The identification of land in our Client’s ownership lying within both Solihull MBC area and within Stratford-on-Avon District area could make a valuable contribution towards meeting the significant outstanding housing land shortfall. At a density of between 30 to 40 dph it could provide between 17 and 23 dwellings.</p> <p>Therefore, our Client recommends the following bullet point be added to the broad strategy on page 10:</p> <ul style="list-style-type: none"> <li>• The pattern of balanced dispersal of development, will include consideration of potential extensions to sustainable settlements which lie close to, but outside the District boundary.</li> </ul>
23	Bidford-on-Avon Parish Council	Broadly speaking in agreement though, as commented before, we believe the Green Belt area should be reviewed and updated.
24	Stephen Jones	Yes – no further comment
25	Brailes Parish Council	<p>Brailes PC believes reserve sites should be dispersed to close to the main employment areas in the district which would maximise the delivery of viable affordable housing. The PC don't believe the reserve sites for SDC's use should be in the LSVs. This is in line with Part D of CS.16 in CS and reason for a Yes answer.</p> <p>The draft Brailes NP has identified a reserve site that will be used in case of local housing need.</p>
26	Stansgate Planning on behalf of Saffron Estates	It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy. The Core Strategy Inspector indicated that it may not be appropriate to direct reserve housing sites to all the LSV's because of local concern but a restricted approach should be handled with caution if it is only to satisfy local communities. What is best for the District as a whole must be given more weight than the objection of an individual community.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored. Taking on board the Inspector's comment about maximising the delivery of affordable housing SAP sites could be required to provide a minimum of 10 dwellings thereby ensuring all sites are caught by the need to provide affordable housing on site.</p> <p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS.10).</p>
27	Kate Bryan	Support – no further comment
28	Martin Grubb	Support – no further comment
29	Tiddington Village Residents' Association	Support – no further comment
30	Reuben Bellamy	Consideration needs to be given to MRCs and LSVs in the Green Belt that are rail connected.
31	Ladbrook Park Golf Club	LPGC comment as follows on the statement "Given raised thresholds, dispersal of reserve sites to LSVs might not maximise the delivery of affordable housing". Focusing too rigidly on identifying only sites of a size able to deliver affordable housing is counter-productive. Many settlements in the District have a demand for middle and upper end market value homes. By under supplying these homes leads to value increases and lack of movement within the market. This in turn causes it to be increasingly harder for the less well-off to be able to afford anything but affordable housing. A balance needs to be struck. Most LSVs are suitable for middle and upper end market value homes in small numbers. The socio-economic profile of the occupiers of such housing brings more spending power to the LSVs, thereby supporting existing and potentially new public and private facilities.
32	Richard Robotham	To not direct further reserve development to LSVs on the grounds that it might not produce sufficient affordable housing is a red herring. In many instances SME builders contribute a disproportionate amount of money for this, either off-site or on-site. The same cannot be said of the larger builders on allocated sites (witness the current application at Long Marston for 400 homes where NO affordable housing is being offered on the grounds of viability/ alleged contamination). The same argument applies to CIL - SME builders on small sites are disproportionately targeted while larger sites avoid the charge completely.
33	Historic England	Historic England would emphasise that a "suitable" site will need to accord with national policy for the delivery of sustainable development and great weight applied to the conservation (protection and enhancement) of heritage assets and their settings.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Whilst the SHLAA is an expedient means to identify potential sites, if they are then to be proposed for inclusion within a statutory development plan then they will need to be supported by a greater level of detailed evidence if the significance of a heritage asset may be affected. To help inform such an exercise Historic England has produced specific advice which you may find helpful. <i>The Historic Environment and Site Allocations in Local Plans</i> (Historic Advice note no.3) was published in October 2015.</p>
34	Clifford Chambers and Milcote Parish Council	Support – no further comment
35	Delta Planning on behalf of AC Lloyd Homes	We do not agree with the broad strategy for seeking to locate reserve house sites. We object to the proposal to exclude Green Belt sites for consideration as reserve sites.
36	Harris Lamb on behalf of Bovis Homes	<p>We set out below our comments in relation to each of the principles that it is suggested will be used to Identify the Reserve Housing Sites in the consultation document:</p> <p style="text-align: center;"><i>1. By their nature, reserve sites would comprise those that are not allocated In the Core Strategy.</i></p> <p>We agree with this principle. There is no point in identifying an allocated site as a Reserve Housing Site. The purpose of the Reserve Housing Sites is to be an additional source of supply.</p> <p style="text-align: center;"><i>2. It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve.</i></p> <p>We agree with this principle. One of the purposes of the Reserve Housing Sites is to deliver development to rectify any shortfall in housing delivery to maintain a five-year housing land supply. As a consequence, the Reserve Housing Sites should be able to deliver development promptly. Any site that is unable to deliver development within the plan period cannot perform one of the roles of the Reserve Housing Sites.</p> <p>On this basis, it is also our view that priority should be given to the identification of Reserve Housing Sites that can be brought forward for development quickly, As highlighted in our submission, the Land East of Southam represents a logical, sustainable and deliverable development opportunity within a settlement suitable to accommodate further housing growth. The strategic site provides an opportunity to deliver a comprehensive scheme delivering social infrastructure, including a unique opportunity to deliver a new primary school and an ability to secure rapid delivery of homes through an established housebuilder deliverability and viability are therefore considered through site promotion and application preparation. If this site needs to be brought forward for development promptly Bovis could, if necessary, prepare a hybrid planning application that included an initial phase of development as a “full” application so that a prompt start could be made on site. If a site is promoted by a landowner or land trader, the site will need to be sold to a developer. This will slow the delivery process down notably and should be considered to be a disadvantage.</p>

No.	Source	Comment
		<p>In this regard, it should be noted that there is little benefit in identifying new settlements as Reserve Housing Sites. New settlements will take a significant amount of time to deliver. Initial infrastructure will need to be provided before development can commence.</p> <p><i>3. Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP.</i></p> <p>It is our view that In the first instance the Reserve Housing Sites should be directed towards Stratford-upon-Avon and the Major Service Centres. The Core Strategy Inspector's Interim Conclusions raised a number of concerns with directing additional development to the Local Service Villages.</p> <p>The number of households in the urban part of the District is 10 times higher in percentage terms than the rural area. A more dispersed strategy of directing development to the Local Service Villages will lead to a less sustainable pattern of development. Furthermore, a number of the Local Service Villages are constrained by the Green Belt preventing them from accommodating Reserve Housing Sites.</p> <p>The Core Strategy Inspector advised in paragraph 201 of his Interim Conclusions that, when considering directing additional development towards the Local Service Villages that the Council would need to robustly consider any further increase in the level of development beyond the levels proposed by the Core Strategy The Sustainability Appraisal that accompanied the Core Strategy concluded that increasing the Local Service Village housing allocation beyond that proposed within the Core Strategy would be inappropriate. It is advised that an overreliance on dispersed developments In smaller villages would not be appropriate due to the impact this would have on their character and the need to travel longer distances, most likely by car, to shops, services, jobs, schools etc.</p> <p>It is our view that there has been no change in circumstances since the production of the Core Strategy Inspectors report to warrant a different conclusion being reached about the ability of the Local Service Villages to accommodate further growth. Given the findings of the Core Strategy Inspector, and the more suitable nature of the larger settlements, it is our view that it would be more appropriate to direct development to the higher order settlements and restrict the identification of Reserve Housing Sites at the Local Service Villages.</p> <p><i>4. Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing.</i></p> <p>We agree the Reserve Housing Sites should be of sufficient scale to deliver a policy-compliant level of affordable housing having regard to the affordable housing thresholds. That being the case, Reserve Housing Site allocations should not be made that are insufficient in size to deliver affordable housing. Indeed, allocations of</p>

No.	Source	Comment
		<p>this nature would be so small they would make no meaningful contribution to addressing the role of Reserve Housing Sites They would be unlikely to make any notable contribution towards a shortfall in the five-year housing land supply, assist in supporting the growth requirements of JLR. or help to meet any identified shortfall In housing form the Local Authority. It is our view that the minimum capacity of the Reserve Housing Sites should be 75 dwellings.</p> <p><i>5. Identifying a broad range of sites that we consistent with the strategy would allow them to be released according to the different needs that might arise</i></p> <p>We agree that a broad range of sites should be identified, however, It is our view that there should be a focus on larger sites. The purpose of the Reserve Housing Sites is to help rectify any shortfall in housing delivery, to meet the growth requirements of JLR or to meet the growth requirements of a neighbouring authority. Clearly small sites would play a highly limited role in addressing any of these requirements. If, for example. a site is required to assist in the growth requirements of JLR a development of 25 dwellings will make no material difference. Likewise, if a five-year housing land supply shortfall exists, any sites released must be of sufficient capacity to rectify the shortfall. Large sites are required to meet these objectives.</p> <p>In addition, large sites have the ability to deliver a range of benefits that smaller sites cannot. They are more likely to be able to deliver policy-compliant levels of affordable housing. They can deliver wider onsite facilities, such as public open space and other services and facilities. For example, the land in Bovis' control at Southam is able to make a site available for the development of a primary school.</p> <p>Large sites also provide the opportunity to deliver a continuous supply of housing over a sustained period of time. For example, we expect the Bovis site to be able to deliver circa 430 homes over a 4-5 year build period should planning permission be granted. This will significantly help to bolster housing delivery</p> <p>Small sites, in contrast, will play a highly limited role in addressing the requirements of Core Strategy Policy S.16.D. In order to make any notable increase to the rate of housing delivery a number of small housing sites will need to be brought forward at the same time. The individual sites will provide limited onsite Infrastructure and limited community benefits due to their size.</p> <p><i>6. It would be perverse to direct more housing to a site that was not delivering.</i></p> <p>We agree with this approach. Clearly there is no benefit in directing additional development to sites that are not delivering as evidence would suggest that further development will not come forward. Indeed, focusing development in a location which is already having difficulty in delivering housing could cause further market saturation, slowing development in this area generally.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p><i>7. The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken.</i></p> <p>As the Site Allocations Local Plan is based upon the Core Strategy, we are of the view that it would be inappropriate to revisit the evidence base that underpinned the Core Strategy. The Site Allocations Plan needs to be in general conformity with the Core Strategy and can simply build on its policies and underpinning evidence base.</p> <p>That existing said, if new information is brought to light that clearly indicates the conclusions in any of the evidence base documents are out of date this should be fully considered. For example, the accompanying Vision Statement for the Land East of Southam in Bovis' control provides a more thorough and updated Landscape and Visual Impact Assessment of the site from the Council's Landscape Sensitivity Assessment (June 2011). The findings of the Vision Statement should be seen to supersede those of the Landscape and Sensitivity Assessment.</p> <p><i>8. Given the Imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.</i></p> <p>As referred to above, our view is that the Site Allocations Plan should not release Green Belt land for Reserve Housing Sites. The Core Strategy does not allow this approach to be adopted. The Council have not undertaken a Green Belt land review to support such release, There are no exceptional circumstances to support Green Belt land release given that Reserve Housing Sites can be identified on land that is not currently on the Green Belt.</p>
37	Steve Taylor (Set Design)	<p>To not direct further reserve development to LSVs on the grounds that it might not produce sufficient affordable housing is a red herring. In many instances SME builders contribute a disproportionate amount of money for this, either off-site or on-site. The same cannot be said of the larger builders on allocated sites (witness the current application at Long Marston for 400 homes where NO affordable housing is being offered on the grounds of viability/ alleged contamination).</p> <p>The same argument applies to CIL - SME builders on small sites are disproportionately targeted while larger sites avoid the charge completely.</p>
38	Stansgate Planning on behalf of Mr and Mrs Wythes	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy.</p> <p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS.10).</p>
39	Stansgate Planning on behalf of Bidford Garages	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy. The Core Strategy Inspector indicated that it may not be appropriate to direct reserve housing sites to all the LSV's because of local concern but a restricted approach should be handled with caution if it is only to satisfy local communities. What is best for the District as a whole must be given more weight than the objection of an individual community.</p> <p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored. Taking on board the Inspector's comment about maximising the delivery of affordable housing SAP sites could be required to provide a minimum of 10 dwellings thereby ensuring all sites are caught by the need to provide affordable housing on site.</p> <p>The aim of the Development Plan is to facilitate the provision of new homes where they are needed in a sustainable manner. The Core Strategy indicates that reserve sites will be released to meet the needs, in part, arising from any identified shortfall both within and beyond the Coventry and Warwickshire HMA; the Greater Birmingham and Black Country HMA; from additional housing needs relating to Jaguar Land Rover and if five year supply shortfall arises. Provision should be made for reserve sites close to where the need arises so a variety of sustainable locations in those parts of the District best placed to meet the need are required.</p> <p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS.10).</p>
40	Star Planning and Development on behalf of Richborough Estates	<p>Notwithstanding the comments regarding the potential to allocate land for residential development, Richborough Estates is supportive of the SAP identifying reserve housing sites based upon circa 3,000 dwellings (paragraph 1.5). This approach would be consistent with Core Strategy Policy CS.16.D</p> <p>Richborough Estates is supportive of the distribution and location of any reserve housing sites being in accordance with Core Strategy Policy CS.15 (paragraph 1.7). However, the emphasis should be on the identification of such sites at the Main Town and Main Rural Centres which, are by definition, the most sustainable settlements, including both Kineton and Bidford on Avon. At these settlements a cross section of housing sites should be provided to meet the varying needs of the housing market.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
41	Andrew Granger and Co. on behalf of Henson Family	<p>We support the broad strategy for identifying locations for reserve housing sites set out at Paragraph 1.7 of the consultation document. The National Planning Policy Framework [NPPF] and adopted Core Strategy are both underpinned by a 'presumption in favour of sustainable development'. It is therefore considered rational to direct development towards locations that are within close proximity to a wide range of employment opportunities and local services and facilities. As outlined above, we consider Stratford-upon-Avon to be a sustainable location with a wide range of services and facilities, and as such appropriately identified as the Main Town of the District, which is expected to be a focus for new development.</p> <p>We fully agree with the Council's proposal that no additional development should be directed towards sites that are currently failing to deliver their commitment. It is our view that any allocation of further development on such sites would not represent a robust strategy for housing delivery in the District.</p> <p>It is considered that any increased allocation on these sites would result in the delivery trajectory being extended into the future, possibly beyond the plan period, rather than any additional development being delivered to meet any immediate needs.</p> <p>Furthermore, we also agree with the recognition that a range of sites should be identified to meet the different needs that may arise. The NPPF and the adopted Core Strategy are both underpinned by a requirement to deliver a wide range of housing opportunities; this encourages developers to provide a mix of housing types and sizes, but should also be considered to encourage development across a wide range of locations.</p> <p>As such, we believe it is essential for the Site Allocations Plan to explore the continuation of the 'dispersal' spatial strategy pursued within the Core Strategy, whereby larger strategic sites in key towns and settlements are supported by smaller sites across the District. This strategy would be consistent with that being pursued by other local planning authorities where additional development may be necessary to meet unmet needs arising from elsewhere in the housing market area i.e. Blaby District Council and Harborough District Council to assist in addressing unmet needs arising from Leicester City Council.</p> <p>It is within this context that we propose the formal allocation of Land at Lower Clopton Farm, Stratford-upon-Avon for a sustainable garden village suburb development.</p>
42	Stansgate Planning on behalf of Alscot Estate	<p>Alscot Estate is in generally in agreement with the broad strategy adopted in seeking to locate reserve housing sites. In particular, the Estate welcomes the specific recognition that reserve sites can potentially include land outside of the Main Town and Main Rural Centres, including in the form of new settlements. This accords with the development strategy of the adopted Core Strategy.</p>

No.	Source	Comment
43	Caroline Dunster	The Stratford-upon-Avon Core Strategy has been put in place (2011-2031). It is inappropriate at this time (2018) to seek Reserve Housing Sites for the future when many of the existing sites have not yet been built on.
44	Woolf Bond on behalf of Rockspring Barwood Southam	<p>Southam forms the most sustainable 'Main Rural Centre' within the District and comprises a logical location to provide for additional growth to assist in meeting the housing requirement and spatial strategy as set out in Policies CS15 and CS16 of the adopted Core Strategy. This was re-affirmed at paragraph 7.1.19 of the Council's final Sustainability Appraisal of the Core Strategy that stated:</p> <p><b>'...the Council has identified Southam as the most appropriate location for additional strategic growth based on the availability of suitable sites, lack of overriding infrastructure constraints and the opportunity to support the existing facilities provided in the town'.</b></p> <p>The subject site adjoins the Southam built up area and therefore represents one of the most sustainable locations in helping to meet the District's housing requirements (including that for affordable). The site's sustainable and accessible location is further acknowledged by the Core Strategy at paragraph 6.7.6 which recognises Southam's role as acting as a service centre for the eastern part of the District together with the adjoining areas of Rugby District. It is therefore appropriate to ensure sufficient housing is delivered in Southam to ensure that its role as a service centre continues and the vitality of existing services retained. As explained later, the whole district also has strong relationships with both the Cities of Birmingham and Coventry through its inclusion of the housing market areas associated with both places.</p> <p>In addition, it should be noted that the housing requirements set out in Policy CS16 of the Core Strategy are clearly expressed as minimums and where appropriate, growth should exceed this minimum figure. This is notwithstanding the substantial unmet needs arising from the wider housing market area (discussed further below) Our client's site offers one such location where such growth can be achieved in a sustainable manner.</p> <p>For the above reasons we are of the strong view that the potential of the subject 30.55ha site that forms land adjoining Southam should be identified in the Site Allocations Plan as a housing allocation. The omission site could be delivered inside a 5 year period and therefore soon after the adoption of the Site Allocations Plan.</p>
45	Harris Lamb on behalf of Alamo	<p>We set out below our comments in relation to each of the principles, that will be used to identify the 5 Reserved Housing Sites identified by the Consultation document:</p> <p><i>1. By their nature Reserve Sites would compromise those that are not allocated in the Core Strategy.</i></p> <p>We agree with this principle. There is no point in identifying an allocated site as a Reserved Housing Site. The purpose of Reserved Housing Sites is to be an additional source of supply.</p>

No.	Source	Comment
		<p data-bbox="712 264 2011 320"><i>2. Is it appropriate to discount the possibility of identifying a housing site currently scheduled beyond the Plan period as a Reserve?</i></p> <p data-bbox="665 352 2024 467">Yes - We agree with this principle. One of the purposes of the Reserved Housing Sites is to deliver development to rectify any shortfall in housing delivery and to maintain a five- year housing land supply. As a consequence, Reserved Housing Sites should be able to deliver development promptly. Any site which is unable to deliver development within the Plan Period cannot perform one of the roles of the Reserved Housing Sites.</p> <p data-bbox="665 499 1995 614">On this basis, it is our view that priority be given to identification of Reserved Housing Sites, which can be brought forward for development quickly. The development of this site is facilitated by the adjoining Bovis scheme that has been deliberately designed to allow this parcel of land to come forward as a second stage of development. The site is deliverable in the short term.</p> <p data-bbox="665 646 2007 730">Building on this point, it is our view that there is little benefit in identifying new settlements as Reserved Housing Sites. New settlements will take a significant amount of time to deliver. Initial infrastructure will need to be provided before development can commence.</p> <p data-bbox="712 762 1995 818"><i>3. Against a backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting Reserve sites in the SAP.</i></p> <p data-bbox="665 850 2033 1054">It is agreed that in the first instance Reserved Housing Sites should be directed towards Stratford-upon-Avon and the Main Service Centres. There are, however, Local Service Villages where it would be appropriate to direct additional development. It is our view that relatively modest parcels of land, such as the site in the control of Alamo, are well suited for identification as Reserved Housing Sites. The site is relatively small and the capacity of the site is appropriate for the size of settlement. It is deliverable in the short-term. It is in a sustainable location with good access to a range of services and facilities. It can, therefore, play an important local role in meeting development requirements.</p> <p data-bbox="712 1086 1906 1142"><i>4. Given raised thresholds, dispersed Reserved Sites to LSV's might not maximise the delivery of affordable housing.</i></p> <p data-bbox="665 1174 2024 1289">We agree that Reserved Housing Sites should be of sufficient scale to deliver policy compliant levels of affordable housing. Those sites that do not meet this test should be ruled out for allocation. The land in Alamo's control is capable of delivering affordable housing and meets the affordable housing threshold. As a consequence this is not a barrier to its allocation.</p> <p data-bbox="712 1321 1989 1377"><i>5. Identifying a broad range of sites that are consistent with the strategy will allow them to be released according to different needs that might arise.</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>We agree that a broad range of sites should be identified. The land in Alamo’s control can play a valuable role as part of a portfolio of sites across the District.</p> <p><i>6. It would be perverse to direct more housing to a site that was not delivering.</i></p> <p>We agree with this approach. Clearly there is no benefit in directing additional development to sites that are not delivering as evidence would suggest that further development will not come forward. Indeed, focussing development in a location which is already having difficulty in delivering housing could cause a further market saturation slowing down development In this area generally.</p> <p><i>7. The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken.</i></p> <p>As the Site Allocations Local Plan is based upon the Core Strategy, we are of a view that it would be inappropriate to revisit the evidence base that informed the Core Strategy. However, as referred to above, the emerging SHLM will play a key role in informing the Reserved Sites selection process. It must be ensured that the SHLAA accurately reflects the deliverability and suitability of potential development locations to inform the emerging plan.</p> <p><i>8. Given the imperative to identify Reserve Sites, it would seem unlikely that the SAP must be informed by a Green Belt review.</i></p> <p>As referred to above, we agree that Green Belt land release is inappropriate. The Core Strategy does not allow this approach to be adopted. The Council have not undertaken a Green Belt land review to support such releases, There are no exceptional circumstances to support Green Belt land release given that Reserve Housing Sites can be identified on land that is not currently within the Green Belt.</p>
46	Savills on behalf of Magdalen College	<p>The College agrees that the broad strategy for locating reserve housing sites must be consistent with the relevant provisions of the adopted Core Strategy, including that reserve sites are released: to rectify any identified shortfall in housing delivery; to contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA; and to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that is accepted through co-operation between the relevant councils.</p> <p>It is agreed that the strategy should identify a range of sites that would allow them to be released according to different levels of arising need. Local Service Villages (LSVs) across all categories have been assessed according to their specific sustainability credentials. An appropriate level of dispersion of reserve sites to the LSVs is a</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		logical approach to ensuring housing delivery can be directed to locations in which it is most needed. The identification of reserve housing sites in a range of LSVs will allow sufficient flexibility over the duration of the plan period for the delivery of small, medium, and large scale housing development whilst remaining in line with the sustainability principles established by the adopted Core Strategy.
47	Brian Tarmey	As stated in my answer to Question 1.1. I believe it is inappropriate to dismiss the opportunity to review the green belt.
48	Stansgate on behalf of Mr H Rashleigh	<p>It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy. The Core Strategy Inspector indicated that it may not be appropriate to direct reserve housing sites to all the LSV's because of local concern but a restricted approach should be handled with caution if it is only to satisfy local communities. What is best for the District as a whole must be given more weight than the objection of an individual community.</p> <p>Furthermore, Green Belt review opens up new options by increasing the number of LSV's where sites could be allocated and bringing in to consideration the role of new settlements such as that South of Birmingham in the GL Hearn Strategic Growth Study.</p> <p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored. Taking on board the Inspector's comment about maximising the delivery of affordable housing SAP sites could be required to provide a minimum of 10 dwellings thereby ensuring all sites are caught by the need to provide affordable housing on site.</p> <p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS. 10).</p> <p>It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy. The Core Strategy Inspector indicated that it may not be appropriate to direct reserve housing sites to all the LSV's because of local concern but a restricted approach should be handled with caution if it is only to satisfy local communities. What is best for the District as a whole must be given more weight than the objection of an individual community.</p> <p>Furthermore, Green Belt review opens up new options by increasing the number of LSV's where sites could be allocated and bringing in to consideration the role of new settlements such as that South of Birmingham in the GL Hearn Strategic Growth Study.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored. Taking on board the Inspector's comment about maximising the delivery of affordable housing SAP sites could be required to provide a minimum of 10 dwellings thereby ensuring all sites are caught by the need to provide affordable housing on site.</p> <p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS. 10).</p>
49	Framptons on behalf of Spitfire Bespoke Homes	<p>Spitfire Bespoke Homes Ltd preference would be for housing to be focused in existing villages, such as Clifford Chambers, where there are existing services. Development should be distributed over a range of settlements rather than in single settlements in order to ensure the vitality of settlements is maintained.</p> <p>Distribution of reserve housing sites should follow the settlement hierarchy as set out by the Scoping and Initial Options paper, and established in Policy CS.15 in the Core Strategy. This will ensure consistency with the adopted Core Strategy which has been found sound by the examining Inspector back in July 2016 and therefore is consistent with current national policy.</p> <p>A strategy based on developing a new settlement places an over reliance on only a few locations and may result in a lack of flexibility should circumstances change. The preference is for a wider distribution over a range of settlements, but in particular in Clifford Chambers.</p> <p>The merits of allocating a range of size of sites, including sites such as Clifford Chambers, is that the overall housing market becomes more fluid and competitive simultaneously due to a larger number and wider range of house builders being involved in the delivery of housing. Smaller sites, favouring smaller house builders, will also favour more sub-regional and local builders, who are more likely to use locally sourced trainees, apprentices and materials suppliers bringing more inward investment per home that a large scale national house builder would typically bring.</p> <p>Turning to Clifford Chambers as a settlement specifically, the allocation of the land as a reserve site will:</p> <ul style="list-style-type: none"> <li>• assist in meeting the District's housing need, including a diversity of housing stock for both market and affordable housing in the critical early part of the local plan;</li> <li>• assist in the vitality and viability of small businesses and services within the area;</li> <li>• deliver new public open space on presently private land;</li> <li>• enhance the biodiversity credentials of the site; and</li> <li>• retain and enhance existing vegetation on the site.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The Taylor Report (The Taylor Review of Rural Economy and Affordable Housing) indicates growth that is proportionate and appropriate to a settlement can have many benefits and may sustain services which is highly desirable in rural areas which have limited services in comparison to higher order settlements.</p> <p>Not allocating the site could hypothetically result in a settlement not experiencing growth for many years. Clearly this would result in a lack of investment in the settlement which would harm all services, employment and other benefits of growth. The current approach to housing delivery in Clifford Chambers is piecemeal meaning that affordable housing is not being delivered in the village.</p> <p>In the balance of planning considerations it is submitted the planning advantage lies firmly in the allocation of the land at Clifford Chambers, to enable a comprehensive planned development to be achieved to deliver new housing.</p>
50	Tim Pollard	<p>I support the strategy, but I also believe there should be a limit to how much a small, market town, such as Stratford, should be expected to grow before it's character and attractiveness to visitors is irreparably damaged or destroyed.</p> <p>I appreciate that since the Grenfell disaster, high rise building is less popular than ever, but in order to preserve 'countryside' I believe it should be beholden on large regional centres, such as Coventry, to build 'up', rather than small towns having to build 'out'.</p>
51	Cerda Planning on behalf of Grevayne Properties Limited	<p>The response to this question is provided by commenting upon each statement comprising the broad strategy individually.</p> <p><i>"By their nature, reserve sites would comprise those that are not allocated in the Core Strategy"</i></p> <p>This is agreed. Existing allocations should not be considered to be reserve sites as due consideration has already been given to their ability to deliver housing over the plan period.</p> <p><i>"It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve."</i></p> <p>This is agreed. The delivery of housing on sites coming forward on large and strategic sites with long term delivery of housing have been objectively assessed and scrutinised to ensure a realistic trajectory for provision. Given the complexity of delivering large and strategic sites, it is unrealistic that sites could be considered able to deliver additional housing planned for beyond the plan period to meet unforeseen demands requiring response in the short term.</p>

No.	Source	Comment
		<p>Historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Delays in the delivery of large and strategic sites with housing trajectories beyond plan periods can be attributed to a multitude of factors which causes uncertainty. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the uncertainty in the ability to deliver housing over the plan period alone, it would be illogical to consider identifying any of these sites as reserve sites as their ability to increase the housing trajectory is unrealistic.</p> <p><i>“Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP.”</i></p> <p>By the nature of the circumstances in which reserve sites can be released for development, it would not be logical to allocate reserve sites towards settlements designated as Category 2 Local Service Villages or lower in the settlement hierarchy. Given the size, scale and infrastructure of Category 2 LSVs and lower settlements in the hierarchy they have a lower capability of accommodating additional housing. The circumstances in which land will be released for reserve housing site detailed in Policy CS.15.D would require a significant housing response.</p> <p>Under the first circumstance as set out, reserve sites would be released where the allocated sites are not delivering housing in accordance with the identified trajectory resulting in a reduction to housing land supply creating a need for a proactive response to maintain a five year housing land supply. A large proportion of the allocated sites provide substantial levels of housing. Smaller sites are less likely to be subject to delays in provision and therefore a failure to maintain a five year housing land supply is most likely to be derived from delays on the larger strategic sites.</p> <p>A delay at the early stages in the delivery of large and strategic sites would be likely to have consequential affects and would lead to a continual shortfall of housing delivery compounding year on year. As such, a relatively minor delay on a large scale site could result in a significant under delivery that could not be adequately mitigated for by allocating sites in the lower category LSVs as these are only capable of accommodating small sites. Category 1 LSVs, MRCs and Stratford-on-Avon are capable of accommodating medium to large sites without putting undue pressure on existing infrastructure. Therefore, reserve sites to meet the first circumstance allowing for the release of reserve sites should be accommodated for through sites in Category 1 LSVs, MRCs and Stratford-upon-Avon. The proposed site at The Greens, Stratford-upon-Avon would provide 57 dwellings which presents an opportunity to provide a significant response to under provision in order to maintain a five year housing land supply in a highly sustainable location.</p>

No.	Source	Comment
		<p>Under the second circumstance for the release of reserve sites, any arising housing requirement should be contained relatively locally to the employment site. Limiting the dispersing of the dwellings geographically to a close proximity to the employment site would reduce the need for future occupiers to travel to access the employment site whilst having access to a good level of services and facilities in the surrounding settlements. Whilst there are several LSVs in close proximity to the employment site the category of LSV varies. The category 1 LSV and two MRCs in proximity to the employment site are the most sustainable locations for development. Given the size of the settlements, they have sufficient infrastructure with a capacity to absorb new development despite any existing allocations.</p> <p>Circumstances three and four arise as a result of the need within the district to accommodate housing from within and outside the Coventry and Warwickshire HMA. It has recently been agreed in a joint position statement published by 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings to meet Coventry's unmet need. The need to accommodate development from the Greater Birmingham and Black Country HMA within the district is not yet established although it has been identified that the shortfall in the delivery across the HMA equates to 28,150 dwellings between 2011 and 2031 and 60,855 to 2036.</p> <p>The housing numbers to be accommodated within the Stratford-on-Avon District from the Coventry HMA alone are significant, notwithstanding the addition of any need arising from the GBBCHMA. In both instances, to appropriately respond to housing needs, housing would need to be accommodated on medium and large sites which have capacity to provide a significant response to the circumstances. Therefore, dwellings should be accommodated in Stratford-upon-Avon, the MRCs or category 1 LSVs that have the infrastructure capable of accommodating the growth and land which is available and deliverable.</p> <p>The proposed site at The Greens, Stratford-upon-Avon presents an opportunity to provide additional residential development to meet both the third and fourth circumstances. The site is located within the Greater Birmingham and Black Country HMA with access to the train station within a reasonable walking distance. Whilst HMA boundaries are not clearly defined physical boundaries, Stratford-upon-Avon abuts the illustrative boundary of the Coventry and Warwickshire HMA and therefore is well located to respond to additional housing need.</p> <p><i>"Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing."</i></p> <p>The majority of LSVs are unlikely to be able to identify and deliver additional sites beyond those anticipated to be delivered which would respect the character and size of the settlement whilst being of sufficient size to require affordable housing to be delivered. The exception to this is likely to be Category 1 LSVs which have a greater level of infrastructure, services and facilities and would be able to accommodate sites delivering 10 dwellings or more which are of sufficient size to require affordable housing. Therefore, it is reasonable to consider that reserve sites should be identified in addition to the larger settlements to ensure affordable housing</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>is delivered. The proposed site at The Greens, Stratford-upon-Avon would provide a policy compliant 35% affordable housing which equates to 20 affordable homes. 20 affordable homes would make a positive contribution towards provision to meet the local community need.</p> <p><i>"Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise."</i></p> <p>As noted above, lower category LSVs would not have the ability for their infrastructure, services and facilities to absorb additional development and sustainably respond to the same effect as sites in Stratford-upon-Avon. Additionally, as noted above, there are identified areas centrally in the district which would be best located to respond to some circumstances for the release of the land due to proximity to facilities, services, employment as well as good transport and communication links,</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>A strategy including residential development at The Greens, Stratford-upon-Avon, along with other appropriate sites, would provide ample scope to accommodate various levels of growth and respond to the differing circumstances for the release of reserve sites. Therefore, a strategy to identify a range of sites including The Greens, Stratford-upon-Avon would be in accordance with the overall strategy for dispersal whilst responding to the specific circumstances for the release of reserve sites.</p> <p>The proposed site at The Greens, Stratford-upon-Avon presents a medium/large site for residential development that is well-related and integrated to the existing built form at Stratford-upon-Avon. The proposed site is of a reasonable size to respond to independently, or cumulatively, to additional housing need dependent upon the arising circumstance for the release of land.</p> <p><i>"It would be perverse to direct more housing to a site that was not delivering."</i></p> <p>Agreed. The reserve sites should provide ample opportunity for delivery of housing on alternative sites to those allocated in the Core Strategy which can mitigate the impact of under delivery on these allocated sites.</p> <p><i>"The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken."</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Agreed. The work undertaken has appropriately categorised settlements and identified the most sustainable locations for development as set out in the settlement hierarchy. Insufficient time has passed that could be considered to render the work out of date.</p> <p><i>“Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.”</i></p> <p>Agreed, as detailed in response to question 1.1 of the consultation document.</p> <p>In light of the above, it is considered that a strategy for dispersal of reserve sites would be suitable. However the dispersal should not be to the same extent as delivering the identified housing needs of the district in the Core Strategy. Development in Category 2 LSVs or lower settlements in the hierarchy, in the main should not be considered given their limited infrastructure and capability and capacity to respond to increased housing demands or under provision. Development should be dispersed amongst the settlements with a greater access to facilities, services, employment and sustainable modes of transport.</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>Stratford-upon-Avon is well positioned to respond to all circumstances for the release of reserve sites and therefore serious consideration should be given to concentrating a proportion of development to the site known as The Greens, south of Alcester Road, Stratford-upon-Avon.</p>
52	Cerdea Planning on behalf of Kler Group	<p>The response to this question is provided by commenting upon each statement comprising the broad strategy individually.</p> <p><i>“By their nature, reserve sites would comprise those that are not allocated in the Core Strategy”</i></p> <p>This is agreed. Existing allocations should not be considered to be reserve sites as due consideration has already been given to their ability to deliver housing over the plan period.</p> <p><i>“It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve.”</i></p> <p>This is agreed. The delivery of housing on sites coming forward on large and strategic sites with long term delivery of housing have been objectively assessed and scrutinised to ensure a realistic trajectory for provision. Given the complexity of delivering large and strategic sites, it is unrealistic that sites could be considered able to</p>

No.	Source	Comment
		<p>deliver additional housing planned for beyond the plan period to meet unforeseen demands requiring response in the short term.</p> <p>Historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Delays in the delivery of large and strategic sites with housing trajectories beyond plan periods can be attributed to a multitude of factors which causes uncertainty. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the uncertainty in the ability to deliver housing over the plan period alone, it would be illogical to consider identifying any of these sites as reserve sites as their ability to increase the housing trajectory is unrealistic.</p> <p><i>“Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP.”</i></p> <p>By the nature of the circumstances in which reserve sites can be released for development, it would not be logical to allocate reserve sites towards settlements designated as Category 2 Local Service Villages or lower in the settlement hierarchy. Given the size, scale and infrastructure of Category 2 LSVs and lower settlements in the hierarchy they have a lower capability of accommodating additional housing. The circumstances in which land will be released for reserve housing site detailed in Policy CS.15.D would require a significant housing response.</p> <p>Under the first circumstance as set out, reserve sites would be released where the allocated sites are not delivering housing in accordance with the identified trajectory resulting in a reduction to housing land supply creating a need for a proactive response to maintain a five year housing land supply. A large proportion of the allocated sites provide substantial levels of housing. Smaller sites are less likely to be subject to delays in provision and therefore a failure to maintain a five year housing land supply is most likely to be derived from delays on the larger strategic sites.</p> <p>A delay at the early stages in the delivery of large and strategic sites would be likely to have consequential affects and would lead to a continual shortfall of housing delivery compounding year on year. As such, a relatively minor delay on a large scale site could result in a significant under delivery that could not be adequately mitigated for by allocating sites in the lower category LSVs as these are only capable of accommodating small sites. Category 1 LSVs, MRCs and Stratford-on-Avon are capable of accommodating medium to large sites without putting undue pressure on existing infrastructure. Therefore, reserve sites to meet the first circumstance allowing for the release of reserve sites should be accommodated for through sites in Category 1 LSVs, MRCs and Stratford-upon-Avon.</p>

No.	Source	Comment
		<p>The proposed site at Home Farm, Southam would provide up to 240 dwellings which presents an opportunity to provide a significant response to under provision in order to maintain a five year housing land supply.</p> <p>Under the second circumstance for the release of reserve sites, any arising housing requirement should be contained relatively locally to the employment site. Limiting the dispersing of the dwellings geographically to a close proximity to the employment site would reduce the need for future occupiers to travel to access the employment site whilst having access to a good level of services and facilities in the surrounding settlements. Whilst there are several LSVs in close proximity to the employment site the category of LSV varies. The category 1 LSV and two MRCs in proximity to the employment site are the most sustainable locations for development. Given the size of the settlements, they have sufficient infrastructure with a capacity to absorb new development despite any existing allocations. The proposed site at Home Farm, Southam is well located to provide residential development to respond to additional need at Gaydon given the close geographical proximity and the existing road network providing an ease of access for future occupants.</p> <p>Circumstances three and four arise as a result of the need within the district to accommodate housing from within and outside the Coventry and Warwickshire HMA. It has recently been agreed in a joint position statement published by 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings to meet Coventry's unmet need. The need to accommodate development from the Greater Birmingham and Black Country HMA within the district is not yet established although it has been identified that the shortfall in the delivery across the HMA equates to 28,150 dwellings between 2011 and 2031 and 60,855 to 2036.</p> <p>The housing numbers to be accommodated within the Stratford-on-Avon District from the Coventry HMA alone are significant, notwithstanding the addition of any need arising from the GBBCHMA. In both instances, to appropriately respond to housing needs, housing would need to be accommodated on medium and large sites which have capacity to provide a significant response to the circumstances. Therefore, dwellings should be accommodated in Stratford-upon-Avon, the MRCs or category 1 LSVs that have the infrastructure capable of accommodating the growth and land which is available and deliverable.</p> <p>The proposed site at Home Farm, Southam presents an opportunity to provide additional residential development to meet both the third and fourth circumstances. The site is located within the Coventry and Warwickshire HMA and would make a significant contribution towards meeting the Coventry and Warwickshire HMA unmet need. Additionally, the site has good access to the M40 which provides ease of access to the Greater Birmingham area.</p> <p><i>"Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing."</i></p>

No.	Source	Comment
		<p>The majority of LSVs are unlikely to be able to identify and deliver additional sites beyond those anticipated to be delivered which would respect the character and size of the settlement whilst being of sufficient size to require affordable housing to be delivered. The exception to this is likely to be Category 1 LSVs which have a greater level of infrastructure, services and facilities and would be able to accommodate sites delivering 10 dwellings or more which are of sufficient size to require affordable housing. Therefore, it is reasonable to consider that reserve sites should be identified at Category 1 LSVs in addition to the larger settlements to ensure affordable housing is delivered. The proposed site at Home Farm, Southam would provide a policy compliant 35% affordable housing which equates to 84 affordable homes. 84 affordable homes would make a significant contribution towards provision to meet the local community need.</p> <p><i>"Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise."</i></p> <p>As noted above, lower category LSVs would not have the ability for their infrastructure, services and facilities to absorb additional development and sustainably respond to the same effect as sites at MRCs. Additionally, as noted above, there are identified areas to the east of the district which would be best located to respond to the circumstances for the release of the land due to their proximity to good transport and communication links.</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>A strategy including residential development at Home Farm, Southam, close to the M40 corridor, along with other appropriate sites, would provide ample scope to accommodate various levels of growth and respond to the differing circumstances for the release of reserve sites. Therefore, a strategy to identify a range of sites including Home Farm, Southam would be in accordance with the overall strategy for dispersal whilst responding to the specific circumstances for the release of reserve sites.</p> <p>The proposed site at Home Farm, Southam presents a large site for residential development that is well-related and integrated to the existing built form at Southam and could be utilised where a housing response is required for any of the arising circumstances.</p> <p><i>"It would be perverse to direct more housing to a site that was not delivering."</i></p> <p>Agreed. The reserve sites should provide ample opportunity for delivery of housing on alternative sites to those allocated in the Core Strategy which can mitigate the impact of under delivery on these allocated sites.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p><i>"The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken."</i></p> <p>Agreed. The work undertaken has appropriately categorised settlements and identified the most sustainable locations for development as set out in the settlement hierarchy. Insufficient time has passed that could be considered to render the work out of date.</p> <p><i>"Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review."</i></p> <p>Agreed, as detailed in response to question 1.1 of the consultation document.</p> <p>In light of the above, it is considered that a strategy for dispersal of reserve sites would be suitable. However the dispersal should not be to the same extent as delivering the identified housing needs of the district in the Core Strategy. Development in Category 2 LSVs or lower settlements in the hierarchy, in the main should not be considered given their limited infrastructure and capability and capacity to respond to increased housing demands or under provision. Development should be dispersed amongst the settlements with a greater access to facilities, services, employment and sustainable modes of transport.</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>Southam is well located in close proximity to the M40 to respond to all circumstances for the release of reserve sites and therefore serious consideration should be given to concentrating a large proportion of development to the site at Home Farm.</p>
53	Cerdea Planning on behalf of Darling Family Trust	<p>The response to this question is provided by commenting upon each statement comprising the broad strategy individually.</p> <p><i>"By their nature, reserve sites would comprise those that are not allocated in the Core Strategy"</i></p> <p>This is agreed. Existing allocations should not be considered to be reserve sites as due consideration has already been given to their ability to deliver housing over the plan period.</p> <p><i>"It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve."</i></p>

No.	Source	Comment
		<p>This is agreed. The delivery of housing on sites coming forward on large and strategic sites with long term delivery of housing have been objectively assessed and scrutinised to ensure a realistic trajectory for provision. Given the complexity of delivering large and strategic sites, it is unrealistic that sites could be considered able to deliver additional housing planned for beyond the plan period to meet unforeseen demands requiring response in the short term.</p> <p>Historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Delays in the delivery of large and strategic sites with housing trajectories beyond plan periods can be attributed to a multitude of factors which causes uncertainty. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the uncertainty in the ability to deliver housing over the plan period alone, it would be illogical to consider identifying any of these sites as reserve sites as their ability to increase the housing trajectory is unrealistic.</p> <p><i>“Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP.”</i></p> <p>By the nature of the circumstances in which reserve sites can be released for development, it would not be logical to allocate reserve sites towards settlements designated as Category 2 Local Service Villages or lower in the settlement hierarchy. Given the size and infrastructure of Category 2 LSVs and lower settlements in the hierarchy they have a lower capability of accommodating additional housing.</p> <p>The circumstances in which land will be released for reserve housing site detailed in Policy CS.15.D would require a significant housing response. The proposed development at Stoneythorpe would provide a sustainable response to increased housing need whilst limiting impact on existing settlements which have already seen a proportionate allocation of development over the plan period to meet the needs of the district dependent on their existing infrastructure.</p> <p>Under the first circumstance as set out, reserve sites would be released where the allocated sites are not delivering housing in accordance with the identified trajectory resulting in a reduction to housing land supply creating a need for a proactive response to maintain a five year housing land supply. A large proportion of the allocated sites provide substantial levels of housing. Smaller sites are less likely to be subject to delays in provision and therefore a failure to maintain a five year housing land supply is most likely to be derived from delays on the larger strategic sites.</p>

No.	Source	Comment
		<p>A delay at the early stages in the delivery of large and strategic sites would be likely to have consequential affects and would lead to a continual shortfall of housing delivery compounding year on year. As such, a relatively minor delay on a large scale site could result in a significant under delivery that could not be adequately mitigated for by allocating sites in the lower category LSVs as these are only capable of accommodating small sites. Category 1 LSVs, MRCs and Stratford-on-Avon are capable of some residential development without putting undue pressure on existing infrastructure.</p> <p>Notwithstanding the ability for existing settlements to accommodate additional growth, the proposed development at Stoneythorpe would mitigate the need for a large proportion of additional development to be provided in existing settlements. Stoneythorpe can deliver up to 800 dwellings in response to the need for additional housing arising from under-provision in order to maintain a five year housing land supply.</p> <p>Although Stoneythorpe is large scale in nature, the modern construction techniques, including modular build, ensure that a large number of houses can be provided in a proportionately short time period which is crucial to the first circumstance for the release of additional sites. There is very limited off-site infrastructure required to implement the proposed scheme and therefore the development would not be subject to any potential delays caused by third parties undertaking off-site works. Significant work has already been undertaken to ensure that the proposal is both viable and deliverable,</p> <p>Under the second circumstance for the release of reserve sites, any arising housing requirement should be contained relatively locally to the employment site. Limiting the dispersing of the dwellings geographically to a close proximity to the employment site would reduce the need for future occupiers to travel to access the employment site whilst having access to a good level of services and facilities in the surrounding area.</p> <p>Stoneythorpe is approximately 11 kilometres from Gaydon. Gaydon is within a reasonable cycling distance from Stoneythorpe which would allow occupiers to respond in a sustainable manner to any additional need arising under the second circumstance. Furthermore, buildings would be provided with electric car charging points ensuring that any private car journeys to and from Gaydon would also constitute a sustainable mode of transport having regard to the definition of sustainable transport modes set out in the glossary of the NPPF. Additionally, Stoneythorpe would include employment land as well as offices to complement the employment provision in the area and therefore occupiers would not be wholly reliant upon employment at Gaydon</p> <p>Circumstances three and four arise as a result of the need within the district to accommodate housing from within and outside the Coventry and Warwickshire HMA. It has recently been agreed in a joint position statement published by 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings to meet Coventry's unmet need. The need to accommodate development from the Greater Birmingham and Black Country HMA within the district is not yet established although it has been identified that the shortfall in the delivery across the HMA equates to 28,150 dwellings between 2011 and 2031 and 60,855 to 2036.</p>

No.	Source	Comment
		<p>The housing numbers to be accommodated within the Stratford-on-Avon District from the Coventry HMA alone are significant, notwithstanding the addition of any need arising from the GBBCHMA. In both instances, to appropriately respond to housing needs, housing would need to be accommodated on medium and large sites which have capacity to provide a significant response to the circumstances.</p> <p>The proposed development at Stoneythorpe could provide up to 800 homes in response to circumstances three and four for the release of reserve sites. The proposal is within the Coventry and Warwickshire HMA and therefore perfectly positioned to accommodate a significant proportion of the 2,020 dwellings required to meet the HMA's unmet need. Whilst Stoneythorpe would be sustainable as an independent, there is good access to large settlements in the surrounding area. Royal Leamington Spa and Warwick are easily accessible along the A425 and Coventry is accessible along the A423.</p> <p>The proposal at Stoneythorpe presents sustainable development to meet the needs of the circumstances for the release of land. The proposal presents a realistic and deliverable site to provide additional housing to meet under-provision from allocated sites or additional need arising over the plan period. Stoneythorpe presents a sustainable solution for a substantial number of dwellings providing a mixed use development. It could function as a stand-alone, sustainable exemplar settlement and would not place additional pressure on existing settlements where only wholly residential developments would be proposed.</p> <p><i>“Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing.”</i></p> <p>The majority of LSVs are unlikely to be able to identify and deliver additional sites beyond those anticipated to be delivered which would respect the character and size of the settlement whilst being of sufficient size to require affordable housing to be delivered. The exception to this is likely to be Category 1 LSVs which have a greater level of infrastructure, services and facilities and would be able to accommodate sites delivering 10 dwellings or more which are of sufficient size to require affordable housing. Therefore, it is reasonable to consider that reserve sites should be identified at Category 1 LSVs and settlements higher in the settlement hierarchy, in addition to new settlements to ensure affordable housing is delivered.</p> <p>Notwithstanding the ability of LSVs to deliver affordable housing, Stoneythorpe would make a significant contribution towards affordable housing by providing a policy compliant number of affordable homes in accordance with the total number of dwellings provided once this is established.</p> <p>Not only would Stoneythorpe provide affordable housing but the construction methods proposed would reduce construction timescales compared to traditional construction methods. The resulting effect would be that</p>

No.	Source	Comment
		<p>affordable housing at Stoneythorpe, whether affordable as per the NPPF definition, or market accessible housing, would be delivered quicker in comparison to other sites.</p> <p>As Stoneythorpe would be a new settlement, it provides an opportunity to ensure that all affordable housing is wholly integrated with and indistinguishable from market homes.</p> <p>The significant provision of affordable housing at Stoneythorpe would reduce the pressure for provision in existing settlements.</p> <p><i>"Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise."</i></p> <p>As noted above, lower category LSVs would not have the ability for their infrastructure, services and facilities to absorb additional development and sustainably respond to the same effect as Category 1 LSVs, MRCs, Stratford-upon-Avon or a new sustainable settlement, such as Stoneythorpe. There are identified areas to the east of the district which would be best located to respond to the circumstances for the release of the land due to their proximity to good transport and communication links.</p> <p>Allocation of sites for residential development over the plan period to meet the needs of the district was required to include two new settlements to ensure that development did not put undue pressure on existing infrastructure in smaller settlements. When commenting upon the need for a second new settlement, the Inspector commented at paragraph 136 of their Final Report that:</p> <p><i>'So whilst one Participant argues that the addition of a second new town serves to distort the pattern of development away from one of dispersal, I cannot agree. It is within the range of options available and disperses housing growth away from the towns whilst providing the necessary infrastructure to address its own impact and deliver wider public benefits.'</i></p> <p>At paragraph 137 the Inspector goes on to state:</p> <p><i>'Conversely a strategy that sought to direct the required housing into existing towns could more accurately be described not as dispersal but concentration.'</i></p> <p>The Inspector has identified that the addition of new settlements is in accordance with the strategy for dispersal of growth where they provide the required infrastructure and further public benefits. It is identified in response to question 1.4 below that there will be a need to identify a housing requirement above the initial 20% buffer for reserve sites initially anticipated. On this basis, as a further significant housing response is required, it is considered necessary for an additional new settlement to be delivered.</p>

No.	Source	Comment
		<p>A new settlement at Stoneythorpe, providing up to 800 dwellings, in addition to a plethora of other public benefits, would allow for a critical mass to be accommodated with the required supporting infrastructure. Other residential extensions at settlements of differing sizes should be used in addition to a new settlement to provide a broad range of sites that would accommodate the additional growth without placing undue pressure on infrastructure at existing settlements. A strategy incorporating a new settlement and residential extensions to existing settlements would be in accordance with, and sympathetic to, the existing spatial strategy for growth that has been adopted through the Core Strategy.</p> <p>Stoneythorpe is well placed to accommodate growth for any circumstance which arises requiring the release of reserve sites and therefore is the best location for a new settlement. The lack of requirement for off-site infrastructure to be provided to accommodate the additional growth means that the site is deliverable and presents a sustainable solution.</p> <p><i>“It would be perverse to direct more housing to a site that was not delivering.”</i></p> <p>Agreed. The reserve sites should provide ample opportunity for delivery of housing on alternative sites to those allocated in the Core Strategy which can mitigate the impact of under delivery on those allocated sites.</p> <p>As noted above, historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the early timescales following the adoption of the Core Strategy, in most instances it is not possible to establish whether which large and strategic sites are not delivering. However, based on the often slow delivery of large and strategic sites when compared to their respective forecast trajectory, caution should be taken when considering allocating additional development to existing allocations. Existing allocations could be subject to delays and therefore the Council should not consider allocating additional development towards existing allocations given the potential to under-deliver as well as sites which are proving to be not delivering.</p> <p><i>“The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken.”</i></p> <p>Agreed. The work undertaken has appropriately categorised settlements and identified the most sustainable locations for development as set out in the Settlement Hierarchy. Insufficient time has passed that could be considered to render the work out of date.</p>

No.	Source	Comment
		<p>Whilst the work undertaken is not considered to be out of date and would not require a fundamental revisit, in light of a significantly increased housing requirement arising from the surroundings HMAs alone, further work should be undertaken and into the sustainability of a new settlements which is able to deliver the additional need.</p> <p>As noted above, the Inspector identified that the siting of residential development at settlements alone would constitute concentration as opposed to dispersal. Further work will be required to identify new settlements which are of both an appropriate size to accommodate additional growth and which are deliverable in a timely manner.</p> <p>An additional new settlement comprising approximately 3,000 homes would likely be disproportionate when considering the extent of the additional need. Whilst the need will be above the initial 20% envisaged, the addition of a settlement for 3,000 homes would accommodate a significant and substantial proportion of the additional need which would be more akin to a strategy for concentration as opposed to dispersal. Additionally, the extent of off-site infrastructure required to facilitate a settlement of such a size would be far greater decreasing the timescales for delivery.</p> <p>Stoneythorpe could provide up to 800 homes with the necessary infrastructure and provide wider public benefits. A new settlement the size of Stoneythorpe would be more proportionately sized in the context of the additional required housing need and is deliverable.</p> <p>Further consideration should be given to how Stoneythorpe can sustainably and sympathetically deliver up to 800 dwellings to complement residential extensions at the sustainable locations for development already identified by the Core Strategy.</p> <p>A fundamental revisit of the sustainability of existing settlements is not required but further consideration should be given to new settlements which can complement the delivery of residential dwellings in these locations.</p> <p><i>“Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.”</i></p> <p>Agreed, as detailed in response to question 1.1 of the consultation document.</p> <p>In light of the above, it is considered that a strategy for dispersal of reserve sites including a moderately sized new settlement, including the necessary infrastructure and wide public benefits, would be suitable. However the dispersal should not be to the same extent as delivering the identified housing needs of the district in the Core</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Strategy. Development in Category 2 LSVs or lower settlements in the hierarchy, in the main should not be considered given their limited infrastructure and capability and capacity to respond to increased housing demands or under provision.</p> <p>Development should be dispersed amongst a new settlement and the settlements with a greater access to facilities, services, employment and sustainable modes of transport.</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p>
54	Cerdea on behalf of Braemar Property Developments	<p>The response to this question is provided by commenting upon each statement comprising the broad strategy individually.</p> <p><i>'By their nature, reserve sites would comprise those that are not allocated in the Core Strategy'</i></p> <p>This is agreed. Existing allocations should not be considered to be reserve sites as due consideration has already been given to their ability to deliver housing over the plan period.</p> <p><i>'It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve.'</i></p> <p>This is agreed. The delivery of housing on sites coming forward on large and strategic sites with long term delivery of housing have been objectively assessed and scrutinised to ensure a realistic trajectory for provision. Given the complexity of delivering large and strategic sites, it is unrealistic that sites could be considered able to deliver additional housing planned for beyond the plan period to meet unforeseen demands requiring response in the short term.</p> <p>Historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Delays in the delivery of large and strategic sites with housing trajectories beyond plan periods can be attributed to a multitude of factors which causes uncertainty. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the uncertainty in the ability to deliver housing over the plan period alone, it would be illogical to consider identifying any of these sites as reserve sites as their ability to increase the housing trajectory is unrealistic.</p>

No.	Source	Comment
		<p><i>'Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP. '</i></p> <p>By the nature of the circumstances in which reserve sites can be released for development, it would not be logical to allocate reserve sites towards settlements designated as Category 2 Local Service Villages or lower in the settlement hierarchy. Given the size, scale and infrastructure of Category 2 LSVs and lower settlements in the hierarchy they have a lower capability of accommodating additional housing. The circumstances in which land will be released for reserve housing site detailed in Policy CS.15.D would require a significant housing response.</p> <p>Under the first circumstance as set out, reserve sites would be released where the allocated sites are not delivering housing in accordance with the identified trajectory resulting in a reduction to housing land supply creating a need for a proactive response to maintain a five year housing land supply. A large proportion of the allocated sites provide substantial levels of housing. Smaller sites are less likely to be subject to delays in provision and therefore a failure to maintain a five year housing land supply is most likely to be derived from delays on the larger strategic sites.</p> <p>A delay at the early stages in the delivery of large and strategic sites would be likely to have consequential affects and would lead to a continual shortfall of housing delivery compounding year on year. As such, a relatively minor delay on a large scale site could result in a significant under delivery that could not be adequately mitigated for by allocating sites in LSVs of Category 2 or lower as these are only capable of accommodating small sites. Category 1 LSVs, MRCs and Stratford-on-Avon are capable of accommodating medium to large sites without putting undue pressure on existing infrastructure. Therefore, reserve sites to meet the first circumstance allowing for the release of reserve sites should be accommodated for through sites in Category 1 LSVs, MRCs and Stratford-upon-Avon. Both of the sites at Wellesbourne and Bishop's Itchington are deliverable and capable of providing residential development of a scale that could respond to the need for the release of land under the first circumstance.</p> <p>Under the second circumstance for the release of reserve sites, any arising housing requirement should be contained relatively locally to the employment site. Limiting the dispersing of the dwellings geographically to a close proximity to the employment site would reduce the need for future occupiers to travel to access the employment site whilst having access to a good level of services and facilities in the surrounding settlements. Whilst there are several LSVs in close proximity to the employment site the category of LSV varies. The category 1 LSV and two MRCs in proximity to the employment site are the most sustainable locations for development. Given the size of the settlements, they have sufficient infrastructure with a capacity to absorb new development despite any existing allocations. Both of the sites at Wellesbourne and Bishop's Itchington are</p>

No.	Source	Comment
		<p>well located geographically to enable a sustainable response to the need for the release of land under the second circumstance.</p> <p>Circumstances three and four arise as a result of the need within the district to accommodate housing from within and outside the Coventry and Warwickshire HMA. It has recently been agreed in a joint position statement published by T4 authorities, including SDC, that SDC will accommodate 2,020 dwellings to meet Coventry's unmet need. The need to accommodate development from the Greater Birmingham and Black Country HMA within the district is not yet established although it has been identified that the shortfall in the delivery across the HMA equates to 28,150 dwellings between 2011 and 2031 and 60,855 to 2036.</p> <p>The housing numbers to be accommodated within the Stratford-on-Avon District from the Coventry HMA alone are significant, notwithstanding the addition of any need arising from the GBBCHMA. In both instances, to appropriately respond to housing needs, housing would need to be accommodated on medium and large sites which have capacity to provide a significant response to the circumstances. Therefore, dwellings should be accommodated in Stratford-upon-Avon, the MRCs or category 1 LSVs that have the infrastructure capable of accommodating the growth and land which is available and deliverable. Both of the sites at Wellesbourne and Bishop's Itchington are located within the Coventry and Warwickshire HMA and are therefore prime locations to provide residential development in response to the need for the release of land under the third circumstance.</p> <p><i>'Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing.'</i></p> <p>The majority of LSVs are unlikely to be able to identify and deliver additional sites beyond those anticipated to be delivered which would respect the character and size of the settlement whilst being of sufficient size to require affordable housing to be delivered. The exception to this is likely to be Category 1 LSVs which have a greater level of infrastructure, services and facilities and would be able to accommodate sites delivering 10 dwellings or more which are of sufficient size to require affordable housing. Therefore, it is reasonable to consider that reserve sites should be identified at Category 1 LSVs in addition to the larger settlements to ensure affordable housing is delivered. The site at Bishop's Itchington would be approximately 57 dwellings which would be able to accommodate a policy compliant element of affordable housing equating to the addition of 20 affordable units.</p> <p><i>'Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise.'</i></p> <p>As noted above, lower category LSVs would not have the ability for their infrastructure, services and facilities to absorb additional development and sustainably respond to the same effect as Category 1 LSVs and MRCs. Additionally, as noted above, there are identified areas to the east of the district which would be best located to</p>

No.	Source	Comment
		<p>respond to some circumstances for the release of the land due to their proximity to good transport and communication links.</p> <p>A strategy including residential development at Land rear of Kineton Road, Wellesbourne and Gaydon Road, Bishop's Itchington, close to the M40 corridor, along with other appropriate sites, would provide ample scope to accommodate various levels of growth and respond to the differing circumstances for the release of reserve sites. Therefore, a strategy to identify a range of sites including Wellesbourne and Bishop's Itchington would be in accordance with the overall strategy for dispersal whilst responding to the specific circumstances for the release of reserve sites.</p> <p>Both sites at Bishop's Itchington and Wellesbourne would provide approximately 57 and 85 dwellings, respectively, and are well located close to good transport and communication links. Both sites present differing levels of residential development that could be utilised dependent on the size of the required housing response.</p> <p><i>'It would be perverse to direct more housing to a site that was not delivering. '</i></p> <p>Agreed. The reserve sites should provide ample opportunity for delivery of housing on alternative sites to those allocated in the Core Strategy which can mitigate the impact of under delivery on these allocated sites.</p> <p><i>'The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken.'</i></p> <p>Agreed. The work undertaken has appropriately categorised settlements and identified the most sustainable locations for development as set out in the settlement hierarchy. Insufficient time has passed that could be considered to render the work out of date.</p> <p><i>'Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.'</i></p> <p>Agreed, as detailed in response to question 1.1 of the consultation document.</p> <p>In light of the above, it is considered that a strategy for dispersal of reserve sites would be suitable. However the dispersal should not be to the same extent as delivering the identified housing needs of the district in the Core Strategy. Development in Category 2 LSVs or lower settlements in the hierarchy, in the main should not be considered in the main given their limited infrastructure and capability and capacity to respond to increased housing demands or under provision. Development should be dispersed amongst the settlements with a greater access to facilities, services, employment and sustainable modes of transport.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>Settlements on the eastern side of the district along or in close proximity to the M40 are well positioned to respond to all circumstances for the release of reserve sites and therefore serious consideration should be given to concentrating a larger proportion of development to the sites to the north of Kineton Road, Wellesbourne and Gaydon Road, Bishop's Itchington.</p>
55	Gladman Developments	<p>Gladman note that the Council are intending to pursue a distribution of housing which is consistent with that established in the Core Strategy. Whilst Gladman understand the approach advocated, and the fact that it was found sound by the Inspector, there are a number of potential issues which may lead to the Council encountering problems as the plan develops.</p> <p>Firstly, the strategy as set out in policy CS.15 considers that Stratford-upon-Avon should be the main focus of development. Followed by the main rural centres, new settlements, local service villages and a range of other categories. The issue with following this settlement hierarchy is that it is influenced and restricted (in terms of allocations) through the way in which the site allocations plan is dealing with settlements which have Neighbourhood Plans which are either Made or at an advanced stage. Stratford-upon-Avon, Bideford-on-Avon, Kineton, Shipston-on-Sour and Wellesbourne are all higher order settlements to which no further allocations will be made through the Site Allocations because of the Neighbourhood Plans in those areas. Those settlements alone account for 36% of the allocations made in the Core Strategy, and which the Council's apparent approach means would now be exempt from further allocations. Whilst in some instances it is fair to say that these areas may have exceeded the totals within the Core Strategy they have not done so by a sufficient enough margin to make up the buffer levels envisaged by the Inspector of the Core Strategy.</p> <p>By way of example the Wellesbourne Neighbourhood Plan, whilst making allocations on three sites, states that its major allocation (250 units) can only be developed after 2030. The allocation would clearly therefore not meet needs in this plan period. Similarly the Stratford-upon-Avon Neighbourhood Development Plan largely just reflects the Core Strategy, as does the Bideford Neighbourhood Plan. The Kineton Neighbourhood Plan provides a modest increase of 10 units on top of the Core Strategy.</p> <p>The result of this, and similar issues with settlements with Neighbourhood Plans further down the hierarchy, is that there is the potential for sites to need to be concentrated in a smaller pool of settlements. This may lead to an allocation strategy which diverges from the settlement hierarchy outlined in the Core Strategy.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>One possible solution would be to consider an additional site in the new settlement/strategic urban extension category. Gaydon Lighthorne Heath and Long Marston Airfield account for nearly 27% of the total housing allocations in the Core Strategy. Providing an additional brownfield site, at Wellesbourne Airfield, would be one such potential solution therefore to the issues identified above which would be in accordance with the Core Strategy policy.</p> <p>With regard to the bullet point principles set out in relation to the broad strategy for seeking to allocate reserve sites Gladman are in broad agreement with the majority of them. Gladman do however disagree with the assertion that the dispersal of reserve sites to LSVs would not maximise affordable housing delivery. Gladman can see no evidence to back up this assertion, the allocation of sites below the affordable housing threshold may indeed lead to a lack of delivery of affordable housing on such sites, but rural areas which have often been starved of development for many years are often the most unaffordable, therefore even with an increased threshold such sites would deliver significant affordable housing as long as the scale of any such site was reasonable.</p> <p>Gladman also note that consultation document sets out that identifying a broad range of sites consistent with the strategy should be undertaken whilst at the same time acknowledging that it would be perverse to direct more housing to a site that was not delivering. The Council will need to reconcile this conflict as it moves forward, if it considers that there are significant failings with the spatial strategy pursued through the Core Strategy then it may be necessary to urgently review this element of the Core Strategy. If however it is a failure of a site in a location to deliver then the Council will need to look at the site specific circumstances of that site to see if it is the location of the site in general or a specific issue e.g. land ownership, ground conditions which have prevented it being developed.</p> <p>Gladman therefore consider that the broad strategy needs to be considered in detail, principally whether or not given the approach taken to Neighbourhood Plans, that the required reserve sites can be found in sustainable, deliverable locations in the remaining settlements. As advocated the allocation of Wellesbourne Airfield as a reserve site would be one such potential solution.</p>
56	WYG on behalf of Barwood Developments	<p>The purpose of the Site Allocations Plan that will be prepared by the Council is to provide flexibility in the Council's ability to meet their agreed housing requirement of 14,600 dwellings over the Plan Period 2011 - 2031, through the identification of Reserve Sites. The Reserve sites will have the capacity to deliver up to 20% of the total housing requirement and the identifications will include for being able to respond to meeting housing need arising outside the Coventry and Warwickshire Housing Market Area.</p> <p>The Consultation Document has sought to set out a methodology that will identify those reserve housing sites which are consistent with the distribution of housing development established in Policy CS.15 of the Core</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Strategy, i.e. to locations within identified settlements. This spatial strategy for the location of Reserve Sites is agreed with.</p> <p>However, the exclusion of those settlements which have Made Neighbourhood Plans in place, is not considered to be a sound approach in the circumstances of this particular plan production. In effect, the Reserve Sites will only likely be engaged in a situation where either delivery has fallen short on current 5-year land supply trajectories, or an additional housing requirement has been identified to address unmet need from another authority area, or through the new standard methodology. It must deliver sufficient flexibility to allow housing to be provided that will ensure local housing need is met.</p> <p>The exclusion of Neighbourhood Plan settlements from that consideration is considered prejudicial to the proper sustainable planning of the District. Kineton, for example, is a Main Rural Centre (MRC), at the second tier of a 7-tier settlement hierarchy (Policy CS.15). It would be wrong to exclude any potential consideration of the role that settlement could play in meeting additional housing needs, solely on the basis that a Made, Neighbourhood Plan pre-existed. The Main Rural Centres should continue to form part of a consideration of any strategy that required additional land to be identified. My client's site, for example, which would extend the existing defined 'safeguarded land' in the Neighbourhood Plan, would represent a logical, and sustainable location for any additional development requirement arising.</p> <p>The strategy should also enable a range of size of sites to be delivered, as encouraged by para 50 of the National Planning Policy Framework (NPPF), to meet the full objectively assessed housing need that is set out in the Core Strategy. The draft NPPF revisions, published on 5<sup>th</sup> March 2018 strongly reflected paras 1.29 and 1.30 of the 2017 Housing White Paper (HWP) and confirmed the need for local authorities to identify a range and portfolio of sites for new development.</p> <p>The Site Allocations Document should, therefore, when progressed ensure that it contains some additional degree of flexibility to allow for likely forthcoming changes at a national policy level.</p>
57	WYG on behalf of Bellway	<p>The purpose of the Site Allocations Plan that will be prepared by the Council is to provide flexibility in the Council's ability to meet their agreed housing requirement of 14,600 dwellings over the Plan Period 2011 - 2031, through the identification of Reserve Sites. The Reserve sites will have the capacity to deliver up to 20% of the total housing requirement and the identifications will include for being able to respond to meeting housing need arising outside the Coventry and Warwickshire Housing Market Area.</p> <p>The Consultation Document has sought to set out a methodology that will identify those reserve housing sites which are consistent with the distribution of housing development established in Policy CS.15 of the Core Strategy, i.e. to locations within identified settlements. This spatial strategy for the location of Reserve Sites is agreed with.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>However, the approach needs to have flexibility, to reflect its application. In effect, the Reserve Sites will only likely be engaged in a situation where either delivery has fallen short on current 5year land supply trajectories, or an additional housing requirement has been identified to address unmet need from another authority area, or through the new standard methodology. It must deliver sufficient flexibility to allow housing to be provided that will ensure local housing need is met.</p> <p>In addition, the strategy should enable a range of size of sites to be delivered, as encouraged by para 50 of the National Planning Policy Framework(NPPF), to meet the full objectively assessed housing need that is set out in the Core Strategy. The draft NPPF revisions, published on 5<sup>th</sup> March 2018 strongly reflected paras 1.29 and 1.30 of the 2017 Housing White Paper (HWP) and confirmed the need for local authorities to identify a range and portfolio of sites for new development. New para 69 seeks to introduce a requirement for at least 20% of all housing site allocations in local plans to be 0.5 hectares or less.</p> <p>The need for a balance of sites within a portfolio is particularly acute where, as with Stratford District, a significant element of the supply is tied to a few large sites. In the adopted Core Strategy for example, only 13.7% of sites were directed to Local Service Villages, where small sites are dominant. The Core Strategy apportionment may therefore need to be revisited as a result of the revised NPPF once published in final form. The Site Allocations Document should, therefore, when progressed ensure that it contains some additional degree of flexibility to allow for likely forthcoming changes at a national policy level.</p>
58	WYG on behalf of Spitfire Properties	<p>The purpose of the Site Allocations Plan that will be prepared by the Council is to provide flexibility in the Council's ability to meet their agreed housing requirement of 14,600 dwellings over the Plan Period 2011 - 2031, through the identification of Reserve Sites. The Reserve sites will have the capacity to deliver up to 20% of the total housing requirement and will need to be able to respond to meeting housing need arising outside of the Coventry and Warwickshire Housing Market Area.</p> <p>The Consultation Document has sought to set out a methodology that will identify those reserve housing sites which are consistent with the distribution of housing development established in Policy CS.15 of the Core Strategy, i.e. to locations within identified settlements. This spatial strategy for the location of Reserve Sites is agreed with.</p> <p>However, the implementation of that strategy, into definition of settlement boundaries and future reserve land, has omitted the potential role of extensions to the New Settlements identified by Policy CS.15, to contribute to future supply as part of a pool of reserve sites. Exclusion of any consideration of the role of future extensions to the New Settlements, which are an integral part of the current Spatial Distribution Strategy under CS.15, is not considered to be a sound approach in the circumstances of this particular plan production. In effect, the Reserve Sites will only likely be engaged in a situation where either delivery has fallen short on current 5-year land</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>supply trajectories, or an additional housing requirement has been identified to address unmet need from another authority area, or through application of the new standard methodology. The Plan must deliver sufficient flexibility to allow housing to be provided that will ensure local housing need is met.</p> <p>The exclusion of any review of the New Settlement boundaries from consideration is prejudicial to the proper sustainable planning of the District. LMA, for example, is a defined New Settlement, at the third tier of a 7-tier settlement hierarchy (Policy CS.15). It would be wrong to exclude any potential consideration of the role that the New Settlements could play in meeting additional housing needs, given the investment in infra-structure being proposed to support their development. The New Settlements (along with the Main Rural Centres) should continue to form part of a consideration of any strategy that requires additional land to be identified. My client's site, adjacent to the LMA development, would represent a logical medium to long term extension opportunity, and sustainable location for any additional development requirement arising.</p> <p>The strategy should also enable a range of size of sites to be delivered, as encouraged by para 50 of the National Planning Policy Framework (NPPF), to meet the full objectively assessed housing need that is set out in the Core Strategy. The draft NPPF revisions, published on 5<sup>th</sup> March 2018 strongly reflected paras 1.29 and 1.30 of the 2017 Housing White Paper (HWP) and confirmed the need for local authorities to identify a range and portfolio of sites for new development.</p> <p>The Site Allocations Document should, therefore, when progressed ensure that it contains some additional degree of flexibility to allow for likely forthcoming changes at a national policy level.</p>
59	WYG on behalf of Follett Property Holdings	<p>The purpose of the Site Allocations Plan that will be prepared by the Council is to identify Reserve Housing Sites that will provide flexibility, to ensure that the District can meet in full the agreed housing requirement of 14,600 dwellings over the Plan Period 2011 - 2031. This will include responding to meeting housing need arising outside the Coventry and Warwickshire Housing Market Area. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement.</p> <p>The Consultation Document has sought to set out a methodology that will identify those reserve housing sites which are consistent with the distribution of housing development established in Policy CS.15 of the Core Strategy, i.e. to locations within the identified settlements.</p> <p>It is agreed that the location of any Reserve Sites identified should be broadly in accordance with the settlement hierarchy at Core Strategy Policy CS.15 which sets out the policy encouragement for new development at existing and new settlements, subject to a number of criteria. However, the strategy should be applied with some flexibility, to reflect that it will only likely be engaged in a situation where either delivery has fallen short on current 5-year land supply trajectories, or an additional housing requirement has been identified to address</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>unmet need from Birmingham, or through the new standard methodology. It must deliver sufficient flexibility to allow housing to be provided that will ensure local housing need is met.</p> <p>The strategy should enable a range of size of sites to be delivered, as encouraged by para 50 of the National Planning Policy Framework (NPPF) to meet the full objectively assessed need. The need to identify a range of sites has been reiterated by the Government at paras 1.29 and 1.30 of the 2017 Housing White Paper (HWP) 'Fixing our broken housing market' which also identified the release of more small and medium-sized sites as a Step 1 proposal (page 18). The draft NPPF revisions, published on 5<sup>th</sup> March 2018 also strongly reflect the importance of having a balanced portfolio of sites for new development. New para 69 seeks to introduce a requirement for at least 20% of all housing site allocations in local plans to be 0.5 hectares or less.</p> <p>The need for a balance of sites within a portfolio is particularly acute where, as with Stratford District, a significant element of the supply is tied to a few large sites. In the adopted LP strategy for example, only 13.7% of sites were directed to LSV's where small sites predominate. This apportionment may need to be revisited to be compatible with the new NPPF when adopted. At this stage, it is necessary to at least ensure some additional degree of flexibility over the existing distribution strategy.</p>
60	WYG	<p>The purpose of the Site Allocations Plan that will be prepared by the Council is to identify Reserve Housing Sites that will provide flexibility, to ensure that the District can meet in full the agreed housing requirement of 14,600 dwellings over the Plan Period 2011 - 2031. This will include responding to meeting housing need arising outside the Coventry and Warwickshire Housing Market Area. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement.</p> <p>The Consultation Document has sought to set out a methodology that will identify those reserve housing sites which are consistent with the distribution of housing development established in Policy CS.15 of the Core Strategy, i.e. to locations within identified settlements.</p> <p>It is agreed that the location of any Reserve Sites identified should be broadly in accordance with Core Strategy Policy CS.15 which sets out the policy encouragement for new development at existing settlements, subject to a number of criteria. However, the policy must deliver sufficient flexibility to allow housing to be provided that will ensure local need is met. The policy must reflect the fact that it will only likely be engaged in a situation where either delivery has fallen short on current five year land supply trajectories, or additional housing is required to address unmet need from outside the District, or through the new standard methodology to be introduced in the NPPF.</p> <p>This should enable a range of size of sites, as encouraged by para 50 of the National Planning Policy Framework (NPPF) to meet the full objectively assessed need. The need to identify a range of sites was then reiterated by the Government at paras 1.29 and 1.30 of the 2017 Housing White Paper (HWP) 'Fixing our broken housing</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>market' which also identified the release of more small and medium-sized sites as a Step 1 proposal (page 18). The draft NPPF revisions, published on 5th March 2018 reflect this aspiration, new para 69 seeks to introduce a requirement for at least 20% of all housing site allocations in local plans to be 0.5 hectares or less.</p> <p>A significant element of Stratford District's housing supply is tiered to a few large sites. This is illustrated in the distribution of housing requirements where Local Service Villages only receive 13.7% of the housing targets, yet these are the locations where smaller sites dominate. It is therefore appropriate, and necessary, for the Council to ensure some degree of flexibility over the existing distribution strategy.</p>
61	Boyer on behalf of Venta Developments	<p>The strategy outlined for locating reserve housing sites indicates that '<i>the dispersal of reserve sites to LS Vs [Local Service Villages] might not maximise the delivery of affordable housing</i>'. Although recent developments within the LSVs have often been smaller scale infill developments (due to the nature of the LSVs themselves), it must not be forgotten that there will still be a local affordable housing need outside the main urban areas of the District and within the LSVs themselves.</p> <p>If the Council seeks to ensure that the affordable housing need is met in LSVs it is imperative that the Council should seek to allocate medium size housing sites over 10 units to LSVs (of all Categories) to ensure these needs are met, including Priors Marston.</p> <p>The Council should not assume that local affordable housing needs in LSVs can be effectively met in larger settlements in larger locations,. Affordable housing should instead be dispersed through the District in medium size allocations in the LSVs as well. This can be accommodated through medium-scale, sensitively designed allocations on the edge of existing LSVs.</p> <p>As well as providing affordable housing, modest levels of additional development in the LSVs will help achieve and maintain sustainable rural communities by supporting existing rural facilities and services. For instance, Priors Marston currently benefits from a Primary School, Post Office, Public House, Village Hall, Church and Sports &amp; Social Club, despite having a small population of less than 600 people. As acknowledged in the Planning Practice Guidance (PPG), "<i>rural housing is essential to ensure viable use of these local facilities</i>" (Paragraph: 001 Reference ID: 50-001-20160519), and so the Council should look for opportunities to disperse some medium scale reserve site allocations to the LSVs to ensure such facilities remain viable going forwards.</p> <p>We therefore broadly agree with the strategy for locating reserve housing sites summarised in the consultation documents however as outlined above, the affordable housing need within the LSVs must be taken into account.</p>
62	Cerdea on behalf of Morris Homes	<p>The response to this question is provided by commenting upon each statement comprising the broad strategy individually.</p>

No.	Source	Comment
		<p><i>"By their nature, reserve sites would comprise those that are not allocated in the Core Strategy"</i></p> <p>This is agreed. Existing allocations should not be considered to be reserve sites as due consideration has already been given to their ability to deliver housing over the plan period.</p> <p><i>"It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve."</i></p> <p>This is agreed. The delivery of housing on sites coming forward on large and strategic sites with long term delivery of housing have been objectively assessed and scrutinised to ensure a realistic trajectory for provision. Given the complexity of delivering large and strategic sites, it is unrealistic that sites could be considered able to deliver additional housing planned for beyond the plan period to meet unforeseen demands requiring response in the short term.</p> <p>Historically, and recently, housing trajectories have often been overly optimistic and the provision of housing is often slower than initially forecast. Delays in the delivery of large and strategic sites with housing trajectories beyond plan periods can be attributed to a multitude of factors which causes uncertainty. Examples of delays in the delivery of strategic sites subsequent to the adoption of a local plan are the Barwell and Earl Shilton Sustainable Urban Extensions in the Borough of Hinckley and Bosworth and the West of Loughborough, North East of Leicester and North of Birstall Sustainable Urban Extensions in the Borough of Charnwood.</p> <p>Given the uncertainty in the ability to deliver housing over the plan period alone, it would be illogical to consider identifying any of these sites as reserve sites as their ability to increase the housing trajectory is unrealistic.</p> <p><i>"Against the backdrop of concerns about the level of dispersal to LSVs, this aspect of the strategy might need to be revisited when selecting reserve sites in the SAP."</i></p> <p>By the nature of the circumstances in which reserve sites can be released for development, it would not be logical to allocate reserve sites towards settlements designated as Category 2 Local Service Villages or lower in the settlement hierarchy. Given the size, scale and infrastructure of Category 2 LSVs and lower settlements in the hierarchy they have a lower capability of accommodating additional housing. The circumstances in which land will be released for reserved housing site detailed in Policy CS.15.D would require a significant housing response.</p> <p>Under the first circumstance as set out, reserve sites would be released where the allocated sites are not delivering housing in accordance with the identified trajectory resulting in a reduction to housing land supply creating a need for a proactive response to maintain a five year housing land supply. A large proportion of the allocated sites provide substantial levels of housing. Smaller sites are less likely to be subject to delays in</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>provision and therefore a failure to maintain a five year housing land supply is most likely to be derived from delays on the larger strategic sites.</p> <p>A delay at the early stages in the delivery of large and strategic sites would be likely to have consequential affects and would lead to a continual shortfall of housing delivery compounding year on year. As such, a relatively minor delay on a large scale site could result in a significant under delivery that could not be adequately mitigated for by allocating sites in the lower category LSVs as these are only capable of accommodating small sites. Category 1 LSVs, MRCs, Stratford-on-Avon and Redditch are capable of accommodating medium to large sites without putting undue pressure on existing infrastructure. Therefore, reserve sites to meet the first circumstance allowing for the release of reserve sites should be primarily accommodated for through sites in and adjacent to Category 1 LSVs, MRCs, Stratford-upon-Avon and Redditch.</p> <p>Under the second circumstance for the release of reserve sites, any arising housing requirement should be contained relatively locally to the employment site. Limiting the dispersing of the dwellings geographically to a close proximity to the employment site would reduce the need for future occupiers to travel to access the employment site whilst having access to a good level of services and facilities in the surrounding settlements. Whilst there are several LSVs in close proximity to the employment site the category of LSV varies. The category 1 LSVs and two MRCs in proximity to the employment site are the most sustainable locations for development. Given the size of the settlements, they have sufficient infrastructure with a capacity to absorb new development despite any existing allocations.</p> <p>Circumstances three and four arise as a result of the need within the district to accommodate housing from within and outside the Coventry and Warwickshire HMA. It has recently been agreed in a joint position statement published by 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings to meet Coventry's unmet need. The need to accommodate development from the Greater Birmingham and Black Country HMA within the district is not yet established although it has been identified that the shortfall in the delivery across the HMA equates to 28,150 dwellings between 2011 and 2031 and 60,855 to 2036.</p> <p>The housing numbers to be accommodated within the Stratford-on-Avon District from the Coventry HMA alone are significant, notwithstanding the addition of any need arising from the GBBCHMA. In both instances, to appropriately respond to housing needs, housing would need to be accommodated on medium and large sites which have capacity to provide a significant response to the circumstances. Therefore, dwellings should be accommodated in Redditch, Stratford-upon-Avon, the MRCs or category 1 LSVs that have the infrastructure capable of accommodating the growth and land which is available and deliverable.</p> <p><i>"Given raised thresholds, dispersal of reserves sites to LSVs might not maximise the delivery of affordable housing."</i></p>

No.	Source	Comment
		<p>The majority of LSVs are unlikely to be able to identify and deliver additional sites beyond those anticipated to be delivered which would respect the character and size of the settlement whilst being of sufficient size to require affordable housing to be delivered. The exception to this is likely to be Category 1 LSVs which have a greater level of infrastructure, services and facilities and would be able to accommodate sites delivering 10 dwellings or more which are of sufficient size to require affordable housing. Therefore, it is reasonable to consider that reserve sites should be identified at Category 1 LSVs in addition to the larger settlements to ensure affordable housing is delivered. The proposed site on HCA land, north of Mappleborough Green would provide a policy compliant 35% affordable housing which would make a significant contribution towards provision to meet the needs of the local community which inevitably already functionally straddles the boundaries of Stratford-on-Avon and Redditch.</p> <p><i>"Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise."</i></p> <p>As noted above, lower category LSVs would not have the ability for their infrastructure, services and facilities to absorb additional development and sustainably respond to the same effect as site adjacent to Redditch. The HCA land, north of Mappleborough Green site to the west of the district would be well located to respond to need arising from the GBBCHMA,</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>A strategy including residential development at HCA land, north of Mappleborough Green along with other appropriate sites, would provide ample scope to accommodate various levels of growth and respond to the differing circumstances for the release of reserve sites. Therefore, a strategy to identify a range of sites including HCA land, north of Mappleborough Green would be in accordance with the overall strategy for dispersal whilst responding to the specific circumstances for the release of reserve sites.</p> <p><i>"It would be perverse to direct more housing to a site that was not delivering."</i></p> <p>Agreed. The reserved sites should provide ample opportunity for delivery of housing on alternative sites to those allocated in the Core Strategy which can mitigate the impact of under delivery on these allocated sites.</p> <p><i>"The Core Strategy has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken."</i></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Agreed. The work undertaken has appropriately categorised settlements and identified the most sustainable locations for development as set out in the settlement hierarchy. Insufficient time has passed that could be considered to render the work out of date.</p> <p><i>“Given the imperative to identify reserve sites, it would seem unlikely that the SAP must be informed by a Green Belt review.”</i></p> <p>Agreed, as detailed in response to question 1.1 of the consultation document.</p> <p>In light of the above, it is considered that a strategy for dispersal of reserve sites would be suitable. However the dispersal should not be to the same extent as delivering the identified housing needs of the district in the Core Strategy. Development in Category 2 LSVs or lower settlements in the hierarchy, in the main should not be considered given their limited infrastructure and capability and capacity to respond to increased housing demands or under provision. Development should be dispersed amongst the settlements with a greater access to facilities, services, employment and sustainable modes of transport.</p> <p>Further to the above, consideration should be given to the geographical dispersal of reserve sites. Settlements in the southern part of the district are unlikely to be well placed to respond to the identified circumstances for the release of reserve sites given the separation from the Gaydon Lighthorne Heath employment site and Coventry and Warwickshire, and Birmingham, HMAs.</p> <p>The proposed site on HCA land, North of Mappleborough Green is well positioned to respond to additional need arising from the GBBCHMA as well as provide housing to maintain a five year housing land supply and therefore serious consideration should be given to concentrating a larger proportion of development to this site.</p>
63	Turley on behalf of St Modwen	Yes – refer to Part 1 answer
64	Kineton Parish Council	<p>We have some concern over the wording of 1.9 which states:</p> <p><i>It is intended that the location and capacity of reserve sites should broadly follow the distribution of housing development established in Policy CS.16 in the Core Strategy.</i></p> <p>There needs to be, within this Plan, a clear mechanism to:</p> <ul style="list-style-type: none"> <li>• ensure that the process does not stop as soon as the 20% head room is reached and also</li> <li>• to determine the order of release of the sites</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>For example sites (whether within the 14,600 or the 20%) should be called down first where they are in a MRC or LSV which has not delivered the number of dwellings proposed in the Core Strategy <u>before</u> reserve sites which are outside a BUAB at a location which has already delivered more than the Core Strategy minimum.</p>
65	Rosconn	<p>Whilst we generally agree with the broad strategy, we object to Bullets 2 and 3. These statements reflect comments made by the Core Strategy Inspector at paragraph 277 of his report. However, the level of dispersal to LSVs as set out within the adopted spatial strategy found sound by the Inspector was, as detailed in Policy CS.15, for a pattern of balanced dispersal in view of the wide range of sustainable locations across the District. This is also demonstrated by the scale of growth directed to the LSVs under Policy CS.16. LSVs remain sustainable locations to accommodate further, albeit proportionate, growth and can make a valuable contribution towards the Reserve Site requirement, as is supported by Part D of Policy CS.16 (i.e. 'The location of reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15').</p> <p>Allocating sites of a sufficient size would also address any possible concerns that LSVs 'might not' maximise the delivery of affordable housing. Whilst recent Monitoring Reports do not detail where affordable housing has been delivered across the District, it would be worthwhile investigating this as it is more than likely that existing commitments and allocations within the LSVs are making a valuable and not insignificant contribution towards affordable housing within the District. Furthermore, it is evident from larger sites such as the new settlements at Long Marston Airfield and Gaydon/Lighthorne Heath, that if anything it is these sites that are not maximising the delivery of affordable housing. Therefore, rather than questioning the role LSVs make in contributing towards the delivery of affordable housing, we consider the broad strategy should be acknowledging the important role these settlements play in helping to meet the needs of the more rural parts of the District, both in terms of affordable housing, but also in helping to maintain the viability of rural communities, as advised at paragraphs 54 and 55 of the Framework.</p> <p>There is also clear evidence within the District that small and medium sites are being delivered quickly, helping to bring forward development including affordable housing in a timely manner in locations in most need by its residents and these are exactly the type of sites the Government is now encouraging more of to help address the on-going housing crisis. The broad strategy should therefore include consideration of the scale of reserve sites that should be identified, particularly in view of the context of need that is likely to arise within the District that would require the release of reserve sites. For instance, in circumstances where the District Council cannot demonstrate a 5-year supply of deliverable housing sites, in order to avoid speculative development, reserve sites would need to be able to come forward quickly or 'shovel-ready' in order to respond the identified shortfall. Allocating larger sites or new settlements would be highly unsuitable in such circumstances, as they will have a long lead-in time and require significant investment up front before they are able to contribute to the housing supply.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
66	RCA Regeneration on behalf of Peter Drew Contracts	<p>The current consultation on the revised wording to the NPPF identifies that Councils should look to allocate 20% of sites allocated for housing are below half a hectare or less (paragraph 69). We consider that sites below half a hectare would be more appropriate in smaller settlements where they would be of an appropriate scale to the village.</p> <p>We consider that by not allocating reserve sites across all settlements there is a possibility that the larger settlements will become overwhelmed (such as Southam) and other villages will lack investment in their infrastructure and undermine existing services and facilities as a result. This is also considered relevant where Neighbourhood Plans have been 'made' and such no further development could be brought forward, other than through the SAP. We consider this contrary to the emerging NPPF which is clear that new strategic policy documents take precedent when adopted after a made neighbourhood plan (paragraph 32).</p> <p>With specific regard to Broom, we consider that the village and its close connection to Bidford -on-Avon (which is a Main Rural Centre significantly constrained by flooding) enhances its suitability for an allocation for a reserve site. The two villages are connected by a well-used footway and there are bus services to Bidford throughout the day.</p> <p>There is no settlement boundary for Broom and such, sites could be allocated within the built-up area of the village. This site is located on Bidford Road and is a previously developed site. It is considered that the site is well related to the village and the village is a suitable location for appropriate residential development.</p>
67	RCA Regeneration on behalf of Duchy Homes	<p>The current consultation on the revised wording to the NPPF identifies that Council's should look to allocate 20% of sites allocated for housing are below half a hectare or less (paragraph 69). We consider that sites below half a hectare would be more appropriate in smaller settlements where they would be of an appropriate scale to the village.</p> <p>We consider that by not allocating reserve sites across all settlements there is a possibility that the larger settlements will become overwhelmed (such as Southam) and other villages will lack investment in their infrastructure and undermine existing services and facilities as a result. This is also considered relevant where Neighbourhood Plans have been 'made' and such no further development could be brought forward, other than through the SAP. We consider this contrary to the emerging NPPF which is clear that new strategic policy documents take precedent when adopted after a made neighbourhood plan (paragraph 32).</p> <p>With specific regard to Broom, we consider that the village and its close connection to Bidford -on-Avon (which is a Main Rural Centre significantly constrained by flooding) enhances its suitability for an allocation for a reserve site. The two villages are connected by a well-used footway and there are bus services to Bidford throughout the day.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>There is no settlement boundary for Broom and such, sites could be allocated within the built-up area of the village. This site is located on Mill Lane, with residential development already permitted adjacent to this site. It is considered that the site is well related to the village and the village is a suitable location for appropriate residential development.</p>
68	RCA Regeneration on behalf of Alexander Stevens Construction	<p>The current consultation on the revised wording to the NPPF identifies that Council's should look to allocate 20% of sites allocated for housing are below half a hectare or less (paragraph 69). We consider that sites below half a hectare would be more appropriate in smaller settlements where they would be of an appropriate scale to the village.</p> <p>We consider that by not allocating reserve sites across all settlements there is a possibility that the larger settlements will become overwhelmed (such as Southam) and other villages will lack investment in their infrastructure and undermine existing services and facilities as a result. This is also considered relevant where Neighbourhood Plans have been 'made' and such no further development could be brought forward, other than through the SAP. We consider this contrary to the emerging NPPF which is clear that new strategic policy documents take precedent when adopted after a made neighbourhood plan (paragraph 32).</p> <p>With specific regard to Welford-on-Avon, we consider that the village and its close connection to Stratford-upon-Avon (which is the Main Town and is significantly constrained by flooding) enhances its suitability for an allocation for a reserve site. The two settlements are connected by bus services to Stratford-upon-Avon throughout the day.</p> <p>It is considered that the site is well related to the village and the village is a suitable location for appropriate residential development.</p>
69	Berkeley Strategic Land	<p>Berkeley Strategic agree with the majority of the broad strategy when seeking to locate reserve housing sites.</p> <p>We believe that more of a focus should be made within the broad strategy to locate and distribute allocations to sites that are on the urban edges of those major settlements within the settlement hierarchy. An effort to identify the least constrained sites within these areas should be made. The priority should be for the identification of sites at Stratford-upon-Avon as the Districts largest and most sustainable settlement.</p> <p>A site such as Little Luddington Farm is in highly sustainable location and would comply with Policy CS.15 while being consistent with the points set out in the broad strategy. In compliance with Policy CS.15, Little Luddington Farm enhances the character of the settlement without harming or impacting the surrounding landscape of the settlement. The land would also not result in any identity and/or integrity of the settlement of Stratford-upon-Avon being undermined, as the site would not reduce any strategic gap with an adjacent settlement.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>We agree that it would be perverse to direct further housing to a site that was not delivering, given that the District is already exceeding its 5 year housing land supply due to a weighted reliance on larger strategic sites. The council should consider the least constrained sites of a smaller, more deliverable nature, with single land ownership that can be relied upon for deliverability.</p> <p>Furthermore, the councils' broad strategy would benefit through the publication of a supporting document that sets out the strategy for releasing sites as needed. How do the council plan on ensuring and maintaining a 5-year housing land supply so as to prevent exposure to speculative planning applications from developers.</p>
70	GVA on behalf of St Philips	We fully support the Council's focus on the re-use of brownfield land for the delivery of housing.
71	Hunter Page on behalf of Bellway Homes	The broad strategy for seeking to locate reserve housing sites is appropriate as this accords with the settlement hierarchy in the adopted Core Strategy that sees Stratford as the main focus for further growth.
72	Mr G Cole	<p>Whilst we generally agree with the broad strategy, we object to Bullets 2 and 3. These statements reflect comments made by the Core Strategy Inspector at paragraph 277 of his report. However, the level of dispersal to LSVs as set out within the adopted spatial strategy found sound by the Inspector was, as detailed in Policy CS.15, for a pattern of balanced dispersal in view of the wide range of sustainable locations across the District. This is also demonstrated by the scale of growth directed to the LSVs under Policy CS.16. LSVs remain sustainable locations to accommodate further proportionate growth and can make a valuable contribution towards the Reserve Site requirement. Allocating sites of a sufficient size would also address any possible concerns that LSVs 'might not' maximise the delivery of affordable housing. Whilst recent Monitoring Reports do not detail where recent affordable housing has been delivered across the District, it would be worthwhile investigating this as it is more than likely that existing commitments and allocations within the LSVs are making a valuable and not insignificant contribution towards affordable housing within the District. Furthermore, it is evident from larger sites such as the new settlements at Long Marston Airfield and Gaydon/Lighthorne Heath, that if anything it is these sites that are not maximising the delivery of affordable housing. Therefore, we consider the broad strategy should acknowledge the important role these settlements play in helping to meet the needs of the more rural parts of the District, in terms of affordable housing and also in helping to maintain the viability of rural communities, as advised at paragraphs 54 and 55 of the Framework.</p> <p>It should also be noted that additional sites outside the LSV's could also be added to the reserve sites list to ensure a more diverse approach to delivering appropriate levels of residential development across the district should the need arise.</p> <p>There is clear evidence within the District that small and medium sites are being delivered quickly, helping to bring forward development including affordable housing in a timely manner in locations in most need by residents and these are the type of sites the Government is now encouraging more of to help address the on-</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>going housing crisis. The broad strategy should therefore include consideration of the scale of reserve sites that should be identified, particularly in view of the context of need that is likely to arise within the District that would require the release of reserve sites. For instance, in circumstances where the District Council cannot demonstrate a 5-year supply of deliverable housing sites, to avoid speculative development, reserve sites would need to be able to come forward quickly to respond to the identified shortfall. Allocating larger sites or new settlements would be highly unsuitable in such circumstances, as they will have a long lead-in time and require significant investment up front before they are able to contribute to the housing supply.</p>
73	Savills on behalf of David Wilson Homes	<p>CS Policy 15 sets out that Shipston-on-Stour is one of eight Main Rural Centres within the District. Rural market towns, like Shipston-on-Stour, are identified as suitable locations for housing and business development. Paragraph 279 of the CS Inspector's report states that "The CS has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken". Therefore, in accordance with the CS, reserved sites should be located in the most sustainable Main Rural Centres, which lie outside the Green Belt, such as Shipston-on-Stour.</p> <p>Within Shipston-on-Stour, in accordance with paragraph 6.6.18, reserved sites should be located in areas with the least landscape sensitivity. In the Councils landscape Sensitivity Study 2011, it was identified that land to the west and south west of the Shipston were the least sensitive to residential development. Therefore, reserve sites should be directed to the west and south west, such as land at Shoulderway Lane.</p>
74	DLP on behalf of Coln Residential	<p>As discussed through the introduction text DLP are concerned about the over reliance on Stratford-on-Avon to deliver a large percentage of the required growth. A greater emphasis should be placed on the MRC's to deliver these potential reserve sites, in particular the larger MRC's such as Wellsbourne.</p> <p>The largest settlement (by population) after Stratford-upon-Avon is Wellesbourne. This settlement is considered a highly sustainable option for growth considering its strategic location (approximately 5 miles to east of Stratford-upon-Avon and 6 miles south of Warwick), access to transport infrastructure (just off the A429) and variety of local facilities (including shops, post office's, public houses, offices, local primary school, community and other facilities together with medical, veterinary, pharmacy, banking and other services.) Further housing growth should be identified in locations such as this to ensure it is apportioned meaningful growth and ensures the ongoing vitality and viability of local services and facilities.</p> <p>Paragraph 1.7 of the Consultation document identifies the Principles which should be considered when identifying a reserve site (as recommended by the Inspector who oversaw the Core Strategy Examination). To reiterate our concerns of how these principles are being applied within Neighbourhood Plans we again refer to the WWN P, which we consider is likely under deliver given the current level of reserve sites in the emerging neighbourhood Plan. We offer the following commentary on the principles set out in para1.7 of the consultation document.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Principles Bullet 1: We agree reserve sites should be new sites not already allocated.</li> <li>• Principles Bullet 2: It is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve. (WWNP Housing Reserve Site Area 2 should be discounted from the reserve site total as it is only available in the last year of the plan). Further reserve sites should be identified in the SAP at Wellesbourne.</li> <li>• Principles Bullet 3/4: It is appropriate to limit the level of development at Local Service villages based on the concerns about the level of dispersal to LSVs and impact of higher affordable housing threshold of the delivery of affordable housing. Reserve Sites should be directed to more sustainable settlements such as Stratford-upon-Avon and the MRC and be in excess of the affordable housing threshold.</li> <li>• Principles Bullet 5: Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise. (At present WWNP provides a limited range of sites and further more appropriate sites should be allocated in the SAP).</li> <li>• Principle Bullet 6: Agreed, large sites or sites with delivery issues should not be enlarged with additional reserve sites allocations.</li> <li>• Principle Bullet 7: The Core Strategy Settlement Hierarchy is well established and does not need revisiting at this time. The strategy to distribute reserve sites allocations should be based on the existing spatial strategy with the primary focus at Stratford-upon -Avon and MRC such as Wellesbourne.</li> </ul> <p>Principle Bullet 8: There are sufficient, available, suitable and deliverable sites outside the Green Belt to meet the reserve site need. There is no justification for a an exceptional Green Belt release at this time, therefore the SAP should not require a Green Belt Review as evidence.</p>
75	Hunter Page on behalf of Spitfire Bespoke Homes	<p>Spitfire agrees that in general yes as it seeks to identify a broad range of sites that are consistent with the strategy and would allow them to be released according to the different needs that might arise. However, Local Service Villages should be allocated reserve sites where appropriate to ensure the rural communities are not stifled in their level of growth. The Council’s own housing delivery strategy is one of dispersal recognising the various locations of sustainable settlements around the district and seeks to restrict the concentration of development to certain key areas, this approach must also be followed through the allocation of reserve sites.</p> <p>Paragraph 69 of the NPPF 2018 draft consultation notes that small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly and therefore promoting smaller allocations in local service villages will help provide this.</p>
76	MJ Thorne	<p>Small-scale developers react quickly to availability of local building sites. They employ the local workforce and the money stimulates the local economy.</p> <p>Local service villages should be promoted, and space allowed for development which is not restricted by tightly drawn artificial boundaries.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
77	Framptons on behalf of Gallagher Estates	The distribution of reserve housing sites should follow the settlement hierarchy as set out by the Scoping and Initial Options paper, and established in Policy CS.15 in the Core Strategy. This will ensure consistency with the adopted Core Strategy which has been found sound by the examining Inspector back in July 2016 and therefore is consistent with current national policy. In order for reserve sites to be identified in locations where there is identified market and affordable housing needs, the relative distribution of development set out within Policy CS.16 remain important, as well as in ensuring that development remains proportionate to the scale of existing settlements.
78	Framptons on behalf of Mr I Lane	The distribution of reserve housing sites should follow the settlement hierarchy as set out by the Scoping and Initial Options paper, and established in Policy CS.15 in the Core Strategy. This will ensure consistency with the adopted Core Strategy which has been found sound by the examining Inspector back in July 2016 and therefore is consistent with current national policy.
79	Sworders on behalf of Mrs Mac	<p>Whilst we generally agree with the broad strategy, we object to Bullets 2 and 3. These statements reflect comments made by the Core Strategy Inspector at paragraph 277 of his report. However, the level of dispersal to LSVs as set out within the adopted spatial strategy found sound by the Inspector was, as detailed in Policy CS.15, for a pattern of balanced dispersal in view of the wide range of sustainable locations across the District. This is also demonstrated by the scale of growth directed to the LSVs under Policy CS.16. LSVs remain sustainable locations to accommodate further proportionate growth and can make a valuable contribution towards the Reserve Site requirement. Allocating sites of a sufficient size would also address any possible concerns that LSVs 'might not' maximise the delivery of affordable housing. Whilst recent Monitoring Reports do not detail where recent affordable housing has been delivered across the District, it would be worthwhile investigating this as it is more than likely that existing commitments and allocations within the LSVs are making a valuable and not insignificant contribution towards affordable housing within the District. Furthermore, it is evident from larger sites such as the new settlements at Long Marston Airfield and Gaydon/Lighthorne Heath, that if anything it is these sites that are not maximising the delivery of affordable housing. Therefore, we consider the broad strategy should acknowledge the important role these settlements play in helping to meet the needs of the more rural parts of the District, in terms of affordable housing and also in helping to maintain the viability of rural communities, as advised at paragraphs 54 and 55 of the Framework.</p> <p>It should also be noted that additional sites outside the LSV's could also be added to the reserve sites list to ensure a more diverse approach to delivering appropriate levels of residential development across the district should the need arise.</p> <p>There is clear evidence within the District that small and medium sites are being delivered quickly, helping to bring forward development including affordable housing in a timely manner in locations in most need by residents and these are the type of sites the Government is now encouraging more of to help address the on-</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>going housing crisis. The broad strategy should therefore include consideration of the scale of reserve sites that should be identified, particularly in view of the context of need that is likely to arise within the District that would require the release of reserve sites. For instance, in circumstances where the District Council cannot demonstrate a 5-year supply of deliverable housing sites, to avoid speculative development, reserve sites would need to be able to come forward quickly to respond to the identified shortfall. Allocating larger sites or new settlements would be highly unsuitable in such circumstances, as they will have a long lead-in time and require significant investment up front before they are able to contribute to the housing supply.</p>
80	LRM Planning on behalf of Hallam Land Management	<p>Policy CS.16 specifies that the capacity of the reserve sites should amount to 20% of the housing requirement and be distributed in accordance with the Spatial Strategy; this requires 2920 new homes to be identified in the Site Allocations DPD.</p> <p>This clearly affords a role to Stratford-upon-Avon town. On the basis of the distribution in Appendix 1 some 650 additional dwellings ought to be accommodated at Stratford-upon-Avon.</p> <p>However, in practice this should be greater because there is no merit in allocating additional land at either of the New Settlements or the Rural Brownfield locations as the capacity of these locations for the plan period has been maximised through the Core Strategy process in any event. Indeed, the Core Strategy Inspector specifically prohibited this as evidenced in para 1.7 of the consultation document.</p> <p>It is evident that the reserve sites are required to be genuinely additional sites capable of being developed in the plan period in the event the need arises. As a matter of principle we agree that the Site Allocations DPD should identify a broad range of sites that are consistent with the strategy. It is beyond question therefore that additional sites need to be identified at Stratford-upon-Avon.</p>
81	Framptons on behalf of Ellis Engineering	<p>The fundamental message of the Government is that there is a housing crisis in this country - which is, in large part, caused by the failure of the development process to allocate sufficient land for housing development. Claims that the housebuilding industry is hoarding land with planning permission for housing fail to recognise that on a grant of planning permission housebuilding cannot practically be undertaken on the entirety of the site from the outset. Market constraints; infrastructure constraints; capacity of production all have a limiting effect upon housing delivery. These constraining factors are especially significant on large sites.</p> <p>A development plan allocations DPD should pursue a portfolio approach with a broad range of housing sites, and not seek to confine new housing delivery to a few large sites - especially where infrastructure constraints are known from the outset.</p> <p>In order to take real action to address the national housing crisis, and the shortage of affordable housing with Stratford on Avon District, reserve sites for 2920 dwellings should be identified.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The fear that too much housing may be released is unfounded, as Core Strategy CS16 provides a policy basis for the release of reserve sites as and when needed.</p> <p>In order to be effective in responding to any identified additional housing need for housing in relation to the growth in jobs at JLR Gaydon, a suitable reserve site should be identified at Gaydon where adequate services are available for the daily needs of future occupiers.</p>
82	Warwickshire County Council	This is a matter for the Local Planning Authority to undertake site appraisals and site selection.
83	Pegasus on behalf of Rainier Developments	Rainier Developments agree with the broad strategy for allocating reserve sites outlined within the consultation document, subject to the comments made in response to Question 1.1 above.
84	Nexus Planning on behalf of Richard Mann	<p>We are in general agreement with the location of reserve sites being determined in accordance with the distribution of development set out within Core Strategy Policy CS.15. However, we do consider that there may be certain circumstances whereby a limited departure from this spatial strategy is appropriate, for example where a material change in the sustainability credentials of a settlement arise through existing or planned growth. Gaydon is identified as a Category 4 Local Service Village within the Core Strategy, but achieves a score at the top end of this category within the settlement hierarchy assessment. Moreover, Gaydon is located within 1.5km of the strategic allocation for a new settlement at Gaydon/Lighthorne Heath (GLH), which will comprise the second largest settlement in the District once complete, offering an extensive array of facilities to the benefit of Gaydon. It is considered that these circumstances offer the type of justification necessary to deviate from the distribution of development set out in Policy CS.15.</p>
85	Nexus Planning on behalf of Mr Brightman	<p>We are in general agreement with the location of reserve sites being determined in accordance with the distribution of development set out within Core Strategy Policy CS.15. However, we do consider that there may be certain circumstances whereby a limited departure from this spatial strategy is appropriate, for example where a material change in the sustainability credentials of a settlement arise through existing or planned growth. Gaydon is identified as a Category 4 Local Service Village within the Core Strategy, but achieves a score at the top end of this category within the settlement hierarchy assessment. Moreover, Gaydon is located within 1.5km of the strategic allocation for a new settlement at Gaydon/Lighthorne Heath (GLH), which will comprise the second largest settlement in the District once complete, offering an extensive array of facilities to the benefit of Gaydon. It is considered that these circumstances offer the type of justification necessary to deviate from the distribution of development set out in Policy CS.15.</p>
86	Nexus Planning on behalf of CEG and Mixed Farms	Policy CS.15 of the Core Strategy identifies that Stratford-upon-Avon is the principal settlement in the District, benefiting from access to a range of services and facilities, employment opportunities and public transport connections. It is therefore rightly identified as the main focus for housing growth in the Core Strategy.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		The Core Strategy states that the location of reserve housing sites should be consistent with the distribution of housing development established at Policy CS. 15, which given the above, means that a large proportion of the reserve housing site total should be located in and around Stratford-upon-Avon, such as land north of Banbury Road.
87	Pegasus on behalf of Gallagher Estates	Gallagher Estates agrees with the broad strategy for allocating reserve sites outlined within the consultation document, subject to the comments made in response to Question 1.1 above.
88	Simon Ward (Propernomics)	Appropriate sites at the LSVs could make an important contribution to supply, helping meet market requirements and needs, and helping to relieve pressure on less suitable sites. Hence if a newly identified site is immediately available then that contribution should be encouraged by the LPA and its planning policies sooner rather than later.
89	Barton Willmore on behalf of Taylor Wimpey	We agree with the broad strategy proposed in that the locations for reserved sites should have regard to Policy CS.15 of the Adopted Core Strategy i.e. that after Stratford Town, the next most suitable locations are the 8 Main Rural Centres. Of these, 3 (Alcester, Henley-in-Arden, Studley) are in the Green Belt and will not therefore be suitable locations for consideration.
90	DLP Planning on behalf of Talbot Homes	Land South of Station Road, Fenny Compton should be allocated as a reserve housing site.
91	Barton Willmore on behalf of Cemex	We agree with the broad strategy proposed in that the locations for reserved sites should have regard to Policy CS.15 of the Adopted Core Strategy i.e. that after Stratford Town, the next most suitable locations are the 8 Main Rural Centres. Of these, 3 (Alcester, Henley-in-Arden, Studley) are in the Green Belt and will not therefore be suitable locations for consideration.
92	Acres Land and Planning on behalf of Sharples family	Support – no further comment
93	John Holden	Need to have areas earmarked for potential building and conversely land protected from future development.
94	Stansgate on behalf of Terra Strategic	It is appropriate that consideration be given to the allocation of reserve sites at all LSV's and MRC's as such consideration would accord with the general strategy already found sound for the Core Strategy. The Core Strategy Inspector indicated that it may not be appropriate to direct reserve housing sites to all the LSV's because of local concern but a restricted approach should be handled with caution if it is only to satisfy local communities. What is best for the District as a whole must be given more weight than the objection of an individual community.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Consideration should be given to all settlements regardless of whether they have received more than their CS.16 share of housing to date or not. Failure to do this would be contrary to the overall strategy of the Plan and may mean that otherwise sustainable sites are ignored. Taking on board the Inspector's comment about maximising the delivery of affordable housing SAP sites could be required to provide a minimum of 10 dwellings thereby ensuring all sites are caught by the need to provide affordable housing on site.</p> <p>The aim of the Development Plan is to facilitate the provision of new homes where they are needed in a sustainable manner. The Core Strategy indicates that reserve sites will be released to meet the needs, in part, arising from any identified shortfall both within and beyond the Coventry and Warwickshire HMA; the Greater Birmingham and Black Country HMA; from additional housing needs relating to Jaguar Land Rover and if five year supply shortfall arises. Provision should be made for reserve sites close to where the need arises so a variety of sustainable locations in those parts of the District best placed to meet the need are required.</p> <p>Consideration of allocations to smaller settlements would be difficult as these are often not sustainable locations, unless there are particular reasons such as to meet an identified local need with local support (where the need is for more than 'small-scale' development as permitted by Policy AS.10).</p>
95	Brodie Planning on behalf of Valefresco	<p>Generally agree.</p> <p>The purpose of reserve sites is to assist with delivering housing that has either not been delivered by the existing identified sites in the plan, or to meet any increased need or shortfall in housing across the Coventry and Warwickshire HMA and outside the Coventry and Warwickshire HMA, for example Greater Birmingham HMA. Therefore it is important to identify a range of reserve sites that could meet a range of needs and could be delivered as quickly as possible with minimal constraints. Smaller sites dispersed through the Local Service Villages could be brought forward more quickly, could assist in maintaining a five year housing land supply, and meet identified needs shortfalls within both HMAs; whilst larger new settlements, and urban extensions would take longer to assemble and deliver homes. It is important that the reserve sites do not just focus on one type of site but that a mix of sizes of sites is identified.</p>
96	Brodie Planning on behalf of Lioned	<p>Generally agree.</p> <p>The purpose of reserve sites is to assist with delivering housing that has either not been delivered by the existing identified sites in the plan, or to meet any increased need or shortfall in housing across the Coventry and Warwickshire HMA and outside the Coventry and Warwickshire HMA, for example Greater Birmingham HMA. Therefore it is important to identify a range of reserve sites that could meet a range of needs and could be delivered as quickly as possible with minimal constraints. Smaller sites dispersed through the Local Service Villages could be brought forward more quickly, could assist in maintaining a five year housing land supply, and meet identified needs shortfalls within both HMAs; whilst larger new settlements, and urban extensions would</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		take longer to assemble and deliver homes. It is important that the reserve sites do not just focus on one type of site but that a mix of sizes of sites is identified.
97	Margaret Phillips	Land identified for housing beyond the plan period should be used for reserve sites
98	Carol Allen	Sites are already on the "reserved list" when the Core Strategy is done, this strategy should be adhered to for its allocated period.
99	Bev Atkinson	Oppose – no further comment
100	Savills on behalf of David Wilson Homes	<p>As we set out in our general comments response, we consider that there will be a significant shortfall in housing if Main Rural Centre's NPs continue to fail to meet their proportion of the reserved sites requirement. The table below sets out the eight Main Rural Centres in the District and identifies which ones are the subject of Green Belt restrictions and whether they have a 'made' Neighbourhood Plan. It also sets out current /emerging proposals for housing against the potential deficit against the Core Strategy Requirement. [table supplied]</p> <p>As set out in the Policy CS.16, there is a requirement for Main Rural Centres to provide approximately 3,800 homes over the plan period. This equates to 475 dwellings for each Main Rural Centre when divided by eight. However this does not take account of any restrictions arising from any of the Main Rural Centres which may have restrictions placed on their ability to deliver growth; for example being surrounded by Green Belt, which is not supported for release in the Core Strategy.</p> <p>The table demonstrates that out of the eight Main Rural Centres, only Shipston-on-Stour, Southam and Wellesbourne can accommodate additional reserve sites. However Wellesbourne and Walton NP is not yet 'made', they are at Examination and are proposing to provide more than double the anticipated 475 proportion of the requirement therefore this impacts on its ability to provide additional reserve sites going forward. Alcester, Henley-in-Arden and Studley are all constrained by Green Belt therefore we consider that it is unlikely that they will be able to support growth of approximately 475 dwellings. Additionally, Bidford-on-Avon and Kineton both have 'made' NPs which have both failed to meet the 475 dwelling proportion of the requirement.</p> <p>Of the 3,800 homes that are identified in the CS, the current / emerging proposals for housing across the Main Rural Centres equates to between 1073 - 1078 dwellings. This creates a deficit of approximately 2,700 dwellings that still need to be accommodated in the Main Rural Centres. If this deficit is divided between the three least constrained Main Rural Centres of Shipston-on-Stour, Southam and Wellesbourne, it would mean additional requirements of 290 dwellings would be required in order to meet the 475 dwelling requirement. This would take their requirement to 765 dwellings each which so far, Shipston-on-Stour has failed to meet having only proposed one reserved site of 48 dwellings. As already mentioned in the general comments section, the Shipston-on-Stour NP Examiner stated that this was sufficient. If every Examiner only reviews the NP before</p>

No.	Source	Comment
		<p>them instead of reviewing the District wide housing issues, the Main Rural Centres which produce their NPs last are going to be under pressure to meet the growing deficit. The District Council must address this issue now in order to control where the reserved sites are located to ensure that the least constrained Main Rural Centres, such as Shipston-on-Stour provide the most sites.</p> <p>In conclusion, we have demonstrated in this section that so far the Main Rural Centres with 'made' NPs are failing to meet their proportion of the reserved site requirement which is leaving a deficit of approximately 2,700 dwellings. The implication of the Main Rural Centres not meeting their proportion of the requirement is that it now puts significant pressure on the other Main Rural Centres to deliver the deficit. When the Green Belt settlements are removed from the remaining Main Rural Centres, this leaves only three settlements, Shipston-on-Stour, Southam and Wellesbourne, to deliver 765 dwellings each. The SAP needs to allocate more reserved sites across the Main Rural Centres, in particular Shipston-on-Stour, Southam and Wellesbourne, to address the housing deficit. If this issue is not addressed and dealt with in the SAP then the Council runs the risk that it will not be found sound at Examination because it has failed to meet its proportion of the reserved housing need.</p>
<p><b>Officer Response</b></p> <p>A large number of the responses expressed general support for the proposed approach to the identification and distribution of reserve sites.</p> <p>Comments relating to the principles for identifying reserve sites:</p> <ul style="list-style-type: none"> <li>• Sites that are already allocated in the Core Strategy should not be identified. - no objections.</li> <li>• Sites that are scheduled to be implemented beyond the plan period should not be identified. No.10/58 – approach should not exclude potential role of extensions to new settlements.</li> </ul> <p>Response: the Core Strategy Examination Inspector was clear in his Final Report (para 276) that it would not be appropriate to identify sites scheduled to be implemented beyond the end of the current plan period as reserve sites.</p> <ul style="list-style-type: none"> <li>• Sites that have not been delivering housing should not be identified. - no objections.</li> <li>• Impact of further development in Local Service Villages should be considered. No.3/11 – concerned about disproportionate scale of development in LSVs given lack of facilities. No.36 – more dispersed development in LSVs will lead to less sustainable pattern of development. No.45/75/76 – identifying reserve sites in LSVs will provide flexibility in delivering wide range of sites.</li> </ul>		

No.	Source	Comment
		<p>No.61/65/75/79 – modest levels of additional development in LSVs will help maintain sustainable rural communities.</p> <p>Response: the Core Strategy Examination Inspector in his Final Report (para 278) indicated that it would be appropriate to identify a broad range of reserve sites that are consistent with the approach to the distribution of development established in the Core Strategy. The nature of individual LSVs, and their categorisation in accordance with Policy CS.15 in the Core Strategy, will be taken into account in identifying reserve sites and in deciding which ones should be released for development if required.</p> <ul style="list-style-type: none"> <li>• Scope to provide affordable housing on sites in Local Service Villages should be considered.</li> </ul> <p>No.2/26/37/61/65/72/79 – reserve sites distributed to LSVs can contribute to affordable housing.                      No.31/32/55 – only identifying sites large enough to deliver affordable housing is counter-productive.</p> <p>Response: it would be appropriate to identify a wide range of reserve sites in terms of location and scale. While some may be too small to provide affordable housing, most of them will be large enough to do so based on the provisions of Policy CS.18 in the Core Strategy.</p> <ul style="list-style-type: none"> <li>• A broad range of sites that are consistent with the Core Strategy should be identified.</li> </ul> <p>No.84/85 – may be circumstances where a limited departure from spatial strategy basis for reserve sites is appropriate.                      No.66/67/68/72/79 – small reserve sites should be allocated in all rural settlements not just LSVs.</p> <p>Response: the established development strategy provides scope to identify sufficient reserve sites that are available, suitable and achievable without the need to deviate from it.</p> <p>Points regarding location of sites:</p> <p>No.12 – should not rule out small developments on edges of settlements in Green Belt.                      Response: there is no justification for amending the Green Belt boundaries to facilitate the identification of reserve sites. Policy CS.10 in the Core Strategy provides for small-scale housing development within or adjacent to settlements in the Green Belt to meet a local need.</p> <p>No.22 – sites close to settlements adjacent to the District boundary should be considered.                      Response: it would be appropriate to consider schemes to meet a local housing need if the site is adjacent to the existing built form of such a settlement.</p> <p>No.36/40/41/51/52/53/54/62/69/73/100 – emphasis should be on identification of reserve sites at larger settlements which are more sustainable                      Response: the Core Strategy Examination Inspector in his Final Report (para 278) indicated that it would be appropriate to identify a broad range of reserve sites that are consistent with the approach to the distribution of development established in the Core Strategy. The nature of individual settlements, and their categorisation in accordance with Policy CS.15 in the Core Strategy, will be taken into account in identifying reserve sites and in deciding which ones should be released for development if required.</p> <p>No.44 – Southam should be the focus of further housing development due to its character, location and facilities.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Response: Southam and LSVs near to it have been covered in the Strategic Housing Land Availability Assessment and other aspects of the evidence base. This will inform the suitability of sites to be identified as reserve sites in this area.</p> <p>No.51/52/53/54/62 – settlements in southern part of District are not well placed to respond to three of the purposes of reserve sites. Response: this factor will be taken into account when the need to release reserve sites is assessed.</p> <p>No.74 – concerned about an over-reliance on Stratford-upon-Avon to deliver large proportion of provision; should be more emphasis on MRCs. Response: there has been no particular emphasis towards certain settlements in the scope of the evidence assessed in order to provide the basis for identifying reserve sites. The approach is to be consistent with the distribution of development established in the Core Strategy.</p> <p>No.94 – provision for reserve sites should be close to where the need arises. Response: the release of reserve sites will reflect the scale and nature of the need identified based on their four purposes.</p> <p>Points regarding size of sites: No.36/49/65/72/79 – little benefit in identifying new settlements or other large sites because take significant amount of time to deliver. No.36/51/52/53/54/62 – reserve sites should not be identified if insufficient in size to deliver affordable housing. No.36 – small reserve sites would make a limited contribution to satisfying the purposes of such sites. No.36 – large sites have the ability to deliver a range of wider benefits. No.51/52/53/54/62/65/72/79/95/96 – small and medium size sites are less likely to be subject to delays in delivery. No.94 – reserve sites should be for a minimum of 10 dwellings to secure affordable housing. Response: all these points are acknowledged which is why the intention is to identify reserve sites which comprise a range of sizes and locations in order to be able to respond to circumstances as they arise.</p> <p>Other points about sites: No.21 – should take account of made/advanced Neighbourhood Plans. No.55/56/57/58/59/60/66/67/68/100 – existence of Neighbourhood Plans should not restrict identification of reserve sites. Response: for those settlements covered by NDPs that do not identify reserve sites it is appropriate for the District Council to do so through the SAP.</p> <p>No.33 – need to assess impact on heritage assets thoroughly. Response: this factor will be considered in identifying suitable reserve sites.</p> <p>No.53 – small new settlement reserve sites would mitigate the need for large proportion of additional development in existing settlements. Response: such sites that are being promoted have been considered through the SHLAA process for their suitability and achievability.</p> <p>No.59/60 – needs to be a wide range of reserve sites identified to provide flexibility. Response: this will be the case.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>No.94 – consideration should be given to all settlements regardless of whether they have met their housing requirement.                      Response: this will be the case in identifying reserve sites.</p> <p>Other issues to address:                      No.1/6 – should provide clearer guidance on the basis for selecting reserve sites.                      No.21 – should be more geographically specific about where sites are identified in relation to purposes other than five year housing land supply.                      No.64 – need a clear mechanism to determine order of release of sites with focus on settlements that have not met their housing requirement.                      No.69 – need to produce supporting document that sets out strategy for releasing reserve sites.                      Response: the SAP should set out the mechanism for assessing which reserve sites should be released dependent on the circumstances that apply over time.</p>
		<p><b>Officer Recommendation</b></p> <p>The factors set out in the Site Allocations Plan Scoping Document regarding the identification of reserve housing sites remain valid and should be applied. It will be necessary for the SAP to set out clearly the circumstances that will be taken into account when assessing whether a reserve site should be released for development.</p>

**Topic: Part 1 Reserve Housing Sites - Question 1.3 Principles**

No.	Source	Comment
1	David Booth	Support – no further comment
2	Bruton Knowles on behalf of Nigel Ward	Our client's site (Land at Evesham Road) satisfies provisions set out in paragraphs 1.10 to 1.13, and any future development would accord with principles outlined in Policy CS.15. For these reasons the site should be considered favourably.
3	Susanne Farmer	<p>CS.15: <i>'The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement.'</i></p> <p>'Unreasonably harmful impact' is subjective. The Sustainability Appraisal Report, December 2017, lists some key sustainability issues at paragraph 3.13, Table 3.1. These should be taken into account when assessing suitability of land for reserve sites. Examples of these key issues are as follows:</p> <p>Congestion: The Districts road network is becoming increasingly congested, particularly along radial and sub-radial routes. This has the potential for adverse effects on human health, safety and the economy. It can make commuter journeys more stressful and delay buses which are then unable to offer a viable alternative to the car for some journeys. Congestion can make deliveries less reliable and deter investment in the area.</p> <p>Conservation &amp; Enhancement of Cultural Heritage Assets: This includes the appropriate site assessments where necessary e. g. an archaeological assessment in areas where the local archaeology is unknown, and extends to non-designated assets.</p> <p>A further new settlement is the way forward using the Sustainability Appraisal criteria and incorporating plenty of dispersed affordable housing.</p>
4	Paul Clark	Support – no further comment
5	Tim Sharples	In general the principles seem to cover most aspects of reserve site requirements. However, the need for locally sourced land for local people to build their 'dream home' in an area they need to live isn't specifically outlined. There are likely a number of situations of this nature which the Core Strategy doesn't fully address.
6	Prior Marston Parish Council	Oppose – no further comment
7	WYG on behalf of Church Commissioners for England	We do not disagree with the thrust of the principles set out in paragraphs 1.10-1.13, however, the text with each relevant criteria should be amended to recognise the potential for identifying reserve sites not just at existing settlements, but also around new settlements which are in the process of being developed. They

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		provide an opportunity to plan, as part of a comprehensive whole, future development in a way that best assimilates with new settlement proposals and maximises the effective use of infrastructure.
8	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	It is important that new sites provide small low impact developments, easily assimilated, provide affordable housing without effect on the existing local infrastructure or the character of villages. A consultation on the National Planning Policy Framework includes a proposal to allow small scale developments on green belt land. It suggests that brownfield sites within the green belt should be considered in the same way as other brownfield land, providing they deliver Starter Homes, subject to local consultation.
9	Acres Land and Planning on behalf of the Sharples family	We would broadly support the criteria listed in policy CS.15 although the first criterion - relating to the number of dwellings identified for the settlement - may be self-defeating if it constrains development where growth is seen to be needed, especially within the smaller settlements where the numbers are insignificant. We therefore welcome paragraph 1.11.
10	Hampton Lucy Parish Council	The core strategy CS15 requirements as listed are supported.
11	H Farmer	<p>CS 15 states that “The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement.”</p> <p>There is a large degree of subjectivity in the phrase “unreasonably harmful impact”. Table 3.1 in Para 3.13 of the Sustainability Appraisal Report (Dec 2017) lists some key sustainability issues and these should be taken into account when assessing reserve sites. Some examples of the key issues are congestion, conservation and enhancement of cultural heritage assets and transport emissions.</p> <p>A further new settlement would be a good way forward, using the Sustainability Appraisal criteria and incorporating adequate amounts of dispersed and integrated affordable housing.</p>
12	PJS Development Solutions on behalf of Gloucester Diocesan Board of Finance	<p>We broadly support the principles but it is important that flexibility and common sense is employed. The current CS approach to apportionment to the LSVs appears to be overly formulaic and mechanistic.</p> <p>There are some LSV’s where the Council itself has granted permissions for substantially greater levels of housing growth than the Core Strategy ever envisaged. Long Marston is a good example, where the Council has permitted more than the CS limit of 32 (8% of the 400 total for LSV 4 villages). This should <u>not</u> preclude suitable small scale infill reserve sites being considered and identified.</p> <p>The SAP should also respond positively to the Draft Revised NPPF and, in particular, its encouragement and support for small sites and the Government’s proposal that 20% of sites should be half a hectare or less.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
13	Long Compton Parish Council	Agree with these principles, although it is hard to reconcile them with the decision not to automatically exclude AONB areas from the list of potential sites.
14	Bidford-on-Avon Parish Council	We would stress the importance of applying all the CS.15 requirements when making allocations.
15	Stephen Jones	In respect to principle 6, improvements to the infrastructure and services to the community, other points should be considered for example in a village that has an under-subscribed school then a development targeted to bring in families that will use the school (or pre-school, village shop, post office) should be considered beneficial to the community. Also where this may address the balance of an aged village population.
16	Stansgate Planning on behalf of Saffron Estates	<p>The principles identified are appropriate for the consideration of individual reserve sites.</p> <p>Ignoring the first of the principles in Policy CS.15 is particularly welcomed.</p>
17	Delta Planning on behalf of A C Lloyd Homes	Object – no further comment
18	Harris Lamb on behalf of Bovis Homes	<p>We support the principles identified by policy CS.15 being applied to the Reserve Housing Site site selection process. The land in Bovis control at Southam meets each of the criteria identified, as explained below, which confirms that the site is suitable for identification as a Reserve Housing Site in the emerging Plan.</p> <p><i>1. In relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in policy CS. 16 Housing Development.</i></p> <p>The land in Bovis' control adjoins Southam, a Main Rural Centre by the Core Strategy. The Main Rural Centres are expected to deliver a significant proportion of the overall housing requirement It is, therefore, entirely appropriate for additional development to be directed towards Southam, There is also clear evidence to suggest Southam should be a preferred location for the identification of Reserve Housing Sites.</p> <p>Furthermore, 3 of the 8 Main Rural Centres are surrounded by Green Belt. Given that land will not be released from the Green Belt and identified as a Reserve Housing Site by the emerging Site Allocations plan, the Main Rural Centres that are not constrained by the Green Belt will need to be a focus for growth.</p> <p>In addition, as referred to above, Kineton has a Neighbourhood Plan that includes land that will be treated as Reserve Housing Sites. In accordance with the proposed approach of the emerging Site Allocations Plan, no further Reserve Housing Sites should be directed towards Kineton We also explain above that whilst it is our view that there would be a policy conflict if Reserve Housing Sites were directed to those settlements that have an emerging or made Neighbourhood Plan that seek to prevent development outside of their settlement boundary where they have been prepared on the basis of the adopted Core Strategy.</p>

No.	Source	Comment
		<p>Southam is not constrained by the Green Belt and there is no Neighbourhood Plan that seeks to constrain the development of Green Belt beyond the settlement boundaries, Southam should, therefore, be a preferred location for directing additional development.</p> <p>Whilst we support the principle of additional development being directed towards Stratford-upon-Avon, as the largest and most sustainable settlement in the District, the ability of Stratford-upon-Avon to accommodate additional development going ahead is limited. We note that the Core Strategy Sustainability Appraisal advises in paragraph 7.1.16 that:</p> <p><b><i>“The District Council considers that Stratford-upon-Avon is clearly the most sustainable settlement in the District. It is, therefore, appropriate and reasonable in the context of the new housing requirement to look first and foremost at strategic options around the town to accommodate additional housing. Due to constraints on the Highways Network in particular, the only realistic option for a site of strategic scale is represented by the land at Bishopton Lane.”</i></b></p> <p>This land is now identified as a strategic allocation in the adopted Core Strategy (Allocation SUA.3). That being the case, all evidence suggests that it is highly unlikely that it will be possible to identify any meaningful Reserve Housing Sites at Stratford-upon-Avon.</p> <p><i>2. The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement.</i></p> <p>It is our view that making a proposed Reserve Housing Site allocation on the land in Bovis control in Southam is entirely in keeping with its immediate surroundings and the overall site and character of the settlement. Indeed, the Core Strategy makes housing allocations at Southern that deliver a greater quantum of development than the proposed Reserve Housing Site clearly indicating that Southam is capable of accommodating such levels of development.</p> <p>In terms of the suitability of Southam to accommodate new development generally, Section 6.7 - Southam Area Strategy of the Core Strategy advises that:</p> <ul style="list-style-type: none"> <li>• Southam town centre contains a large range of shops, commercial activities, services and facilities.</li> <li>• There are good public transport services to higher order settlements.</li> <li>• Southam functions as a service centre to much of the eastern part of the District.</li> <li>• Reserve Housing Sites may need to be identified for the town in the Site Allocations Plan or a Neighbourhood Plan.</li> </ul> <p>Paragraph 7.1.19 of the Core Strategy Sustainability Appraisal advises that:</p>

No.	Source	Comment
		<p><b><i>“The Council has identified Southam as the most appropriate location for additional strategic growth based upon the availability of suitable sites, the lack of overriding infra structure constraints, and the opportunity to support the existing facilities provided in the town.”</i></b></p> <p>The Core Strategy Inspectors report advises at paragraph 102 that:</p> <p><b><i>“Given its relative lack of constraints, e.g. compared to Studley, the analysis tends to underline the appropriateness of focusing significant housing development in Southam.”</i></b></p> <p>Furthermore, in order to inform the preparation of the Core Strategy, the District published the ‘Meeting the Revised Housing Requirement Options Assessment.’ This document identifies and assesses a range of potential development options in the District Appendix C of the assessment provides guidance on which settlements are best suited to accommodate new development. In terms of the Major Rural Centres it is advised that Southam is one of the most sustainable settlements in the rural part of the District and it supports a wide range of shops and services and a large industrial area. A number of potential strategic locations on the edge of the urban area that are worthy of assessment, although each of them has specific issues that need to be addressed</p> <p>Chapter 3 of the study advises that Southam is arguably the second-most sustainable Major Rural Centre after Alcester, due to its range of shops and services, the scale of employment provision and accessibility. However, development options at Alcester are restricted by the surrounding Green Belt. Southam has scope for further largescale development and a number of potential strategic sites at the edge of the urban area exist. Of all the Major Rural Centres, it is possible that further large-scale housing development would be effective in supporting and improving the retail service offer in the town centre. As things stand, the centre does not provide as many shops and services as Alcester and Shipston and it is less buoyant in comparison.</p> <p>The Council’s own evidence-based documents do, therefore, clearly support further development being directed towards Southam as one of the most suitable locations for development in the District.</p> <p>In terms of the land in Bovis control, the accompanying Vision Statement demonstrates that the site is capable of coming forward for development without adversely impacting upon the character of the settlement It will form a natural urban extension to Southam.</p> <p><i>3. The design of the development is well related to, and can be readily integrated, into the existing form of the settlement.</i></p> <p>As demonstrated by the accompanying Vision Statement, the proposed Reserve Housing Site is well related to, and can be easily integrated into the existing settlement. As previously highlighted, the site adjoins the built-up</p>

No.	Source	Comment
		<p>edge of Southam on its western and southern boundaries The development of the site would form a natural continuation of the development to the south of the Daventry Road and would therefore present the opportunity for the logical and sustainable growth of Southam. During a meeting with John Careford on 81b February 2018, HLPC were advised that the expansion of Southam to the east of the bypass is the most logical way for the settlement to grow going ahead.</p> <p>In terms of integration, Appendices B and C of the Vision Statement identify the footpath connections back into Southam from the site, which offers multiple opportunities to connect to an existing network of routes. The town centre is easily accessible with the majority of the facilities within the town centre within a 40Dm walking distance. It is envisaged that contributions could be made to upgrading the footpath connections to the town centre from the site if it comes to forward development. This will improve the existing connection across the Southam bypass and be of benefit to the local community generally.</p> <p><i>4. The location and extent of development does not have any reasonably harmful impact on the surrounding landscape and setting of settlement.</i></p> <p>As referred to above, the Vision Statement includes a Landscape Visual Impact Appraisal of the site. This has been used to inform the proposed development strategy. It demonstrates that the proposed site can come forward for development and will not have a harmful impact on the surrounding landscape and settlement. Indeed, it is shown how an attractive, high quality housing development can be brought forward that responds positively to its landscape setting and creates a highly desirable place to live.</p> <p><i>5. The location and extent of development would not result in the identity and/or integrity of the settlement being undermined as a result of a reduction of gap within an adjoining settlement.</i></p> <p>The nearest settlement to the east of Southam is Stockton, which is located to the north-east, At its closest point Stockton will be approximately 1.4km from the edge of the proposed Reserve Housing Site. As a consequence, there will be no adverse impact to the gap between Stockton and Southam as a result of development of the proposed Reserve Housing Site.</p> <p>It Is our view that the land in Bovis control represents the most appropriate location for identification of a Reserve Housing Site in Southam</p> <p>Development opportunities to the north of the town are restricted by Southam Cement Works, which is an active quarry. It is also designated as a Local Wildlife Site Part of the Southam Cement Works site Is promoted as a potential housing site through the Core Strategy Examination, however this option was dismissed by the Council and the Inspector. The site was considered to be unsuitable for allocation as part of the site is not currently available and is detached from a settlement edge with limited connectivity. It would be inappropriate for a site</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>that cannot be delivered immediately to be identified as a Reserve Housing Site given than one of the purposes of Reserve Housing Sites is to deliver development promptly to help rectify any shortfall in the five-year housing land supply position.</p> <p>Development to the west of Southam is also unrealistic. The Core Strategy identifies an “Area of Restraint” to the west of the town, as shown on the Core Strategy Insert Map for Southam. This area is designated as an Area of Restraint as it makes an important contribution to the character of the town, There Is also a scheduled ancient monument to the west of the town.</p> <p>There are no real development options to the south of the town. Further growth south is constrained by HS2 and its associated safeguarding zone.</p> <p>Southam can, therefore, only realistically grow eastwards. It is our view that the land in Bovis’ control represents the most appropriate location for the eastwards growth of the town for reasons explained in response to principle 6, below.</p> <p><i>6. The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></p> <p>As referred to above, the site provides the opportunity to deliver significant amounts of open space and, if required, land for provision of a primary school. This sets the site apart from other potential development locations at Southam There is no other site that we are aware of that is able to provide a site for a school. We understand that primary school capacity in Southam is decreasing and additional school places will be required in the relatively near future. This requirement could be met on the proposed Reserve Housing Site.</p>
19	Stansgate Planning on behalf of Mr and Mrs Wythes	<p>The principles identified are appropriate for the consideration of individual reserve sites.</p> <p>Ignoring the first of the principles in Policy CS.15 is particularly welcomed, reflecting our comments above.</p>
20	Stansgate Planning on behalf of Bidford Garages	<p>The principles identified are appropriate for the consideration of individual reserve sites.</p> <p>Ignoring the first of the requirements in Policy CS.15 is particularly welcomed, reflecting our comments above.</p>
21	Star Planning and Development on behalf of Richborough Estates	<p>The pragmatic adoption of the criteria of Core Strategy Policy CS.15 to assist with the identification of reserve sites at the Main Town and the Main Rural Centres is appropriate and Richborough Estates support the omission of criterion 1 of Policy CS.15 as part of the assessment. This omission supports the principle of revisiting those Neighbourhood Plans which have not made provision for reserve sites in the mistaken belief that all that was</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>required was to meet the minimum housing requirement of Core Strategy Policy CS.16 for 3,800 dwellings at Main Rural Centres</p> <p>As an example of a reserve site in a Neighbourhood Plan area, the SHLAA pro forma assessment form for land at Marriage Hill Farm is attached as Appendix 1. This site is available, suitable and achievable for residential development.</p>
22	Harris Lamb on behalf of Alamo	<p>We would broadly support the criteria listed in policy CS.15 although the first criterion - relating to the number of dwellings identified for the settlement - may be self-defeating if it constrains development where growth is seen to be needed, especially within the smaller settlements where the numbers are insignificant. We therefore welcome paragraph 1.11.</p> <p>We support the principles identified by Policy CS.15 being applied to the Reserve Housing Site selection process. The land in Alamo's control at Salford Priors meets the criteria identified, as explained below, which confirms that the site is suitable for identification as a Reserve Housing Site in the emerging Plan.</p>
23	Savills on behalf of Magdalen College	<p>Adopted Core Strategy CS. 15 sets out the principle for determining the suitability of sites for development. The College agrees that the first of these principles regarding the scale of development is not directly applicable to the identification of reserve sites.</p> <p>It is agreed that the remainder of these principles should, to some extent, apply in the identification of reserve sites. This includes the principle of identifying sites which would allow for development which is appropriate to the size and character of the settlement, well-related to the existing settlement form, and does not result in unreasonable harm to the surrounding landscape or setting of the settlement.</p> <p>It is supported that decisions about which sites to identify should be based on the findings of the Strategic Housing Land Availability Assessment (SHLAA), and other such material prepared as part of the Council's evidence base.</p>
24	Stansgate on behalf of Mr H Rashleigh	<p>The principles identified are appropriate for the consideration of individual reserve sites.</p> <p>Ignoring the first of the Requirements in Policy CS.15 is particularly welcomed, reflecting our comments above in respect of the overall scale of development for each settlement.</p>
25	Tim Pollard	<p>I have no particular problem with the principles, other than reiterating my comment in 1.1 above.</p> <ul style="list-style-type: none"> <li>• For example, in appendix 6, Sites outside settlements with future potential, site ref STR727, is listed as having the potential for 70 units. This site has just had planning permission refused for the 2<sup>nd</sup> time in 12</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>months, (17/03028/FUL) due to heritage and safety factors amongst others. The developer’s agent, Cerda Properties, has proposed this site be added to the reserve list.</p> <p>Whichever you look at this site, developing it would still destroy heritage landscape, would still be dangerous to enter and exit due to the entrance position on the Alcester Road, and would still impact on the Shottery Conservation area, (amongst other reasons).</p> <p>It seems that the planning process is not joined up enough to identify that when a site is refused planning permission (twice), it isn’t earmarked as being not suitable for inclusion on the reserve list.</p>
26	Cerda Planning on behalf of Grevayne Properties Limited	<p>Policy CS.15 in the Core Strategy sets a number of principles for determining the suitability of sites for development which are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</i></li> <li>• <i>The design of the development is well-related to, and can be readily integrated with the existing form of the settlement;</i></li> <li>• <i>The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</i></li> <li>• <i>The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</i></li> <li>• <i>The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></li> </ul> <p>Application of the principles for identifying suitable sites for allocation to the reserve sites would be a consistent approach which complements the broad strategy for the dispersal of housing across the district.</p>
27	Cerda Planning on behalf of Kler Group	<p>Policy CS.15 in the Core Strategy sets a number of principles for determining the suitability of sites for development which are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</i></li> <li>• <i>The design of the development is well-related to, and can be readily integrated with the existing form of the settlement;</i></li> <li>• <i>The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</i></li> <li>• <i>The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</i></li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• <i>The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></li> </ul> <p>Application of the principles for identifying suitable sites for allocation to the reserve sites would be a consistent approach which complements the broad strategy for the dispersal of housing across the district.</p>
28	Cerdea Planning on behalf of Braemar Property Developments	<p>Policy CS.15 in the Core Strategy sets a number of principles for determining the suitability of sites for development which are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</i></li> <li>• <i>The design of the development is well-related to, and can be readily integrated with the existing form of the settlement;</i></li> <li>• <i>The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</i></li> <li>• <i>The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</i></li> <li>• <i>The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></li> </ul> <p>Application of the principles for identifying suitable sites for allocation to the reserve sites would be a consistent approach which complements the broad strategy for the dispersal of housing across the district.</p>
29	Cerdea Planning on behalf of The Darling Family Trust	<p>Policy CS.15 in the Core Strategy sets a number of principles for determining the suitability of sites for development which are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</i></li> <li>• <i>The design of the development is well-related to, and can be readily integrated with the existing form of the settlement;</i></li> <li>• <i>The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</i></li> <li>• <i>The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</i></li> <li>• <i>The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Application of the principles for identifying suitable sites for allocation to the reserve sites would be a consistent approach which complements the broad strategy for the dispersal of housing across the district.
30	Gladman Developments	Gladman are broadly supportive of the principles outlined in CS.15. Certain principles, such as the reduction of gaps between settlements and the impacts on landscape will require careful consideration. All of the principles outlined will need to be considered alongside the issues expressed above by Gladman in relation to what settlements are actually considered still available for additional allocations given the approach taken towards Neighbourhood Plans. Further, consideration will have to be given against the weight to be attached to these principles in relation to the need to allocate new sites for development needs.
31	Boyer on behalf of Venta Developments	<p>We generally support the principles set out in the application of identifying reserve housing sites in the Borough, however our comments on specific principles are set out below.</p> <p>Principle 1 states that, <i>'In relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS. 16 Housing Development'</i>. In respect of LSVs, the Council should give consideration to how many homes have already been delivered within specific settlements through Neighbourhood Plan allocations and existing planning permissions. Core Strategy Policy CS.15 allocates approximately 400 homes in total, of which no more than around 8% should be provided in any individual settlement. If a number of LSVs have already benefited from the level of development set out in policy CS.15, other LSVs such as Priors Marston, should therefore have development allocated to them as a reserve housing site to ensure new development is distributed evenly and proportionately across the District. This is important to ensure the local needs of all rural communities are met.</p> <p>Principle 3 states that, <i>'The design of the development is well-related to, and can be readily integrated with, the existing form of the settlement'</i>. It is deemed inappropriate for design to be part of the principles applied to the identification of reserve housing sites as this is a matter that will be addressed via the development management process. It is unusual for the detailed design of potential schemes to be carried out prior to a site being allocated for development as the Council may not have sufficient information on each site at this stage to make a judgement on the anticipated design of individual sites.</p> <p>The above notwithstanding, in the case of our client's land at Land adjacent to Grange Cottages, Priors Marston, we are currently engaged in pre-application discussions with the Council for the provision of a new residential development on the site and so an indicative site layout has been prepared (<b>Appendix 2</b>). This has been designed in response to initial feedback from Council Officers and with regard to the District Design Guide (2001), to ensure the new development is well-related to, and can be readily integrated with, the existing form of the settlement, whilst providing a mix of market and affordable housing to meet local needs.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
32	Cerdea Planning on behalf of Morris Homes	<p>Policy CS.15 in the Core Strategy sets a number of principles for determining the suitability of sites for development which are as follows:</p> <ul style="list-style-type: none"> <li>• <i>The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</i></li> <li>• <i>The design of the development is well-related to, and can be readily integrated with the existing form of the settlement;</i></li> <li>• <i>The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</i></li> <li>• <i>The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</i></li> <li>• <i>The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</i></li> </ul> <p>Application of the principles for identifying suitable sites for allocation to the reserve sites would be a consistent approach which complements the broad strategy for the dispersal of housing across the district.</p> <p>The HCA land, north of Mappleborough Green would be well located geographically to meet housing need arising from the circumstances set out in Policy CS.16 and would adhere to the above principles and provide a sustainable response to housing need.</p>
33	Turley on behalf of St Modwen	Yes – refer to Part 1 answer
34	Kineton Parish Council	<p>Broadly agree with the principles but would want to see tighter controls over, and against, abuse of process.</p> <p>Experience has shown that a landowner/developer will bring forward a site with a proposed number of dwellings that would meet the conditions within CS15 and be accepted by the local community. The site is then split and sold on to two or more different developers who, by building less than 10 homes each, escape many of the obligations which would apply to a single developer of more than 10 homes. The potential for them to develop the site for more than the originally proposed number of dwellings also arises, contrary to the wishes of the community.</p> <p>We suggest that such obligations (e.g. affordable homes, sustainable travel packs) should remain with the party that initially brings the site forward in the call for sites process.</p>
35	Rosconn	Whilst we are generally content with the principles identified, we consider No. 3 should be amended. In view of the intention to introduce BUABs to all settlements from LSVs and above, it would seem sensible to require any

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		potential reserve site allocations to immediately adjoin the BUAB boundary if they are to be considered well-related to the existing form of the settlement.
36	RCA Regeneration on behalf of Peter Drew Contracts	Further to the answer to question 1.2, we consider that villages within the 'all other settlement' category are suitable to provide residential sites of an appropriate scale. We consider that where villages are well located nearby to larger settlements that this enhances the suitability of the settlement for allocations of an appropriate scale.
37	RCA Regeneration on behalf of Duchy Homes	Further to the answer to question 1.2, we consider that villages within the 'all other settlement' category are suitable to provide residential sites of an appropriate scale. We consider that where villages are well located nearby to larger settlements that this enhances the suitability of the settlement for allocations of an appropriate scale.
38	RCA Regeneration on behalf of Alexander Stevens Construction	Further to the answer to question 1.2, we consider that villages within the 'all other settlement' category are suitable to provide residential sites of an appropriate scale. We consider that where villages are well located nearby to larger settlements that this enhances the suitability of the settlement for allocations of an appropriate scale.
39	Berkeley Strategic Land	All principles agreed with. Comments attached relating to Little Luddington Farm site.
40	GVA on behalf of St Philips	<p>We support the principles being applied to the identification of reserve sites for housing growth.</p> <p>The supporting Vision Document sets out how the proposed development intends to protect and enhance the character of Napton with specific regard to:</p> <ul style="list-style-type: none"> <li>• The scale of development in respect of the proposed site's immediate setting, together with the overall size and character of the settlement.</li> <li>• The design of the development with regard to the existing form of the settlement.</li> <li>• The location and extent of development in relation to the surrounding landscape and setting of the settlement.</li> <li>• The location and extent of the development in respect of the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement.</li> <li>• Appropriate improvements to infrastructure and service of the community, through canal side regeneration and on-site recreational facilities.</li> </ul>
41	Hunter Page on behalf of Bellway Homes	The method for the identification of reserve sites is supported in principle providing a realistic approach is taken to the constraints associated within individual sites and full understanding of their context is undertaken.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Directly engaging with landowner/promoter will be key to gaining a full understanding of the availability and deliverability of sites.
42	DLP Planning on behalf of Coln Residential	<p>DLP agree with the general principles and policy requirements (as set out in policy CS.15) which will be used to consider potential reserve sites. We do however raise concerns about whether those Neighbourhood Plan Areas which have been tasked to identify their own Reserve Sites have robustly applied these principles in their assessments. In the case of WWNP this is particularly apparent when considering the Housing Reserve Site Area 3 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) 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:</p> <ul style="list-style-type: none"> <li>• The site's release from allotment use does not support the NP objectives;</li> <li>• Loss of allotments are not supported by those who responded to the Neighbourhood Plan survey;</li> <li>• The loss of well used, valued and in demand allotments are contrary to adopted Core Strategy Policy CS25.</li> <li>• The potential scheme will therefore harm the existing community infrastructure rather than improve the situation for existing and future residents.</li> <li>• This is something evidently agreed by the County Council considering their response to the Neighbourhood Plan Reg 16 Consultation.</li> </ul> <p><i>"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.... 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"</i> (Schedule of Representations - WWNP Examination)</p> <p>This is also highlighted by the Wellesbourne Allotment Association on the Save Our Wellesbourne Allotments web-page; <a href="http://www.sowa.org.uk/">http://www.sowa.org.uk/</a> which states:  <i>"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"</i>.</p>
43	Hunter Page on behalf of Spitfire Bespoke Homes	Spitfire agrees with the principles being applied to the identification of reserve sites as they reflect the adopted policy and requirements of policy CS.15.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
44	Framptons on behalf of Gallagher Estates	Gallagher Estates acknowledge the appropriateness of the principles of CS15 being applied to the identification of a Reserve Site at land north of Leamington Road, Long Itchington.
45	Framptons on behalf of Mr I Lane	Yes, we would acknowledge the appropriateness of the principles of CS15 being applied to the identification of a Reserve Site at land north of Leamington Road, Long Itchington.
46	LRM Planning on behalf of Hallam Land Management	<p>We agree with the principles set out in the consultation document for the assessment of potential Reserve Sites; namely</p> <ol style="list-style-type: none"> <li>1. In relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS.16 Housing Development;</li> <li>2. The scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</li> <li>3. The design of the development is well-related to, and can be readily integrated with, the existing form of the settlement;</li> <li>4. The location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</li> <li>5. The location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</li> <li>6. The scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</li> </ol> <p>In the context of the spatial strategy, and the principles defined in relation to Question 1.2, it is clear that the largest proportion or scale of Reserves Sites should be identified at Stratford-upon-Avon. The development options around Stratford-upon-Avon are influenced by the extent of the Green Belt to the north, areas of high landscape, ecological and heritage sensitivity, areas of flood risk, and existing areas of development to the west and east. Having regard to these constraints, the area to the south of the town is eminently suitable for development.</p> <p>The Council's own analysis demonstrates this. Its 'Assessment of Land Parcels on the edge of Stratford-upon-Avon' illustrates the extent of these constraints. Whilst this was undertaken to identify land suitable for car</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>dealerships, bulky goods retail store and the relocation of businesses from Wharf Road, the environmental constraints apply equally for future housing development.</p> <p>In this regard we note that the recently published Greater Birmingham HMA Strategic Growth Study identifies south of Stratford-upon-Avon as a potential Area of Search for strategic development. The study acknowledges:</p> <ul style="list-style-type: none"> <li>• This is an area substantially free from nationally significant constraints and policy designations.</li> <li>• The area is situated around the southern edge of the urban area of Stratford-on-Avon which includes a range of services and employment opportunities in line with the spatial development model criteria.</li> <li>• The area is within close proximity to Stratford-upon-Avon Train Station which connects the area to the conurbation. The area is also served by the A3400, A46 and the A422.</li> </ul> <p>The area of land, controlled by Hallam, between the A3400 and A422, to the south of Stratford- upon-Avon, is inherently deliverable, is contiguous with the existing built up area and readily accessible. Accompany this representation is additional information about the development opportunity in this location.</p>
47	Warwickshire County Council	This is a matter for the local authority to determine.
48	Pegasus on behalf of Rainier Developments	<p>Rainier Developments support the requirements set out in Core Strategy Policy CS.15 being applied to the identification of reserve sites, insofar as they reflect the criteria for residential development coming forward at existing settlements.</p> <p>However, Paragraph 1.11 of the consultation document states that <i>'the first of these principles is not applicable to the identification of reserve sites but the remainder will be applied in assessing the suitability of such sites'</i>.</p> <p>The first principle set out within Policy CS.15 states:</p> <p><i>"In relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS.16 Housing Development"</i>.</p> <p>Whilst Rainier Developments acknowledge that Policy CS.16 details the distribution of the Core Strategy housing requirement across the settlement hierarchy (which is separate from the reserve sites to be apportioned by the SAP), it nonetheless remains that the Policy also contains a requirement for the location of any reserve sites to take account of the settlement pattern hierarchy and the overall balance of distribution of development set out in Policy CS.15.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>In order for reserve sites to be identified in locations where there is identified market and affordable housing needs, the relative distribution of development set out within Policy CS.16 remains important, as well as in ensuring that development remains proportionate to the scale of existing settlements.</p> <p>Rainier Developments submit that housing sites should be identified in the most sustainable locations in the District where market and affordable housing needs are known, primarily the Main Rural Centres and Category 1 Local Service Villages located outside of the Green Belt in line with the findings of the Core Strategy examining Inspector.</p>
49	Pegasus on behalf of Gallagher Estates	<p>Gallagher Estates supports the principles applied to the identification of reserve sites, insofar as they reflect the criteria for residential coming forward at existing settlements, as defined by Core Strategy Policy CS.15.</p> <p>However, Paragraph 1.11 of the consultation document states that <i>'the first of these principles if not applicable to the identification of reserve sites but the remainder will be applied in assessing the suitability of such sites'</i>.</p> <p>The first principle set out within Policy CS.15 states:</p> <p><i>"In relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS.16 - Housing Development"</i>.</p> <p>Whilst Gallagher Estates acknowledges that Policy CS.16 details the distribution of the Core Strategy housing requirement across the settlement hierarchy (which is separate from the reserve sites to be apportioned by the SAP), it nonetheless remains that the Policy also contains a requirement for the location of any reserve sites to take account of the settlement pattern hierarchy and the overall balance of distribution of development set out in Policy CS.15.</p> <p>In order for reserve sites to be identified in locations where there is identified market and affordable housing needs, the relative distribution of development set out within Policy CS.16 remains important, as well as in ensuring that development remains proportionate to the scale of existing settlements.</p>
50	Simon Ward (Propernomics)	<p>Paras 1.12 and 1.13 refer to work on the SHLAA that is currently ongoing. This work on the new SHLAA (para 1.6) should consider sites newly submitted via the "Call for Sites" as this consultation process is a spur for such sites to be proposed at this time.</p> <p>Appropriate sites at the LSVs could make an important contribution to supply, helping meet market requirements and needs, and helping to relieve pressure on less suitable sites. Hence if a newly identified site is immediately available then that contribution should be encouraged by the LPA and its planning policies sooner rather than later.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
51	DLP Planning on behalf of Talbot Homes	Land South of Station Road, Fenny Compton should be allocated as a reserve housing site.
52	Acres Land and Planning on behalf of Noralle	<p>The Introduction explains the purpose of the Site Allocations Plan which is to identify a range of non-strategic sites within the District amounting to at least the 20% proportion of Reserve Sites specified in policy CS.16 to ensure that there is a generous and constant supply of housing for the life of the Local Plan and beyond.</p> <p>The Government has also indicated that it wishes to see local authorities identify at least 20% of its housing provision within smaller sites (up to 0.5ha in size) The Government's recently published National Planning Policy Framework Review is consulting on this commitment.</p> <p>Noralle feel the Council's policy of releasing further land, on smaller sites especially in smaller communities is running along the right lines. There should be a range and type of smaller sites so that a wider range of small and medium enterprise (SME) builders are able to thrive and other smaller builders are encouraged to enter the market. This has not been the case in the past within Stratford on Avon DC. Much of Stratford on Avon's current housing supply is tied up in two very large Strategic sites at Gaydon and Long Marston. Smaller sites will provide a suitable counter balance to this.</p>
53	Brodie Planning on behalf of Valefresco	Agree that the first principle cannot be applicable, as the identification of reserve sites would most likely increase the number of homes allocated in an individual settlement to that identified in Policy CS.16.
54	Brodie Planning on behalf of Lioned	Agree that the first principle cannot be applicable, as the identification of reserve sites would most likely increase the number of homes allocated in an individual settlement to that identified in Policy CS.16.
55	Margaret Phillips	<p>CS15 'the location and extent of development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement'.</p> <p>The local road network is becoming more and more congested. eg. Church Lane is very congested at rush hour with high levels of pollution from exhaust gases and is not wide enough for buses and lorries to pass.</p>
56	Carol Allen	Traffic congestion should be seriously considered. Archaeology assessments should be carried out.
57	Framptons on behalf of Gallagher Estates	Gallagher Estates acknowledge the appropriateness of the principles of CS15 being applied to the identification of a Reserve Site at land east of Banbury Road, Southam. Please see Appendix 1-10 for supporting technical documents.
<b>Officer Response</b>		

No.	Source	Comment
		<p>Of the comments submitted in response to this question, 36 are generally supportive of the principles to be used in identifying reserve sites.</p> <p>Some of the matters raised have been assessed under other topics, particularly in Part 1-General and in response to Questions 1.1 and 1.2.</p> <p>A number of specific issues were raised and are responded to as follows:</p> <p>Nos.3/11 – identification of reserve sites should take into account issues such as landscape, heritage, traffic. Response: a wide range of factors will be taken into account when identifying suitable reserve sites.</p> <p>No.31 – all LSVs should have development allocated to them as a reserve housing site to ensure new development is distributed evenly and proportionately across the District Response: all LSVs outside the Green Belt are being covered in the identification of reserve sites which will be over and above the provision made in Core Strategy Policy CS.16.</p> <p>No.31 – it is inappropriate for design to be part of the principles applied to the identification of reserve housing sites as this is a matter that will be addressed via the development management process. Response: it is relevant to assess whether an acceptable design and layout is achievable on a site when considering whether it should be identified as a reserve site.</p> <p>No.35 – it would seem sensible to require any potential reserve site allocations to immediately adjoin the BUAB boundary if they are to be considered well-related to the existing form of the settlement. Response: this is acknowledged although in specific circumstances it is possible that a reserve site may not immediately abut the existing edge of the settlement.</p> <p>No.42 – raise concerns about whether those Neighbourhood Plan Areas which have been tasked to identify their own Reserve Sites have robustly applied these principles in their assessments. Response: Neighbourhood Plans are subject to thorough examination in their own right.</p> <p>Nos.48/49 – the location of reserve sites should take account of the settlement pattern hierarchy and the overall balance of distribution of development set out in Policy CS.15. Response: it is agreed that the distribution of reserve sites should be consistent with the locational pattern of housing development established in the Core Strategy.</p>
		<p><b>Officer Recommendation</b></p> <p>None</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

<b>No.</b>	<b>Source</b>	<b>Comment</b>

**Topic: Part 1 Reserve Housing Sites - Question 1.4 Capacity**

No.	Source	Comment
1	David Booth	Reserve sites should be identified that have the capacity to provide in the region of 1,320 dwellings.
2	Anna Corser	1,320 should be the <u>upper</u> limit.  It is not just the land-use but also the saturation point being reached in terms of infrastructure and services.
3	Bruton Knowles on behalf of Nigel Ward	The provision of 2,920 dwellings to be identified sets a good fall-back position should housing targets not be achieved over the plan period (up to 2031).
4	Susanne Farmer	Option 2 – no further comment
5	John Read	Option 2 should be taken otherwise 1600 committed dwellings will not count towards the housing requirement, which is irrational.
6	Paul Clark	Option 2 – no further comment
7	Tim Sharples	It makes sense to add small quantities of housing to the fringes of existing settlements. This, in turn, will promote a much more sustainable and long term solution to a housing shortage which is often in areas where no further development is taking place. In any case, there will always be a long term demand for housing which needs to be planned on a forward looking basis.
8	Greenwood Planning on behalf of Henry and Lucy Jervis	No comment on numbers.  Increased provision should be made for windfall small to medium sized sites in line with Government encouragement for this type of development.
9	H Farmer	Option 2 – no further comment
10	Priors Marston Parish Council	No reserve sites in Priors Marston however Option 2 is preferable.  We have no reserve sites in Priors Marston and wouldn't expect any transfer as no infrastructure for any development sites. A general concern to be noted is a link between development and appropriate infrastructure.
11	Alderminster Parish Council	i) No ii) No iii) Yes. Small housing developments should be distributed across the district.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
12	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	<p>The Core strategy requires that at least an additional 14,600 homes will need to be built across the District on brownfield and greenfield sites, reflecting the dispersed settlement pattern of the District.</p> <p>It makes sense to forward plan and address this need from the outset, and identify a larger proportion of reserve sites. Not all reserve sites need be used, but are readily available should a requirement be identified.</p> <p>For this number of homes to be assimilated into the landscape it is preferable to identify many small infill, windfall and brownfield sites on urban fringe areas outside of the BUAB/ This will have a lower impact on local villages. Larger sprawling estates do not reflect the character of the surrounding countryside</p>
13	Acres Land and Planning on behalf of the Sharples family	<p>The identification of Reserve Sites is intended to provide an adequate supply of housing sites to provide sufficient homes for the foreseeable future. There is always a shortfall in delivery due to time lags, leakage of consents (since some are only made for valuation purposes) and other constraints, therefore it is sensible for the LPA to provide the full 20% figure amounting to 2,920 dwellings. The Government is any event specify that a buffer of 5% against the 5 year supply (or 20% where an authority suffers from a persistent shortfall in delivery) should be reserved for development. There are little danger that too many houses will be provided. In any event, the policy provides a set of criteria which act as a 'brake' against over-provision.</p>
14	Paul Dunster	2,920 dwellings – no further comment
15	Hampton Lucy Parish Council	1,320 - A reasonable number of reserve sites should be identified to cover any shortfall in the current housing supply numbers.
16	Stansgate Planning on behalf of K & R Hutsby	<p>Policy CS.16 of the Core Strategy requires reserve sites to have 'the capacity to deliver up to 20% of the total housing requirement to 2031'. Adoption of a lesser number therefore would be contrary to the requirements of the policy. Further adoption of a lesser number would fail to meet the requirements of the National Planning Policy Framework to boost significantly the supply of housing land and to ensure a continuous supply.</p> <p>The identification of reserve sites should ensure adequate choice, flexibility and competition in the housing market, and take into account that not all committed sites will come forward for development within the plan period. The quantum of provision on reserve sites should include an allowance for non- implementation and therefore it is appropriate to work to the figure of 2,920 dwellings irrespective of the level of existing commitments.</p>
17	RPS on behalf of Taylor Wimpey	The purpose of the reserve sites, as set out in policy CS16 is four fold, including ensuring that there is a 5 year supply of housing land; to meet and identified shortfall in housing across the Coventry and Warwickshire Housing Market Assessment (HMA) and to contribute to meeting any housing needs arising outside the Coventry

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>and Warwickshire HMA. As set out in the answer to question 1.1, there is an outstanding minimum shortfall of 60,900 dwellings to 2036 across the Birmingham HMA.</p> <p>The anticipated net housing supply is 18,968 dwellings to 2031, according to the Council's Housing Sites Schedule 31 March 2017'. Whilst this exceeds the housing requirement of 14,600 homes identified in paragraph 1.1 of the SAP Revised Scoping and Initial Options - January 2018, it is important in light of paragraph 153 of the NPPF that there is sufficient flexibility to respond to changing circumstances, as well as being able to meet wider unmet development needs.</p> <p>The Council's most recently published 5 year housing land supply document (April 2017) sets out that the annual requirement needs to be increased from 730 homes to 938 homes <i>"to continue to rectify the shortfall in delivery in Stratford-on-Avon District over the period 2011 to 2017"</i> (paragraph 5). The Council themselves acknowledge that <i>"The calculation is <b>predicated on a number of assumptions</b> about deliverability of sites. <b>If sites do not deliver as quickly as expected or permissions expire without having being implemented, then the land supply figure will reduce accordingly.</b>"</i> This risk can be mitigated by ensuring a healthy land supply through the grant of planning permissions on sustainable sites in accordance with the Development Plan, although <i><b>the Council acknowledges that it has no direct control over whether and when sites actually get built"</b></i> (RPS emphasis) (paragraph 6).</p> <p>Therefore, the Council should ensure that there are sufficient sites that would become available if the Council is struggling to maintain a supply of housing sites in the future, or if other sites do not come forward. This includes existing allocations failing to come forward or sites lapsing. Having sufficient reserve sites is a mechanism, which will ensure that the Council has the right tools to plan positively to meet growth in the District, which will ensure that the Council has the right tools to plan positively to meet growth in the District.</p> <p>RPS contends that the reserve sites should be in excess of 2,920 dwellings. In addition, this would give the Council greater control on locations which could come forward for development and ensure that development is directed towards the most sustainable locations for growth. This matter was extensively considered at the Core Strategy examination, where the Inspector recommended <i>"that the 10% reserve be increased to 20%...to ensure the Plan is positively prepared in line with the Framework"</i> (paragraph 71 of Inspector's Report).</p> <p>Land at Haye Lane, Mappleborough Green is being promoted by RPS on behalf of Taylor Wimpey Homes as a sustainable extension. This is a logical extension to the urban area of Redditch, given the history of the new town and its constrained administrative boundaries. The adopted Redditch Local Plan No 4 (January 2017) recognises that there is limited land availability and little choice about the locations for development within the Borough (paragraph 3.6) and this is reiterated in paragraph 39.6. Due to insufficient land within Redditch Borough to meet housing needs, Policy 4 Housing Provision in the Redditch Local Plan states that some cross</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		boundary growth will be required. The Land at Haye Lane, Mappleborough Green would meet the housing needs of the area and help support local services and facilities.
18	Stansgate on behalf of A M Ausden	<p>Policy CS.16 of the Core Strategy requires reserve sites to have <i>'the capacity to deliver up to 20% of the total housing requirement to 2031'</i>. Adoption of a lesser number therefore would be contrary to the requirements of the policy. Further adoption of a lesser number would fail to meet the requirements of the National Planning Policy Framework to boost significantly the supply of housing land and to ensure a continuous supply.</p> <p>The identification of reserve sites should ensure adequate choice, flexibility and competition in the housing market, and take into account that not all committed sites will come forward for development within the plan period. The quantum of provision on reserve sites should include an allowance for non-implementation and therefore it is appropriate to work to the figure of 2,920 dwellings irrespective of the level of existing commitments.</p>
19	Stansgate Planning on behalf of Hayward Developments	<p>Policy CS.16 of the Core Strategy requires reserve sites to have <i>'the capacity to deliver up to 20% of the total housing requirement to 2031'</i>. Adoption of a lesser number therefore would be contrary to the requirements of the policy. Further adoption of a lesser number would fail to meet the requirements of the National Planning Policy Framework to boost significantly the supply of housing land and to ensure a continuous supply.</p> <p>The identification of reserve sites should ensure adequate choice, flexibility and competition in the housing market, and take into account that not all committed sites will come forward for development within the plan period. The quantum of provision on reserve sites should include an allowance for non-implementation and therefore it is appropriate to work to the figure of 2,920 dwellings irrespective of the level of existing commitments.</p>
20	PJS Development Solutions on behalf of Gloucester Diocesan Board of Finance	The Council should follow its own Development Plan Policy CS.16. There is no basis within CS.16 that would justify re-engineering the 20% for anything other than 20% of the total housing requirement i.e. 2,920 dwellings. It should be remembered that reserve sites are just that, they form a reserve to draw from if other sites under deliver or circumstances change. Given the importance of boosting the housing supply, the Council should do all within its power to make appropriate provisions for the future.
21	Long Compton Parish Council	The 1,600 site option would be workable and appropriate for SYHLS under-delivery (clearly housing which has already been delivered will not be "under-delivered") if it were linked to three geographically specific reserve sites associated with Coventry, Birmingham and Jaguar overspill.
22	Paul Quinney	Reserve sites is another opportunity by developers to expand profitability by developing in affluent locations and no regard for brownfield, more sustainable locations or distributing to more affordable locations.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Limit to number of houses that is minimum government requirement to be compliant.
23	Tyler Parkes on behalf of Mr James McBride	<p>Our Client supports Option 3 because the proportion of the objectively assessed housing need which is required to be accommodated within Stratford-on-Avon District remains to be agreed between the local authority areas which make up the HMAs. Until the Duty to Cooperate Memorandum of Understanding has been signed it is therefore not possible to be certain how many dwellings need to be accommodate on reserve sites within Stratford-on-Avon District.</p> <p>Our Client recommends the figure of 2,920 dwellings should be used as a minimum figure to be reviewed and amended in a later version of the SAP when a more accurate figure has been agreed.</p>
24	Bidford-on-Avon Parish Council	It appears that more than the +20% as required has been reached and allocated. However, applying Option 2 may result in having to review site allocation again in the near future. Option 3, with a figure of approx 1,500 should address this.
25	Stephen Jones	Option 1 - housing demand is very high in Warwickshire particularly with the expansion of JLR and related industries.
26	Brailes Parish Council	Option 2 – no further comment
27	Stansgate Planning on behalf of Saffron Estates	The Core Strategy requires reserve sites to have <i>'the capacity to deliver up to 20% of the total housing requirement to 2031'</i> . The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time.
28	Tony Buckingham	3500 should be identified to provide a robust buffer against non-delivery and future policy change, specifically in relation to the method for calculating objectively assessed need and accommodating overspill from neighbouring authorities under the duty to cooperate.
29	RPS on behalf of Miller Homes	The purpose of the reserve sites, as set out in policy CS16 is four fold, including ensuring that there is a 5 year supply of housing land; to meet and identified shortfall in housing across the Coventry and Warwickshire Housing Market Assessment (HMA) and to contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA. The recently published Greater Birmingham HMA Strategic Growth Study (February 2018), concluded that there is an outstanding minimum shortfall of 60,900 dwellings to 2036 across the Birmingham HMA (paragraph 123).

No.	Source	Comment
		<p>The anticipated net housing supply is 18,968 dwellings to 2031, according to the Council's Housing Sites Schedule 31 March 2017'. Whilst this exceeds the housing requirement of 14,600 homes identified in paragraph 1.1 of the SAP Revised Scoping and Initial Options - January 2018, it is important in light of paragraph 153 of the NPPF that there is sufficient flexibility to respond to changing circumstances, as well as being able to meet wider unmet development needs.</p> <p>The Council's most recently published 5 year housing land supply document (April 2017) sets out that the annual requirement needs to be increased from 730 homes to 938 homes "to continue to rectify the shortfall in delivery in Stratford-on-Avon District over the period 2011 to 2017" (paragraph 5). The Council themselves acknowledge that "The calculation <b><i>is predicated on a number of assumptions about deliverability of sites. If sites do not deliver as quickly as expected or permissions expire without having being implemented then the land supply figure will reduce accordingly</i></b>. This risk can be mitigated by ensuring a healthy land supply through the grant of planning permissions on sustainable sites in accordance with the Development Plan, although <b><i>the Council acknowledges that it has no direct control over whether and when sites actually get built</i></b>" (RPS emphasis) (paragraph 6).</p> <p>Therefore, the Council should ensure that there are sufficient sites that would become available if the Council is struggling to maintain a supply of housing sites in the future, or if other sites do not come forward. This includes existing allocations falling to come forward or sites lapsing. Having sufficient reserve sites is a mechanism, which will ensure that the Council has the right tools to plan positively to meet growth in the District.</p> <p>RPS contends that the reserve sites should be in the region of 2,920 dwellings. In addition, this would give the Council greater control on locations which could come forward for development and ensure that development is directed towards the most sustainable locations for growth. This matter was extensively considered at the Core Strategy examination, where the Inspector recommended "that the 10% reserve be increased to 20%...to ensure the Plan is positively prepared in line with the Framework" (paragraph 71 of Inspector's Report).</p> <p>The site has long been promoted by RPS on behalf of Miller Homes as a sustainable extension to the large village of Bidford-on-Avon. The site lies to the north of the appeal site (Land at Waterloo Road) granted at appeal (Appeal Ref APP/J3720/W/15/33089709 and application ref 14/03027/OUT) in June 2016. This is a logical extension to the village, which would meet the housing needs of the area and help support and retain local services and facilities. The Inspector stated that "...In this case I have found the proposal to represent sustainable development" (paragraph 144 and also referenced in paragraph 145).</p> <p>It is clear that the Council needs to ensure appropriate levels of growth to meet housing need in the most sustainable locations. As an identified centre for growth, Bidford-on-Avon is a sustainable settlement for future</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		growth, with a range of services and employment opportunities, and the plan should therefore include Land to the east of Jacksons Meadow and to the north west of Waterloo Road appeal site as a reserve site.
30	Kate Bryan	Option 1: No Option 2: Yes Option 3: No
31	Reuben Bellamy	The SAP should plan for Option 1. The 1600 dwellings given permission in excess of the Core Strategy figure cannot be reserve sites as they have planning permission.
32	Ladbrook Golf Club	Question 1.4: Option 3: Should reserve sites be identified that have the capacity to provide some other number of dwellings? LPGC's opinion is that whatever the number of dwellings reserved for, the Council should seek as much flexibility as possible with the sites that could deliver the number needed. By this LPGC mean that a greater range of sites will be able to respond and deliver more quickly than a small number of large sites. LSVS by their nature will only provide small, easier and quicker to deliver sites.
33	Richard Robottom	Object – no further comment
34	Ricketts Architects on behalf of Mr and Mrs Hartley	At least 3500 to provide greater flexibility and to ensure delivery.
35	Ricketts Architects on behalf of Mr and Mrs Johns	There is a need for more housing to ensure flexibility and deliverability
36	Clifford Chambers and Milcote Parish Council	Other number - Based on local need not manufactured government figures without understanding local condition for employment and travel.
37	Delta Planning on behalf of A C Lloyd Homes	The scale of reserve sites should not change from that stated in Policy CS.16 of the adopted Core Strategy. The Government is clear that Local Plan housing requirements should always be treated as minimum figures.
38	Harris Lamb on behalf of Bovis Homes	<p>The capacity of the Reserve Sites should be 2,920 dwellings. The Core Strategy Inspector advised in paragraph 71 of his report that he recommended that the Reserve Site allowance be increased from 10% to 20%. Reducing the quantum of Reserve Sites below the 20% level will be in conflict with the guidance of the Inspector.</p> <p>In addition, there should be no danger in delivering 20% provision. If these sites are not required for development they simply won't be called upon. Delivering 20% provision builds flexibility into the plan (in accordance with the requirements of paragraph 14 of the framework and ensures a range of potential options are available to rectify any shortfall in housing delivery, either to meet the five-year housing land supply requirements, the growth with JLR, or other authorities within the HMA. Reducing the capacity below 20% may result in insufficient safeguarded sites being available to meet these requirements.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		In addition, It Is clear that in the next version of the Local Plan the Local Authority will need to rely upon the expansion of settlements to meet the housing requirement. Reserve Housing Sites will prove a useful source that can be allocated for development in these documents having already been tested through the plan-making process for suitability for development.
39	Steve Taylor (Set Design)	3500 should be identified to provide a robust buffer against non-delivery and future policy change, specifically in relation to the method for calculating objectively assessed need and accommodating overspill from neighbouring authorities under the duty to cooperate.
40	Stansgate Planning on behalf of Mr and Mrs Wythes	The Core Strategy requires reserve sites to have <i>'the capacity to deliver up to 20% of the total housing requirement to 2031'</i> . The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time.
41	Stansgate Planning on behalf of Bidford Garages	The Core Strategy requires reserve sites to have <i>'the capacity to deliver up to 20% of the total housing requirement to 2031'</i> . The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time.
42	Star Planning and Development on behalf of Richborough Estates	For the reasons already provided, the SAP should include reserve sites for circa 3,000 dwellings (i.e. Option 1).
43	Andrew Granger and Co. on behalf of Henson family	<p>It is our view that it is not possible to determine an appropriate quantum of development that should be identified by reserve sites, without due consideration being given to the context in which they would be released.</p> <p>Core Strategy Policy CS.16 (D) identifies the four scenarios whereby reserve sites would be released for development; i) to maintain a five year supply of housing land; ii) to contribute to any additional need for housing arising from employment growth at JLR at Gaydon Lighthorne Heath; iii) to contribute to meeting unmet needs across the Coventry and Warwickshire HMA; and iv) to contribute to meeting unmet needs arising outside the Coventry and Warwickshire HMA that is identified as being appropriately met within the District.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Paragraphs 1.14 to 1.16 of the consultation document refer to the District's current housing land supply position as justification for the two defined options, and no consideration is given to the three other scenarios in which reserve sites would need to be released for development.</p> <p>It is our view that it may be necessary to allocate additional development sites to meet unmet needs arising from elsewhere in the Coventry and Warwickshire HMA and the Greater Birmingham HMA that form the Stratford-on-Avon District.</p> <p>Within the Coventry and Warwickshire HMA it is agreed by all of the authorities that the findings of the 2015 SHMA represent the objectively assessed need for the HMA and the individual authorities. It is also agreed that Coventry is unable to meet all of its own identified housing needs and that the shortfall is up to 17,800 dwellings between 2011 and 2031 (890 dwellings).</p> <p>A Memorandum of Understanding [MoU] relating to the level and distribution of housing across the HMA, including the re-distribution of Coventry's unmet needs, has been signed by each of the local authorities with the exception of Nuneaton and Bedworth Borough Council [NBBC].</p> <p>The 2015 SHMA concludes that the OAN for NBBC is 10,040 dwellings between 2011 and 2031. The MoU sets a total figure for NBBC of 14,060 dwellings, this includes 4,020 dwellings towards meeting Coventry's unmet needs. However, the NBBC's submitted Borough Plan sets out a housing requirement of 13,374 dwellings; this includes provision for the OAN for the Borough, a degree of flexibility for non-implementation of allocations and 2,118 dwellings toward Coventry's unmet needs.</p> <p>Within this context, it is possible that there may be a shortfall of 1,902 dwellings against the OAN for the Coventry and Warwickshire HMA across the Plan Period. Under the terms of the MoU this unmet need would be required to be redistributed across the remaining local authorities of the HMA. As such, it is possible that the Site Allocations Plan will need to identify additional development land across the District to assist in addressing NBBC's failure to allocate their full housing requirement set out within the MoU.</p> <p>In the Greater Birmingham HMA, the current scenario is not as clear. It is broadly agreed between all HMA authorities that Birmingham is unable to meet all of its own identified housing needs. The OAN for Birmingham is 89,000 dwellings but the adopted Birmingham Development Plan only makes provision for 51,000 dwellings - the Inspector accepted that this housing requirement exhausted all suitable options for housing delivery. As such, there are approximately 28,000 dwellings that will need to be delivered elsewhere in the HMA.</p> <p>At this stage, there is no agreement in place between the HMA authorities regarding the distribution of these unmet housing needs. A series of options for meeting the shortfall have been identified and it is the</p>

No.	Source	Comment
		<p>responsibility of the Greater Birmingham and Solihull Local Enterprise Partnership to determine their preferred option for inclusion within the Spatial Plan for Growth and Recovery.</p> <p>Therefore, it is also possible that the Site Allocations Plan will need to identify additional development land across the Stratford-on-Avon District to assist in addressing the unmet housing needs arising from elsewhere in the Greater Birmingham HMA.</p> <p>As previously outlined, we consider that a continuation of the dispersal spatial strategy would be the most appropriate mechanism for addressing any unmet needs arising from elsewhere in the HMA; this is a strategy that has been pursued within Leicestershire by Blaby District Council and Harborough District Council to assist in meeting the unmet needs arising from Leicester City. It is within this context, that we are proposing the formal allocation of Land at Lower Clopton Farm, Stratford-upon-Avon for development as a sustainable garden village suburb.</p> <p>As stated above, we consider the site has the capacity to deliver up to 750 dwellings including any associated infrastructure. The site is immediately available and could be delivered across a 9 year development period. Any development scheme for the site could provide a range of property types and sizes, as well as public open space and pedestrian links. The site's location on the north-western edge of Stratford-upon-Avon is considered to be suitable in respect of access to local service and employment opportunities within the District, but also in terms of having a functional relationship with both Birmingham and Coventry. Consequently, we consider that the site represents an appropriate, available, achievable and viable source of housing land that can deliver residential development in the short-term and assist in meeting the unmet needs arising across the Greater Birmingham and Coventry and Warwickshire HMA's.</p> <p>We consider the proposed development site at Lower Clopton Farm, Stratford-upon-Avon has the capacity to accommodate up to 750 new dwellings, including vehicular access, pedestrian links, public open space, car parking, landscaping, drainage and community facilities. The proposed scheme could provide a proportion of affordable housing, and a range of property types and sizes.</p> <p>We fully support the broad strategy for locating reserve site allocations, in particular the necessity to direct development towards sustainable locations and provide a wide range of development opportunities to meet the different housing needs that may arise.</p> <p>It is our view that it is not possible to determine an appropriate quantum of development that should be identified by reserve sites, without due consideration being given to the context in which they would be released. We do not believe that the options suggested within the consultation document have given appropriate regard to the requirement to meet unmet housing needs across the HMA; which is the major housing</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>consideration for the District at present and one of the key reasons for reserve site delivery identified within the Core Strategy.</p> <p>The District is uniquely positioned within both the Greater Birmingham HMA and Coventry and Warwickshire HMA. It has been identified that there are unmet housing needs arising within both HMAs which may require additional development to be delivered within the Stratford-on-Avon District under the terms of the Duty-To-Cooperate.</p> <p>In this light, we are proposing the formal allocation of Land at Lower Clopton Farm, Stratford-upon-Avon for a garden village suburb development which could deliver a significant quantum of development to meet the unmet needs arising elsewhere in the HMA.</p> <p>The site is available, deliverable and developable and discussions with a national developer interested in promoting the site are on-going.</p> <p>Andrew Granger &amp; Co. would like to remain involved throughout the preparation of the Stratford-on-Avon Site Allocations Plan and therefore request to be informed of any future consultation opportunities and when the document is submitted for Examination.</p>
44	Stansgate Planning on behalf of Alscot Estate	<p>Policy CS.16 of the Core Strategy requires reserve sites to have ‘the capacity to deliver up to 20% of the total housing requirement to 2031’. Adoption of a lesser number therefore would be contrary to the requirements of the policy. Further adoption of a lesser number would fail to meet the requirements of the National Planning Policy Framework to boost significantly the supply of housing land and to ensure a continuous supply.</p> <p>The identification of reserve sites should ensure adequate choice, flexibility and competition in the housing market, and take into account that not all committed sites will come forward for development within the plan period. The quantum of provision on reserve sites should include an allowance for non-implementation and therefore it is appropriate to work to the figure of 2,920 dwellings irrespective of the level of existing commitments.</p>
45	Caroline Dunster	2,920 – no further comment
46	Woolf Bond on behalf of Rockspring Barwood Southam	<p>Paragraph 1.15 of the Site Allocations Plan consultation document states:</p> <p><b>‘At 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings. On that basis, it might be argued that because provision has already been made for 1,600 dwellings over and above the housing requirement, this should be discounted, leaving about 1,320 dwellings to be identified on reserve sites’.</b></p>

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		<p>We strongly object to any proposal to not allocate a minimum figure of 2,920 dwellings as reserve sites through the Site Allocations Plan. Any such decision would fundamentally contradict the comments of the Core Strategy Inspector at paragraphs 68 and 71 of his report:</p> <p><b>'Acknowledging that a very modest component of the OAN might contribute towards the unmet needs of others, there can be no question that it is necessary to increase the scale of the reserve to 20 % to provide a positive and effective mechanism. Ultimately there would be no jeopardy from adopting this approach. If reserve sites are not needed to fulfil these roles they do not need to come forward, but they would be available to provide a flexible response to any identified need'</b> (paragraph 68).</p> <p><b>'In passing it is material to note that 2 of the reserve sites identified in the Local Plan have been built and the third, the land west of Shottery, has planning permission. In other words, from the land owner and developer's perspective, such a mechanism has a proven track record in this District. The point is considered further, in terms of spatial distribution, in due course [276], but for the above reasons this approach is appropriate. Accordingly I recommend that the 10 % reserve be increased to 20 % [MM33] to ensure the Plan is positively prepared in line with the Framework'</b> (Our emphasis) (paragraph 71).</p> <p>In addition to the above and having regard to our response to question 1.3, a substantial body of evidence has been forthcoming since the adoption of the District's Core Strategy in 2016 and confirms that the District will have to contribute substantially towards unmet needs arising from elsewhere in the Coventry City and Greater Birmingham Housing Market Areas. The only way to account for this established and substantial unmet need that exists elsewhere in the HMA and forms need established today is to plan positively at every available plan making stage. It follows that there is a substantive need for a level of reserve site allocations above the suggested 2,920 dwellings and in addition, a body of further housing site allocations. Any failure to not follow such a strategy would therefore fail the positively prepared, justified and effective tests of soundness.</p>
47	Acres Land and Planning on behalf of Noralle Traditional Country Homes	<p>The identification of Reserve Sites is intended to provide an adequate supply of housing sites to provide sufficient homes for the foreseeable future. There may be a shortfall in delivery due to time lags, leakage of consents (since some are only made for valuation purposes) and other constraints, therefore Noralle feels it is sensible for the LPA to provide the full 20% figure amounting to 2,920 dwellings. The Government specifies that a buffer of 5% against the 5 year supply (or 20% where an authority suffers from a persistent shortfall in delivery) should be reserved for development. There is little danger that too many houses will be provided. In any event, the policy provides a set of criteria which act as a 'brake' against over-provision.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
48	Harris Lamb on behalf of Alamo	<p>The capacity of Reserved Sites should be 2,920 dwellings. The Core Strategy Inspector advised in paragraph 71 of his Report that the Reserve Site Allowance should be increased from 10 percent to 20 percent. Reducing the capacity of the Reserve Sites to below 20 percent would be in conflict with the guidance of the Inspector.</p> <p>In addition, there is no danger in delivering 20 percent provision. If these sites are not required for development they simply won't be called upon. Delivering 20 percent provision builds flexibility into the Plan (in accordance with the requirements of Paragraph 14 of the Framework) providing a range of potential opportunities to rectify any shortfall in housing delivery either to meet the growth requirements of JLR, the growth requirements of other authorities within HMA or to help address a 5 year housing land supply shortfall. Reducing the requirement below 20 percent may result in insufficient safeguarded sites being available to meet these requirements.</p> <p>In addition, it is clear that the next version of a Local Plan will need to rely upon the expansion of settlements to meet the housing requirement. Reserve Housing Sites will prove to be a source of supply that can be allocated for development in the following plans that have already been tested through the plan making process.</p>
49	Savills on behalf of Magdalen College	<p>The delivery capacity of housing reserve sites should be consistent with the approach of the adopted Core Strategy and any relevant up to date technical evidence. Policy CS. 16 specifies that reserve sites should have the capacity to deliver 20% of the District's total housing requirement to 2031. On the basis that adopted policy CS. 16 outlines a housing requirement of 14,600 dwellings, this equals 2,920 dwellings. As a minimum, the SAP should seek to identify reserve sites with a capacity to provide in the region of 2,920 dwellings.</p> <p>However, this should not be viewed as an upper limit to the capacity which could be provided by reserve sites. Where appropriate, the District should look to provide additional housing capacity in sustainable locations in order to ensure the greatest level of flexibility should it be required during the plan period. This is particularly relevant in light of the reliance on housing delivery at strategic sites which generally carry greater risk of delayed implementation.</p>
50	Stansgate on behalf of Mr H Rashleigh	<p>The Core Strategy requires reserve sites to have 'the capacity to deliver up to 20% of the total housing requirement to 2031'. The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Having regard to the needs of Birmingham and the recommendations of GL Hearn Study, this need may now need to be increased or a Local Plan review considered.
51	Framptons on behalf of Spitfire Bespoke Homes	<p>Reserve sites should provide a capacity equalling 20% of the housing requirement, and therefore sites included as reserve sites should equate to 2,920 dwellings as a minimum.</p> <p>Whilst it is acknowledged that the housing supply over the plan period 2011-2031 was 16,200 dwellings at 31st March 2017, the delivery of sites contained within this figure is likely to fluctuate and therefore it is prudent for Stratford on Avon District to make a provision for the full 2,920 dwellings within their reserve sites. This figure should be a minimum in light of the wider Housing Market Area issue and the need to address Birmingham City Council and Coventry City Council unmet housing needs and the findings of the recent GL Hearn Housing Market Assessment report.</p>
52	Stansgate on behalf of Yarnold Developments	<p>Policy CS.16 of the Core Strategy requires reserve sites to have ‘the capacity to deliver up to 20% of the total housing requirement to 2031’. Adoption of a lesser number therefore would be contrary to the requirements of the policy. Further adoption of a lesser number would fail to meet the requirements of the National Planning Policy Framework to boost significantly the supply of housing land and to ensure a continuous supply.</p> <p>The identification of reserve sites should ensure adequate choice, flexibility and competition in the housing market, and take into account that not all committed sites will come forward for development within the plan period. The quantum of provision on reserve sites should include an allowance for non-implementation and therefore it is appropriate to work to the figure of 2,920 dwellings irrespective of the level of existing commitments.</p>
53	Tim Pollard	<p>Taking worst case, (para 1.14), of having to find land on which to build 2,920 homes, one consolidated site or two dispersed but similar sized sites would be the optimum solution. However, in order to ‘spread the impact’ it would probably be more feasible to find up to 10/12 sites on the outskirts of town, and of a size that could also provide local facilities for existing residents.</p> <p>Anything smaller than that simply becomes an exercise in filling in the smaller gaps between existing developments, (generally semi-rural fields or open green spaces), which would, and does, impact on neighbourhood character, heritage sites, sites of environmental importance, wildlife, etc., etc.</p> <p>Again, I would use the example of site ref STR727 to illustrate the point.</p>
54	Cerda on behalf of Grevayne Properties	It is acknowledged that at 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings which is above the identified need as set out in Policy CS.16 of the Core Strategy. However, it is not logical to therefore reduce the number of reserve sites in response to this for the following reasons.

No.	Source	Comment
		<p>The Inspector for the examination of the Core Strategy stated that <i>“identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise”</i>. By reducing the capacity of the reserve sites to 1,320 or a lower number than the 20% initially envisaged would limit the ability to identify a <b>range of sites</b> of differing capacities to accommodate the different circumstances that may require the release of land.</p> <p>For example, it would be prudent to plan for a reserve new settlement to accommodate housing for circumstances of under provision on strategic sites and increased need in the surrounding HMAs. It would also be prudent to allocate several reserve medium sized sites in Category 1 LSVs, MRCs in various geographical locations and Stratford-upon-Avon to accommodate for localised under provision which would otherwise affect the whole district’s five year housing land supply. However, there may not be sufficient flexibility to provide sites with the differing capabilities required if the number of dwellings to be allocated on reserve sites is limited.</p> <p>Limiting the number of dwellings planned for on reserve sites would inhibit the Council’s ability to respond to changing circumstances which is counterintuitive to the reasoning for doing so and to the advice set out in the NPPF.</p> <p>In order to appropriately accommodate for a 20% shortfall including a broad range of sites of differing sizes which can respond to the differing circumstances in which they are released, it is necessary to plan for reserve sites catering for above the 20% level.</p> <p>One of the core principles of the NPPF and reiterated at paragraph 47 is the need to objectively identify and then meet the housing needs of an area, significantly boost housing land supply and respond positively to wider opportunities for growth. Paragraph 47 also identifies the need to plan for a buffer of 5-20% above the five year housing requirement dependent on past delivery. In the event that the local plan process still fails to deliver the require housing, the Government rely at paragraphs 14 and 49 of the NPPF, on the tilted balance exercise and the presumption in favour of sustainable development.</p> <p>The Government continually emphasise the priority of providing for sufficient housing to meet the demand and provide mechanisms to ensure the delivery where the local plan process fails. The emphasis is reflective of the uncertainties in the ability of the market to deliver the required housing.</p> <p>It is logical to plan for additional reserve sites to mitigate for uncertainty in the ability to deliver housing which can include influences such as economic factors.</p> <p>The 2017 Housing White Paper identifies that homes are typically bought with debt, so a slight change in interest rates can have a big impact on people’s ability to afford a new home. Building at scale still exposes</p>

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		<p>commercial developers to significant financial risk and the 2007 recession reinforced cautious behaviours at all stages of the house-building process.</p> <p>As of June 2017, the economy is in an expansion phase of the economic cycle; it has been for eight years, since June 2009. Historically, expansion phases last approximately five years prior to contraction and recession. Therefore, based on historical trends, the economy is approaching a recession which presents uncertainty for developers. This uncertainty is further compounded by the unknown implications of events such as Brexit.</p> <p>The Core Strategy includes several large and strategic residential sites. There are multiple reasons why a large, strategic site may fail to deliver the identified housing required despite independent objective assessment of the deliverability and envisaged housing trajectory. Under delivery of large sites can result in a local planning authority being unable to demonstrate a five year housing land supply and a newly adopted plan being rendered out of date.</p> <p>The above can be evidenced recently in the Borough of Charnwood in Leicestershire. In the Core Strategy, adopted in November 2015, Charnwood Borough Council placed reliance upon three strategic allocations to deliver a quantum of development over the plan period and within the first five years of the plan following adoption. The trajectory for the delivery of the first dwellings to be delivered on all SUEs has been delayed by three years between the housing trajectory shown in the adopted Core Strategy and the latest Monitoring Report issued by the Council. As a result, the Council were unable to demonstrate a five year housing land supply within the first two years of the plan being adopted.</p> <p>Potential uncertainty impacts on the Core Strategy can be demonstrated through Jaguar Land Rover's announcement in early 2018 that they will temporarily reduce production in England later this year, as a response to weakening demand caused by Brexit and tax increases on diesel-powered cars. The Gaydon Lighthorne Heath is proposed to sustainably respond to the employment demands of the JLR site in the District. The uncertainty of JLR may impact upon the Gaydon Lighthorne Heath housing site and therefore there is a need to ensure sufficient reserve sites are allocated in response to potential eventualities.</p> <p>Further to the above, it has recently been agreed through a joint position statement between 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings from Coventry's unmet need. This will require a significant housing response above and beyond that originally envisaged when considering a buffer of only 20% would be required to meet the potential need of all circumstances for the release of reserve sites.</p> <p>The substantial need to accommodate housing from the Coventry and Warwickshire HMA illustrates the uncertainty and the extent of unforeseen circumstances which can arise. Based on the level of need which has arisen from the Coventry and Warwickshire HMA alone, it is evident that a buffer of only 20% of the housing requirement identified as reserve sites is insufficient to meet all the circumstances which may arise. In the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>event there is a cumulative impact from more than one circumstance i.e. the 2,020 dwellings from Coventry, plus a requirement from the Greater Birmingham and Black Country HMA and under-provision of dwellings from the strategic sites which is not uncommon, there would be a significant under-provision of dwellings. On this basis, it would be logical to plan for the 2,920 dwellings initially considered plus the 2,020 dwelling recently agreed to be accommodated from Coventry' unmet need.</p> <p>In light of the above, to adequately plan for the differing circumstances in which reserve housing sites may be released including having regard to economic uncertainties in the delivery of the allocated housing sites, it is considered that it would be prudent for the local planning authority to plan for 2,920 dwellings as a minimum and consider that a greater figure would provide greater certainty in maintaining the integrity of the plan.</p>
55	Cerdea Planning on behalf of Braemar Property Developments	<p>It is acknowledged that at 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings which is above the identified need as set out in Policy CS.16 of the Core Strategy. However, it is not logical to therefore reduce the number of reserve sites in response to this for the following reasons.</p> <p>The Inspector for the examination of the Core Strategy stated that <i>"identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise"</i>. By reducing the capacity of the reserve sites to 1,320 or a lower number than the 20% initially envisaged would limit the ability to identify a <b>range of sites</b> of differing capacities to accommodate the different circumstances that may require the release of land.</p> <p>For example, it would be prudent to plan for a reserve new settlement to accommodate housing for circumstances of under provision on strategic sites and increased need in the surrounding HMAs. It would also be prudent to allocate several reserve medium sized sites in Category 1 LSVs, MRCs in various geographical locations and Stratford-upon-Avon to accommodate for localised under provision which would otherwise affect the whole district's five year housing land supply. However, there may not be sufficient flexibility to provide sites with the differing capabilities required if the number of dwellings to be allocated on reserve sites is limited.</p> <p>Limiting the number of dwellings planned for on reserve sites would inhibit the Council's ability to respond to changing circumstances which is counterintuitive to the reasoning for doing so and to the advice set out in the NPPF.</p> <p>In order to appropriately accommodate for a 20% shortfall including a broad range of sites of differing sizes which can respond to the differing circumstances in which they are released, it is necessary to plan for reserve sites catering for above the 20% level.</p> <p>One of the core principles of the NPPF and reiterated at paragraph 47 is the need to objectively identify and then meet the housing needs of an area, significantly boost housing land supply and respond positively to wider</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>opportunities for growth. Paragraph 47 also identifies the need to plan for a buffer of 5-20% above the five year housing requirement dependent on past delivery. In the event that the local plan process still fails to deliver the require housing, the Government rely at paragraphs 14 and 49 of the NPPF, on the tilted balance exercise and the presumption in favour of sustainable development.</p> <p>The Government continually emphasise the priority of providing for sufficient housing to meet the demand and provide mechanisms to ensure the delivery where the local plan process fails. The emphasis is reflective of the uncertainties in the ability of the market to deliver the required housing.</p> <p>It is logical to plan for additional reserve sites to mitigate for uncertainty in the ability to deliver housing which can include influences such as economic factors.</p> <p>The 2017 Housing White Paper identifies that homes are typically bought with debt, so a slight change in interest rates can have a big impact on people’s ability to afford a new home. Building at scale still exposes commercial developers to significant financial risk and the 2007 recession reinforced cautious behaviours at all stages of the house-building process.</p> <p>As of June 2017, the economy is in an expansion phase of the economic cycle; it has been for eight years, since June 2009. Historically, expansion phases last approximately five years prior to contraction and recession. Therefore, based on historical trends, the economy is approaching a recession which presents uncertainty for developers. This uncertainty is further compounded by the unknown implications of events such as Brexit.</p> <p>The Core Strategy includes several large and strategic residential sites. There are multiple reasons why a large, strategic site may fail to deliver the identified housing required despite independent objective assessment of the deliverability and envisaged housing trajectory. Under delivery of large sites can result in a local planning authority being unable to demonstrate a five year housing land supply and a newly adopted plan being rendered out of date.</p> <p>The above can be evidenced recently in the Borough of Charnwood in Leicestershire. In the Core Strategy, adopted in November 2015, Charnwood Borough Council placed reliance upon three strategic allocations to deliver a quantum of development over the plan period and within the first five years of the plan following adoption. The trajectory for the delivery of the first dwellings to be delivered on all SUEs has been delayed by three years between the housing trajectory shown in the adopted Core Strategy and the latest Monitoring Report issued by the Council. As a result, the Council were unable to demonstrate a five year housing land supply within the first two years of the plan being adopted.</p> <p>Potential uncertainty impacts on the Core Strategy can be demonstrated through Jaguar Land Rover’s announcement in early 2018 that they will temporarily reduce production in England later this year, as a</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>response to weakening demand caused by Brexit and tax increases on diesel-powered cars. The Gaydon Lighthorne Heath is proposed to sustainably respond to the employment demands of the JLR site in the District. The uncertainty of JLR may impact upon the Gaydon Lighthorne Heath housing site and therefore there is a need to ensure sufficient reserve sites are allocated in response to potential eventualities.</p> <p>Further to the above, it has recently been agreed through a joint position statement between 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings from Coventry's unmet need. This will require a significant housing response above and beyond that originally envisaged when considering a buffer of only 20% would be required to meet the potential need of all circumstances for the release of reserve sites.</p> <p>The substantial need to accommodate housing from the Coventry and Warwickshire HMA illustrates the uncertainty and the extent of unforeseen circumstances which can arise. Based on the level of need which has arisen from the Coventry and Warwickshire HMA alone, it is evident that a buffer of only 20% of the housing requirement identified as reserve sites is insufficient to meet all the circumstances which may arise. In the event there is a cumulative impact from more than one circumstance i.e. the 2,020 dwellings from Coventry, plus a requirement from the Greater Birmingham and Black Country HMA and under-provision of dwellings from the strategic sites which is not uncommon, there would be a significant under-provision of dwellings. On this basis, it would be logical to plan for the 2,920 dwellings initially considered plus the 2,020 dwelling recently agreed to be accommodated from Coventry's unmet need.</p> <p>In light of the above, to adequately plan for the differing circumstances in which reserve housing sites may be released including having regard to economic uncertainties in the delivery of the allocated housing sites, it is considered that it would be prudent for the local planning authority to plan for 2,920 dwellings as a minimum and consider that a greater figure would provide greater certainty in maintaining the integrity of the plan.</p>
56	Cerdea Planning on behalf of Kler Group	<p>It is acknowledged that at 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings which is above the identified need as set out in Policy CS.16 of the Core Strategy. However, it is not logical to therefore reduce the number of reserve sites in response to this for the following reasons.</p> <p>The Inspector for the examination of the Core Strategy stated that <i>"identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise"</i>. By reducing the capacity of the reserve sites to 1,320 or a lower number than the 20% initially envisaged would limit the ability to identify a <b>range of sites</b> of differing capacities to accommodate the different circumstances that may require the release of land.</p> <p>For example, it would be prudent to plan for a reserve new settlement to accommodate housing for circumstances of under provision on strategic sites and increased need in the surrounding HMAs. It would also be prudent to allocate several reserve medium sized sites in Category 1 LSVs, MRCs in various geographical</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>locations and Stratford-upon-Avon to accommodate for localised under provision which would otherwise affect the whole district's five year housing land supply. However, there may not be sufficient flexibility to provide sites with the differing capabilities required if the number of dwellings to be allocated on reserve sites is limited.</p> <p>Limiting the number of dwellings planned for on reserve sites would inhibit the Council's ability to respond to changing circumstances which is counterintuitive to the reasoning for doing so and to the advice set out in the NPPF.</p> <p>In order to appropriately accommodate for a 20% shortfall including a broad range of sites of differing sizes which can respond to the differing circumstances in which they are released, it is necessary to plan for reserve sites catering for above the 20% level.</p> <p>One of the core principles of the NPPF and reiterated at paragraph 47 is the need to objectively identify and then meet the housing needs of an area, significantly boost housing land supply and respond positively to wider opportunities for growth. Paragraph 47 also identifies the need to plan for a buffer of 5-20% above the five year housing requirement dependent on past delivery. In the event that the local plan process still fails to deliver the require housing, the Government rely at paragraphs 14 and 49 of the NPPF, on the tilted balance exercise and the presumption in favour of sustainable development.</p> <p>The Government continually emphasise the priority of providing for sufficient housing to meet the demand and provide mechanisms to ensure the delivery where the local plan process fails. The emphasis is reflective of the uncertainties in the ability of the market to deliver the required housing.</p> <p>It is logical to plan for additional reserve sites to mitigate for uncertainty in the ability to deliver housing which can include influences such as economic factors.</p> <p>The 2017 Housing White Paper identifies that homes are typically bought with debt, so a slight change in interest rates can have a big impact on people's ability to afford a new home. Building at scale still exposes commercial developers to significant financial risk and the 2007 recession reinforced cautious behaviours at all stages of the house-building process.</p> <p>As of June 2017, the economy is in an expansion phase of the economic cycle; it has been for eight years, since June 2009. Historically, expansion phases last approximately five years prior to contraction and recession. Therefore, based on historical trends, the economy is approaching a recession which presents uncertainty for developers. This uncertainty is further compounded by the unknown implications of events such as Brexit.</p> <p>The Core Strategy includes several large and strategic residential sites. There are multiple reasons why a large, strategic site may fail to deliver the identified housing required despite independent objective assessment of the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>deliverability and envisaged housing trajectory. Under delivery of large sites can result in a local planning authority being unable to demonstrate a five year housing land supply and a newly adopted plan being rendered out of date.</p> <p>The above can be evidenced recently in the Borough of Charnwood in Leicestershire. In the Core Strategy, adopted in November 2015, Charnwood Borough Council placed reliance upon three strategic allocations to deliver a quantum of development over the plan period and within the first five years of the plan following adoption. The trajectory for the delivery of the first dwellings to be delivered on all SUEs has been delayed by three years between the housing trajectory shown in the adopted Core Strategy and the latest Monitoring Report issued by the Council. As a result, the Council were unable to demonstrate a five year housing land supply within the first two years of the plan being adopted.</p> <p>Potential uncertainty impacts on the Core Strategy can be demonstrated through Jaguar Land Rover's announcement in early 2018 that they will temporarily reduce production in England later this year, as a response to weakening demand caused by Brexit and tax increases on diesel-powered cars. The Gaydon Lighthorne Heath is proposed to sustainably respond to the employment demands of the JLR site in the District. The uncertainty of JLR may impact upon the Gaydon Lighthorne Heath housing site and therefore there is a need to ensure sufficient reserve sites are allocated in response to potential eventualities.</p> <p>Further to the above, it has recently been agreed through a joint position statement between 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings from Coventry's unmet need. This will require a significant housing response above and beyond that originally envisaged when considering a buffer of only 20% would be required to meet the potential need of all circumstances for the release of reserve sites.</p> <p>The substantial need to accommodate housing from the Coventry and Warwickshire HMA illustrates the uncertainty and the extent of unforeseen circumstances which can arise. Based on the level of need which has arisen from the Coventry and Warwickshire HMA alone, it is evident that a buffer of only 20% of the housing requirement identified as reserve sites is insufficient to meet all the circumstances which may arise. In the event there is a cumulative impact from more than one circumstance i.e. the 2,020 dwellings from Coventry, plus a requirement from the Greater Birmingham and Black Country HMA and under-provision of dwellings from the strategic sites which is not uncommon, there would be a significant under-provision of dwellings. On this basis, it would be logical to plan for the 2,920 dwellings initially considered plus the 2,020 dwelling recently agreed to be accommodated from Coventry's unmet need.</p> <p>In light of the above, to adequately plan for the differing circumstances in which reserve housing sites may be released including having regard to economic uncertainties in the delivery of the allocated housing sites, it is considered that it would be prudent for the local planning authority to plan for 2,920 dwellings as a minimum and consider that a greater figure would provide greater certainty in maintaining the integrity of the plan.</p>

No.	Source	Comment
57	Cerdea Planning on behalf of The Darling Family Trust	<p>It is acknowledged that at 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings which is above the identified need as set out in Policy CS.16 of the Core Strategy. However, it is not logical to therefore reduce the number of reserve sites in response to this for the following reasons.</p> <p>The Inspector for the examination of the Core Strategy stated that <i>“identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise”</i>. By reducing the capacity of the reserve sites to 1,320 or a lower number than the 20% initially envisaged would limit the ability to identify a <b>range of sites</b> of differing capacities to accommodate the different circumstances that may require the release of land.</p> <p>For example, it would be prudent to plan for a reserve new settlement to accommodate housing for circumstances of under provision on strategic sites and increased need in the surrounding HMAs. It would also be prudent to allocate several reserve medium sized sites in Category 1 LSVs, MRCs in various geographical locations and Stratford-upon-Avon to accommodate for localised under provision which would otherwise affect the whole district’s five year housing land supply. However, there may not be sufficient flexibility to provide sites with the differing capabilities required if the number of dwellings to be allocated on reserve sites is limited.</p> <p>Limiting the number of dwellings planned for on reserve sites would inhibit the Council’s ability to respond to changing circumstances which is counterintuitive to the reasoning for doing so and to the advice set out in the NPPF.</p> <p>In order to appropriately accommodate for a 20% shortfall including a broad range of sites of differing sizes which can respond to the differing circumstances in which they are released, it is necessary to plan for reserve sites catering for above the 20% level.</p> <p>One of the core principles of the NPPF and reiterated at paragraph 47 is the need to objectively identify and then meet the housing needs of an area, significantly boost housing land supply and respond positively to wider opportunities for growth. Paragraph 47 also identifies the need to plan for a buffer of 5-20% above the five year housing requirement dependent on past delivery. In the event that the local plan process still fails to deliver the require housing, the Government rely at paragraphs 14 and 49 of the NPPF, on the tilted balance exercise and the presumption in favour of sustainable development.</p> <p>The Government continually emphasise the priority of providing for sufficient housing to meet the demand and provide mechanisms to ensure the delivery where the local plan process fails. The emphasis is reflective of the uncertainties in the ability of the market to deliver the required housing.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>It is logical to plan for additional reserve sites to mitigate for uncertainty in the ability to deliver housing which can include influences such as economic factors.</p> <p>The 2017 Housing White Paper identifies that homes are typically bought with debt, so a slight change in interest rates can have a big impact on people's ability to afford a new home. Building at scale still exposes commercial developers to significant financial risk and the 2007 recession reinforced cautious behaviours at all stages of the house-building process.</p> <p>As of June 2017, the economy is in an expansion phase of the economic cycle; it has been for eight years, since June 2009. Historically, expansion phases last approximately five years prior to contraction and recession. Therefore, based on historical trends, the economy is approaching a recession which presents uncertainty for developers. This uncertainty is further compounded by the unknown implications of events such as Brexit.</p> <p>The Core Strategy includes several large and strategic residential sites. There are multiple reasons why a large, strategic site may fail to deliver the identified housing required despite independent objective assessment of the deliverability and envisaged housing trajectory. Under delivery of large sites can result in a local planning authority being unable to demonstrate a five year housing land supply and a newly adopted plan being rendered out of date.</p> <p>The above can be evidenced recently in the Borough of Charnwood in Leicestershire. In the Core Strategy, adopted in November 2015, Charnwood Borough Council placed reliance upon three strategic allocations to deliver a quantum of development over the plan period and within the first five years of the plan following adoption. The trajectory for the delivery of the first dwellings to be delivered on all SUEs has been delayed by three years between the housing trajectory shown in the adopted Core Strategy and the latest Monitoring Report issued by the Council. As a result, the Council were unable to demonstrate a five year housing land supply within the first two years of the plan being adopted.</p> <p>Potential uncertainty impacts on the Core Strategy can be demonstrated through Jaguar Land Rover's announcement in early 2018 that they will temporarily reduce production in England later this year, as a response to weakening demand caused by Brexit and tax increases on diesel-powered cars. The Gaydon Lighthorne Heath is proposed to sustainably respond to the employment demands of the JLR site in the District. The uncertainty of JLR may impact upon the Gaydon Lighthorne Heath housing site and therefore there is a need to ensure sufficient reserve sites are allocated in response to potential eventualities.</p> <p>Further to the above, it has recently been agreed through a joint position statement between 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings from Coventry's unmet need. This will require a significant housing response above and beyond that originally envisaged when considering a buffer of only 20% would be required to meet the potential need of all circumstances for the release of reserve sites.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The substantial need to accommodate housing from the Coventry and Warwickshire HMA illustrates the uncertainty and the extent of unforeseen circumstances which can arise. Based on the level of need which has arisen from the Coventry and Warwickshire HMA alone, it is evident that a buffer of only 20% of the housing requirement identified as reserve sites is insufficient to meet all the circumstances which may arise. In the event there is a cumulative impact from more than one circumstance i.e. the 2,020 dwellings from Coventry, plus a requirement from the Greater Birmingham and Black Country HMA and under-provision of dwellings from the strategic sites which is not uncommon, there would be a significant under-provision of dwellings. On this basis, it would be logical to plan for the 2,920 dwellings initially considered plus the 2,020 dwelling recently agreed to be accommodated from Coventry' unmet need.</p> <p>In light of the above, to adequately plan for the differing circumstances in which reserve housing sites may be released including having regard to economic uncertainties in the delivery of the allocated housing sites, it is considered that it would be prudent for the local planning authority to plan for 2,920 dwellings as a minimum and consider that a greater figure would provide greater certainty in maintaining the integrity of the plan.</p>
58	Gladman Developments	<p>Gladman believe that as a minimum the figure should remain at 2,920 units, but in actual fact may well need to be higher. It must be remembered that the need to allocate reserve sites through the Site Allocations is not merely an exercise in ensuring that the needs of Stratford-on-Avon itself can be met. The plan also needs to deal with the issues arising from Coventry and Birmingham. In this instance it is crucial that the issues in Birmingham are fully addressed through this plan, this means that Stratford need to fully assess and deliver their share of the unmet needs from Birmingham.</p> <p>The recently published <i>Greater Birmingham Housing Market Area - Strategic Growth Study</i> will be a key part of this, and whilst it does not go as far as apportioning the unmet housing needs, it very clearly articulates the scale of development which will be required. Stratford-on-Avon can deliver significant development, outside of the Green Belt to meet this need. Indeed alongside the various options for site delivery, in the tiers of settlement across the hierarchy, Wellesbourne Airfield remains a large brownfield site which could be developed to meet not only the needs of Stratford but which would also make a large contribution towards meeting the needs of Birmingham.</p> <p>Gladman therefore contend that the Council, before moving forward, must establish what amount of need it is required to provide from Birmingham. Gladman note that North Warwickshire are proposing to take 3,790 dwellings from Birmingham as part of their submission Local Plan, it is noted that North Warwickshire have signed a memorandum of understanding with Birmingham to this effect. Stratford-on-Avon, in order to ensure the Duty to Cooperate has been passed, and to produce a sound plan, will need to undertake similar discussions to arrive at a sound, evidence based conclusion as to what level of development it should accommodate.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
59	Mr N Gasson	Ticked Option 1 and Option 3 - no further comment
60	David Cook Associates on behalf of Barwood Developments	<p>Core Strategy Policy CS.16 requires reserve sites to provide capacity for 2,920 dwellings, which is 20% of the District's total housing requirement of 14,600 to 2031.</p> <p>The NPPF, and the HWP, are both focused on housing delivery. NPPF para 14, which sets out the presumption in favour of sustainable development states that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...</i>". Para 47 requires local planning authorities to "boost significantly" the supply of housing, to "<i>...ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing...</i>". These themes are continued in the emerging NPPF review.</p> <p>Core Strategy Policy CS.16 requires the provision of 'at least' 14,600 new homes over the Plan period. Core Strategy CS.16D confirms that Reserve Sites should have capacity to deliver up to 20% of the 'requirement' to 2031. The plan should therefore demonstrate a capacity of 'at least' 2,920 dwellings and any draft policy published should be amended to express this figure as a minimum. Failure to do so, would mean that the Plan was not consistent with the Core Strategy parent policy, and would therefore be unsound. This approach would also reflect the Framework's requirement to significantly boost housing supply (para 47).</p> <p>Expressing the figure as a minimum is also appropriate in light of ongoing work which is seeking to identify and distribute Birmingham's unmet need and its duty to co-operate to help meet the unmet needs of Coventry.</p> <p>Indeed, it is noted that the Council's Monitoring Report 2015/16 (Map 1) clearly demonstrates how the Birmingham Housing Market Area includes parts of Stratford upon Avon District. Moreover, GL Hearn's "Greater Birmingham Strategic Housing Market Study - Strategic Growth Study" (February 2018) provides an assessment of the extent of un-met need within the Birmingham housing market area and it states (table 2) that there is a shortfall of at least 28,150 dwellings (2011-31) or 60,855 (2011-36) across the whole market area, based upon the approach of the study regarding deliverable sources of supply together with un-met needs for Coventry &amp; Warwickshire which also require resolution.</p> <p>The scale of unmet need in Coventry City was also acknowledged in the recent Coventry Local Plan 2011 - 2031 Inspector's Report (dated October 2017), which notes the Memorandum of Understanding agreed between most of the Authorities within the HMA to help meet the residual housing needs that cannot be met within the city's boundaries, which totals at least 17,800 homes.</p> <p>Until an agreement is reached on where Birmingham's unmet need will be located the Council should employ flexibility in their approach to the provision of safeguarded sites, to ensure that the Council can respond appropriately and proactively to identify land to meet any unmet need arising from Birmingham and Coventry, or indeed arising from within the LPA's own area.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
61	WYG on behalf of Bellway Homes	<p>Core Strategy Policy CS.16 requires reserve sites to provide capacity for 2,920 dwellings, which is 20% of the District's total housing requirement of 14,600 to 2031.</p> <p>The NPPF, and the HWP, are both focused on housing delivery. NPPF para 14, which sets out the presumption in favour of sustainable development states that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...</i>". Para 47 requires local planning authorities to "<i>boost significantly</i>" the supply of housing, to "<i>...ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing...</i>". These themes are continued in the emerging NPPF review.</p> <p>Core Strategy Policy CS.16 requires the provision of 'at least' 14,600 new homes over the Plan period. Core Strategy CS.16D confirms that Reserve Sites should have capacity to deliver up to 20% of the 'requirement' to 2031. The plan should therefore demonstrate a capacity of 'at least' 2,920 dwellings and any draft policy published should be amended to express this figure as a minimum. Failure to do so, would mean that the Plan was not consistent with the Core Strategy parent policy. This would reflect the Framework's requirement to significantly boost housing supply (para 47).</p> <p>Expressing the figure as a minimum is also appropriate in light of ongoing work which is seeking to identify and distribute Birmingham's unmet need. Until an agreement is reached on where Birmingham's unmet need will be located the Council should employ flexibility in their approach to the provision of safeguarded sites, to ensure that the Council can respond appropriately and proactively to identify land to meet any unmet need arising from Birmingham, or indeed within the LPA's own area.</p>
62	WYG on behalf of Spitfire Properties	<p>Core Strategy Policy CS.16 requires reserve sites to provide capacity for 2,920 dwellings, which is 20% of the District's total housing requirement of 14,600 to 2031.</p> <p>The NPPF, and the HWP, are both focused on housing delivery. NPPF para 14, which sets out the presumption in favour of sustainable development states that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...</i>". Para 47 requires local planning authorities to "<i>boost significantly</i>" the supply of housing, to "<i>...ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing...</i>". These themes are continued in the emerging NPPF review.</p> <p>Core Strategy Policy CS.16 requires the provision of 'at least' 14,600 new homes over the Plan period. Core Strategy CS.16D confirms that Reserve Sites should have capacity to deliver up to 20% of the 'requirement' to 2031. The plan should therefore demonstrate a capacity of 'at least' 2,920 dwellings and any draft policy published should be amended to express this figure as a minimum. Failure to do so, would mean that the Plan was not consistent with the Core Strategy parent policy. This would reflect the Framework's requirement to significantly boost housing supply (para 47).</p>

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		<p>Expressing the figure as a minimum is also appropriate in light of ongoing work which is seeking to identify and distribute Birmingham's unmet need. Until an agreement is reached on where Birmingham's unmet need will be located the Council should employ flexibility in their approach to the provision of safeguarded sites, to ensure that the Council can respond appropriately and proactively to identify land to meet any unmet need arising from Birmingham, or indeed within the LPA's own area.</p>
63	WYG on behalf of Follett Property Holdings	<p>Core Strategy Policy CS.16 requires reserve sites to provide capacity for 2,920 dwellings, which is 20% of the District's total housing requirement of 14,600 to 2031.</p> <p>The NPPF, and the HWP, are both focused on housing delivery. NPPF para 14, which sets out the presumption in favour of sustainable development states that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...</i>". Para 47 requires local planning authorities to "<i>boost significantly</i>" the supply of housing, to "<i>...ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing...</i>". These themes are continued in the emerging NPPF review.</p> <p>Core Strategy Policy CS.16 requires the provision of 'at least' 14,600 new homes over the Plan period. Core Strategy CS.16D confirms that Reserve Sites should have capacity to deliver up to 20% of the 'requirement' to 2031. The plan should therefore demonstrate a capacity of 'at least' 2,920 dwellings and any draft policy published should be amended to express this figure as a minimum. Failure to do so, would mean that the Plan was not consistent with the Core Strategy parent policy. This would reflect the Framework's requirement to significantly boost housing supply (para 47).</p> <p>Expressing the figure as a minimum is also appropriate in light of ongoing work which is seeking to identify and distribute Birmingham's unmet need. Until an agreement is reached on where Birmingham's unmet need will be located the Council should employ flexibility in their approach to the provision of safeguarded sites, to ensure that the Council can respond appropriately and proactively to identify land to meet any unmet need arising from Birmingham, or indeed within the LPA's own area.</p>
64	WYG	<p>Core Strategy Policy CS.16 requires reserve sites to provide capacity for 2,920 dwellings, which is 20% of the District's total housing requirement of 14,600 to 2031.</p> <p>The NPPF, and the HWP, are both focused on housing delivery. NPPF para 14, which sets out the presumption in favour of sustainable development states that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change...</i>". Para 47 requires local planning authorities to "<i>boost significantly</i>" the supply of housing, to "<i>...ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing...</i>". These themes are continued in the emerging NPPF review.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>Core Strategy Policy CS.16 requires the provision of ‘at least’ 14,600 new homes over the Plan period. Core Strategy CS.16D confirms that Reserve Sites should have capacity to deliver up to 20% of the ‘requirement’ to 2031. The plan should therefore demonstrate a capacity of ‘at least’ 2,920 dwellings and any draft policy published should be amended to express this figure as a minimum. Failure to do so, would mean that the Plan was not consistent with the Core Strategy parent policy. This would reflect the Framework’s requirement to significantly boost housing supply (para 47).</p> <p>Expressing the figure as a minimum is also appropriate in light of ongoing work which is seeking to identify and distribute Birmingham’s unmet need. Until an agreement is reached on where Birmingham’s unmet need will be located the Council should employ flexibility in their approach to the provision of safeguarded sites, to ensure that the Council can respond appropriately and proactively to identify land to meet any unmet need arising from Birmingham, or indeed within the LPA’s own area.</p>
65	Boyer on behalf of Venta Developments	<p>Option 1 of 2,920 dwellings appears to be the most appropriate level to use for the identification of reserve housing sites as it ensures that the whole housing requirement is met.</p> <p>However it is important to note that the required amount of housing should be kept under review due to expected changes to national policy which may affect the level of housing need required in the District, and which may result in the need to prepare a comprehensive review of the existing Core Strategy and the District’s housing need in due course.</p> <p>Option 2 is deemed inappropriate as it fails to meet the housing requirement set out in the Core Strategy. The number of 1,320 dwellings also does not take into account non- implementation or under delivery of allocated housing sites and reserve housing sites. Not all sites allocated will be built out so there needs to be some degree of flexibility in the allocation of numbers to ensure the housing need is met in a robust manner, and as such Option 1 is deemed the most appropriate.</p>
66	Cerda Planning on behalf of Morris Homes	<p>It is acknowledged that at 31 March 2017, the housing supply over the plan period 2011-2031 was 16,200 dwellings which is above the identified need as set out in Policy CS.16 of the Core Strategy. However, it is not logical to therefore reduce the number of reserve sites in response to this for the following reasons.</p> <p>The Inspector for the examination of the Core Strategy stated that <i>“identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise”</i>. By reducing the capacity of the reserve sites to 1,320 or a lower number than the 20% initially envisaged would limit the ability to identify a <b>range of sites</b> of differing capacities to accommodate the different circumstances that may require the release of land.</p>

No.	Source	Comment
		<p>For example, it would be prudent to plan for a reserve new settlement to accommodate housing for circumstances of under provision on strategic sites and increased need in the surrounding HMAs. It would also be prudent to allocate several reserve medium sized sites in Category 1 LSVs, MRCs in various geographical locations and Stratford-upon-Avon to accommodate for localised under provision which would otherwise affect the whole district's five year housing land supply. However, there may not be sufficient flexibility to provide sites with the differing capabilities required if the number of dwellings to be allocated on reserve sites is limited.</p> <p>Limiting the number of dwellings planned for on reserve sites would inhibit the Council's ability to respond to changing circumstances which is counterintuitive to the reasoning for doing so and to the advice set out in the NPPF.</p> <p>In order to appropriately accommodate for a 20% shortfall including a broad range of sites of differing sizes which can respond to the differing circumstances in which they are released, it is necessary to plan for reserve sites catering for above the 20% level.</p> <p>One of the core principles of the NPPF and reiterated at paragraph 47 is the need to objectively identify and then meet the housing needs of an area, significantly boost housing land supply and respond positively to wider opportunities for growth. Paragraph 47 also identifies the need to plan for a buffer of 5-20% above the five year housing requirement dependent on past delivery. In the event that the local plan process still fails to deliver the require housing, the Government rely at paragraphs 14 and 49 of the NPPF, on the tilted balance exercise and the presumption in favour of sustainable development.</p> <p>The Government continually emphasise the priority of providing for sufficient housing to meet the demand and provide mechanisms to ensure the delivery where the local plan process fails. The emphasis is reflective of the uncertainties in the ability of the market to deliver the required housing.</p> <p>It is logical to plan for additional reserve sites to mitigate for uncertainty in the ability to deliver housing which can include influences such as economic factors.</p> <p>The 2017 Housing White Paper identifies that homes are typically bought with debt, so a slight change in interest rates can have a big impact on people's ability to afford a new home. Building at scale still exposes commercial developers to significant financial risk and the 2007 recession reinforced cautious behaviours at all stages of the house-building process.</p> <p>As of June 2017, the economy is in an expansion phase of the economic cycle; it has been for eight years, since June 2009. Historically, expansion phases last approximately five years prior to contraction and recession. Therefore, based on historical trends, the economy is approaching a recession which presents uncertainty for developers. This uncertainty is further compounded by the unknown implications of events such as Brexit.</p>

No.	Source	Comment
		<p>The Core Strategy includes several large and strategic residential sites. There are multiple reasons why a large, strategic site may fail to deliver the identified housing required despite independent objective assessment of the deliverability and envisaged housing trajectory. Under delivery of large sites can result in a local planning authority being unable to demonstrate a five year housing land supply and a newly adopted plan being rendered out of date.</p> <p>The above can be evidenced recently in the Borough of Charnwood in Leicestershire. In the Core Strategy, adopted in November 2015, Charnwood Borough Council placed reliance upon three strategic allocations to deliver a quantum of development over the plan period and within the first five years of the plan following adoption. The trajectory for the delivery of the first dwellings to be delivered on all SUEs has been delayed by three years between the housing trajectory shown in the adopted Core Strategy and the latest Monitoring Report issued by the Council. As a result, the Council were unable to demonstrate a five year housing land supply within the first two years of the plan being adopted.</p> <p>Potential uncertainty impacts on the Core Strategy can be demonstrated through Jaguar Land Rover's announcement in early 2018 that they will temporarily reduce production in England later this year, as a response to weakening demand caused by Brexit and tax increases on diesel-powered cars. The Gaydon Lighthorne Heath is proposed to sustainably respond to the employment demands of the JLR site in the District. The uncertainty of JLR may impact upon the Gaydon Lighthorne Heath housing site and therefore there is a need to ensure sufficient reserve sites are allocated in response to potential eventualities.</p> <p>Further to the above, it has recently been agreed through a joint position statement between 14 authorities, including SDC, that SDC will accommodate 2,020 dwellings from Coventry's unmet need. This will require a significant housing response above and beyond that originally envisaged when considering a buffer of only 20% would be required to meet the potential need of all circumstances for the release of reserve sites.</p> <p>The substantial need to accommodate housing from the Coventry and Warwickshire HMA illustrates the uncertainty and the extent of unforeseen circumstances which can arise. Based on the level of need which has arisen from the Coventry and Warwickshire HMA alone, it is evident that a buffer of only 20% of the housing requirement identified as reserve sites is insufficient to meet all the circumstances which may arise. In the event there is a cumulative impact from more than one circumstance i.e. the 2,020 dwellings from Coventry, plus a requirement from the Greater Birmingham and Black Country HMA and under-provision of dwellings from the strategic sites which is not uncommon, there would be a significant under-provision of dwellings. On this basis, it would be logical to plan for the 2,920 dwellings initially considered plus the 2,020 dwelling recently agreed to be accommodated from Coventry's unmet need.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>In light of the above, to adequately plan for the differing circumstances in which reserve housing sites may be released including having regard to economic uncertainties in the delivery of the allocated housing sites, it is considered that it would be prudent for the local planning authority to plan for 2,920 dwellings as a minimum and consider that a greater figure would provide greater certainty in maintaining the integrity of the plan.</p>
67	Turley on behalf of St Modwen	<p>The SAP should consider the findings of the GL Hearn Study and the potential for at least 2,720 additional dwellings to be identified within Stratford District to meet the needs of Greater Birmingham HMA. This is in addition to the needs arising from the Coventry and Warwickshire HMA.</p>
68	Kineton Parish Council	<p>There is no guarantee that all of the 16,200 will be deliverable in the Plan period. By having a total which arithmetically delivers the numbers required by the Core Strategy there is no opportunity for the Site Allocations Plan or the Core Strategy to be challenged either by developers or a planning inspector.</p> <p>However, where there is clearly excessive capacity it is vital that there is a clear policy/ procedure for the release of the sites.</p>
69	Rosconn	<p>The requirement of Policy CS.16 is to identify reserve sites with a capacity to deliver up to 20% of the total housing requirement. This was quantified by the Core Strategy Inspector at paragraph 277 of his report as being 2,920 dwellings. It should also be noted that this was in the context of the housing requirement being a minimum, in order that the Plan was positively prepared and helping to achieve the requirement of paragraph 47 of the Framework in boosting significantly the supply of housing within the District. Boosting the supply of housing in the context of a housing crisis and severe housing affordability issues should not be confused with providing sufficient capacity over and above this to meet the potential needs arising under a number of potential scenarios, 4 of which are detailed within Policy CS.16, Part D. As highlighted at paragraph 68 of the Inspector's Report, whilst it is necessary for a reserve of 20% to be provided as a positive and effective mechanism, if the reserve sites are not needed to fulfil the roles envisaged, then they do not need to come forward, but they would be available to provide a flexible response to any identified need.</p> <p>It is again relevant to note the findings of the recent Greater Birmingham HMA Strategic Growth Study (February 2018) which indicates the scale of unmet need arising within the HMA, within which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the District Council are obliged to help accommodate. This is potentially much more significant than was known at the time of the Core Strategy Examination and this, alongside the other 3 potential scenarios against which reserve sites might need to be released, all point towards providing as much flexibility as possible to ensure that the Plan is positively prepared and is found sound at Examination.</p> <p>With reference to Policy CS.17, were the unmet need arising outside the District and required to be met within the District to exceed the scale of reserve sites identified within the SAP, this would trigger a full Local Plan</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Review and render the Core Strategy out of date. In view of the lengthy timescales of undertaking a Local Plan Review, it is entirely sensible and appropriate to identify the maximum level of reserve sites permitted by the existing planning policy framework. To fail to do so could result in speculative and unplanned development across the District under the presumption in favour of sustainable development.
70	RCA Regeneration on behalf of Peter Drew Contracts	<p>With a significant portion of the OAN being provided through the new settlements there is already evidence of delay in delivery. The allocation of 2,920 reserve dwellings may no longer represent a sufficiently robust buffer to ensure the Council are able to maintain a 5-year housing land supply over the plan period, particularly in light of the clear delays in the delivery of the new settlements.</p> <p>We consider that the SAP allocation of 2,920 dwellings as a minimum is appropriate.</p>
71	RCA Regeneration on behalf of Duchy Homes	Further to the answer to question 1.2, we consider that villages within the 'all other settlement' category are suitable to provide residential sites of an appropriate scale. We consider that where villages are well located nearby to larger settlements that this enhances the suitability of the settlement for allocations of an appropriate scale.
72	RCA Regeneration on behalf of Alexander Stevens Construction	<p>With a significant portion of the OAN being provided through the new settlements there is already evidence of delay in delivery. The allocation of 2,920 reserve dwellings may no longer represent a sufficiently robust buffer to ensure the Council are able to maintain a 5-year housing land supply over the plan period, particularly in light of the clear delays in the delivery of the new settlements.</p> <p>We consider that the SAP allocation of 2,920 dwellings as a minimum is appropriate.</p>
73	Berkeley Strategic Land	<p>Option 1: Berkeley Strategic believe that reserve sites should be identified that can fulfil the required capacity of 2,920 dwellings , 20% of the overall housing requirement as set out in points 67-71 of the Inspectors Report on the Core Strategy (2016). The current plan relies heavily on a small number of large strategic sites to deliver a significant proportion of its housing numbers. Therefore we strongly believe that due to this heavy reliance on certain strategic sites the council will find itself falling short on its housing delivery.</p> <p>Smaller, more deliverable parcels of land such as the proposed 360 new homes at Little Luddington Farm should therefore be identified as reserve sites to support the Districts' housing deliverability within the Local Plan period.</p>
74	GVA on behalf of St Philips	We would support the proposals set out in Option 1, on the basis that this would provide maximum flexibility now to enable the delivery of new housing in the event of a potential shortfall.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
75	Nexus Planning on behalf of Mr Brightman	<p>The Core Strategy examining Inspector was clear at paragraph 68 of his report that there is "<i>no question that it is necessary to increase the scale of the reserve to 20%</i>". This is quantified at paragraph 69 of the Inspector's report as being 2,920 dwellings.</p> <p>The Inspector set out a need to identify this quantum of reserve housing sites in order to provide a positive and effective mechanism to deal with any potential shortfall in housing delivery. This figure was determined in the full knowledge of the Council's housing trajectory, which at the time of the Inspector's report identified that 16,423 homes could be delivered by 2031. The Council's housing land supply position, as at 31 March 2017, suggests a supply of 16,200 dwellings over the period 2011-2031 i.e. a lower trajectory than previously shown. As such, it is clear that the Council should identify at least 2,920 dwellings as reserve housing sites, rather than an unjustified lower figure.</p>
76	Nexus Planning on behalf of Bellway Homes	<p>The higher housing number of 2,920 should be adhered to when considering reserve sites in this case as it is within the adopted Core Strategy and is a figures agreed by the Inspector during the Examination of the Core Strategy. Moreover there is the requirement within the Framework to be flexible over housing numbers and therefore identifying reserve sites that have the potential to deliver up to 2,920 dwellings is considered appropriate in this case.</p> <p>Over the next 5 years, Stratford are reliant on a number of large sites coming forward to meet their 5 year housing land supply and should some of these due to viability or long term phasing not come forward sufficient reserve sites should be identified.</p>
77	Framptons on behalf of Dallas Burston Polo Club	<p>The reserve sites need to be of sufficient scale to deliver infrastructure and sustainable development therefore new settlement options such as that proposed at Stoneythorpe for up to 700 dwellings (or 500 as outlined in the attached letter) may be appropriate as they will facilitate facilities such as primary education provision and affordable housing.</p>
78	Mr G Cole	<p>The requirement of Policy CS.16 is to identify reserve sites with a capacity to deliver up to 20% of the total housing requirement. This was quantified by the Core Strategy Inspector at paragraph 277 of his report as being 2,920 dwellings. This was in the context of the housing requirement being a minimum, in order that the Plan was positively prepared and helping to achieve the requirement of paragraph 47 of the Framework in boosting significantly the supply of housing within the LPA. Boosting the supply of housing in the context of a housing crisis and severe housing affordability issues should not be confused with providing sufficient capacity over and above this to meet the potential needs arising under a number of potential scenarios, 4 of which are detailed within Policy CS.16, Part D. As highlighted at paragraph 68 of the Inspector's Report,</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>whilst it is necessary for a reserve of 20% to be provided as a positive and effective mechanism, if the reserve sites are not needed to fulfil the roles envisaged, then they do not need to come forward, but they would be available to provide a flexible response to any identified need.</p> <p>It is relevant to note the findings of the Greater Birmingham HMA Strategic Growth Study (February 2018) which indicates the scale of unmet need arising within the HMA, within which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the District Council are obliged to help accommodate. This is potentially much more significant than was known at the time of the Core Strategy Examination and this, alongside the other 3 potential scenarios against which reserve sites might need to be released, all point towards providing as much flexibility as possible to ensure that the Plan is positively prepared and is found sound at Examination.</p> <p>With reference to Policy CS.17, were the unmet need arising outside the District and required to be met within the District to exceed the scale of reserve sites identified within the SAP, this would trigger a full LP Review and render the Core Strategy out of date. In view of the lengthy timescales of undertaking a LP Review, it is entirely sensible and appropriate to identify the maximum level of reserve sites permitted by the existing planning policy framework. To fail to do so could result in speculative and unplanned development across the District under the presumption in favour of sustainable development.</p>
79	Savills on behalf of David Wilson Homes	<p>Under Paragraph 154 of the National Planning Policy Framework, Local Plans should be aspirational. We do not consider that providing a housing figure of less than 2,920 would be appropriate, this figure should only be a minimum, especially as the Council may have to amend their overall housing requirement when more information is available in relation to the distribution of the Greater Birmingham HMA shortfall. Additionally, we consider that providing a 'minimum of 2,920' dwellings on reserved sites will provide more flexibility in allocated a range of sites to meet local needs.</p>
80	DLP Planning on behalf of Coln Residential	<p>DLP has considered the evidence relating to housing need for both the Coventry and Warwickshire HMA and wider Greater Birmingham and Black Country HMA which highlights potential significant shortfalls in terms of future housing delivery. Given the potential shortfalls and future housing requirements which could fall to the LPA to address DLP would conclude that the reserve sites proposed should deliver at least 2,920 dwellings as a minimum.</p> <p>According to the Greater Birmingham and Black Country Housing Market Area Strategic Locations Study 2018 (completed by GL Hearn and Wood Plc) Joint Position Statement, published alongside the Strategic</p>

No.	Source	Comment															
		<p>Growth Study February 2018, It has been established that there is a shortfall in planned provision to meet housing requirements in the HMA.</p> <p>The above study was commissioned by the 14 local authorities comprising the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) including Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford upon Avon, Tamworth, Walsall and Wolverhampton. The table below was taken from the Strategic Growth Study and highlights the housing shortfall:</p> <table data-bbox="672 550 1612 742"> <thead> <tr> <th></th> <th>2011 - 31</th> <th>2011 - 36</th> </tr> </thead> <tbody> <tr> <td>Minimum need</td> <td>205,099</td> <td>254,873</td> </tr> <tr> <td>Coventry/Warks contribution*</td> <td>2880</td> <td>3600</td> </tr> <tr> <td>Supply baseline</td> <td>179,829</td> <td>197,618</td> </tr> <tr> <td>Minimum shortfall</td> <td>28,150</td> <td>60,855</td> </tr> </tbody> </table> <p>* North Warwickshire and Stratford-on-Avon also fall within the Coventry &amp; Warwickshire HMA and have agreed to make provision for Coventry's unmet housing needs. North Warwickshire is contributing 860 dwellings to meeting Coventry's unmet needs to 2031 and Stratford-on-Avon 2,020 dwellings from Stratford-on-Avon, totalling 2,880 dwellings. Rolled forward to 2036 on a pro-rata basis, this would be 3,600 dwellings (2011-36).</p> <p>Paragraph 1.13 of the study states that <i>"GL Hearn conclude that on the basis of the current evidence provision of between 205,000 - 246,000 homes is needed across the Birmingham HMA to 2031; and provision of between 256,000 - 310,000 homes to 2036 (from a 2011 baseline) to meet the Birmingham HMA's housing needs. Alongside the HMA's housing needs, it also needs to be borne in mind that two authorities North Warwickshire and Stratford-on-Avon also fall within the Coventry &amp; Warwickshire HMA and have agreed to make provision for Coventry's unmet housing needs. North Warwickshire is contributing 860 dwellings to meeting Coventry's unmet needs to 2031 and 2,020 dwellings from Stratford-on-Avon, totalling 2,880 dwellings. If this was rolled forward to 2036 on a pro-rata basis, this would be 3,600 dwellings (2011-36). In considering supply across the Birmingham HMA as a whole, this needs to be added on top of the need figures above. This would result in a minimum provision taking account of Coventry's unmet need of 208,000 dwellings to 2031 and 258,500 homes to 2036"</i>.</p>		2011 - 31	2011 - 36	Minimum need	205,099	254,873	Coventry/Warks contribution*	2880	3600	Supply baseline	179,829	197,618	Minimum shortfall	28,150	60,855
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Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Given the highlighted needs in this evidence Stratford-on-Avon District Council should allocate the 2,920 homes on reserve sites as a minimum requirement to meet the shortfall.</p>
	<p>Hunter Page on behalf of Spitfire Bespoke Homes</p>	<p>Spitfire feel that option 1 is the most suitable in calculating the 20% capacity for reserve sites given that this reflects the total housing requirement contained within the adopted Core Strategy policy CS.16. Any reduction in this figure could create offset consequences in later years, once the level of S.78 appeals have been reduced and in light of the fact that although many permissions have been granted, they may not all be built out. National policy requires local authorities to significantly boost the supply of housing and whilst there may be a 'healthy' supply of housing currently, there is the requirement to maintain a five year housing land supply. It is also important to note that a 5 year housing land supply is not an upper limit or a ceiling figure but a minimum requirement, which is established in Case Law.</p> <p>Furthermore, the recently published GL Hearne Report entitled 'A Strategic Growth Study into the Greater Birmingham and Black Country Housing Market Area, February 2018' looks at the housing needs of the wider Housing Market Area, and commissioned by the relevant 14 Local Authorities including Stratford-upon-Avon. Stratford-upon-Avon sits between two housing market areas and is therefore considered part of the functional HMA for Birmingham. The report highlighted that, <i>"...Bringing together the need and currently identified supply, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA."</i></p> <p>They conclude that the solution to meeting the housing need shortfall will clearly require a multi-faceted response which includes, increasing development density and identifying and allocating further land including strategic, small and medium sized sites within and beyond the green belt which will make a principle contribution to supply particularly in the short and medium term. Given As such, the unmet need across the HMA identified, this will inevitably result in Stratford-upon-Avon District having to accommodate further growth. This needs to be taken into account when assessing the housing requirement in the Allocations Plan.</p>
82	MJ Thorne	<p>Option 3 - greater than 2920 to future proof against further demands against higher numbers.</p>
83	Framptons on behalf of Gallagher Estates	<p>Reserve sites should provide a capacity equalling 20% of the housing requirement, and therefore sites included as reserve sites should equate to 2,920 dwellings.</p> <p>Whilst it is acknowledged that the housing supply over the plan period 2011-2031 was 16,200 dwellings at 31st March 2017, the delivery of sites contained within this figure will almost certainly fluctuate.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Stratford-on-Avon's Core Strategy makes provision for 5,440 dwellings to meet unmet housing needs to 2031 (2,720 dwellings for Coventry and 2,720 dwellings for Birmingham HMA).</p> <p>The recently published Greater Birmingham and Black Country Housing Market Area Strategic Locations Study (2018) identified a minimum housing requirement of 208,000 dwellings to 2031 and 258,500 dwellings to 2036, with a minimum shortfall remaining across the Greater Birmingham and Black Country HMA, of 28,150 dwellings to 2031 and of 60,855 dwellings to 2036.</p> <p>Therefore, considering the likely fluctuation in delivery, and in the light of the significant housing needs discussed above, it is considered prudent for Stratford-on-Avon District to make a provision for 2,920 dwellings in their Reserve Sites.</p>
84	Framptons on behalf of Mr I Lane	<p>Reserve sites should provide a capacity equalling 20% of the housing requirement, and therefore sites included as reserve sites should equate to 2,920 dwellings.</p> <p>Whilst it is acknowledged that the housing supply over the plan period 2011-2031 was 16,200 dwellings at 31st March 2017, the delivery of sites contained within this figure is likely to fluctuate and therefore it is prudent for Stratford-on-Avon District to make a provision for the full 2,920 dwellings within their reserve sites.</p>
85	Sworders on behalf of Mrs E Mac	<p>The requirement of Policy CS.16 is to identify reserve sites with a capacity to deliver up to 20% of the total housing requirement. This was quantified by the Core Strategy Inspector at paragraph 277 of his report as being 2,920 dwellings. This was in the context of the housing requirement being a minimum, in order that the Plan was positively prepared and helping to achieve the requirement of paragraph 47 of the Framework in boosting significantly the supply of housing within the LPA. Boosting the supply of housing in the context of a housing crisis and severe housing affordability issues should not be confused with providing sufficient capacity over and above this to meet the potential needs arising under a number of potential scenarios, 4 of which are detailed within Policy CS.16, Part D. As highlighted at paragraph 68 of the Inspector's Report, whilst it is necessary for a reserve of 20% to be provided as a positive and effective mechanism, if the reserve sites are not needed to fulfil the roles envisaged, then they do not need to come forward, but they would be available to provide a flexible response to any identified need.</p> <p>It is relevant to note the findings of the Greater Birmingham HMA Strategic Growth Study (February 2018) which indicates the scale of unmet need arising within the HMA, within which the District falls partly within. To 2031, this is estimated at between 15,000 and 56,000 dwellings, which through the Duty to Cooperate, the District Council are obliged to help accommodate. This is potentially much more significant than was known at the time of the Core Strategy Examination and this, alongside the other 3 potential scenarios against which</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>reserve sites might need to be released, all point towards providing as much flexibility as possible to ensure that the Plan is positively prepared and is found sound at Examination.</p> <p>With reference to Policy CS.17, were the unmet need arising outside the District and required to be met within the District to exceed the scale of reserve sites identified within the SAP, this would trigger a full LP Review and render the Core Strategy out of date. In view of the lengthy timescales of undertaking a LP Review, it is entirely sensible and appropriate to identify the maximum level of reserve sites permitted by the existing planning policy framework. To fail to do so could result in speculative and unplanned development across the District under the presumption in favour of sustainable development.</p>
86	LRM Planning on behalf of Hallam Land Management	<p>Core Strategy Policy CS.16 requires that "Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031. Any lower figure would patently be in conflict with the Core Strategy and thus manifestly unsound.</p> <p>Irrespective of this, this level of additional housing land is important.</p> <p>It is necessary as a matter of principle for the Site Allocations DPD to provide flexibility to ensure that the District can meet its agreed housing requirement, namely its share of the housing needs arising in the Coventry and Warwickshire Housing Market Area (H MA) to 2031, and also to respond to additional needs from outside this HMA.</p> <p>Stratford-upon-Avon is part of the Greater Birmingham and Black Country HMA. The extent to which the housing needs of Birmingham cannot be met within its administrative area is significant; the Birmingham Development Plan (BDP, adopted January 2017) quantified its shortfall as 37,900 (2011 - 31). Moreover, the Black Country Core Strategy Review Issues and Options document suggests there may be an emerging capacity shortfall of up to 22,000 dwellings (2016 - 36).</p> <p>On the basis that part of the role of the reserve sites is to provide flexibility to meet these needs, the Site Allocations SPD cannot be advanced on any lower requirement than that prescribed in Policy CS.16. Indeed the role of the reserve sites in providing flexibility would be enhanced if a greater allowance were proposed.</p> <p>Conversely, the extent to which housing supply at the present time suggests a total supply of 16,100 between 2011-2031 is not relevant.</p> <p>Firstly, the housing requirement in Policy CS.16 is expressed as "at least 14,600" and therefore any additional provision should be welcomed.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Secondly, circumstances are likely to change over the plan period in any event with a different out turn of completions being almost inevitable. Already, assumptions in the Core Strategy's housing trajectory have not been realised.</p> <p>Thirdly, the Core Strategy Inspector alighted upon 20% having considered representations that a lower percentage would be more appropriate. This is a figure chosen for the purpose of ensuring sufficiently flexibility. Reducing this would be an anathema to this purpose.</p> <p>Fourthly, identifying the reserve sites is a commitment to their development only in the terms expressed by the policy. Only if these circumstances arise will their development be necessary and even then in the context defined by those circumstances which could vary over the plan period. As became evident with the previous Local Plan's strategic reserve sites, the circumstances in which the three identified sites were released differed over time as the housing shortfall differed.</p> <p>Lastly, if the circumstances prescribed by the policy do not arise, the reserve sites will not be released. Thus, there is no harm in identifying the requirement identified by the Core Strategy.</p>
87	Warwickshire County Council	<p>This level will also provide for housing pressures of the District. The County Council supports sustainable growth therefore we support housing of 2,920.</p> <p>More housing will also introduce more families and a younger profile for the District. Therefore, help balance the aging population of the District.</p>
88	Pegasus on behalf of Rainier Developments	<p>Of the three options put forward Rainier Developments are supportive of Option 1; that reserve sites should have the capacity to provide in the region of 2,920 dwellings i.e. 20% of the District's total housing requirement to 2031, as specified by Policy CS.16 of the Core Strategy.</p> <p>Whilst it is acknowledged that the consultation document states the District's housing supply at 31 March 2017 had exceeded the 14,600 dwellings figure, changing circumstances since the beginning of the Plan period in 2011, mean that there is now an even greater demand for housing in Stratford District. Stratford-on-Avon's Core Strategy makes provision for 5,440 dwellings to meet unmet housing needs to 2031, which is to be split 50/50 between meeting unmet needs from Coventry and from the Birmingham HMA. This therefore equates to a contribution of 2,720 dwellings towards to each HMA.</p> <p>Firstly, attention is drawn to the circumstances listed in Policy CS. 16 for the release of reserve sites, which include:</p>

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		<p><i>"To contribute to meeting within the District any shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities".</i></p> <p>With regard to the Coventry and Warwickshire HMA it is the case that Stratford-on-Avon District has agreed to make provision for Coventry's unmet housing needs to 2031 by contributing 2,720 dwellings, as referenced above. If the District is to deliver this figure then it is imperative that the SAP looks to identify reserve sites that have capacity to deliver the identified 20% of the District's total housing requirement.</p> <p>Secondly, circumstances set out in Policy CS.16 also include:</p> <p><i>"To contribute to meeting any housing needs arising outside of the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District".</i></p> <p>Pertinent to this circumstance are the identified housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It is the case that the Birmingham Development Plan (BDP, adopted January 2017) quantified its shortfall as 37,900 to 2031. Subsequently, the Black Country Core Strategy Review Issues and Options document suggests there may be an emerging capacity shortfall of up to 22,000 dwellings (2016 -2036).</p> <p>Furthermore, the recently published Greater Birmingham and Black Country Housing Market Area Strategic Growth Study (2018) identified a minimum housing need of 208,000 dwellings to 2031 and 258,500 to 2036, with an overall significant minimum shortfall remaining across the Greater Birmingham and Black Country HMA, of some 28,150 dwellings to 2031 and of 60,855 to 2036.</p> <p>Therefore, in light of these significant housing needs arising both within and outside of the Coventry and Warwickshire HMA, it is considered that the allocation of reserve sites with the capacity to deliver at least 20% of the Stratford-on-Avon District Core Strategy housing requirement should be identified within the SAP.</p> <p>Another option not considered is for the SAP to identify a trigger for review which would be subject to the outcomes of future joint working with regards to housing needs in the Greater Birmingham and Black Country HMA. Several areas of search have been identified in the Strategic Growth Study which have implications for Stratford-on-Avon District which will therefore require further testing.</p> <p>Rainier Developments therefore do not support Option 2; that reserve sites should have the capacity to deliver in the region of 1,320 dwellings. This figure is derived from the fact Stratford-on-Avon District has made provision for 1,600 dwellings over and above the Core Strategy requirement of 14,600 dwellings, between</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>2011- 2031. It should be stressed that the requirement to deliver 14,600 dwellings between 2011-2031 is a minimum requirement and that, secondly, whilst 1,600 additional dwellings above the minimum requirement have been identified, there is no guarantee that these dwellings will be delivered within the Plan period.</p> <p>With regard to Option 3, in the light of housing needs emerging from within the Coventry and Warwickshire HMA and ongoing work in relation to the Greater Birmingham and Black Country Housing Market Area's housing need, it may be the case that Stratford -on-Avon District may be required to identify reserve sites that have the capacity to provide in excess of 20% (2,920) of the District's Core Strategy total housing requirement. Option 3 could therefore provide the flexibility to facilitate this.</p>
89	Nexus Planning on behalf of Richard Moon	<p>The Core Strategy examining Inspector was clear at paragraph 68 of his report that there is "<i>no question that it is necessary to increase the scale of the reserve to 20%</i>". This is quantified at paragraph 69 of the Inspector's report as being 2,920 dwellings.</p> <p>The Inspector set out a need to identify this quantum of reserve housing sites in order to provide a positive and effective mechanism to deal with any potential shortfall in housing delivery. This figure was determined in the full knowledge of the Council's housing trajectory, which at the time of the Inspector's report identified that 16,423 homes could be delivered by 2031. The Council's housing land supply position, as at 31 March 2017, suggests a supply of 16,200 dwellings over the period 2011-2031 i.e. a lower trajectory than previously shown. As such, it is clear that the Council should identify at least 2,920 dwellings as reserve housing sites, rather than an unjustified lower figure.</p>
90	Nexus Planning on behalf of CEG and Mixed Farms	<p>The Core Strategy examining Inspector was clear at paragraph 68 of his report that there is "<i>no question that it is necessary to increase the scale of the reserve to 20%</i>". This is quantified at paragraph 69 of the Inspector's report as being 2,920 dwellings.</p> <p>The Inspector set out a need to identify this quantum of reserve housing sites in order to provide a positive and effective mechanism to deal with any potential shortfall in housing delivery. This figure was determined in the full knowledge of the Council's housing trajectory, which at the time of the Inspector's report identified that 16,423 homes could be delivered by 2031. The Council's housing land supply position, as at 31 March 2017, suggests a supply of 16,200 dwellings over the period 2011-2031 i.e. a lower trajectory than previously shown. As such, it is clear that the Council should identify at least 2,920 dwellings as reserve housing sites, rather than an unjustified lower figure.</p>
91	Pegasus on behalf of Gallagher Estates	<p>Of the three options put forward, Gallagher Estates is supportive of Option 1; that reserve sites should have the capacity to provide in the region of 2,920 dwellings i.e. 20% of the District's total housing requirement to 2031, as specified by Policy CS. 16 of the Core Strategy.</p>

No.	Source	Comment
		<p>Whilst it is acknowledged that the District's housing supply at 31 March 2017 had exceeded the 14,600 dwellings requirement set out within the Core Strategy, changing circumstances since the beginning of the Plan period (2011) mean that there is now an even greater demand for housing in the Stratford District area.</p> <p>Stratford on Avon's Core Strategy makes provision for 5,440 dwellings to meet unmet housing needs to 2031, which is to be split 50/50 between meeting unmet needs from Coventry and from the Birmingham HMA. This, therefore, equates to a contribution of 2,720 dwellings towards to each HMA.</p> <p>Firstly, attention is drawn to the circumstances listed in Policy CS. 16 for the release of reserve sites, which include:</p> <p>"To contribute to meeting within the District any shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities".</p> <p>With regard to the Coventry and Warwickshire HMA, it is the case that Stratford-on-Avon District has agreed to make provision for Coventry's unmet housing needs to 2031 by contributing 2,720 dwellings, as referenced above. If the District is to achieve in delivering this figure, then it is imperative that the SAP looks to identify reserve sites that have capacity to deliver the identified 20% of the District's total housing requirement.</p> <p>Secondly, circumstances set out in Policy CS.16 also include:</p> <p>"To contribute to meeting any housing needs arising outside of the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District".</p> <p>Pertinent to this circumstance are the identified housing shortfalls within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It is the case that the Birmingham Development Plan (BDP, adopted January 2017) quantified its shortfall as 37,900 dwellings to 2031. Subsequently, the Black Country Core Strategy Review Issues and Options document suggests there may be an emerging capacity shortfall of up to 22,000 dwellings (2016 - 2036).</p> <p>Furthermore, the recently published Greater Birmingham and Black Country Housing Market Area Strategic Growth Study (2018) identified a minimum housing need of 208,000 dwellings to 2031 and 258,500 dwellings to 2036, with an overall significant minimum shortfall remaining across the Greater Birmingham and Black Country HMA, of some 28,150 dwellings to 2031 and of 60,855 dwellings to 2036.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Therefore, in light of these significant housing needs arising both within and outside of the Coventry and Wan/vickshire HMA, it is considered that the allocation of reserve sites with the capacity to deliver at least 20% of the Stratford-on-Avon District Core Strategy housing requirement should be identified within the SAP.</p> <p>Another option not considered is for the SAP to identify a trigger for review which would be subject to the outcomes of future joint working with regards to housing needs in the Greater Birmingham and Black Country HMA. Several areas of search have been identified in the Strategic Growth Study which have implications for Stratford-on-Avon District which will therefore require further testing.</p> <p>Gallagher Estates therefore does not support Option 2; that reserve sites should have the capacity to deliver in the region of 1,320 dwellings. This figure is derived from the fact Stratford-on-Avon District has made provision for 1,600 dwellings over and above the Core Strategy requirement of 14,600 dwellings, between 2011- 2031. It should be stressed that the requirement to deliver 14,600 dwellings between 2011-2031 is a minimum requirement and that, secondly, whilst 1,600 additional dwellings above the minimum requirement have been identified, there is no guarantee that these dwellings will be delivered within the Plan period.</p> <p>With regard to Option 3, in the light of housing needs emerging from within the Coventry and Warwickshire HMA and ongoing work in relation to the Greater Birmingham and Black Country Housing Market Area's housing need, it may be the case that Stratford-on-Avon District may be required to identify reserve sites that have the capacity to provide in excess of 20% (2,920) of the District's Core Strategy total housing requirement. Option 3 could therefore provide the flexibility to facilitate this.</p>
92	Barton Willmore on behalf of Taylor Wimpey	Reserve sites should be identified that have the capacity to accommodate a minimum of 2,920 dwellings as this is in accordance with Policy CS.16. The fact that the Council currently consider themselves to be ahead of the trajectory should not be used as a reason to reduce the quantum of development for reserve sites. The life of the plan extends to 2031 and thus decisions should be made taking into account this lifespan and not based on the 7 years only. The reserve sites are identified to assist in delivery in the event of a shortfall (amongst others) - that this has not occurred to date does not preclude it happening in the near future. Furthermore, we highlight that Paragraph 47 of the current NPPF seeks to boost significantly the supply of housing.
93	DLP Planning on behalf of Talbot Homes	It is essential that the highest number of dwellings possible are identified to contribute to the necessary reserve housing delivery amounts, and to add the necessary flexibility to the development plan. Please refer to accompanying Development Plan Representations document and other supporting documentation, which should be read in conjunction with this form.
94	Barton Willmore on behalf of Cemex	Reserve sites should be identified that have the capacity to accommodate a minimum of 2,920 dwellings as this is in accordance with Policy CS.16. The fact that the Council currently consider themselves to be ahead of the trajectory should not be used as a reason to reduce the quantum of development for reserve sites. The life of

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		the plan extends to 2031 and thus decisions should be made taking into account this lifespan and not based on the 7 years only. The reserve sites are identified to assist in delivery in the event of a shortfall (amongst others) - that this has not occurred to date does not preclude it happening in the near future. Furthermore, we highlight that paragraph 47 of the current NPPF seeks to boost significantly the supply of housing.
95	Homes England	The Council should identify the 20% requirement as per CS.16. To deviate from this would put the balanced dispersal policy at risk, and also undermine the future five year supply. However it is considered that the proximity of Redditch as major urban settlement can make a greater contribution to Stratford's housing provision. Particularly land which abuts the urban fringe of Redditch.
96	Acres Land and Planning on behalf of Sharples family	The identification of Reserve Sites is intended to provide an adequate supply of housing sites to provide sufficient homes for the foreseeable future. There may be a shortfall in delivery due to time lags, leakage of consents (since some are only made for valuation purposes) and other constraints, therefore Noralle feels it is sensible for the LPA to provide the full 20% figure amounting to 2,920 dwellings. The Government specifies that a buffer of 5% against the 5 year supply (or 20% where an authority suffers from a persistent shortfall in delivery) should be reserved for development. There is little danger that too many houses will be provided. In any event, the policy provides a set of criteria which act as a 'brake' against over-provision.
97	John Holden	Other - suspect population growth will slow with Brexit.
98	Stansgate on behalf of Terra Strategic	The Core Strategy requires reserve sites to have 'the capacity to deliver up to 20% of the total housing requirement to 2031'. The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time.
99	Brodie Planning on behalf of Valefresco	As a minimum 2920 dwellings should be identified as this is the amount stipulated in the Core Strategy. Although additional permissions have taken the forecast quantum of development above the Plan period requirement there is no certainty that they will all be delivered within the Plan period, or that the requirement will remain the same until 2031, as a review is likely to trigger the need to increase the target. Therefore it is important to identify sufficient reserve sites to assist the authority in their desire to provide certainty to communities as to where additional development will take place. It will also provide the flexibility to adapt to changing requirements such as a shortfall in the Housing Market Area or adjoining areas. The Greater Birmingham HMA Strategic Growth Study (February 2018) already identifies a significant shortfall and it is inevitable that Stratford District will need to identify further sites to assist with this demand in any forthcoming review.

No.	Source	Comment
100	Brodie Planning on behalf of Lioned	As a minimum 2920 dwellings should be identified as this is the amount stipulated in the Core Strategy. Although additional permissions have taken the forecast quantum of development above the Plan period requirement there is no certainty that they will all be delivered within the Plan period, or that the requirement will remain the same until 2031, as a review is likely to trigger the need to increase the target. Therefore it is important to identify sufficient reserve sites to assist the authority in their desire to provide certainty to communities as to where additional development will take place. It will also provide the flexibility to adapt to changing requirements such as a shortfall in the Housing Market Area or adjoining areas. The Greater Birmingham HMA Strategic Growth Study (February 2018) already identifies a significant shortfall and it is inevitable that Stratford District will need to identify further sites to assist with this demand in any forthcoming review.
101	Margaret Philips	Support – no further comment
102	WYG on behalf of Church Commissioners for England	Option 1 – see response to Part 1

**Officer Response**

Of the responses submitted, 64 supported the identification of sufficient reserve sites to provide 2,920 dwellings, whereas 10 thought capacity for 1,320 dwellings would be sufficient.

A further 10 responses identified a different dwelling figure to these for the following reasons:

No.17 – reserve sites should be in excess of 2,920 dwellings in order to maintain supply and ensure that the Council has greater control on locations which come forward for development.

No.23/27/79 – the figure of 2,920 should be used as a minimum to be reviewed and amended as the Site Allocations Plan progresses.

No.24 – a figure of approximately 1,500 dwellings should be applied.

No.28/34/39 – 3,500 dwellings should be identified to provide a robust buffer against non-delivery and future policy change

No.43 – it is not possible to determine the appropriate quantum of development that should be identified on reserve sites without due consideration being given to the context in which they would be released.

No.58/82/93 – 2,920 figure may need to be higher to deal with issues arising from Coventry and Birmingham and provide flexibility against further demands.

Response: the Core Strategy Examination Inspector made it clear in his Final Report (para 71) that reserve sites should have the capacity to equate to 20% of the District’s housing requirement, ie. 2,920 dwellings. The purpose of reserve sites is to be able to respond to circumstances that may arise before the Core Strategy is reviewed, based on the four purposes identified in Policy CS.16. The process of reviewing the Core Strategy will be the

No.	Source	Comment
		<p>means by which additional housing needs are appropriately provided for. This is made clear in Policy CS.17 whereby the District Council commits to reviewing the Core Strategy in order to respond to any significant increase in housing needs arising from outside the District.</p> <p>A range of specific comments were made on the purpose of reserve sites:                      No.7 – small quantities of housing should be added to the fringes of existing settlements.                      No.11 – small housing developments should be distributed across the District.                      No.12 – it is preferable to identify many small infill, windfall and brownfield sites.                      No.22 – reserve sites are another opportunity by developers to expand profitability by developing in affluent locations.                      No.32 – whatever the number of dwellings as much flexibility as possible should be applied by identifying a greater range of sites.                      No.36 – figure should be based on local need not manufactured government figures.                      No.53 – to identify sufficient land it would be more feasible to find sites that are large enough to provide local facilities                      No.77 – reserve sites need to be of a sufficient scale to deliver infrastructure and sustainable development.                      No.97 – suspect population growth will slow after Brexit.</p> <p>Response: the purpose of reserve sites is to be able to respond to specific circumstances as identified in Core Strategy Policy CS.16. This provides flexibility around whether additional dwellings need to be provided and to release appropriate sites in order to respond in an effective manner to such circumstances.</p>
		<p><b>Officer Recommendation</b></p> <p>The District Council should identify reserve sites which have a total capacity of at least 2,920 dwellings (ie. 20% of the housing requirement for the Core Strategy plan period) in accordance with the Examination Inspector’s Final Report. It would not be inappropriate for reserve sites in total to have a greater capacity than this in order to provide flexibility should it become clear that certain sites cannot be implemented. Doing so would not increase the number of dwellings that should be provided as this remains constant in accordance with how the four purposes of reserve sites take effect.</p>

**Topic: Part 2 Built-Up Area Boundaries - General**

No.	Source	Comment
1	Wellesbourne Matters	<p>Commenting as Wellesbourne Matters an Association with over 3,000 members that was set up specifically to support the continuation of aviation activities at Wellesbourne Airfield. Latterly also in support of Economic Policy AS.9 (the Area Strategy for Wellesbourne) which confirms an intention to: 'Retain and support the enhancement of the established flying functions and aviation related facilities at Wellesbourne Airfield', which has now been endorsed by the examination inspector and adopted by the Council. Wellesbourne Matters are broadly in favour of the Site Allocations Plan as detailed in the Regulation 18 Consultation Revised Scoping &amp; Initial Options. We understand that although the Neighbourhood Plan for Wellesbourne has been submitted for examination and that it identifies a settlement boundary and it was not intended to cover this Boundary in the SAP we suggest that there are a number of points that will require strengthening if the intent of the Council with the Site Allocations Plan is to be met. In line with Policy CS.26 Wellesbourne Airfield must remain classified as a General Aviation Airfield outwith the Built-up Area Boundary due to its value as an asset to the entire district and the Country as a whole and not just to Wellesbourne. In line with Policy CS. 15 the Built-up Area Boundary must remain as-is, where-is on the July 2016 Wellesbourne Inset Plan and in line with the Neighbourhood Plan and not be allowed to encroach on the Airfield or onto any part of the Airfield. Any encroachment on to the Airfield would risk undermining the strategic purpose of policies AS.9 and CS.26.</p>
2	Acres Land and Planning on behalf of the Sharples family	<p>Issues of landscape, agricultural land quality, flood risk and ease of access might all be criteria which could be taken into account in drawing boundaries.</p> <p>The Council has indicated that BUAB's will be defined by the Neighbourhood Plan, where this exists, rather than the SAP. This is somewhat worrying insofar as it leaves open the opportunity for communities to restrain BUAB's for reasons other than planning justification. Similarly, it could open the possibility of BUAB's being changed through undue influence locally – i.e. people granting themselves or others extensions to the BUAB for reasons of personal gain. This approach will only be acceptable where the level of scrutiny is consistent with the SAP. There is a danger otherwise that BUAB's could be defined without a proper public inquiry.</p>
3	RPS on behalf of Miller Homes	<p>RPS considers that the Council should seek to review the settlement boundaries to reflect the need for additional growth as part of the plan period. The main thrust of the NPPF is detailed in Paragraph 14 which states that there should be a presumption in favour of sustainable development, promoting opportunities for new development, unless the adverse impacts of development would significantly and demonstrably outweigh the benefits. The review of settlement boundaries must include land for reserve sites on the edge of settlements.</p> <p>The Council should also consider what harm would result when looking to review the settlement boundaries, to ensure that they are not so tightly drawn as to stifle the government's key objective of significantly boosting the supply of housing (paragraph 47 of the NPPF).</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Bidford-on-Avon is acknowledged in both the Local Plan and Core Strategy as a MRC and after Stratford-upon-Avon considered, along with the other MRCs as the second most sustainable settlements in the District. They are referred to in the Core Strategy Inspector’s Report as being ‘highly sustainable’ and whilst the settlement is a village, with a resident population of approximately 6,000 people it is the size of many small market towns in the West Midlands. Indeed, the Local Plan at paragraph 2.3.6 refers to small rural towns as having a population of between 2,000 and 20,000 people.</p> <p>Bidford-on-Avon has pedestrian and cycle links within the settlement and bus links connecting it to nearby communities along with good road links to the principal road network, with the need to travel significantly reduced by the facilities and services which already exist within Bidford. The site is well located in relation to Bidford’s centre which comprises 37 units which includes a range of convenience, comparison and financial services, along with the recently consented supermarket off Waterloo Road, close to the appeal site.</p> <p>The Council’s Strategic Housing Land Availability Assessment (SHLAA), under site reference BID702 (Miller Homes adjoining site), concluded it was suitable, available and achievable for development to assist the increased provision of housing at Bidford. The SHLAA identified the appeal site together with the land parcel to the north-west as 19.73 ha site reference BID702 has no significant constraints identified which restrict the site coming forward for development and it was perceived as being able to contribute within the first five years of the Plan. Importantly the SHLAA acknowledges the site’s potential as a future housing site, because of its accessibility to facilities, job opportunities and public transport:</p> <p>“The site is currently outside, but adjacent to, the development boundary. The 2008 SHLAA, and associated landscape work, identified the site within a Broad Location, and as a site with potential for future residential development. The area is bounded on 3 sides by development and on fourth by Small Brook, where structural landscaping could provide an improved edge of the settlement when viewed from the north. From the information available, <i>the site is considered suitable in principle for future housing potential, because of its accessibility to facilities, job opportunities and public transport</i> and because there are no known insurmountable constraints. ”</p> <p>Given the above, the settlement boundary at Bidford should be amended to include Miller Homes land put forward through these representations as a safeguarded site.</p>
4	Star Planning and Development on behalf of Richborough Estates	<p>Richborough Estates’ comments concerning Built-up Area Boundaries are solely directed at the potential need for amendments to existing boundaries, including those defined in Neighbourhood Plans, where reserve housing should still be identified (e.g. Bidford on Avon).</p> <p>The stance of the Council is that reserve sites should be excluded from the Built-up Urban Area Boundaries and such boundaries will only change if a site comes forward for development. However, as with reserve sites taken</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		out of the Green Belt, reserve sites could be included within the defined Built-up Area Boundaries of settlements and subject to a trigger policy for their release.
5	Gladman Developments	<p>Whilst Gladman do not disagree with the Councils criteria for identifying the Build-up Area Boundaries (BUAB), there are two issues with the proposed approach being taken that Gladman believe will need to be further considered as the Site Allocations Plan evolves.</p> <p>Firstly, the Site Allocations plan is being prepared to provide the reserve sites and additional housing capacity which is required to make the Core Strategy sound. In that sense therefore it is providing flexibility to ensure the Core Strategy can be delivered, as well as catering for the unmet needs of Birmingham and Coventry. It is important therefore that if BUAB are to be put in place for all settlements within Stratford-on-Avon that a criteria based policy to allow for sustainable sites on the edges of the BUAB can be approved, should the land supply position, or housing requirement position require it. A failure to do so will simply mean the imposition of rigid, inflexible boundaries which do not allow the plan to respond to rapid change. Such a strategy would place the Core Strategy and the Site Allocations DPD at risk of failure.</p> <p>Secondly, as referenced in earlier sections, as settlements with made or well advanced Neighbourhood Plans are not having their BUAB amended by the Council there is, on top of the chance that those settlements will not take a reasonable share of the needed housing numbers, the chance that their BUABs will not reflect similar criteria to those proposed by the Council through the Site Allocations document. In combination, this produces the very real risk that unsustainable patterns of development will result from the way in which the Council is currently seeking to allocate the reserve sites through the plan.</p>
6	Kineton Parish Council	Where a Neighbourhood Plan delivers specific reserve sites outside of the BUAB there should be protection given which will prevent any presumption that other locations not in the Plan and outside the BUAB are capable of being developed. This is of particular concern where a previous, or recent, Call for Sites brought forward such locations.
7	MJ Thorne	Land considered economically unviable should be made available for development, as should farm buildings which can easily be replaced.
8	Simon Ward (Propernomics)	<p>Para 2.8 refers to BUABs. Policy CS15D rightly recognises that development may be appropriate within BUABs or otherwise within the physical confines of LSVs. It would not be correct to infer from para 2.8 that development at LSVs should be confined to BUABs; this would fetter the ability of suitable sites to come forward.</p> <p>Policy AS.10 (a) and (b) also recognise that development can occur on land within or adjacent to a village, and whether within the BUAB or within the physical confines of the village.</p>

No.	Source	Comment
		Furthermore, as suggested by para 3 of Appendix 1 (LSV Methodology), there continues to be a role for LSVs to meet both local needs and demand for market housing from new households, including those moving into the District - this remains the case.
9	Tony Buckingham	20% of housing requirement should be on small scale sites to break the stranglehold of the volume housebuilders who currently control the land supply. This re-balancing is long overdue and will not be achieved by artificially constraining development within tightly drawn BUABS. Ideally BUABS should be abandoned to prevent a return to the days of the former housing moratorium - which is effectively what will result if the current proposals are driven forward. As has been the case since 2012, each application on peripheral LSV sites should be dealt with on its planning merits without being subject to an arbitrarily drawn boundary.
10	Steve Taylor (Set Design)	20% of housing requirement should be on small scale sites to break the stranglehold of the volume housebuilders who currently control the land supply. This re-balancing is long overdue and will not be achieved by artificially constraining development within tightly drawn BUABS. Ideally BUABS should be abandoned to prevent a return to the days of the former housing moratorium - which is effectively what will result if the current proposals are driven forward. As has been the case since 2012, each application on peripheral LSV sites should be dealt with on its planning merits without being subject to an arbitrarily drawn boundary.
<p><b>Officer Response</b></p> <ol style="list-style-type: none"> <li>1. Seemingly satisfied that the BUAB for Wellesbourne as set out in the CS and NDP is appropriate [i.e. excluding the airfield] and should remain as such. Officers agree that the airfield should remain outside the BUAB of the village, as it does not meet the assessment criteria set out in the BUAB methodology and is not an allocated site within the 'made' Wellesbourne Neighbourhood Plan.</li> <li>2. First para re: issues of landscape etc – officers do not agree that these are appropriate criteria by which to assess the suitability of a BUAB, since they are irrelevant in determining the edge of the built form of a settlement.  Second para re: scrutiny – officers do not agree that a BUAB identified through a NDP could be 'changed through undue local influence'. BUABs [as with all NDP policies] require justification and evidence to support their inclusion and need to show a clearly defined methodology. They are consulted upon (twice) through the statutory NDP process and independently examined. Whilst there is scope for 'local influence' through the inclusion of site allocations, for example - BUABs need to ensure compliance with the NPPF and Development Plan policies in order to meet the Basic Conditions text at examination and will be considered purely on 'planning justifications'.</li> <li>3. Officers do not agree that reserve sites on the edge of settlements should be included within the settlement boundaries. The SAP is currently identifying potential reserve sites throughout the District. It would not be appropriate to include such sites within settlement boundaries, since</li> </ol>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>any site within the BUAB would have the presumption in favour of sustainable development and could be brought forward through a planning application at any time. The whole point of reserve sites is that they should only be brought forward under specific circumstances (as set out in Policy CS.16 of the Core Strategy). The representation refers to a site off Waterloo Road, Bidford-on-Avon and states that the BUAB should be amended to include this site. The site is not a current commitment and is a greenfield site. Therefore, it should not be included within the BUAB, but considered as a potential reserve site through the SAP.</p> <p>4. Officers do not agree that reserve sites should be included within the BUABs for reasons already stated, above.</p> <p>5. Not all settlements within the District will have a BUAB. It suggests that a criterion based policy should be created to allow sustainable sites on the edges of BUABs to be approved should the land supply position require it. This already exists in Policy CS.16 and particularly section D re: release of reserve sites. It is unclear what a 'half way house' policy between windfall and allocated sites within a BUAB and reserve sites outside the BUAB would look like or how it would operate. In any case, any new policy could only be included within any revision or update to the Core Strategy.</p> <p>The respondent has raised concerns over settlement boundaries in NDPs not reflecting SDC criteria, this resulting in unsustainable patterns of development. This concern is not being borne out in reality. The majority of Parish Councils have turned to SDC for advice on BUABs and have in the most part utilised very similar assessment criteria to SDC. SDC are consultees on all NDPs and have the opportunity to comment on any anomalies. NDP Examiners have often accepted SDC comments on 'consistency of approach' and amended NDP BUABs on a number of occasions in accordance with accepted criteria derived from Annex 3 of previous Local Plan. The Core Strategy Examination Inspector did not raise concerns about the way BUABs have been defined, to date.</p> <p>6. Noted. The issue of reserve sites and the role of 'made' Neighbourhood Plans in the process is being considered through the SAP.</p> <p>7. Noted. Officers agree that commercial/employment sites on the edge of settlements should be included within BUABs to cover the prospect of change of use should sites become economically unviable. It is also agreed that modern farm buildings within farm complexes on the edge of settlements should also be included within BUABs to allow potential change of use opportunities. Whilst it is recognised these sites are greenfield in nature, this decision is based in part to reflect recent changes to PD Rights for creating dwellings from agricultural buildings and recognition of recent permissions/appeal decisions within the District for the re-development of farm complexes for residential development. Officers consider including such sites would provide flexibility for re-development of sustainable sites on the edge of settlements.</p> <p>8. Para 2.8 of the Reg.18 consultation document is entirely consistent with Core Strategy policies CS.15D and as such it is entirely correct to infer from para 2.8 that development in LSVs should be confined to BUABs/physical confines of the villages, apart from exceptions as listed in Core Strategy Policy AS.10.</p> <p>9. The purpose of BUABs is not to artificially constrain development, as suggested. The purpose of BUABs is clearly set out in para 2.1 of the consultation document. It is not agreed that BUABs will lead to a housing moratorium – there will continue to be organic growth through the</p>

No.	Source	Comment
		<p>development of appropriate sites within the villages. Neither is it agreed that BUABs are arbitrary in nature, since each is drawn against the same consistent set of assessment criteria.</p> <p><b>10.</b> Identical comments to no.9, above.</p>
		<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Reserve sites should not be included within the BUABs for the reasons set out above.</li> <li>• All sites with planning permission should be included within the BUABs (including those with outline consent, since the principle of development has been accepted).</li> <li>• Include employment/commercial and modern agricultural buildings [including associated hardstanding] on the edge of villages within the BUABs.</li> </ul>

**Topic: Part 2 Built-Up Area Boundaries - Question 2.1 Criteria**

No.	Source	Comment
1	David Booth	Two criteria should be added to Land to be excluded from settlement boundaries. These are: Open air recreational spaces including play parks. Public open space. These areas provide vital local outdoor play and recreation opportunities other than formal sport that might take place on a playing field. These open areas are part of the character of settlements and need protection from built up development.
2	Anna Corser	I feel strongly that playing fields and allotments as important local amenities should be included <u>within</u> the boundaries.
3	Bruton Knowles	Identified reserve sites should be included within the settlement boundary in addition to allocated sites
4	Susanne Farmer	Agree with the criteria
5	Paul Clark	Support – no comment
6	Tim Sharples	<p>All factors should be considered, not just an arbitrary line around an existing settlement. See below for the case for Stockton (Category 2 LSV).</p> <ul style="list-style-type: none"> <li>• Land off Glebe Close should be included within the BUAB to allow 10-15 self-build houses, enabling the playing field to be permanently leased to the village.</li> </ul>
7	Tyler-Parkes Partnership	<p>Our Client supports the use of the proposed criteria applied to define the BUABs for settlements (Question 2.1), but raises objection to the proposed settlement BUAB for Category 3 Local Service Village, Earlswood, on the basis that the proposed boundary is unsound and does not meet the criteria set out to define the BUAB.</p> <p>The detailed grounds for our Client's objection to omission of the garden land associated with Westbrook are set out below, with a brief summary here:</p> <ul style="list-style-type: none"> <li>• The established use of the site as a whole is domestic residential curtilage – there is no change of use or strong physical boundary along the proposed BUAB line.</li> <li>• The house and garden are extremely close to the centre of the village in a very sustainable location and the site is surrounded on three sides by built form making it logical for inclusion within any tightly drawn BUAB for the settlement of Earlswood.</li> <li>• The site in its entirety meets all the criteria set out in the SAP for including land within the BUAB for Earlswood settlement.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• The Peter Brett Strategic Housing Land Availability Assessment (SHLAA) Review, 2012, defined a built-up area boundary for settlements where settlement boundaries did not already exist. Our Client's site is included within the boundary defined for Earlswood by the SHLAA.</li> <li>• Council Development Management Planning Officers have recently accepted that the site in its entirety '...is deemed to be within the village confines...' (Delegated Report - planning application reference number 17/00908/OUT) .</li> </ul>
8	Alderminster parish Council	Yes. The parish Council agrees with the criteria for identifying built up area boundaries.
9	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	<p>The BUAB criteria have not been applied in Studley. This issue needs to be tackled and the BUAB extended to include these new sites and other small former brownfield /windfall sites to allow infilling developments which will have minimal impact on the Village.</p> <p>In future it would make more sense to extend the boundary first so that locals with suitable sites can be made aware of it rather than largescale building developers buying up swathes of land outside the BUAB.</p>
10	Paul Dunster	Support – no further comment
11	Hampton Lucy Parish Council	Support – no further comment
12	H Farmer	Support – no further comment
13	RPS on behalf of Taylor Wimpey	<p>RPS considers that the Council should seek to review the settlement boundaries around Mappleborough Green to reflect the need for additional growth as part of the plan period. The main thrust of the NPPF is detailed in Paragraph 14 which states that there should be a presumption in favour of sustainable development, promoting opportunities for new development, unless the adverse impacts of development would significantly and demonstrably outweigh the benefits. The review of settlement boundaries must include land for reserve sites on the edge of Redditch.</p> <p>The Council should also consider what harm would result when looking to review the settlement boundaries, to ensure that they are not so tightly drawn as to stifle the government's key objective of significantly boosting the supply of housing (paragraph 47 of the NPPF).</p>
14	PJS Development Solutions Ltd on behalf of Gloucester Diocesan Board of Finance	<p>Other criteria should include:</p> <ul style="list-style-type: none"> <li>- logical infill/rounding off opportunities</li> <li>- sites that may have the potential to deliver some housing and community benefits e.g. green infrastructure</li> <li>- Para 69 of the Draft Revised NPPF considerations which sets out explicit encouragement and support for small sites</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
15	Long Compton Parish Council	A simple statement to the effect that boundaries established in 'made' Neighbourhood Development Plans will not be affected is an important addition to this policy statement.
16	Paul Quinney	Support – no further comment
17	Priors Marston Parish Council	Support – no further comment
18	Tony Buckingham	New farm buildings should be included within BUABs as these can be a valuable source of brownfield land and form an important source of new and affordable housing within the physical confines of LSVs.
19	Sport England	It is considered that the exclusion of playing fields from the defined settlement boundary should not represent a constraint for the provision of outdoor sports facilities to meet current and future demand, which will be detailed in the Playing Pitch Strategy.
20	Kate Bryan	Support – no further comment
21	Reuben Bellamy	There is no reason to exclude miscellaneous brownfield uses such as sewage works, telephone exchanges and railway sidings. Such uses are not agricultural or open space and can clearly be within the confines of a settlement. If and when they are no longer required for their current use they could make a contribution to the windfall development target.
22	Rickett Architects on behalf of Mr and Mrs Hartley	Support – no further comment
23	Historic England	<p>Historic England assumes that an understanding of the historic importance of each settlement and its heritage assets, character and townscape has informed proposed boundaries.</p> <p>It should also be made clear that any prospective development within settlements will need to accord with the relevant local plan policy including those relating to the protection and enhancement of the historic environment i.e. planning permission should not be presumed.</p>
24	Clifford Chambers and Milcote Parish Council	Support – no further comment
25	Stansgate Planning on behalf of Mr and Mrs Wythe	The proposed Built-Up Area Boundaries are, in many cases, drawn too tightly around settlements and will not allow appropriate levels of development to take place. The criteria should be widened to include all land which is within the 'physical confines' of a settlement rather than seek to exclude everything which is not already built on. This will still provide the level of certainty sought by owners and developers but will also provide opportunities for limited development to meet local needs to be undertaken.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The ‘physical confines’ of a settlement, the phrase used until such time as BUAB’s have been designated, means all those areas which appear to be part of that settlement rather than part of the countryside beyond, regardless of their use. This may include playing fields, electricity sub stations, allotments and Manor Houses. It will also include small gaps in otherwise built-up frontages and on occasion larger sites which are otherwise bound by development. Other policies in the Development Plan would prevent development of many of those pieces of land but their inclusion would provide a comprehensive view of each settlement. In the light of this boundaries should be reconsidered to properly identify the confines of settlements rather than seek to draw them so tightly that there is no opportunity for development. The Core Strategy requires reserve sites to have ‘<i>the capacity to deliver up to 20% of the total housing requirement to 2031</i>’. The reason for this is to ensure adequate choice, flexibility and a continuous supply of housing to meet any identified shortfall. The shortfall may arise from a number of sources - shortfall in five year housing land supply, needs arising from elsewhere in the HMA, those arising from beyond the HMA or from Jaguar Land Rover. If a limited number of reserve sites are chosen (the 1,320 figure, for example) then those chosen sites may not be best placed to meet the type of need identified. As such at least 20% should therefore be provided to ensure the needs can be met in the right place at the right time during the Plan period.</p>
26	Caroline Dunster	Support – no further comment
27	Acres Land and Planning on behalf of Noralle Traditional Country Homes	Oppose – no further comment
28	Savills on behalf of Magdalen College	<p>The College agrees that the introduction of BUABs to the LSVs is a useful mechanism in providing clarity in the planning process.</p> <p>However the BUABs should not be overly restrictive, nor should they preclude the plan’s ability to flexibly address housing supply matters should they arise. The introduction of BUABs at the LSVs should not conflict with the NPPF’s presumption in favour of sustainable development and the aim to boost significantly the supply of housing. BUABs should be drawn to include the identification of reserve sites.</p> <p>The criteria that have been applied to define the BUABs are too restrictive and fail to provide an adequate level of flexibility to respond to the housing delivery requirements which may arise during the lifetime of the Plan. The criteria applied to the BUABs presently fail to fully acknowledge the capacity of existing settlements to provide additional housing capacity in a sustainable manner.</p> <p>The proposed criteria set out the land to be included and excluded from the BUABs. These criteria should be revised to take better account of the relationship of existing buildings to the built up settlement, including</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		agricultural buildings. Such buildings offer significant potential to provide further development across the district, whether through conversion opportunities or otherwise. Given that there are other mechanisms, such as permitted development rights, which may enable appropriate changes of use it would be sensible to account for this through in the criteria defining the BUABs.
29	Framptons on behalf of Spitfire Bespoke Homes	We reiterate the Council's own admission in paragraph 2.10 of the Scoping and Initial Options paper whereby they have set out that " <i>whilst much of the distinction between the built-up area and the open countryside is clear cut, <u>subjective judgement has been necessary in certain cases</u></i> ".
30	Cerda Planning on behalf of Braemar Property Developments	<p>Paragraph 69 of the NPPF states '<i>the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and that local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. Planning policies and decisions, in turn, should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other.</i>'</p> <p>Paragraph 70 of the NPPF states that '<i>to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.</i>'</p> <p>To ensure that facilities such as playing fields and allotments which are essential in creating healthy communities are protected, it is agreed that these should not be located within settlement boundaries. Exclusion from settlement boundaries provides clarity that the areas are not suitable for development, cannot be considered infill development and afford the sites greater protection against inappropriate loss that would be contrary to the NPPF.</p>
31	David Lock Associates on behalf of Trenport Investments Ltd	The proposed exclusion of open areas that are within the built-up framework of settlements is not appropriate. The resultant definition of built-up area boundaries is too tight, restricting opportunities for the limited, organic growth of settlements and thereby undermining sustainable development.
32	Boyer on behalf of Venta Developments	The criteria generally appear appropriate but it is recommended that Built-Up Area Boundaries should also be extended to included proposed development which benefits from existing planning permission and reserve housing allocations (once known).
33	Hunter Page on behalf of Bellway Homes	The criteria for considering built up area boundaries would seem sound but these need to be looked at carefully so they can be adjusted appropriately to accommodate reserve housing sites.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
34	Hunter Page on behalf of Spitfire Bespoke Homes	We would however reiterate that Council's own admission in Para 2.10 of the Scoping and Initial Options paper whereby they have set out that "whilst much of the distinction between the built-up area and the open countryside is clear cut, subjective judgement has been necessary in certain cases."
35	Framptons on behalf of Gallagher Estates	Generally, we accept the criteria that has been applied in the MRC's with regard to what features are to be included within a settlement boundary subject to the proviso that, as advised by the Inspector (MM88) the BUAB's are 'the appropriate basis for assessing whether any revisions are justified'. We would reiterate the Council's own admission in paragraph 2.10 of the Scoping and Initial Options paper whereby they have set out that " <i>whilst much of the distinction between the built-up area and the open countryside is clear cut, <u>subjective judgement has been necessary in certain cases.</u></i> "
36	Framptons on behalf of Mr I Lane	Generally, we accept the criteria that has been applied in the MRC's with regard to what features are to be included within a settlement boundary subject to the proviso that, as advised by the Inspector (MM88) the BUAB's are 'the appropriate basis for assessing whether any revisions are justified'. We would reiterate the Council's own admission in paragraph 2.10 of the Scoping and Initial Options paper whereby they have set out that " <i>whilst much of the distinction between the built-up area and the open countryside is clear cut, <u>subjective judgement has been necessary in certain cases.</u></i> "
37	Warwickshire County Council	This is a matter for the local authority to determine.
38	GL Hearn on behalf of Severn Trent Water	<p>We do not consider it is appropriate to automatically determine that land in "miscellaneous use which may be located on the fringe of a settlement" will be excluded from settlement boundaries. Often, such infrastructure sites provide key fundamental services to the village within which they are located and as such should be regarded as an integral part of the village settlement, its built form and its character.</p> <p>In any event, (as in this instance at Napton on the Hill) it should not be assumed that such "miscellaneous use" infrastructure will be permanently required. Automatically excluding such infrastructure sites from consideration for inclusion within a settlement boundary removes the development potential for such 'surplus' brownfield sites to come forward through the plan-led system and contribute to meeting housing requirements or other development needs.</p> <p>Accordingly STWL considers that brownfield infrastructure sites that are fundamental to the operation of a settlement - and particularly those which abut existing development of the type identified for automatic inclusion within settlement boundaries (set out at 2.10 of the SAP consultation document) - should be included within redrawn settlement boundaries. This would enable their timely redevelopment (where appropriate and available) without the need to periodically review settlement boundaries through a plan led review process.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
39	Pegasus on behalf of Rainier Developments	Rainier Developments are in agreement with the criteria applied to define Built-Up Area Boundaries, noting that reserve sites will not be incorporated, as their release will be dependent on specific circumstances.
40	Barton Willmore on behalf of Taylor Wimpey	The Built Up Area boundaries should be amended to include the reserve sites once these are identified. Reserve sites should be able to come forward quickly in the event of a shortfall in supply. As currently proposed, if a safeguarded site were to come forward, the boundary would be amended through a subsequent review of the Development Plan. The effect of this is that if a site comes forward to meet a shortfall in supply, it would not be in accordance with the Development Plan at that time as it would be outside of the settlement boundary. This cannot be a practical or rational way to proceed.
41	Barton Willmore on behalf of Cemex	The Built Up Area boundaries should be amended to include the reserve sites once these are identified. Reserve sites should be able to come forward quickly in the event of a shortfall in supply. As currently proposed, if a safeguarded site were to come forward, the boundary would be amended through a subsequent review of the Development Plan. The effect of this is that if a site comes forward to meet a shortfall in supply, it would not be in accordance with the Development Plan at that time as it would be outside of the settlement boundary. This cannot be a practical or rational way to proceed.
42	Acres Land and Planning on behalf of Sharples family	Support – no further comment
43	John Holden	Support – no further comment
44	Brodie Planning on behalf of Valefresco	Generally agree, but need to consider including sites on the edge of settlements that are well contained and have strong established boundaries within the Built Up Area Boundary to allow for windfall development.
45	Steve Taylor (Set Design)	New farm buildings should be included within BUABs as these can be a valuable source of brownfield land and form an important source of new and affordable housing within the physical confines of LSVs.
46	MJ Thorne	Villages should not be strangled by arbitrarily drawn boundaries. These further remove the ability of communities to remain sustainable. Applications should be dealt with on individual merit.
47	WYG on behalf of Spitfire Properties	<p>The questions proposed by Q 2.1 - 2.6 do not allow for consideration of a Settlement Boundary review of Long Marston Airfield.</p> <p>The Site Plan at Appendix 1, identifies how my client's land interests, the subject of these representations relates well to the LMA proposal. The site comprises a suitable location for residential development and would provide a logical area for expansion of the New Settlement in a sustainable location, as evidenced by the Council's identification of LMA as part of the spatial distribution pattern at Policy CS.15 of the adopted Core Strategy.</p>

No.	Source	Comment
		The site would form a logical and coherent urban extension to the existing LMA allocation, maximising the use of improvements to existing local infra-structure arising from new settlement's delivery.
<p><b>Officer Response:</b></p> <ol style="list-style-type: none"> <li>1. It is agreed that 'informal' recreational/play areas and public open spaces on the edge of settlements should be excluded from the BUABs. Whilst informal play areas have been excluded when creating the BUABs, it is acknowledged they are not explicit criteria on the list at para 2.10 of the consultation document. These land uses should be added to a revised methodology for clarification purposes.</li> <li>2. It is not agreed that important local amenities such as allotments and playing fields on the edges of settlements should be included within BUABs due to the implications this would have for the land in question in relation to 'in principle' acceptance of development on land within the BUAB.</li> <li>3. It is not agreed that identified reserve sites should be included within BUABs (in addition to allocated sites) as, in effect, they would become allocated sites in their own right due to the 'in principle' acceptance of development on land within the BUAB. Locating reserve sites outside the BUABs will ensure they will only be released in accordance with the specific circumstances as set out in Core Strategy Policy CS.16D.</li> <li>4. Noted.</li> <li>5. Noted.</li> <li>6. It is not agreed that BUABs are arbitrary in nature; all the boundaries have been created utilising set criteria. This particular representation mentions Stockton, and more specifically the recreation ground and playing fields to the south of the village. It is assumed that the writer considers these parcels of land should be considered for inclusion within the BUAB [mention is made of the possible site for self-build/custom housebuilding]. Clearly, these sites are greenfield in nature and not 'built-up' and do not meet the BUAB criteria. As such, it is not considered necessary or appropriate to change the BUAB for Stockton to include these parcels of land. Sites for self-build would remain outside any BUAB as 'exception sites' [similar to rural housing schemes] and would only be subsumed within the BUAB once built-out.</li> <li>7. Since the consultation on the draft BUABs, application ref: 18/00808/FUL for the erection of 3 dwellings on land associated with Westbrook, Valley Road, Earlswood has been granted planning permission. It is agreed that the BUAB should be amended to reflect this planning permission.</li> <li>8. Noted.</li> </ol>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
9.		The representation does not make it clear which criteria have not been followed, or how they have been ignored. No examples have been given and no such circumstances are known. It is not considered there is sufficient evidence or requirement to amend the BUAB for Studley, particularly as it would require an amendment to the Green Belt boundary which would be beyond the scope of the SAP.
10.		Noted.
11.		Noted.
12.		Noted.
13.		It is not agreed that the BUAB around Mappleborough Green should be amended to reflect the need for additional growth, since this is not the reason for creating a boundary denoting the built form of the settlement. It is not agreed that the BUAB should include land for reserve sites on the edge of Redditch since any land included within a BUAB has the status of being 'acceptable in principle' in terms of development, whereby reserve sites should only be released for development in certain, specific circumstances as set out in Policy CS.16D of the Core Strategy.
14.		It is not agreed that opportunities to "round-off" a settlement or include "logical infill" sites within BUABs would be appropriate since it would be extremely difficult to create an assessment criteria which could be assessed on a settlement by settlement basis in a consistent manner. The purpose of the BUAB is not to anticipate or cherry pick sites which may have the potential to deliver housing and green infrastructure. Para 68 of the NPPF (2018) encourages small sites to meet the housing requirement of an area via a number of means including through the development plan and brownfield registers, for example. This the LPA does. Criterion c) is most relevant to BUAB assessment in that it refers to windfall development within existing settlements. This is precisely what the BUABs are looking to assist with – interpreting where windfall development would be acceptable in principle.
15.		It is not proposed to amend village BUABs associated with 'made' Neighbourhood Plans through the SAP process. However, the appropriateness of all village BUABs would need to be considered through any review of the Core Strategy.
16.		Noted.
17.		Noted.
18.		It is agreed that modern farm buildings within farm complexes on the edge of settlements should also be included within BUABs to allow potential change of use opportunities. Whilst it is recognised these sites are greenfield in nature, this decision is based in part to reflect recent changes to PD Rights for creating dwellings from agricultural buildings and recognition of recent permissions/appeal decisions within the District for the re-development of farm complexes for residential development. Officers consider including such sites would provide flexibility for re-development of sustainable sites on the edge of settlements.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
19.		BUABs will not affect the provision of sports facilities.
20.		Noted.
21.		It is agreed that ‘other miscellaneous brownfield uses’ as described in the representation should be included within BUABs since it would provide an opportunity for re-development of brownfield sites and make a valuable contribution through windfall development.
22.		Noted.
23.		It is not the purpose of a BUAB to assess the historic importance of a settlement or assess heritage assets, merely to reflect the edge of the built form of the settlement. The assessment of prospective development within settlements is set out in relevant policies within the NPPF, Core Strategy and neighbourhood plans (where appropriate).
24.		Noted.
25.		Re-drawing BUABs to include parcels of land that could be classified as being ‘within the physical confines’ of a village would be difficult due to potential inconsistencies in interpreting a methodology criteria that would be different for each individual land parcel. For this reason, it is not considered appropriate to include greenfield sites on the edges of villages within BUABs. It is not considered appropriate to include playing fields or allotments within BUABs, either. Such sites are not ‘built-up’ in nature and, more often than not, are considered community assets not appropriate for development. Including such sites within a BUAB would change the ‘in principle’ status of development of such sites and lead to the potential loss of important spaces/assets within villages. It is not agreed that BUABs will lead to very limited opportunities for windfall development. Finally, it is not considered appropriate to include reserve sites within BUABs, as these sites should only be released in certain circumstances, as set out in Core Strategy Policy CS.16D. If they were included within BUABs, there would be an immediate ‘in principle’ acceptance of all such sites which would be contrary to their proposed status.
26.		Noted.
27.		Noted.
28.		It is not agreed that BUABs should be drawn to include reserve sites, for the reasons stated elsewhere in this schedule. The representation considers the criteria that have been used to define the BUABs fail to provide flexibility. However, it is not agreed that ‘flexibility’ is the reason for confirming the built form of the settlement. The representation suggests the assessment criteria should include agricultural buildings. This has been raised elsewhere and it is agreed that such sites on the edges of settlements should be included within BUABs.
29.		Noted.
30.		Noted and agreed.

No.	Source	Comment
31.		The BUABs do not exclude open areas of land that are located within the built-up areas of villages, as suggested. Land such as playing fields would only be excluded from a BUAB if on the periphery of a settlement. It is not agreed that the BUABs are too tightly drawn; given their very nature they are denoting the edge of the settlement’s built form. The BUABs still allow for sustainable windfall development.
32.		Sites benefiting from planning permission are included within the draft BUABs. It is not agreed that reserve sites should be included within BUABs for reasons set out elsewhere in this schedule.
33.		It is not agreed that BUABs should be adjusted to accommodate reserve housing sites for the reasons set out elsewhere in this schedule.
34.		Noted.
35.		Noted.
36.		Noted.
37.		Noted.
38.		It is agreed that infrastructure sites on the edge of villages should be included within the BUABs.
39.		Noted.
40.		It is not agreed that BUABs should be adjusted to accommodate reserve housing sites for the reasons set out elsewhere in this schedule. The SAP will include a list of appropriate reserve sites to be released in the circumstances set out in Policy CS.16D of the Core Strategy and the sites chosen will be available to come forward in the event of such circumstances being triggered. It is not agreed that reserve sites would not be in accordance with the Development Plan due to it being located outside the settlement boundary, given that Core Strategy Policy CS.16 makes it clear that the SAP will identify such sites to meet any shortfall.
41.		Identical comment/response as point 40, above.
42.		Noted.
43.		Noted.
44.		It is not agreed that greenfield sites on the edge of settlements that may be considered by some parties to be ‘within the physical confines’ of a village should be included within BUABs for reasons set out elsewhere in this schedule.

No.	Source	Comment
		<p>45. Whilst it is not agreed that modern agricultural farm buildings and land associated with them are brownfield land [they are classified as greenfield], it is agreed that such sites on the edge of villages should be included within BUABs for reasons set out elsewhere in this schedule.</p> <p>46. Noted.</p> <p>47. Long Marston Airfield is not a Main Rural Centre or Local Service Village at this point in time and therefore is not covered by this element of the SAP.</p>
		<p><b>Officer Recommendation:</b></p> <ul style="list-style-type: none"> <li>• Exclude greenfield sites on the edge of villages that may be argued by some parties to be ‘within the physical confines’ due to the land not meeting the BUAB methodology and concerns over inconsistency of assessing whether land would be appropriate [or not] to include.</li> <li>• Include a specific methodology criteria for play areas, recreation areas and open spaces on the edge of settlements to be excluded from BUABs.</li> <li>• Include the land associated with planning permission 18/00808/FUL at ‘Westbrook’, Earlswood within the BUAB for the village.</li> <li>• Include modern agricultural buildings [including associated hardstanding] on the edge of villages within BUABs.</li> <li>• Only include BUABs within the SAP for Local Service Villages without ‘made’ neighbourhood plans.</li> <li>• Include ‘miscellaneous brownfield uses or infrastructure sites’ on the edge of villages within BUABs.</li> </ul>

**Topic: Part 2 Built-Up Area Boundaries - Question 2.2 Main Rural Centres**

No.	Source	Comment
1	Bloor Homes	<p>The criteria is accepted but not the application of the same in terms of the Southam BUAB and in particular its relationship to site SOU.1. The role of a Settlement BUAB is to <i>'distinguish between land inside the settlement which new development is acceptable in principle, from /and outside the settlement, where, subject to certain exemptions, development is generally not acceptable'</i>.</p> <p>The current southern BUAB boundary excludes land now under development within SOU.1. The area excluded includes a 2 storey community building, ancillary community buildings and development including carparks and path/roadways. As para. 2.10 states that land to be included within the settlement boundary shall include Community buildings and their immediate curtilage, the BUAB requires adjustment to incorporate all land inherent with consents 13/00809/FUL and 16/01930/VARY.</p> <p>In addition the SOU.1 allocation implies development is acceptable in principle. The BUAB should therefore be realigned to include the additional land outside the Settlement boundary within SOU.1. Furthermore as explained above, the small area of land to the south of SOU.1 and to the north/west of the safeguarded HS2 land should also be included as its value as open countryside if excluded would be negligible given surrounding built form and the HS2 development parcel.</p> <p>There is the potential for Bloor Homes to deliver additional housing and community facilities on the remaining area of SOU.1 and land parcel to the immediate south within the next 5 years of the Local Plan. An indicative plan accompanies this submission. For the reasons stated above the case to realign the BUAB boundary is considered robust and supportable and would encourage the deliverability of this proposal.</p> <p>Whilst the supporting text to para 2.5 references para. 84 of the Framework (which relates more to the drawing up/reviewing of Green Belt boundaries), the thrust of 84 is considered applicable inasmuch as boundary realignments must not conflict with the Framework's presumption in favour of promoting sustainable development. To this end given the acceptance of SOU.1 as a developable site, the BUAB needs to be revised to enclose that land to assist rather than hinder delivery. The realignment would also accord with the 3rd and 5th bullet points of Para 2.5 of the consultation document.</p> <p>Realignment of the BUAB would provide a clear robustly defined southern/eastern boundary to the Southam BUAB. All other land to the south and east would remain open countryside and have clearly defined northern and western boundaries in the guise of the HS2 land and Banbury Road respectively.</p> <p>See response to Part 2 and accompanying OS map extract. The extract shows the area Bloor Homes consider can justifiably be included within the Southam BUAB settlement area.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>In summary, in light of the (a) housing, economic and community sporting facilities presently being constructed within the SOU.1 area including on land outside the current BUAB (b) the remaining SOU.1 area already located outside of the BUAB and (c) the low contribution the land to the south of the same abutting the safeguarded HS2 land makes to the openness of the countryside - the case to maintain the current BUAB is considered weak and unsupportable.</p> <p>This is particularly the case when noting how sustainably located SOU.1 is by definition coupled with the fact the land to the south of the BUAB already has consent to be developed.</p>
2	Anna Corser	Agree with these BUABs
3	Councillor Justin Kerridge	Yes for Studley.
4	Stratford Ramblers	<p>(a) Alcester: provided the footpaths AL50b and ALSI are retained and clearly shown on any developer's plans.</p> <p>(b) Pleased that this is a tight envelope, particularly avoiding development west of the railway line.</p>
5	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	<p>With regard to: d. Studley</p> <p>No, the BUAB has new building work outside of the boundary and so should be extended to cover these and other available sites.</p> <p>In Studley northern boundary should be extended to include new development in Green Lane and brownfield (former brickworks) site STUD703 in Brickyard Lane which is surrounded by housing, leisure and commercial development. The true greenbelt and open countryside begins beyond the golf range and sports field, these being formerly the brickworks clay pit and later a refuse tip. (Map attached, suggested revisions.)</p>
6	Alcester Town Council	<p>The Alcester BUAB was agreed as part of the Core Strategy.</p> <p>We would wish SDC to note that the BUAB extends beyond the boundary of the parish of Alcester and includes part of Kinwarton parish.</p> <p>We would also wish SDC to note that the emerging Neighbourhood Development Plan for Alcester will use the BUAB for Alcester but only in so far as it is within the designated Neighbourhood Plan Area.</p>
7	Bidford-on-Avon Parish Council	As previously stated, Green Belt areas need to be reviewed and updated: Alcester, Henley in Arden and Studley have all Green Belt areas which has repercussions on the other MRCs, not protected by Green Belt.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
8	RPS Group on behalf of Miller Homes	<p>Paragraph 2.15 of the Site Allocations Plan Revised Scoping and Initial Options - January 2018 makes it clear that because the Neighbourhood Plan for Bidford-on-Avon has been made and identifies a settlement boundary then it is not intended to cover these boundaries in the Site Allocations Plan (SAP)."</p> <p>The Inspector's report (31 October 2016) into the Neighbourhood Plan states that "<i>The (Neighbourhood) Plan seeks to enlarge the (village) boundary</i>" (p13) and this has happened so it now includes the existing housing commitments, i.e. the appeal site at Land at Waterloo Road now lies within the village boundary.</p> <p>It is important to recognise that examiners of neighbourhood plans are only required to check whether the neighbourhood plan meets the basic conditions and other matters. Conversely, an Inspector examining a Local Plan will need to consider matters in much greater detail including whether the plan is legally compliant and 'sound' as per paragraph 182 of the NPPF. Furthermore, the neighbourhood plan will not have considered further changes since the examiner's report was published in October 2016, including changes in housing supply for example. In light of the above, it is entirely appropriate for the Site Allocations Plan to consider any revisions to the settlement boundary for Bidford-on-Avon.</p> <p>In the 2016 Miller Homes appeal (Land at Waterloo Road), the Council accepted during the Inquiry that the "<i>proposed site was in the optimum location to extend the village. . .and this was borne out by the site visit and associated evidence in this case</i>" (paragraph '101 of Inspector's Report into APP/J3720/W/15/3089709).</p> <p>As can be seen from the above Map (Map 1) from the Neighbourhood Development Plan, Land to the east of Jacksons Meadow and to the north west of Waterloo Road appeal site lies immediately outside the village boundary. Similarly to the recently granted appeal, the promoted site is considered to be an optimum location to extend the village. The site is bound to the south, west and partially to the east by 'housing / housing commitments' so is contained by built development to three sides. RPS contends that the settlement boundary should be enlarged to include the land shown on the attached Ordnance Survey map (see site hatched in red). The site boundaries of Miller Homes's site would provide a logical and defensible northern extent of the village through a rounding off of the settlement in this location, as can be seen in Appendix 1 of this form.</p>
9	Rickett Architects on behalf of Mr and Mrs Johns	Land off the A423 Southam By-Pass, adjoining the new Galanos House Development [plan supplied] represents a natural rounding off to the settlement boundary.
10	Tompkins Construction	Land at Insight Park on Welsh Road East in Southam should be included within the built up area boundary (BUAB) for Southam. For convenience I have indicated the land as 'INFILL SITE' on the plan below, referred to as 'the site' in these representations. The plan illustrates the relationship of the site to surrounding development. Since drawing the BUAB for Southam, housing development on local plan site SOU.3 has commenced and is under construction across the whole of site SOU.3. Housing development on SOU.3 abuts the

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>site. There is a recently constructed warehouse building immediately to the south, live/work, business units and housing at Insight Park, and two dwellings alongside Insight Park to the west. With completion of housing development at SOU.3, the site will be wholly within the built up area of Southam and therefore, by definition, should be within the defined BUAB. To include this area within the BUAB would be consistent with the inclusion of the industrial development at Kineton Road in Southam.</p> <p>Including the site within the BUAB would be consistent with the Council's own criteria for defining BUABs, the main purpose of which is to draw a distinction between the built-up area of settlements and open countryside. The purpose of the BUAB is set out at 2.10 of the January 2018 SAP Scoping document. The site is clearly not within the open countryside and by definition, should be within the BUAB. The proposed revised BUAB is shown as a thick black line on the plan below. The revised BUAB would include all of the developments mentioned above.</p>
11	Stansgate Planning on behalf of Mr and Mrs Wythes	The boundary for Alcester should be extended to include land off Allimore Lane, Alcester, as shown on attached drawing 7928-600. This would provide a proper 'rounding off' of the settlement.
12	Woolf Bond Planning on behalf of Rockspring Barwood Southam	We object to the proposed BUAB for Southam as drafted on the basis that it excludes our client's site to the west of Southam, lying both north and south of Welsh Road West. This forms an accessible and sustainable location for a medium sized residential development opportunity [map supplied].
13	WYG on behalf of Barwood Developments	<p>This question, by limiting itself to only 4 of the 7 MRC's pre-supposes that the exclusion of Neighbourhood Plan settlements from consideration, is a sound approach. It is not, for the reasons stated above in respect of Question 1.2.</p> <p>The Site Plan at Appendix 1 [plan supplied], identifies how my client's land interests, the subject of these representations relates well to the existing village, and the existing committed residential sites in the Kineton Neighbourhood Plan. The site comprises a suitable location for residential development and would provide a logical area for growth in a sustainable location, evidenced by the Council's identification of Kineton as a Main Rural Centre in the adopted Core Strategy.</p> <p>It seems inappropriate to rule out the potential of sustainable MRC settlements to deliver part of the overall distribution of Stratford's reserve housing land, solely on the basis of neighbourhood Plan status, rather than a methodical assessment of where it is appropriate to locate new housing having regard to District wide sustainability.</p>
14	Napton-on-the-Hill Parish Council	Support – no further comment

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
15	Hunter Page on behalf of Bellway Homes	Support – no further comment
16	Framptons on behalf of Gallagher Estates	We note that the Built-Up Area Boundary (BUAB) of Alcester fits with the existing envelope of built up development and extant permissions in Alcester reflecting the Local Plan Inspectors comments above. The boundary is therefore an appropriate basis for considering whether a revision is justified. With regard to the Policy CS15 principles being applied to the identification of reserve sites, land south of Allimore Lane, Alcester (see plan 1) would not be contrary to these principles.
17	Warwickshire County Council	This is a matter for the local authority to determine.
18	Pegasus on behalf of Rainier Developments	Whilst Rainier Developments have no comments to make in respect of the above Built-Up Area Boundaries for these settlements, it is recommended that these will need to be changed should the Council decide to identify reserve housing sites in the Main Rural Centres. For reasons explained further below Rainier Developments consider this should form part of the strategy for the SAP.
19	DLP Planning on behalf of Talbot Homes	Support – no further comment
20	John Holden	Support – no further comment
21	Framptons on behalf of Gallagher Estates	We note that the Built-Up Area Boundary (BUAB) of Southam fits with the existing envelope of built up development and extant permissions in Southam reflecting the Local Plan Inspectors comments above. The boundary is therefore an appropriate basis for considering whether a revision is justified. With regard to the Policy CS15 principles being applied to the identification of reserve sites, land to the east of Banbury Road would not be contrary to these principles.

**Officer Response**

1. In relation to the SOU.1 allocation, some development may well extend beyond the BUAB boundary as set out in the Core Strategy. However, the elements of the development which are outside the BUAB are those that would not be classified as 'built form' [i.e. attenuation pond, playing pitches and other open space], although it is acknowledged that some infrastructure relating to the sports facilities are located outside the BUAB. The BUAB is not looking to "distinguish between land in the open countryside and land within the settlement" as indicated in the representation. The intention of the BUAB is to distinguish between the edge of the built form and any other 'open land' of any nature on the edge of the settlement. It is not agreed that the BUAB should be realigned to take account of land to the south of SOU.1 seeing as it is clearly un-developed at the present time. Additionally, it is not agreed that the BUAB should be extended to include a "potential development" on the remaining SOU.1 land. This land is not the subject of a current planning application and as such does not have any consent. There is no indication if/when this site will come forward. The land in question is currently football pitches associated with Southam United Football Club and the land clearly does not meet any of the criteria set out for including land within a BUAB. It is concluded the BUAB as currently drawn for

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Southam is entirely appropriate based on the BUAB assessment criteria and the land outlined in this representation should not be included within the BUAB.
2.		Noted.
3.		Noted.
4.		Noted.
5.		The representation states that development has been allowed outside the BUAB for Studley and it is therefore out-of-date. It also states that the BUAB should be extended to include 'new development in Green Lane' and a small site in Brickyard Lane. It is considered that the only part of this site [STUD703 in 2012 SHLAA] that could meet the BUAB assessment criteria would be the third of the site occupied by the dwelling and associated amenity space. The remainder of the site is not domestic in nature and therefore would not meet the BUAB methodology for inclusion. Since there are other very similar small, individual pockets of development on the periphery of the village that historically have not been included within the settlement boundary, it is not considered there is sufficient evidence or requirement to amend the BUAB to include the whole of the site, or an element of it. There is no supporting evidence with the representation to indicate what development has taken place outside the BUAB; particularly given land outside the village is within the West Midlands Green Belt. In conclusion, it is not agreed that the BUAB for Studley should be amended to include any of this land.
6.		Noted.
7.		Noted. However, it is not the purpose of the SAP to carry out a Green Belt Review of the District. This would need to be considered through a review of the Core Strategy.
8.		It appears the representation is promoting agricultural land to the east of Jacksons Meadow to the north of the village as a potential Reserve Site through the SAP. The site does not have planning consent for development and is clearly not part of the settlement in terms of built form. Therefore it is not agreed that the BUAB should be amended to include this parcel of land. In any case, should the site be successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D. It is not agreed that the SAP should review BUABs within 'made' Neighbourhood Plans.
9.		The land in question is not built-up, although it is acknowledged there is a single dwelling to the northern corner of the site. The inclusion of this land would not meet the assessment criteria for a BUAB and it is not agreed that including the land would form a 'natural rounding off' to the settlement, as purported. Therefore, it is not agreed that the BUAB should be amended to include this parcel of land.
10.		Site SOU.3 is currently under construction, with Phases being built-out off Daventry Road to the north and Welsh Road East to the south, abutting the northern edge of Insight Park. The recently completed warehouse and live/work units at Insight Park have substantially increased

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>built-form in this location and the land uses at Insight Park comply with the assessment criteria for land to be included within BUABs. Whilst not commenting specifically on the site promoted through this representation, any changes to the BUAB in this location would have the consequence of including the parcel of land in question within the revised BUAB. It is agreed that consistent interpretation of the assessment criteria would result in the inclusion of employment sites on the edge of villages within BUABs. It is therefore agreed that the BUAB for Southam should be amended to include Insight Park. It is also recommended to include the agricultural buildings associated with Holt Farm (Ross) adjacent to Insight Park within the BUAB, based on other comments received through this consultation indicating sites of this nature should also be included to provide flexibility for potential expansion of built form in sustainable locations.</p>
		<p>11. The land in question is greenfield in nature. The site clearly does not comply with the criteria for including land within a BUAB, the role of which is to define the existing edge of the built up area of a settlement. It is not agreed this parcel of land should be included within the BUAB.</p>
		<p>12. The two large tracts of land are agricultural fields and have been promoted through the SAP as potential Reserve Sites. The land to the south of Welsh Road West has been the subject of a planning application [17/01254/OUT] for up to 175 dwellings. This application was refused in October 2017 and the subsequent appeal was recently withdrawn. The land in question is greenfield in nature. The land clearly does not comply with the criteria for including land within a BUAB, the role of which is to define the existing edge of the built up area of a settlement. It is not agreed these tracts of land should be included within the BUAB.</p>
		<p>13. The land in question has been promoted through the SAP as a potential Reserve Site. The land is greenfield in nature. The site clearly does not comply with the criteria for including land within a BUAB, the role of which is to define the existing edge of the built up area of a settlement. It is not agreed this parcel of land should be included within the BUAB.</p>
		<p>14. Noted.</p>
		<p>15. Noted.</p>
		<p>16. It is noted that this representation is promoting land south of Allimore Lane, Alcester as a Reserve site. It is not suggesting it should be included within the existing BUAB as set out in the Core Strategy. It would not be appropriate to include this tract of land within the BUAB for Alcester, since the land is greenfield in nature and clearly does not meet the BUAB assessment criteria.</p>
		<p>17. Noted.</p>
		<p>18. The purpose of BUABs is not to identify Reserve Sites. Additionally, it is not the intention to include Reserve Sites within the BUABs for reasons set out elsewhere in this schedule.</p>
		<p>19. Noted.</p>
		<p>20. Noted.</p>

No.	Source	Comment
		<p>21. It is noted that this representation is promoting land to the east of Banbury Road, Southam as a Reserve site. It is not suggesting it should be included within the existing BUAB as set out in the Core Strategy. It would not be appropriate to include this tract of land within the BUAB for Southam, since the land is greenfield in nature and clearly does not meet the BUAB assessment criteria.</p>
		<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Amend the BUAB for Southam to include Insight Park and the agricultural buildings associated with Holt Farm (Ross) located adjacent to Insight Park.</li> </ul>

**Topic: Part 2 Built-Up Area Boundaries - Question 2.3 Category 1 Local Service Villages**

No.	Source	Comment
1	Anna Corser	Agree with these BUABs
2	Bidford-on-Avon Parish Council	Do not consider we have sufficient information to give this a considered opinion.
3	Stephen Jones	Support – no further comment
4	Tiddington Village Residents' Association	<p>Whilst the TVRA (Tiddington Village Residents' Association) is fully aware that the question of defining the BUAB for the village: - is being reviewed under the Stratford-upon-Avon Neighbourhood Plan, which has been submitted for examination, and that given this situation, it is appropriate for the boundary for the town to be examined and established through the Neighbourhood Plan process and not duplicate the matter in the SAP, and - that the submitted Stratford-upon-Avon NDP identifies a BUAB for the separate settlement of Tiddington so it is not necessary for the SAP to do so. it is important to have on record again that the villagers of Tiddington voted unanimously that the Village should remain as such, a village. Not only a village but one that is able to sustain itself in terms of local amenities and not over whelmed by more than the current 100+ houses currently to be built in the village under the current plan.</p>
5	Savills on behalf of Magdalen College	<p>With reference to Lower Quinton, the draft BUAB is drawn too tightly around existing built development and, excluding consented planning applications, does not allow appropriate sustainable development opportunities which may otherwise assist in the identification of suitable reserve sites.</p> <p>The revision of BUABs to include sites adjacent to existing or consented development is a logical approach in ensuring the capacity of the SAP to support sustainable development throughout the plan period. It is noted that existing development management policies elsewhere in the plan would provide sufficient protection from unsustainable or inappropriate development.</p> <p>Specifically, the BUAB at Lower Quinton should be amended to include land (or parts thereof) at Henneys Farm which represents a logical opportunity for small scale residential development (by conversion or new build) to the immediate east of the built up area of the settlement. Likewise, land at College Farm to the immediate south of the built up area represents an equally logical option for small scale development, again most likely achieved through conversion and new build. Land at Goose Lane represents a further option in providing further residential development in a sustainable development adjacent to the consented development of 44 dwellings (14/01449/OUT). In view of the sustainability credentials of Lower Quinton and opportunities to further consolidate an appropriate scale of development within and adjoining the built up area of the settlement, the above options to redefine the BUAB at Lower Quinton should be considered closely by the Council at this stage of the plan preparation process. Comment on the other Category 1 LSVs is not provided at this stage.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
6	WYG on behalf of Bellway Homes	<p>Option (b) of this consultation question specifically refers to Long Itchington and these representations provide specific comment on the boundary drawn around that Local Service Village. The boundary, as currently proposed is objected to.</p> <p>As drawn, the settlement boundary takes no account of the need for any additional housing in the village, that might arise from, inter alia, the Birmingham Unmet Need, changes in requirement, or shortfall in delivery. As tightly drawn as it is, it is difficult to understand how the objectives set out in the Consultation document for reserve sites (such as those at para 1.7 or CS.15) could be met when pockets of land, clearly suitable for, have been excluded through a convoluted drawing of a Settlement Boundary, which has not considered the relationship of such potential sites on the ground.</p> <p>The Long Itchington Development Boundary as currently identified at Appendix B to the Consultation document is considered not to deliver the objectives sought by the Plan, and should be amended to include at least the northern parts of my client's land interests.</p>
7	WYG on behalf of Follett Property Holdings	<p>Option (a) of this consultation question refers specifically to Bishop's Itchington and these representations provide comment on the boundary drawn around that Local Service Village. The boundary, as currently proposed is objected to.</p> <p>As drawn, the settlement boundary takes no account of the need for any additional housing in the village, that might arise from the Birmingham unmet Need, changes in requirement, of shortfall in delivery. As tightly drawn as it is, it is difficult to understand how the objectives set out in the Consultation document for reserve sites (such as those at para 1.7 or CS.15) could be met when pockets of land, clearly suitable for development and within the urban fabric of a village, have been excluded through a convoluted drawing of a Settlement Boundary, which appears to ignore the practical relationship of such potential reserve sites on the ground.</p>
8	Rosconn	<p>In respect of b) Long Itchington, the northern boundary at the rear of the housing development currently under construction by David Wilson Homes should be a continuous straight line from east to west, rather than as currently shown to exclude an area of open space within the development. In a recent planning application (Ref. 17/00981/FUL), the officer's delegated report described this area as falling 'within the physical confines of the settlement' and which formed part of the wider development site and its associated public realm (as opposed to being within open countryside). Paragraph 2.9 of the document states that boundaries are drawn around the existing extent of the built-up area, whilst paragraph 2.10 states that subjective judgement has been used where the distinction between the built-up area and open countryside is not clear. The subjective judgement adopted in this instance appears to be directly at odds with the assessment of its officer in respect of this specific area and we therefore request that the boundary is amended accordingly.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
9	Hunter Page on behalf of Bellway Homes	Support – no further comment
10	Framptons on behalf of Gallagher Estates	We note that the Built-Up Area Boundary (BUAB) of Long Itchington fits with the existing envelope of built up development in Long Itchington reflecting the Local Plan Inspectors comments above. With regard to the Policy CS15 principles being applied to the identification of reserve sites, land north of Leamington Road would not be contrary to these principles.
11	Warwickshire County Council	This is a matter for the local authority to determine.
12	TR & NC Dowdeswell	<p>The area to the east of the defined Built-Up Area Boundary for Long Itchington is available for development/ redevelopment. Should this land be required for development to meet the housing needs for the District it would be logical for the defined Built-Up Area Boundary to be extended to include the site, as was the case with the residential development on the land to the north of Stockton Road.</p> <p>As a Category 1 Local Service Village, Long Itchington remains a settlement with a level of services that makes it an appropriate location for a proportionate degree of growth, as acknowledged by the Inspectors conclusions in respect of the appeal allowed on the land to the north of Stockton Road.</p> <p>The land to the east of the village is supported by a Call for Sites submission. The site is not within any designated area of special landscape value and is not subject to any restrictive environmental designations. It is also predominantly located within Flood Zone 1.</p>
13	DLP Planning on behalf of Talbot Homes	Support – no further comments
14	Canal and River Trust	<p>The Canal &amp; River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”.</p> <p>The proposed Built-up Area boundary for Long Itchington adjoins the Oxford Canal for a distance of approximately 580m though the canal does not appear to be included within the boundary itself. It will be important to ensure that any future policies or allocations take full consideration of this and appropriately address any issues with regards to the proximity to the canal and impacts on its structural stability and wider visual / historical character and ecological function.</p>
15	Darin Tudor	<p>Copy of 3x correspondence with Parish Council regarding Harbury Neighbourhood Plan BUAB boundary. Unsatisfied with PC response.</p> <p>Key points as follows:</p>

No.	Source	Comment
		1) Harbury NDP boundary should not be used as it is inaccurate and unfit for purpose 2) The Wilsons [respondent's neighbours] property should be within boundary 3) Boundary too tight - further expansion should be accommodated 4) Entire land footprint at Springfields Farm [owned by respondent] should be included within boundary as this could make a contribution towards housing numbers
<p><b>Officer Response</b></p> <ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. Noted.</li> <li>4. Tiddington has not been included within the SAP Consultation as it is acknowledged that the BUAB for the village is set out within the 'made' Stratford-upon-Avon Neighbourhood Plan.</li> <li>5. It is agreed that modern agricultural buildings associated with farms on the edges of villages should be included within BUABs for potential re-development for housing. It is considered appropriate for the SAP to also consider a policy approach to support the principle of change of use of modern agricultural buildings to appropriate employment uses. Land at Goose Lane is agricultural in nature and as such clearly does not comply with the criteria for including land within a BUAB, the role of which is to define the existing edge of the built-up area of a settlement. It is not agreed any agricultural land on Goose Lane should be included within the BUAB.</li> <li>6. It is not the role of the village BUAB to include potential sites that may be required to take account of possible future housing provision via specific matters such as unmet need from Birmingham, as quoted in the representation. Such requirements will be met through Reserve Sites set out within the SAP. It would not be appropriate to include Reserve Sites within settlement boundaries, since any site within the BUAB would automatically have a presumption in favour of sustainable development and could be brought forward through a 'speculative' planning application at any time. The whole point of Reserve Sites is that they should only be brought forward under specific circumstances (as set out in Policy CS.16 of the Core Strategy). The representation refers to three large tracts of agricultural land to the south of the village, either side of the canal and suggests that the BUAB should be amended to include at least the northern site. The sites are not current commitments and are both greenfield in nature. Therefore, these parcels of land do not meet the BUAB assessment criteria and it is not agreed that these sites should be included within the village BUAB.</li> <li>7. It is not the role of the village BUAB to include potential sites that may be required to take account of possible future housing provision via specific matters such as unmet need from Birmingham, as quoted in the representation. Such requirements will be met through Reserve Sites set out within the SAP. It would not be appropriate to include Reserve Sites within settlement boundaries, since any site within the BUAB</li> </ol>		

No.	Source	Comment
		<p>would automatically have a presumption in favour of sustainable development and could be brought forward through a 'speculative' planning application at any time. The whole point of Reserve Sites is that they should only be brought forward under specific circumstances (as set out in Policy CS.16 of the Core Strategy). The representation includes a map indicating that a strip of land between Marlow Green and High Street to the west and Butchers Close to the east should be included within the BUAB for the village of Bishops Itchington. The site is not a current commitment and it is greenfield in nature. Therefore, this parcel of land does not meet the BUAB assessment criteria and it is not agreed that the site should be included within the village BUAB.</p> <p>8. It is not agreed that the woodland copse/natural accessible green space to the north edge of the scheme for 150 dwellings off Stockton Road, Long Itchington [approved under 15/03542/REM] should be included within the settlement BUAB. Application 17/00981/FUL referred to in this representation was refused planning permission for the construction of 2 further dwellings on part of the woodland copse, partly due to unacceptable loss of important open space and landscape feature on the site. Whilst the officer referred to the application site being within the physical confines of the village [in the absence of a draft BUAB at the time of the decision], against the BUAB methodology, such areas of informal recreation space on the edge of villages should not be included within a BUAB. A more cogent argument relates to removing the public open space directly to the south of the woodland copse from the settlement BUAB, with the result that the BUAB would be revised through removing more land from the BUAB, not adding more land in.</p> <p>9. Noted.</p> <p>10. The representation suggests that a large tract of agricultural land to the north of Leamington Road [that has been submitted to be considered as a potential Reserve Site through the SAP] would not be contrary to the BUAB principles. This is not the case. The site is greenfield in nature. The site clearly does not comply with the criteria for including land within a BUAB, the role of which is to define the existing edge of the built-up area of a settlement. It is not the intention to include potential Reserve Sites within BUABs since such sites should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D. It is not agreed that this land should be included within the village BUAB.</p> <p>11. Noted.</p> <p>12. Whilst part of the land put forward through this representation is brownfield and commercial in nature, the vast majority is greenfield. The greenfield land is not contiguous with the village and does not meet the criteria for including land within a BUAB. Whilst the principle of including large brownfield commercial sites on the edge of villages within BUABs is appropriate, the commercial site referred to in this representation is not adjoining the village and it would not be appropriate to create an 'island' BUAB remote from the village. For these reasons, it is not agreed that the land promoted through this representation should be included within the BUAB for Long Itchington.</p> <p>13. Noted.</p> <p>14. Noted.</p>

No.	Source	Comment
		<p>15. The BUAB for Harbury has been promoted through the Neighbourhood Plan (NDP) and as such is not being assessed through the SAP process. The Harbury NDP is now 'made' and forms part of the Development Plan for the area.</p>
		<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Include a policy in the SAP to support the principle of change of use of modern agricultural buildings to appropriate employment uses.</li> </ul>

**Topic: Part 2 Built-Up Area Boundaries - Question 2.3 Category 2 Local Service Villages**

No.	Source	Comment
1	GVA on behalf of St Philips	<p>We recognise the need to define settlement boundaries and thus identify the extent of Built- Up Areas across the Stratford-on-Avon District as this provides the ability to be able to establish where new development is acceptable, in principle.</p> <p>We acknowledge that a number of views were expressed at the Site Allocations Plan Scoping Stage in August/September 2014, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>• The use of boundaries should not conflict with the NPPF’s presumption in favour of sustainable development and its aim to significantly boost housing supply.</li> <li>• Boundaries should not be drawn too tightly but enable a degree of flexibility rather than restrict or limit development.</li> <li>• Boundaries should include any sites allocated and with planning permission for development.</li> </ul> <p>Policy CS.16 of the Core Strategy establishes the principle of using Built-Up Area Boundaries as a mechanism for managing the location of development. During Examination, the Inspector agreed that Built-Up Area Boundaries should include allocations identified in the Core Strategy, but not that any unallocated land on the edges of these settlements should be included.</p> <p>We note that the Site Allocations Plan acknowledges the rural nature of the District with many settlements having a dispersed settlement pattern. Therefore, separate boundaries have been drawn around the distinct parts of settlements where a settlement comprises more than one part.</p> <p>We support the criterion that has been applied to define the Built-Up Area Boundary of Napton-on-the-Hill. However, due to its proposed allocation in the Site Allocations Plan, we would recommend that the site be included as a distinct part of the village of Napton and a separate boundary be drawn around the proposed development site to include it within the Built-Up Area of Napton.</p> <p>Through the design iteration process and discussions with the Parish we have identified that connectivity from the site to the main Built- Up Area of Napton village will be critical in creating a holistic development for the village, rather than a satellite addition to Napton. The Developers are therefore exploring opportunities and progressing discussions with the relevant statutory bodies to ensure suitable and sustainable means for pedestrian and cycle access to the site from the village.</p> <p>It is therefore considered that the site’s inclusion within the boundary would formalise and establish the principle of connectivity.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>As demonstrated above, we support the criterion that has been used to establish the Built-Up Area Boundaries for Category 2 Villages, specifically Napton. However, due to its proposed allocation in the Site Allocations Plan, we would recommend that the proposed development site be included within the boundary as a distinct part of Napton-on-the-Hill.</p> <p>As noted, connectivity from the site to the main Built-Up Area of the village will be critical in ensuring a holistic development. It is therefore considered that the site's inclusion within the boundary would formalise and establish the principle of connectivity.</p>
2	Barton Willmore on behalf of Talbot Homes	Land South of Station Road, Fenny Compton should be included within the defined settlement (Built-Up-Area).
3	David Booth	<p>I do not agree with the boundaries proposed for Lighthorne Heath as they include public open spaces:</p> <p>Land near the primary school and and to the rear of houses on Stratford Road. Land to the west of the southern end of Leam Road.</p> <p>I will email a map extracted from the consultation documents. The land that should be excluded from the built up area boundaries will be marked with a red line.</p>
4	Anna Corser	Agree with these BUABs
5	Paul Clark	<p>Brailles:</p> <p>The proposed BUAB includes many errors, for instance part of the churchyard is excluded as are recent planning consents. A more accurate BUAB has been drawn up, based on the BUAB published in the expired Local Plan, but updated with appropriate changes.</p> <p>Each change has been documented with decisions based upon the current SDC rules governing BUABs and on-site assessments. The BUAB is being maintained in an up-to-date condition ready for inclusion in the developing Brailles and Winderton Neighbourhood Plan.</p> <p>Planning consent 17/02414/FUL provides details of the current boundary of the domestic curtilage of Grove End Farm, Henbrook Lane, Upper Brailles. Plan attached (1250 Location Plan Grove End Farm.pdf). The BUAB proposed by SDC does not take account of this revision.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The SDC proposed BUAB is also incorrect for Grove Cottage, Henbrook Lane as it excludes the dwelling 's residential curtilage. The residential curtilage is shown shaded purple on the attached plan (1250 Plan Grove Cottage.jpg).</p> <p>The above changes have been included in the revised BUAB at <a href="http://www.brailesparishcouncil.co.uk/npwp/wp-content/uploads/2018/02/Developing-Map-V9w.jpg">http://www.brailesparishcouncil.co.uk/npwp/wp-content/uploads/2018/02/Developing-Map-V9w.jpg</a></p>
6	Greenwood Planning on behalf of Henry and Lucy Jervis	<p>We submit that the settlement boundary plan for Tysoe is wrongly drawn in the area around Oxhill Road and should be amended to include land with residential and commercial buildings, in line with the criteria set out at 2.10 of the draft plan - which includes residential land and employment sites on the edges of villages. This discrepancy is perhaps not surprising as there have been several planning permissions here in recent years.</p> <p>The line as drawn picks up most of the site approved for 3 houses (planning permissions 16/01219/FUL and 17/03111/VARY), but leaves out land and buildings approved for:</p> <ul style="list-style-type: none"> <li>• Light industrial use (permission 13/01899/FUL);</li> <li>• Ancillary residential use (permission 13/00229/FUL); and</li> <li>• 2 new houses (permission 16/01219).</li> </ul> <p>The light industrial (joinery) use and the ancillary residential use have been implemented. The 5 houses are under construction. Extracts from the approved plans are provided below.</p> <ul style="list-style-type: none"> <li>• It would therefore be correct to amend the settlement boundary to include these developments. The plan at the end of this letter picks up these developments in 2 ways:</li> <li>• We suggest that the red line should be used, surrounding not just the buildings but also the approved access route. If that is not satisfactory for some reason then at least the blue line, which sticks more closely to the built form, should be used.</li> </ul> <p>The settlement boundary for (g) Tysoe should be adjusted to include land in light industrial use and residential use at Oxhill Road and New House Farm, Tysoe, as per the attached letter and plans. This is in line with the stated principles for built up area boundaries.</p>
7	Tim Sharples	<p>Please see attached plan with annotations and proposed amendments as follows:</p> <ol style="list-style-type: none"> <li>1. The annotated Recreation ground (Area A outlined in red) is shown incorrectly on the BUAB plan. It is, in fact, in the adjacent field (Area B outlined in blue) as shown.</li> <li>2. There is no Hall in Area A. This is the existing Scout Hut which is in very poor condition.</li> <li>3. Planning permission (ref 16/01951/FUL) has already been granted for a new Scout facility in Area C (outlined in blue).</li> </ol>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>4. Both the land in Area C and the whole of the Playing Field (Area B) are proposed to be leased in perpetuity to the Scouts and Village Parish Council thus protecting valuable amenities and green areas for the village.</p> <p>5. Area A is proposed as a very small development of 10-15 houses for local self-build families.</p> <p>By developing the site with 10-15 Self-Build houses, sufficient funds are released to enable the Playing Field to be permanently leased to the Village as well as providing a permanent lease to the Scouts so that a new purpose-designed, Hut can be constructed - please note that planning approval has already been given for a new Hut (16/01951/FUL) on the proposed land. Further, under this current proposal, the security of scouting facilities will be significantly improved.</p> <p>In short, by granting approval to the construction of the small number of self-build dwellings the following benefits become apparent:</p> <ol style="list-style-type: none"> <li>1. The Village has permanent use of a 2.5 acre Playing Field.</li> <li>2. The Scouts have permanent use of significant area which provides benefits as: <ol style="list-style-type: none"> <li>a. A new Scout Hut to their design with modern security and safety features</li> <li>b. Certainty of the future of Scouting activities in the village</li> <li>c. Contributions from the family towards the new hut in terms of foundations, moving of services and assistance with the construction.</li> </ol> </li> <li>3. Housing for local people in the village who wish to create accommodation to their own design for their own use</li> <li>4. Low density housing.</li> <li>5. Preservation of green areas on the edge of the village.</li> <li>6. The scheme has the support of the Parish Council, 15' Stockton Scout Group and the District Councillor.</li> </ol> <p>I trust that the above will be considered favourably during finalisation of the review and that the BUAB can be extended to include this parcel of land.</p>
8	Fenny Compton Parish Council	The Parish Council agrees with the built up area boundary for Fenny Compton.
9	Acres Land and Planning on behalf of the Sharples family	<p>In the case of Stockton, we consider that there is a strong argument for extending the BUAB to include both the current Children's Playing field and the land to the south 'Land off Glebe Close' (which is identified as a self-build site within Appendix G) since this is likely to form part of the built-up area of the village in the life of the Local Plan. Please see attached plan.</p> <p>This would effectively 'round off' the village on its south-western edge in a logical way. This approach would be consistent with the picture for Ettington where the self-build site at Old Warwick Road on the edge of the village - recently granted consent in outline - has been absorbed within the village boundary.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
10	Greenwood Planning on behalf of Mr P Rigler and Mrs R Rigler	<p>We submit that the settlement boundary plan for Salford Priors is wrongly drawn in respect of The Old Forge and its garden and should be amended to include land with residential curtilage, in line with the criteria set out at 2.10 of the draft plan.</p> <p>The line as drawn excludes an oddly shaped piece of this house's garden and curtilage. The Google Earth photo and application plan below confirm the triangle of land associated with the house. [map supplied]</p> <p>We recognise that as drawn the plan includes Neighbourhood Plan Allocation site SP6-1, but this does not mean that other garden/curtilage land should be excluded.</p> <p>We therefore ask that the settlement boundary for Salford Priors be amended/corrected as shown. I hope this is helpful and meets your requirements. Please let me know if I can assist further.</p>
11	Bidford-on-Avon Parish Council	Do not consider we have sufficient information to give this a considered opinion.
12	Stephen Jones	There should be a BUAB around Lower Tysoe. It is a built up area of over 30 dwellings and an industrial unit. It has a bus stop and is within 5 minutes walk to a village shop, post office, primary school, pre-school, sports ground and doctors surgery. it should have a BUAB around the existing built-up extents with a separation gap to Middle Tysoe.
13	Brailes Parish Council	<p>The Draft Brailes NDP includes an updated BUAB map. It informs the Brailes BUAB and is a snapshot of the built up area. The BUAB map.</p> <ol style="list-style-type: none"> <li>1. References the last BUAB dated around year 2000</li> <li>2. References SDC's guidelines for BUAB being Annexe 3 of the Local Plan review adopted July 2006</li> <li>3. Includes all new planning approvals and finished new development to date.</li> <li>4. Is an accurate "on the ground" measurement plotting the boundary line (1m wide) on the map.</li> </ol> <p>At this moment the Brailes NDP BUAB excludes any allocated or reserved sites but these will be added before submission.</p> <p>Until then, Brailes PC recommends SDC use the attached Brailes NDP map in place of the SDC's BUAB map in their SAP Scoping. Once the Brailes NDP is made or reached an advanced stage, it is expected that SDC's SAP will use the Plan's BUAB map. Brailes PC have adopted this BUAB map (excluding the allocated sites) which is published here <a href="http://www.brailesparishcouncil.co.uk/npwp/">http://www.brailesparishcouncil.co.uk/npwp/</a> as an interim measure until the NDP is made.</p>
14	Tony Buckingham	The boundary for Tysoe should include Lower Tysoe in line with current adopted policy, which does not distinguish between its various constituent parts and classifies all of Tysoe as an LSV. The current proposal to exclude Lower Tysoe is also in direct conflict with the emerging Neighbourhood Plan which seeks to include it. The distance from the school and village services is no greater in Lower Tysoe than Upper Tysoe therefore both are equally sustainable.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The proposed boundary should include three changes:</p> <ol style="list-style-type: none"> <li>1. The whole of the Home Holdings site within its natural boundaries should be included in accordance with the original boundary proposed (and 83% supported) during the public consultation exercise of Dec 2016 for the NP.</li> <li>2. The land to the north of Lower Grounds should also be included as this is in the same ownership and has the same classification under the 2012 White Report, as medium sensitivity to housing development. It also provides an opportunity for a single stone dwelling and extensive tree planted buffer strip to soften the hard edge created by the recent development to the rear of Lower Grounds.</li> <li>3. The Neighbourhood Plan currently does not allocate any sites for affordable housing, therefore a strategic reserve site as shown should be included specifically to provide a development incorporating 35% on-site affordable housing. The Shenington Road site has no planning constraints other than being on the periphery of the AONB.</li> <li>4. The shape of the rear boundary of the land adjacent to Church Farm Court is incorrect and does not reflect the recent planning approval for 10 dwellings 16/02684/FUL - The approved boundary extends out to the existing footpath and is demarcated by an existing post and rail fence.</li> </ol>
15	Reuben Bellamy	<p>Salford Priors - as is noted in the preamble, Salford Priors has a made neighbourhood plan. It is clearly set out at the beginning of this consultation document, that the SAP will not deal with BUABS that have already been addressed in a neighbourhood plan. And in any event, the BUAB does not comply with that in the made plan, or the allocated development sites in that neighbourhood plan.</p>
16	Rickett Architects on behalf of Hamlin Estates	<p>Land west of Avon Dassett Road, Fenny Compton [plan supplied] represents a sustainable, natural and deliverable rounding off on the settlement.</p>
17	Rickett Architects on behalf of Mr and Mrs Biggerstaff	<p>Land adjoining Grange Farm, Stockton should be included as it represents a sustainable and natural extension to the village [plan supplied].</p>
18	Steve Taylor (Set Design)	<p>The boundary for Tysoe should include Lower Tysoe in line with current adopted policy, which does not distinguish between its various constituent parts and classifies all of Tysoe as an LSV. The current proposal to exclude Lower Tysoe is also in direct conflict with the emerging Neighbourhood Plan which seeks to include it. The distance from the school and village services is no greater in Lower Tysoe than Upper Tysoe therefore both are equally sustainable.</p> <p>The proposed boundary should include three changes:</p> <ol style="list-style-type: none"> <li>1. The whole of the Home Holdings site within its natural boundaries should be included in accordance with the original boundary proposed (and 83% supported) during the public consultation exercise of Dec 2016 for the NP.</li> </ol>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>2. The land to the north of Lower Grounds should also be included as this is in the same ownership as recent planning approvals and has the same classification under the 2012 White Report, as medium sensitivity to housing development. It also provides an opportunity for a single stone dwelling and extensive tree planted buffer strip to soften the hard edge created by the recent development to the rear of Lower Grounds.</p> <p>3. The Neighbourhood Plan currently does not allocate any sites for affordable housing, therefore a strategic reserve site as shown should be included specifically to provide a development incorporating 35% on-site affordable housing. The Shenington Road site has no planning constraints other than being on the periphery of the AONB.</p> <p>4. The shape of the rear boundary of the land adjacent to Church Farm Court is incorrect and does not reflect the recent planning approval for 10 dwellings 16/02684/FUL - the approved boundary extends out to the existing footpath and is demarcated by an existing post and rail fence.</p>
19	Day Lewis Planning on behalf of Mr Hourigan and Miss Grabowska	<p>The built-up boundary should be drawn so as to encompass garden land associated with The Rosses, Tommy's Turn (please see the red line plan Site Location Plan 15-048 attached with this representation, and the map extract below (shaded red). Approx. grid ref Easting = 430634, Northing = 239028 ). By doing so, this would be consistent with the approach suggested in para 2.10 which states areas of residential curtilage will be included.</p> <p>It would also be in accordance with the approach apparently taken in the latest publicly available version of the 'Brailes Built-up Area Boundary Revision Map 2018' which is to be part of the forthcoming Neighbourhood Development Plan. That draft has identified land across the road (at Upper Grove End Farm) as being part of the proposed BUAB, but in order for it to be consistent it should have also included the garden land to The Rosses as identified in the plan submitted herewith [plan supplied]</p>
20	Mr N Gasson	Affordable housing is vital to any proposed development sites. The site on the north of Shenington Road has no planning constraints, apart from being on the edge of an AONB, and any development there could include 30% on-site affordable housing.
21	Napton-on-the-Hill Parish Council	Napton Parish Council agrees in principle with the current proposed BUAB but notes that this is subject to ratification by the Neighbourhood Development Plan process and therefore may change.
22	Hunter Page on behalf of Bellway Homes	Support – no further comment
23	MJ Thorne	Stratford District Councils own Core Strategy is being ignored by the proposed BUAB. There is no separation of any part of Tysoe in this document. Also, the PC and NPG argue that none of Tysoe should be placed outside the LSV. Local votes have confirmed the above.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		The Home Holdings site, (as endorsed by an 83% vote), at an NPG consultation in the village in December 2016 confirmed it should be included in the LSV.
24	Framptons on behalf of Mr I Lane	We note that the Built-Up Area Boundary (BUAB) of Brailes fits with the existing envelope of built up development in Brailes reflecting the Local Plan Inspectors comments above. With regard to the Policy CS15 principles being applied to the identification of reserve sites, land at Henbrook Lane, Upper Brailes would not be contrary to these principles.
25	Warwickshire County Council	This is a matter for the local authority to determine.
26	GL Hearn on behalf of Severn Trent Water	When considered against other sites around Napton on the Hill that have been submitted as part of the Councils Call for Sites exercise, the STWL site should be considered as one of the most suitable for allocation and inclusion within the settlement boundary. Its location abutting the existing built form, on previously developed land and deliverable in the very near future make it an ideal candidate for residential development.
27	Pegasus on behalf of Rainier Developments	Rainier Developments have no comments to make in respect of the above Built-Up Area Boundaries for these settlements.
28	Acres Land and Planning on behalf of the Sharples family	In the case of Napton on the Hill, we recommend that the Built-up Area Boundary be extended to include 'the Land at Dog Lane' identified on the accompanying Site Allocations Form for Self-Build sites. The site is a logical extension to the village boundary which is close to the school, playing field, local club and village hall and local village shop and is regarded as a suitable and sustainable site.
29	John Holden	Support – no further comment
30	PJ Binns	The above change in red in the BUAB at The Willows is to match the Brailes NDP 2018 adopted boundary and include the disused and dilapidated tennis court, drive and shed used for storage and garden machinery. All this area was previously a builders yard until 1997. [map attached]
31	Keith Risk	<p>In answer to question 2.5, with regard to proposed BUAB's for the LSV of Tysoe, I wish to register support of the proposed BUAB as show in Appendix C of the Consultation Document.</p> <p>My comment in support of this BUAB disagrees with that proposed in the current section 14 pre-submission draft Neighbourhood Plan (NP) for the LSV of Tysoe, which seeks to create a second BUAB incorporating Lower Tysoe for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Contrary to statements made in a submission made by the Tysoe Neighbourhood Plan steering committee (NPG) to a Consultation with SDC in June/July 2017, there has not been a 'targeted public consultation which resolved that Lower Tysoe should have its own BUAB"</li> </ol>

No.	Source	Comment
		<ol style="list-style-type: none"> <li>2. Consultations with Tysoe and Lower Tysoe residents have not been conducted in such a way that residents could safely rely on information provided to them by the NPG when asked to provide comments on the draft NP, including, inter alia, the proposal that Lower Tysoe was to become part of the Local Service Village of Tysoe, with its own BUAB.</li> <li>3. Lower Tysoe is currently a separate and distinct hamlet, with its own history, identity and characteristics. It is protected, for planning purposes, by NPPF, AS.10, and CS.15 policy provisions which provide it with the planning principled protection of a general presumption against development. A change to this status, to include Lower Tysoe in the LSV of Tysoe would adversely affect this protection. Such a change is not appropriate. The identity and characteristics of Lower Tysoe as a remote rural hamlet need to be adequately protected.</li> <li>4. There is no adequate evidence of local (Lower Tysoe) resident preference for a change to Lower Tysoe's planning status.</li> <li>5. Comparisons to Kineton and Little Kineton and its Neighbourhood Plan decisions, made in the June consultation submission by the NPG, are not valid. Little Kineton is already an LSV, and Kineton is a Main Rural Centre, each with different development needs, characteristics and applicable planning policies to those of Tysoe and Lower Tysoe.</li> <li>6. Lower Tysoe is not sustainable as an area appropriate for development. It is too remote from the services of Tysoe, as defined in the criteria applicable to the Core Strategy. There are no services in Lower Tysoe.</li> </ol>
<p><b>Officer Response</b></p> <ol style="list-style-type: none"> <li>1. It appears from the representation that the Napton Brickworks site [the subject of this submission] has been submitted through the SAP consultation for consideration as a Reserve Site for housing development. It is not agreed that the Brickworks site should be included within the BUAB for Napton-on-the-Hill for four reasons: The first being that it is not considered appropriate to include sites that may be identified as Reserve Sites in the SAP within BUABs due to the fact that such sites should only be released in certain circumstances, as set out in Core Strategy Policy CS.16D. If such sites were included with BUABs, there would be an immediate 'in principle' acceptance of all Reserve Sites being developed, which would be contrary to their proposed status. The second reason is that the site is clearly not 'built-up'. Whilst it is a large brownfield site that received outline planning permission for a 'mixed use development' in 2015 [08/00410/OUT], the necessary Reserve matters application has not been submitted within the timescales necessary to retain an extant planning permission and as such, the consent has expired. The site clearly has no built form and as such, for these reasons does not meet the criteria to be included within any BUAB. The third reason is that the site is some distance [approximately 1 km] from the edge of the village of Napton and cannot therefore be considered to be commensurate with the existing settlement. Finally, it is not agreed that the site is a distinct part of the village and it is not the purpose of the BUAB to attempt to establish or formalise 'the principles of connectivity' between brownfield sites for potential re-development and nearby villages. For these reasons, it is not agreed that the former brickworks site should be included within the BUAB for Napton.</li> </ol>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
2.		The site in question is part of a large field on the edge of Fenny Compton, situated between the Station Works site and the northeast corner of the village. The site is clearly greenfield in nature and does not comply in any way with the assessment criteria for including land within a BUAB. For these reasons, it is not agreed that this land be included within the BUAB.
3.		It is agreed that the parcel of land to the south of the school would be classified as public open space/amenity land and the parcel of land off Leam Road would be classified as a playing field/recreation area. It is also agreed that, utilising the assessment methodology, both parcels of land should be excluded from the BUAB, since they are located on the edge of the settlement.
4.		Noted.
5.		The Brailes Neighbourhood Plan includes an alternative BUAB taking account of site allocations being promoted by the local community. The Brailes NDP has now passed Examination and been recommended to proceed to referendum, with some minor modifications. It is likely the referendum will take place sometime in September this year and if there is a majority 'yes' vote, the NDP will be 'made' by the end of this year. Since the NDP is now at such an 'advanced stage' in the NDP process, SDC is no longer pursuing a BUAB for Brailes through the SAP process.
6.		The submission helpfully confirms the planning history for New House Farm off Oxhill Road, Tysoe, including recent permissions for employment use, ancillary residential use and new dwellings. It is agreed that the proposed settlement boundary should be amended in accordance with the plan submitted through the representation to include the land and buildings associated with these uses, as they comply with the BUAB assessment methodology. The Regulation 16 'submission' ended on 28 <sup>th</sup> June 2019 and will progress to Examination August/September. Whilst it is acknowledged the BUAB as proposed in the NDP will take precedence if the Plan passes Examination and subsequent referendum, SDC is retaining a BUAB for the village within the SAP since there is a possibility that the NDP could be amended through the Examination process and the SAP cannot afford to have a 'gap' for this settlement, should the NDP be amended or not proceed for any reason.
7.		The representation relates to the recreation ground and playing field to the south of the village of Stockton, on greenfield land outside the draft BUAB. An element of this land is being promoted as a site for a self-build scheme. It is the same site the subject of representation 9, below. For the reasons set out at point 9, it is not agreed that the site should be included within the BUAB for Stockton.
8.		Noted.
9.		Land to the south of Glebe close is greenfield in nature and as such its inclusion would not comply with BUAB methodology. Whilst the site is being promoted as a potential 'self-build' site, there is no guarantee the site will see any development within the Plan period. Additionally, there is no policy requirement for self-build sites to be included within a BUAB. Indeed, if such a site was included within a settlement boundary prior to the dwellings gaining planning consent or being built-out, it would leave the site open to applications for speculative market dwellings, contrary to the sites intended purpose. For these reasons, it is not agreed that the site should be included within the BUAB for Stockton.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>10. Planning application ref: 10/01804/FUL for the construction of domestic outbuildings at The Old Forge confirms that the application site [including residential curtilage] includes a parcel of land not included within the draft BUAB drawn-up for the consultation. Based on the BUAB methodology, residential curtilage should be included within the BUAB and as such, it is agreed the BUAB should be amended to include this small parcel of garden land associated with the dwelling known as 'The Old Forge', Salford Priors.</p> <p>11. Noted.</p> <p>12. Noted. The 'submission' version Tysoe Neighbourhood Plan includes a BUAB for Lower Tysoe, which will be examined later this year. The NDP has included a BUAB for Lower Tysoe as a local aspiration based on local evidence. Tysoe had a BUAB in the District Local Plan May 2000 which was made up of Middle and Upper Tysoe only. This was due to SDC concluding at the time that due to the separation distance from Middle and Upper Tysoe, together with the more fragmented make-up of the built form, Lower Tysoe was seen as a separate hamlet and not appropriate to include within the Category 2 Settlement (as it was listed in the 2000 Local Plan). This remains SDC's stance and as such, it is not agreed that the draft BUAB in the SAP should include Lower Tysoe for the reasons stated here. However, it is acknowledged that should the BUAB within the NDP pass Examination and referendum, it would take precedence.</p> <p>13. Noted. Please see response to comment 5 above, in relation to the BUAB for Brailes.</p> <p>14. Noted. See response to comment 12 above, in relation to the BUAB for Tysoe. It is not agreed that greenfield sites on the periphery of the village referred to in points 1, 2 and 3 of the representation should be included within the draft BUAB, since their inclusion would not comply with the BUAB assessment methodology. It is agreed that the approved residential boundary associated with the development adjacent to Church Farm Court (planning permission ref: 16/02684/FUL refers) should be included within the BUAB and the boundary should be amended, accordingly.</p> <p>15. The 'made' Salford Priors Neighbourhood Plan does not include a BUAB, hence the reason for including this settlement within the SAP consultation. It is acknowledged that the draft BUAB within the SAP consultation does not take account of the approved scheme off School Road [18/01498/OUT] and associated reserved matters application [18/03276/REM]. It is acknowledged that the BUAB will need to be amended to take account of this allocation in the Neighbourhood Plan, based on the approved planning application layout plan.</p> <p>16. The land in question is greenfield in nature and as such its inclusion would not comply with BUAB methodology. For this simple reason, it is not agreed that the land should be included within the BUAB for the village of Fenny Compton.</p> <p>17. The land in question is greenfield in nature and as such its inclusion would not comply with BUAB methodology. For this simple reason, it is not agreed that the land should be included within the BUAB for the village of Stockton.</p> <p>18. Noted. Please see response to comments 12 and 14, above.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
19.		Noted. Please see comments elsewhere in this schedule relating to the Brailes BUAB.
20.		Noted. The definition of the BUAB for Tysoe will be assessed through the NDP process. The land in question is greenfield in nature and as such its inclusion would not comply with BUAB methodology. For this simple reason, it is not agreed that the land should be included within the BUAB for the village of Tysoe.
21.		Noted. There is a BUAB set out within the draft Napton-on-the-Hill NDP, which has been through Regulation 14 (pre-submission) consultation. However, for the same reasons as set out at response 6 above, since the NDP has not reached an 'advanced stage', SDC has made the decision to include a BUAB for the village within the SAP.
22.		Noted.
23.		Noted. Please see comments elsewhere in this schedule relating to the village of Tysoe. The site referred to in this particular representation relates to land on the northwest edge of Lower Tysoe and has been the subject of 2 no. planning applications in recent times. Application 17/03730/FUL for 5 dwellings and application 18/02303/FUL for 3 dwellings were both refused planning permission in principle for being contrary to Core Strategy policies CS.15 and AS.10 [i.e. the proposals would not constitute development within the physical confines of a village or a built-up area boundary]. Both refusal decisions are currently at appeal. The site has not been included within the BUAB being promoted through the emerging Tysoe Neighbourhood Plan. From the perspective of the LPA, Lower Tysoe has never had an established BUAB. It is clear that the site is greenfield in nature; the site is not within the physical confines of the village and is not shown to be included within the draft BUAB promoted through the NDP. As such, the site does not comply with the methodology for including land within a BUAB as it is clearly not 'built-up'.
24.		Noted. With the site being promoted as a potential Reserve Site through the SAP process, in the opinion of SDC officers, the land in question should remain outside the village BUAB in order to comply with the principles of releasing reserve sites as set out in Core Strategy policy CS.16 D.
25.		Noted.
26.		It is not agreed that the land parcel submitted through this representation would be classified as 'previously developed land'. Whilst it includes a structure [a covered reservoir], the site is clearly greenfield in nature and the land would not be classified as being within the physical confines of the village. As such, its inclusion would not comply with BUAB methodology. For this simple reason, it is not agreed that this land should be included within the BUAB for the village of Napton-on-the-Hill. Please see other comments in this schedule in relation to the status of the associated Neighbourhood Plan.
27.		Noted.

No.	Source	Comment
		<p>28. The land at Dog Lane referred to in this representation is greenfield in nature and as such its inclusion would not comply with BUAB methodology. Whilst the site is being promoted as a potential 'self-build' site, there is no guarantee the site will see any development within the Plan period. Additionally, there is no policy requirement for self-build sites to be included within a BUAB. Indeed, if such a site was included within a settlement boundary prior to the dwellings gaining planning consent or being built-out, it would leave the site open to applications for speculative market dwellings, contrary to the sites intended purpose. For these reasons, it is not agreed that the land should be included within the BUAB for Napton-on-the-Hill.</p> <p>29. Noted.</p> <p>30. Noted. The definition of the BUAB for Brailes will be assessed through the NDP process. As mentioned in the representation, the land associated with this property has been included within the proposed BUAB for the village as set out in the Neighbourhood Plan. Please see comments elsewhere in this schedule in relation to the status of the NDP.</p> <p>31. Noted. Please see comments elsewhere in this schedule in relation to the status of the NDP and the role of the BUAB within the SAP.</p>
		<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Based on existing assessment criteria, it is recommended two parcels of amenity/recreation land on the edge of the settlement of Lighthorne Heath be removed from the BUAB.</li> <li>• Amend the BUAB for Salford Priors to include the entire residential curtilage of the property known as 'The Old Forge' and also the extent of the approved residential scheme off School Road.</li> <li>• Amend the BUAB for Tysoe to include the approved residential curtilage associated with planning permission ref: 16/02684/FUL on land adjacent to Church Farm Court.</li> </ul>

**Topic: Part 2 Built-Up Area Boundaries - Question 2.5 Category 3 Local Service Villages**

No.	Source	Comment
1	Tyler-Parkes Partnership on behalf of Mr Shaun Hussey	<p>We write on behalf of our Client, Mr Shaun Hussey, who has an interest in land at Westbrook, Valley Road, Earlswood; as edged red on the location plan attached, an extract of which is reproduced below [map supplied]</p> <p>This letter, conveyance documents, and accompanying plans are submitted in response to the Site Allocations Plan (SAP) Revised Scoping and Initial Options consultation, together with completed Comment Form.</p> <p>Our submission responds to Question 2.1 ‘Do you agree with the criteria that have been applied to define Built-up Area Boundaries?’ and Question 2.5 ‘Do you agree with the proposed Built-Up Area Boundaries defined for the following Category 3 Local Service Villages? (See Appendix D for Category 3 BUAB Maps)’</p> <ul style="list-style-type: none"> <li>• Our Client supports the use of the proposed criteria applied to define the BUABs for settlements (Question 2.1), but raises OBJECTION to the proposed settlement BUAB for Category 3 Local Service Village, Earlswood, on the basis that the proposed boundary is unsound and does not meet the criteria set out to define the BUAB (Question 2.5).</li> <li>• The detailed grounds for our Client’s objection to omission of the garden land associated with Westbrook are set out below, with a brief summary here:</li> <li>• The established use of the site as a whole is domestic residential curtilage - there is no change of use or strong physical boundary along the proposed BUAB line.</li> <li>• The house and garden are extremely close to the centre of the village in a very sustainable location and the site is surrounded on three sides by built form making it logical for inclusion within any tightly drawn BUAB for the settlement of Earlswood.</li> <li>• The site in its entirety meets all the criteria set out in the SAP for including land within the BUAB for Earlswood settlement.</li> <li>• The Peter Brett Strategic Housing Land Availability Assessment (SHLAA) Review, 2012, defined a built-up area boundary for settlements where settlement boundaries did not already exist. Our Client’s site is included within the boundary defined for Earlswood by the SHLAA.</li> <li>• Council Development Management Planning Officers have recently accepted that the site in its entirety ‘...is deemed to be within the village confines...’(Delegated Report by Eleanor Bass 5<sup>th</sup> June 2017 planning application reference number 17/00908/OUT).</li> </ul> <p>The Site and Established Use</p> <p>1. Westbrook comprises a dwelling house and associated access, parking area and garden curtilage with buildings incidental to the enjoyment of the residential property. The site extends to approximately 0.29 hectares. Westbrook house is accessed directly from Valley Road to the southwest.</p>

No.	Source	Comment
		<p>2. The conveyance documents enclosed with this letter, dated March 1965, identify the residential property and curtilage. The boundaries are well defined on the ground with mature trees and hedges. The site is bounded on three sides by residential built development - the rear and side gardens of properties fronting Earlsmere residential close to the north west; side and rear gardens of properties fronting Valley Road to the south; and the rear gardens of properties fronting Shutt Lane to the east. The end of the garden, on the north east boundary, is clearly defined by trees which would provide a strong physical defensible BUAB for the settlement.</p> <p>3. The lawful residential use of the property extends to the whole 'planning unit' i.e. it includes the physical and functional residential land and building(s) as a whole. At no time since the 1965 has any part of this planning unit, the building or garden curtilage (as outlined in red on the plan above), been abandoned or used for an alternative use. The established use of the site is therefore as a single dwellinghouse and the curtilage garden land has been enjoyed for domestic purposes forming part of this planning unit i.e. it is 'domestic residential curtilage'.</p> <p>4. There is no change of use or strong physical boundary along the proposed BUAB line. There is therefore no justification for proposing a BUAB which effectively cuts across the middle of the garden.</p> <p>5. The site is located very close to the centre of Earlswood where there are a range of services and facilities including a food store, lying to the south east. The site is therefore also physically closely linked to the built-up heart of the village in a sustainable location where it would be appropriate to direct development under the terms of the national planning policy.</p> <p>Relevant Planning History</p> <p>6. On 5th June 2017 a Delegated Report was considered for application reference number 17/00908/OUT. This was an outline application for the construction of three new houses with garages plus a new shed for the existing bungalow and an improved access to Valley Road on land at Westbrook, Valley Road, Earlswood. The application site was the same as the site area currently being promoted for inclusion within the BUAB shown outlined in red on the enclosed location plan.</p> <p>7. Whilst planning permission was refused for the proposal as submitted, it is important to note that the reasons for refusal were on the grounds of concerns over the living conditions for future occupants due to the proximity of trees, and potential detrimental impact of the new dwellings on the neighbouring dwelling at 8, Earlsmere in terms of overbearing and overshadowing. The report unequivocally accepted that the site is physically within the confines of the village and small scale limited infill development would be appropriate.</p>

No.	Source	Comment
		<p>8. The acceptance by the Council of Westbourne house and garden falling within the built-up area is shown in the following extract taken from the Delegated Report:</p> <p style="padding-left: 40px;"><u>'Principle of Development...</u>whilst the District Council does not currently have an identified Built-Up Area Boundary for Earlswood, the main village does appear to be centered around the cross roads. The application site has development to the north western boundary of it, which consists of 10 dwellings, and the rear garden backing onto it. I am satisfied that given the surroundings of the site, that it is deemed to be within the village confines...'</p> <p>Defining the Built-Up Area Boundaries</p> <p>9. The logic of including Westbrook house and garden within the BUAB was accepted by the Council in 2012 in the Peter Brett SHLAA evidence document. For site analysis reasons, this report introduced built-up area boundaries for settlements which did not already have adopted settlement boundaries. For Earlswood, our part of site EAR102. The SHLAA report rejected the site as a potential development site only because there was concern that the access to the site fell within flood zone 3 making it unsuitable for residential development. Although the flood risk associated with a site is not relevant to the criteria used in the SAP to define the BUABs, it is perhaps helpful to note that this reason for rejection has been overcome through preparation of a detailed flood risk assessment. An extract of the Earlswood plan included in the SHLAA showing our Client's site and the proposed BUAB in brown is shown below [map supplied]</p> <p>10. The Local Plan Review, 2006, included 'Annexe 3 - Guidelines for defining Built-Up Area Boundaries' used to define the eight Main Rural Centres. Whilst the guidelines accept that 'subjective judgements have been necessary in some respect of some areas of land on the periphery of settlements', it also states that it is 'important to achieve a high degree of consistency'. The guidelines set out how different types of land located on the periphery should be treated. These guidelines have been replicated excluded from settlement boundaries.</p> <p>11. Our Client supports the guidelines for how the BUABs for settlements should be defined, an approach which was adopted for the Main Rural Centres and found sound by an Examination Inspector. It is therefore vital that these guidelines are implemented proportionately and fairly across the local authority area to ensure consistency and justify the BUABs proposed.</p> <p>12. On the basis of the guidelines set out in the SAD, our Client's site, in its entirety, meets the criteria for inclusion within settlement boundary. The site is an area of residential curtilage which should be included within the settlement boundary under the terms of the third bullet point within paragraph 2.10 of the SAD. None of the site should be excluded because it does not include: a paddock, orchard or land more appropriately described as 'non-urban'; planning fields; modern agricultural buildings'; miscellaneous uses; allotments; or a manor house and associated land.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>13. Indeed, it is more appropriate and ‘sound’ for our Client’s site to be included within the BUAB than several more extensive open sites currently shown within the proposed BUAB for Earlswood, many of which are much further from the centre and less likely to meet the NPPF sustainable development criteria.</p> <p>14. Therefore, our Client strongly objects to the exclusion of Westbrook dwelling and residential curtilage because this land clearly meets the criteria for inclusion within the settlement boundary. Our Client recognises that this may be a drafting error, but without an amendment to the BUAB as shown on the map extract below, the settlement boundary for Earlswood is unsound.</p> <p>Summary</p> <p>15. Our Client strongly objects to the exclusion of the garden land associated with Westbrook from Earlswood proposed BUAB. Excluding the site from the BUAB is contrary to the SAP guidelines for defining the settlement boundary and unsound. The site is a domestic residential curtilage in the heart of the village bounded on three sides by existing development. The principle of the site being accepted as falling within the built-up area has recently been accepted by the Council in a Delegated Report prepared for an outline application on the site, where officers deemed it to be within the village confines.</p> <p>16. We commend our Client’s site to you for inclusion within a revised BUAB for Earlswood, as shown on the plan above.</p> <p>We should be grateful if you would acknowledge receipt of this letter and confirm that the site will be included within the Earlswood BUAB.</p>
2	Anna Corser	Agree with these BUABs
3	Stratford Ramblers	Support – no further comment
4	Bidford-on-Avon Parish Council	Do not consider we have sufficient information to give this a considered opinion.
5	Stephen Jones	Support – no further comment

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
6	Donna Savage Planning	<p>Whilst I acknowledge that BUABs are a good thing, it can also be dangerous to have an exhaustive list. I attach a plan Emailed under separate cover as I was unable to attach to these comments) which shows a small area in Cloweswood Lane Earlswood which lies between two dwellings but would make an ideal infill plot and which could be viewed as being within the confines of the village as there is housing either side. I would therefore ask that you consider extending the BUAB to include this area.</p> <p>I have been having problems attaching this to my comments made through the interactive document, however I trust you will accept this email as part of my formal consultation response. My representation relates mostly to the built up area boundary of Earlswood. I would be grateful if you would consider revising the BUAB to include the piece of land identified on the plan below. There is a piece of land in-between two dwellings which would make a natural infill plot of self-build or otherwise without encroaching into the countryside further than existing development within the village.</p>
7	Dorothe Jackson	<p>After reviewing the initial proposed built up area boundaries plan for Earlswood, I have detailed below my objection regarding the 'proposed Settlement Boundary for Earlswood'. Specifically, the proposed alignment to the Settlement Boundary in the rear garden of my home: Westbrook, Valley Road, Earlswood (shown outlined in red on the plans below)[plans supplied]. This representation is in addition to a representation from Tyler Parkes Planning consultants.</p> <p>I raise an objection to the proposed position to the settlement boundary on the grounds that it is not 'sound' as the approach taken to the alignment of the Settlement Boundary is not wholly consistent with Stratford-On-Avon's DC guidelines for defining the confines of a settlement.</p> <p>I believe it is entirely appropriate that the Settlement Boundary should be extended towards the North to include all of my garden and the whole of my property, Westbrook (shown in red).</p> <p>It is illogical that my property could be part excluded from within the Settlement Boundary, particularly given that it is located in such a sustainable location at the centre of the village and is surrounded on three sides by residential properties. The mature trees and fencing along the north boundary of my property represent a well-established physical feature, which is a clear defensible boundary for the village. The current proposed boundary line follows an unusual direction, diverting inwards towards the centre of the village and has no physical features to make it readily recognisable (when crossing my garden). The photo below details the approximate position of the current proposed boundary (in Red) and proposed revision to the end of my garden (in Blue).</p> <p>I submitted a planning application on my property last year (17/00908/OUT), which was ultimately refused (see attached decision notice), as part of this planning application my entire property was deemed to be within the confines of the villages settlement. The delegated report is also enclosed and states the following:</p>

No.	Source	Comment
		<p><u>Principle of development</u>                      'Whilst the district does not currently have an identified built-up area boundaries for Earlswood, the main village does appear to be centred around the cross roads. The application site has development to the north western boundary of it, which consists of 10 dwellings, and rear gardens backing onto it. I am satisfied that given the surroundings of the site, that it is deemed to be within the village confines.'</p> <p><u>Conclusions</u>                      'The application site is considered to be within the confines of the village and small scale in accordance with CS.15 and AS.10 and limited infilling in accordance with CS.10'</p> <p>My property was also considered as part of the Peter Brett Strategic Housing Land Availability Assessment (SHLAA) review in 2012 and my entire property was then included in the village boundary.</p> <p>It's clear from the details of the previous application and SHLAA assessment, that the village boundary has already been considered (at this location) and it was determined that the entire property is within the village confines.</p> <p>I appreciate that the exclusion of some of my property may be a drafting error. However, given that the parish council objected to my recent planning application I am concerned that they have been involved in drafting the initial proposed village boundaries (through a workshop with Stratford-On-Avon DC). I feel it is right that any parish council should help draft their boundaries, but also think that my property may have been partly excluded to prevent possible future development, and in doing so the guidelines for 'defining the confines of a settlement' have not been followed. The parish council objected to the recent planning application on the basis that 'the proposal does not represent limited infill' (as stated above this was found to be incorrect by the Stratford-On-Avon DC).</p> <p>I have enclosed below an extract from Stratford's Site Allocation Plan p15 which details how Built-Up Area Boundaries should be/are defined:</p> <p>2.10 Whilst much of the distinction between the built-up area and the open countryside is clear cut, subjective judgement has been necessary in certain cases. To assist, the Council has applied, subject to specific local circumstances, the following principles:</p> <p><u>Land to be included within settlement boundaries:</u></p> <ul style="list-style-type: none"> <li>• Church yards;</li> <li>• Community buildings and their immediate curtilage (i.e. playing fields are excluded);</li> <li>• <u>Areas of residential curtilage unless these areas are clearly paddocks or orchards or land more appropriately defined as 'non-urban';</u></li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Employment sites on the edge of a village</li> </ul> <p>Land to be excluded from settlement boundaries:</p> <ul style="list-style-type: none"> <li>• Playing fields - including public, private and school playing fields;</li> <li>• Modern agricultural buildings;</li> <li>• Miscellaneous uses which may be located on the fringe of a settlement (e.g. sewage treatment plants, electricity sub-stations, railway land etc.);</li> <li>• Allotments</li> <li>• 'Manor Houses' and their associated land</li> </ul> <p>My properties residential curtilage clearly follows the area outlined (in red) on the above plans, but just to reinforce this point, I have also enclosed a copy of the original conveyance and title plan to show that this has been the case since I moved into the property in 1965.</p> <p>The land which is proposed to be excluded from the village boundary is used by me and my sons. The hard standing area is used for parking, the outbuildings are used for garden equipment storage and the garden area for general amenity. I have never rented any of my property or used it for commercial or agricultural purposes and the property has always remained in one residential curtilage. The garden area of Westbrook has recently been cleared of vegetation and reseeded (however prior to this clearance there was still no physical features to follow as a possible boundary)</p>
8	Delta Planning on behalf of AC Lloyd Homes	Support – no further comment
9	Stansgate on behalf of Mr and Mrs Linfoot	<p>Objection is made to the proposed BUAB for Great Alne. The BUAB should be amended to include the land edged red on the plan (Drawing No 8530-600) attached to these representations.</p> <p>The land lies to the west of St Mary Magdalene's Church and to the north of existing residential properties including West Meadow Barn and Manor House. The land comprises land and building used as a builders' yard and storage compound by Linfoot Country Homes Limited, a hard tennis court used ancillary to the residential use of Manor House, and an area of garden to Manor House. The builders' yard and storage compound has been in continuous use since 1983 and is in close proximity to and used ancillary to the office of Linfoot Country Homes Ltd which forms part of the adjoining Manor Court complex.</p> <p>The land is well-defined by existing physical features along its northern and western boundaries and is clearly distinct from the open countryside to the north and west.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Vehicular access to the land is via an existing driveway, which lies within the proposed BUAB, within the ownership of Mr and Mrs Linfoot and which also serves the properties in Manor Court and the dwelling known as Little Orchard. The drive is used on a regular basis for access to the land.</p> <p>The land identified constitutes previously developed land as defined in the National Planning Policy Framework. Further inclusion of the land within the BUAB would clearly meet the principles set down in paragraph 2.10 of the consultation document.</p> <p>The land shown edged red on drawing No 8530-600 should be included within the BUAB [map supplied].</p>
10	Hunter Page on behalf of Bellway Homes	Support – no further comment
11	Warwickshire County Council	This is a matter for the local authority to determine.
12	Pegasus on behalf of Rainier Developments	Rainier Developments have no comments to make in respect of the above Built-Up Area Boundaries for these settlements.
13	DLP Planning on behalf of Talbot Homes	Support – no further comments
14	Canal and River Trust	<p>The Canal &amp; River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”.</p> <p>The proposed Built-up Area for Earlswood includes land up to the boundary with the existing Reservoirs (Engine Pool, Terrys Pool &amp; Windmill Pool) Any proposals for policies / allocations / development relating to this area should have full regard for the impact on the Trust’s infrastructure in this location.</p> <p>Any development that affects the rate of inflow of water into the reservoir itself or the perimeter ditches and the diverted section of the River Blythe will affect the Trust’s operating regime and emergency drawdown capabilities; and any development downstream of the dam head bank may affect the risk and also the perception of risk from dam failure which may lead to additional works to the dam and its overflows being required in the future, and these would need to be met by the developers.</p>
15	John Holden	Support – no further comment
<b>Officer Response</b>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
1.		Since the SAP consultation, planning permission for 3 no. detached dwellings has been granted on the land the subject of this representation [application ref: 18/00808/FUL refers]. Therefore, it is agreed that this parcel of land be included within the BUAB for Earlswood.
2.		Noted.
3.		Noted.
4.		Noted.
5.		Noted.
6.		When measured against the BUAB assessment criteria set out in the SAP consultation, the paddock area the subject of this representation would be deemed to be outside the confines of the settlement. The land is also clearly greenfield in nature and therefore not 'built-up'. For these reasons, it is not agreed that the paddock land in question should be included within the BUAB.
7.		See response to point 1, above.
8.		Noted.
9.		Since the representation confirms that the parcels of land in question include employment and domestic uses, it is agreed that the BUAB for Great Alne be amended to contain these small sites.
10.		Noted.
11.		Noted.
12.		Noted.
13.		Noted.
14.		Noted.
15.		Noted.

No.	Source	Comment
<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Include land associated with the property known as 'Westbrook', Valley Road, Earlswood within the BUAB for the settlement, following grant of planning permission for 3 dwellings on the site in question.</li> <li>• Include employment site, tennis court and domestic garden associated with Manor House at Great Alne.</li> </ul>		

**Topic: Part 2 Built-Up Area Boundaries - Question 2.6 Category 4 Local Service Villages**

No.	Source	Comment
1	Anna Corser	Yes - my exception is a) Alderminster. This small village with very few amenities has already got a high number of new buildings so moving the boundary on the east of Shipston Road is inappropriate.
2	Peter Birks	<p>I am writing with regard to the proposed Built Up Area Boundary 2017 (BUAB) for Moreton Morrell. Whilst my wife and I are supportive of the reasons behind the initiative and understand the guidelines that were used in producing the boundary, we would welcome your support and guidance on how to go about achieving a small amendment to the boundary affecting our property Manor Fields.</p> <p>Within the next 3-5 years, we may consider applying for planning permission to build an additional dwelling or dwellings on land that is currently outside of the proposed BUAB for the village. The land in question lies between the boundary of the primary school field and our main property, marked X on enclosed map. If we were to undertake the development project, we would manage the process in a highly professional manner. All stakeholders would be consulted &amp; informed, with strict adherence given to current planning regulations.</p> <p>We would therefore like to request a change to the proposed boundary submission. I look forward to hearing from you and appreciate your support regarding our request and additional guidance on how this can be achieved.</p>
3	Stratford Ramblers	Generally agree. (o) Oxhill: retain RoW SS14/4, and require developers to show clearly on any plans.
4	Priors Marston Parish Council	Priors Marston BUAB - no. Below is copy of email sent to Matthew Neal - our comments around the BUAB line stand and would like this considered. The map with the line is attached. The reason for the [proposed] change is this area of the village has no buildings there currently and is grazing fields.
5	Steven Parkinson (Parkinson Estates Ltd)	<p>I refer to our three way meeting with Councillor George Atkinson in your offices at SDC on Thursday 1st February in regard to our land at the rear of The Warwickshire Public House and our promotion of this potential development site under the site allocations plan and call for sites carried out by the Council. As mentioned during our discussions the promotion has also included detailed engagement with Tanworth in Arden Parish Council via the NDP committee and this has resulted in a comprehensive needs survey being undertaken by WRCC, ratified by SDC, which identifies a specific need in the Parish for more affordable market housing.</p> <p>On January 18th, as you may already be aware, The Parish Council formally adopted a draft consultation paper which I have taken the liberty of attaching herewith, hope you don't mind. I appreciate that this document is seeking views from local residents on potential planning policies to determine the content and way forward for finalising the NDP. There is however, as you will read, considerable argument for identifying a suitable parcel of land to accommodate lower cost starter homes and smaller homes for people wishing to downsize.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>At our meeting you produced a draft plan showing a suggested built up area boundary which excluded our particular site and given that it is included in the draft NDP, is the most sustainable within the Parish being immediately adjacent to Wood End Station, positioned behind The Warwickshire Public House, opposite the Birches Medical Centre and being a triangular parcel of land has defensible boundaries with Wood End Lane and is arguably the least intrusive location within the green belt. Indeed part of our proposal is to incorporate a car park for Wood End Station where none exists at present and people using the line have to leave their vehicles on a restricted lay by on Broad Lane. Our development scheme, if supported by SDC, would offer not only much needed housing and planning gain for a new car park but also enhancement of the existing facilities at the Public House, including the building and grounds to ensure that this facility is maintained for the use and enjoyment of everyone.</p> <p>I am mindful that the Built Up Area Boundaries under discussion could well determine future planning policy and with the NDP draft consultation now adopted is it possible consideration could be given to include our site within the BUAB or at least delay the decision making process until the NDP is completed?</p> <p>I would welcome any advice or information you may be able to impart.</p>
6	George Stepney	<p>In response to comments invited in the SDC new draft site allocation Plan I ask that the built-up area boundary for Pillerton Priors be amended. I understand that the supporting guidance directed Church Yard's be included and this appears to have been over looked in the draft for Pillerton Priors. In addition our property situated at Stockleys Orchard East of Sand Pit Farm Road - does not appear on the plan submitted for Pillerton Priors for consideration of the boundary.</p> <p>Archive records held at the Warwick County Records Office unequivocally evidence residential use of the land east of Sand Pit Farm Road as far back as the 1817 Mills Estates Map and the 1886 Ordnance Survey Map OS51 Z194/1 51.SW.</p> <p>I ask that the boundary to the east of the village be amended to include the Church-Yard, run along the rear of Stockleys Orchard to Michaelmas Cottage and the Banbury Road. This amendment and uniform treatment of the eastern boundary will then reflect more fairly the approach taken elsewhere in the village.</p>
7	Alderminster Parish Council	Yes. The Parish Council agrees with the proposed built up area boundary for Alderminster.
8	Hampton Lucy Parish Council	The BUAB for Hampton Lucy is agreed. No comment for all other Category 4 LSV's.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
9	PJS Development Solutions Ltd on behalf of Gloucester Diocesan Board of Finance	<p>The Long Marston (j) boundary should be revised to incorporate the front part of the Glebe field, south of The Brickall.</p> <p>This site is a logical rounding off/ infill opportunity that should be allocated as a 'reserve site'. Development of the site has been discussed and earmarked for some years, with a view to some housing and some use for wider community benefit.</p> <p>A recent application was refused for a 12 unit scheme (17/0575/OUT) in November 2017, the main reason being overprovision of housing in the LSV 4 village (permitted by the LPA itself). However, the case officer subsequently advised that a smaller scheme of 5 units could be considered 'small in scale'.</p> <p>The application site plan is reproduced below. GDBF's preference would be that the BUAB is extended to follow the red line to embrace the area as a 'reserve site'. However, should the LPA consider this area to be too large, GDBF would also support the allocation of an up to 0.5 hectare site for 5 units on the front part (approximately the western half of the red lined area). This would accord with the 'small in scale' criteria officer advice and align with Para 69 of the Draft Revised NPPF, which sets out explicit encouragement and support for small sites.</p>
10	Bidford-on-Avon Parish Council	Do not consider we have sufficient information to give this a considered opinion.
11	Stephen Jones	Support – no further comment
12	Tony Buckingham	<p>The Gaydon plan should be modified as is does not follow the proposed guidance in a number of respects:</p> <p>1. Modern farm buildings at Gaydon Farm at the south end of the village are included but other similar modern farm buildings to the north are excluded. This is inconsistent, as all buildings are employment sites, albeit at different levels of intensity. The farm buildings highlighted should be included in the BUAB as shown on the plan below as they are clearly within the confines of the village. The existing building nearest the village centre is currently at appeal ref APP/J3720/W/18/3195979</p> <p>Residential dwellings and curtilage at the north end of the village are excluded from the proposal. This again is against the guidance principles and is inconsistent, especially as two very recent planning permissions as noted have been approved. The plan should be adapted to include these areas as shown.</p> <p>The plan should be adapted as shown to include the area of land adjacent to Manor Farm House currently the subject of a recent planning application 17/03073/FUL about to be lodged at appeal. This is a natural round-off to the BUAB and is within the physical confines of the village.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
13	Loxley Parish Council	<p>LPC are continuing to make progress with their Neighbourhood Development Plan and have now prepared an initial draft of the document.</p> <p>The Parish Council has previously been asked as part of this process for its views on the BUAB for Loxley. However, I was surprised to find that no consideration has been given to our suggested changes to the BUAB, on which you had asked for our comments.</p> <p>It should also be noted that as part of the process of preparing a NDP, further adjustments may be made to the Parish's recommended BUAB.</p> <p>We would be therefore grateful if you would confirm that the final BUAB for Loxley will reflect the wishes of the community.</p>
14	Reuben Bellamy	<p>The boundary for Lighthorne does not take account of the recently approved application for 3 dwellings at Morton Morrell Lane under ref. 17/03344/OUT.</p>
15	Ladbrook Park Golf Club	<p>LPGC's comment as follows is about Wood End where the Club is located. LPGC submitted its Penn Lane site of circa 5 acres to the SHLAA Call for Sites exercise in 2014. The site is listed in the Council's SHLAA as W00.01. The site remains available for development. It is surplus to any useful purpose for the golf course. Neither has it any agricultural value due to its poor quality soil and ecology. The field is therefore unproductive. If development was allowed, it would be for houses in keeping with the homes in Penn Lane. Revenue realised would help LPGC to secure its future even more strongly, plus possibly enable LPGC to make new facilities available for local residents. Ideally, LPGC would like to see the Wood End Built-Up Area Boundary to include its 5 acres site, alternatively for it to be identified as a reserve site in the Green Belt. LPGC refer you back to their responses to Questions 1.1, 1.2 and 1.4. These set out our opinions on why additional small scale, high value development is beneficial in LSVs, and provides the Council greater flexibility in delivering future housing needs.</p>
16	William Morgan-Harrod	<p>The proposed boundary line for Loxley has not followed the principles outlined within the Policy Consultation Document, regarding flexibility of curtilage. I believe this hasn't been exercised specifically when reviewing the boundary line proposed between the back elevation and corner of Four Winds and the boundary line towards Home Farm crossing Home Farm's land. The boundary line that has been proposed, should lead from the west side corner of Home Farm's land, down the rear side of Four Winds gardens, around the planted trees that are clearly marked on the plans and that are bounded by a fence and should travel, with a gradual diagonal border line, towards the northwest part of the boundary at Home Farm which is already identified on the proposal. It seems rather odd that this border line has been proposed for this particular position and direction, as there is nothing visible on the plans that should lead the boundary line to cut in from the corner of Four Winds and then to reconnect to Home Farm where it has. To reiterate it should follow from the corner of the field along Four</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		Winds property, include the trees that are within fencing and head off in a diagonal boundary line up towards the most north part of the boundary line marked already.
17	Rickett Architects on behalf of Mr and Mrs Hartley	Land to the rear of Holleytree Cottage, Bearley lies within the village and should be included for development (please see attached plan) [plan supplied]
18	Clifford Chambers and Milcote Parish Council	Please find below the revised BUAB for Clifford Chambers & Milcote Parish. Agreed at public consultation meetings on 9th and 21st August 2017 and ratified at a full Parish Council Meeting on 4th September 2017. [map supplied]
19	Steve Taylor (Set Design)	<p>The Gaydon plan should be modified as is does not follow the proposed guidance in a number of respects:</p> <ol style="list-style-type: none"> <li>1. Modern farm buildings at Gaydon Farm at the south end of the village are included but other similar modern farm buildings to the north are excluded. This is inconsistent, as all buildings are employment sites, albeit at different levels of intensity. The farm buildings highlighted should be included in the BUAB as shown on the plan below as they are clearly within the confines of the village. The existing building nearest the village centre is currently at appeal ref APP/J3720/W/18/3195979.</li> <li>2. Residential dwellings and curtilage at the north end of the village are excluded from the proposal. This again is against the guidance principles and is inconsistent, especially as two very recent planning permissions as noted have been approved. The plan should be adapted to include these areas as shown.</li> <li>3. The plan should be adapted as shown to include the area of land adjacent to Manor Farm House currently the subject of a recent planning application 17/03073/FUL about to be lodged at appeal. This is a natural round-off to the BUAB and is within the physical confines of the village.</li> <li>4. A strategic reserve site should be identified as shown - the site is sustainably located (3000 houses are proposed within 200m), has excellent access and is too steep and too small to have any viable agricultural future. This would again form a natural round-off to the village against the recently approved bunding and nature area at JLR.</li> </ol> <p>The above changes would bring the boundary into line with the guidance and would incorporate very recent planning permissions as noted - it seems iniquitous to include certain granted and implemented permissions (the Spitfire site behind the Gaydon Inn for example) and ignore others - especially when these others post-date some of the included permissions.</p>
20	Steve Taylor (Set Design)	Long Marston - The boundary should be revised as shown below to reflect recent planning applications and include the garden land and amenity land associated with Ashmead House. The land to the north of the public

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>footpath is garden land / curtilage for Ashmead House and the shaded amenity land to the south is too small for livestock or any other viable use - it cannot be classed as paddock land, there is therefore no justifiable reason for excluding it from the BUAB. Land to the north and south of the shaded region is also used as garden/amenity land for the various properties backing on to it, so consideration should be given for including this also and joining the currently detached area of proposed BUAB to the east to the main body of the village.</p> <p>The NPPF revision planned for this spring will include a requirement for LPAs to support small sites in sustainable locations to the tune of 20% of the total pipeline supply. The drawing of BUABs in this consultation should reflect this requirement and plan ahead for this case to be adequately met.</p>
21	Steve Taylor (Set Design)	<ol style="list-style-type: none"> <li>1. As shown, the BUAB [for Lighthorne] should include traditional farm buildings and more recent buildings where they form a unified whole and a single employment unit - Curacy Farm being a case in point.</li> <li>2. The existing Pound Green House and curtilage / garden area should also be included to comply with the guidance.</li> <li>3. The planning approval 15/04359/FUL for a single dwelling and curtilage to the north of Pound Green should also be included.</li> </ol>
22	Framptons on behalf of Spitfire Bespoke Homes	<p>We agree with the general extent of the Built-Up Area Boundary (BUAB), however submit that the boundary takes account of land at Campden Road which we are proposing for 23 dwellings (see accompanying location plan). With regard to the principles being applied to the identification of reserve sites, land at Campden Road would not be contrary to these principles.</p> <p>The scale of development is appropriate to Clifford Chambers, due to its position within the settlement hierarchy as a Category 4 Local Service Village. Any scheme brought forward on this site would be designed to respect the existing settlement and be fully integrated.</p> <p>The Council's adopted Landscape Sensitivity Study (2012) found that Clifford Chambers could accommodate potential housing development and concluded the site has a 'Medium' sensitivity to housing development.</p> <p>The extent of development at land at Campden Road would not result in the identity and/or integrity of the settlement being undermined.</p>
23	Framptons on behalf of Spitfire Bespoke Homes	<p>We submit that the boundary takes account of land to the east of Shuckburgh Road which we are proposing for circa 23 dwellings (see accompanying location plan). With regard to the principles being applied to the identification of reserve sites, land north off Shuckburgh Road would not be contrary to these principles.</p> <p>The scale of development is appropriate to Priors Marston, due to its position within the settlement hierarchy as a Category 4 Local Service Village. Any scheme brought forward on this site would be designed to respect the existing settlement and be fully integrated.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		The extent of development would not result in the identity and/or integrity of the settlement being undermined.
24	Framptons on behalf of Spitfire Bespoke Homes	<p>We agree with the general extent of the Built-Up Area Boundary (BUAB), however submit that the boundary takes account of land to the north of Brook Lane which we are proposing for up to 29 dwellings (see accompanying location plan). With regard to the principles being applied to the identification of reserve sites, land north of Brook Lane would not be contrary to these principles.</p> <p>The scale of development is appropriate to Moreton Morrell, due to its position within the settlement hierarchy as a Category 4 Local Service Village. Any scheme brought forward on this site would be designed to respect the existing settlement and be fully integrated. Further information regarding the proposed site layout will be submitted as part of the next stage of the Site Allocations consultation.</p> <p>The Council's adopted Landscape Sensitivity Study found that Moreton Morrell could accommodate potential housing development and concluded the site has a 'Medium' sensitivity to housing development (albeit it is part of a much larger site).</p> <p>The extent of development at land north of Brook Lane would not result in the identity and/or integrity of the settlement being undermined.</p>
25	Stansgate on behalf of Mr and Mrs Pollock	<p>Objection is made to the proposed BUAB for Clifford Chambers. The BUAB should be amended to include the land edged red on the plan (Drawing No 7995-600) attached to these representations.</p> <p>The land lies adjacent to the BUAB, as proposed by the District Council, but clearly falls within the physical confines of the settlement having existing residential development to the north west, south west and south east.</p> <p>The land is used by Mr and Mrs Pollock ancillary to the residential use of their dwelling, which lies close to the identified land, and contains an existing building.</p> <p>Inclusion of the land within the BUAB would accord with the principle set down in paragraph 2.8 of the consultation document.</p> <p>The land shown edged red on drawing No 7995-600 should be included within the BUAB.</p>
26	Stansgate on behalf of Yarnold Developments	Objection is made to the proposed BUAB for Gaydon. The BUAB should be amended to include the land edged red on the plan (Drawing No 8266-600) attached to these representations.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The land lies adjacent to the BUAB, as proposed by the District Council, and to the front of The Old Rectory, with further development to the north west. Moreover, the site has extant planning permission for the erection of two dwellings and associated works (17/00307/FU L).</p> <p>Inclusion of the land within the BUAB would clearly meet the principles set down in paragraphs 2.9 and 2.10 of the consultation document.</p>
27	David Lock Associates on behalf of Trenport Investments	<p>The boundary for Lighthorne should be revised to include land north of Old School Lane, on the eastern side of the village (see the attached plan).</p> <p>The site lies within the built-up framework of Lighthorne, which extends as far east as Stonecroft and the old school house. In this respect, within the recommendations (section 5.3) of its 1994 report for the council on the Lighthorne conservation area, Shankland Cox stated that:</p> <p>"There is no reason [emphasis added] why new development adjacent to the road from Tansey court eastwards [i.e. on the subject site] should not be permitted provided it is sensitively designed [which it would be] and did not extend beyond Stonecroft and ivy cottages [which it would not]. This would "round off" the Eastern end of the village."</p>
28	WYG	<p>Option (r) of this consultation question refers specifically to Tanworth in Arden and these representations provide specific comment on the boundary drawn around the Local Service Village of Tanworth in Arden. The boundary, as currently proposed is objected to.</p> <p>As drawn, the settlement boundary takes no account of the need for any additional housing in the village, nor does it take account of the development needs identified by the Parish Council in their approved Neighbourhood Development Plan Consultation Paper (February 2018).</p> <p>Whilst not yet published for formal public consultation, Tanworth in Arden Parish Council has approved a consultation paper which is available on the Parish Council's website and which will seek views on possible planning policies and sites for development to inform the Neighbourhood Plan in due course.</p> <p>In particular, para 1.9 bullet point 1 states that the Parish Council will consider promoting a Local Housing Needs Scheme on one of three identified sites (which includes land at Butts Lane, Tanworth that is outside of the revised development boundary for the village as drawn).</p> <p>The Neighbourhood Plan has an evidence based predicated on information gathered from a 2015 Household Survey and also a Warwickshire Rural Community Council report on a Survey of Local Housing Needs in the Parish. From these documents paras 5.7 and 5.9 of the Parish Council's approved Consultation Paper indicate</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>that the housing stock in the Parish is highly skewed to 4 plus bedroom homes with limited and diminishing opportunities for younger families. In addition, the Housing Needs Survey identified 42 families either currently living in the Parish or with other local connections, who would like to live in the Parish but for whom affordable housing is likely to be the only realistic option.</p> <p>The site at Butts Lane, Tanworth identified in the Council's consultation paper is identified as a potential solution for the provision of an additional number of affordable homes of the right size, and also as a location for potential improvements to the existing school access, to the benefit of the community.</p> <p>Yet the draft proposed Settlement Boundary for Tanworth in Arden in the Council's consultation paper has not taken this available evidence into account. The Development Boundary should therefore be reviewed with all available evidence taken into account, to clearly define Tanworth in Arden and allow flexibility for its identified growth requirements as well as changes and improvements to the village services that will benefit the community.</p>
29	WYG	<p>Option (r) of this consultation question refers specifically to Tanworth in Arden and these representations provide specific comment on the boundary drawn around the Local Service Village of Tanworth in Arden. The boundary, as currently proposed is objected to.</p> <p>As drawn, the settlement boundary takes no account of the need for any additional housing in the village, nor does it take account of the development needs identified by the Parish Council in their approved Neighbourhood Development Plan Consultation Paper (February 2018).</p> <p>Whilst not yet published for formal public consultation, Tanworth in Arden Parish Council has approved a consultation paper which is available on the Parish Council's website and which will seek views on possible planning policies and sites for development to inform the Neighbourhood Plan in due course.</p> <p>This Paper sets out the Council's ideas and potential aspirations for the Neighbourhood Plan and has an evidence base that is predicated on information gathered from a 2015 Household Survey and also a Warwickshire Rural Community Council report on a Survey of Local Housing Needs in the Parish. From these documents, paras 5.7 and 5.9 of the Parish Council's approved Consultation Paper indicate that the housing stock in the Parish is highly skewed to 4 plus bedroom homes with limited and diminishing opportunities for younger families. In addition, the Housing Needs Survey identified 42 families either currently living in the Parish or with other local connections, who would like to live in the Parish but for whom affordable housing is likely to be the only realistic option.</p> <p>My Client's land interests at Danzey Green Lane are outside of the existing and proposed Built-Up Area Boundaries for Tanworth in Arden but should be considered by the Council as a suitable brownfield location, in</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>proximity to the village for the provision of housing. The site constitutes previously developed land and is therefore a site which is encouraged to be reused. Indeed, national policy allows for the redevelopment of previously developed land in the Green Belt, subject to meeting relevant criteria and considerations of impacts on openness.</p> <p>It is requested that the Council take these points into account when preparing the Site Allocation Plan, indeed the Site could be a more suitable location for development than a greenfield location.</p> <p>The Tanworth in Arden Built-Up Area Boundary should also be reviewed, with all available evidence taken into account, including the availability of previously developed land.</p>
30	Boyer on behalf of Venta Developments	<p>We agree with the proposed Built-Up Area Boundary defined for the Category 4 LSV of Priors Marston in so far as it relates to existing development. In terms of reserve site allocations, we consider that it should be amended to include our client's land adjacent to Grange Cottages on Hardwick Road. An amended Built-Up Boundary for Priors Marston including the site can be seen in Appendix 3.</p> <p>As the amended boundary demonstrates, the addition of the land adjacent to Grange Cottages creates a natural rounding off of the settlement and presents a logical location for new development to come forward in Priors Marston.</p> <p>An illustrative site layout demonstrating how the site could accommodate approximately 21 new homes is also included at Appendix 2. This includes an indicative mix of 1, 2 and 3 bedroom homes to provide a range of smaller housing to meet local needs, suitable for first time buyers, downsizers and young families, to enable people to stay in the village. The proposals also include 40% affordable provision to ensure the development contributes to local affordable housing needs, which will be integrated with and indistinguishable from the rest of the development through 'tenure blind' design.</p> <p>The layout demonstrates how the site can be delivered whilst retaining existing natural landscape features, including the existing pond and mature boundary trees; respecting the existing public right of way across the site; and providing a new childrens play area for existing and future residents.</p>
31	Rosconn Strategic Land	<p>Question 4.2 puts forward a proposal for a site at Alderminster, under the control of Rosconn Strategic Land, for consideration as a Self/Custom Housebuilding site. RSL fully support this proposal and should this be included as an allocation within the SAP, we would request that the Built-Up Area Boundary for Alderminster is adjusted accordingly.</p>
32	Hunter Page on behalf of Bellway Homes	<p>Support – no further comment</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
33	Hunter Page on behalf of Spitfire Bespoke Homes	<p>Spitfire believe that when looking at the village of Bearley, the settlement boundaries have been tightly drawn around the existing development within the centre of the village however the Council's own criteria has not been followed which permits community buildings and their immediate curtilage (i.e. not playing fields) and employment sites on the edge of a village to be included within the settlement boundaries.</p> <p>In the case of Bearley, to the west of the current boundary lies Bearley Sports Social Club and Village Hall, and the existing Countrywide retail store and associated buildings. These sites should be included in the settlement boundary in line with the above guidance, either through extension of the proposed settlement boundary along Snitterfield Road to the west or individual boundaries can be drawn up around the sites to maintain existing green gaps. These areas are very much part of the village given their close proximity and best access to the railway to the west and existing residential development to the east.</p>
34	Framptons on behalf of Ellis Engineering	<p>This submission is made in respect of the BUAB for Gaydon. The stated principles for the inclusion of land within the settlement boundaries includes:</p> <p><i>'employment sites on the edge of a village'.</i></p> <p>This principle has not been followed in the context of Gaydon as the boundary which is drawn through the Ellis Engineering site does not encompass the lawful extent of the commercial use. The accompanying plan shows the extent of the commercial use. The BUAB boundary should be drawn as shown on the accompanying plan (Plan 1).</p> <p>It is further evident that, in drawing a BUAB for Temple Herdewyke, land has been included where presently no development has taken place. In this context, it is considered that defining the BUAB should also include land which is considered suitable for future housing development - well related to meet an identified housing need from JLR.</p> <p>Plan 2 identifies the suggested realignment of the BUAB to encompass a future housing site.</p>
35	Warwickshire County Council	This is a matter for the local authority to determine.
36	Pegasus on behalf of Rainier Developments	Rainier Developments have no comments to make in respect of the above Built-Up Area Boundaries for these settlements.
37	Nexus Planning on behalf of Richard Mann	The draft built-up area boundary for Gaydon on the southern side currently closely follows behind Poplars Farm, Poplar and the Firs, however the exact position of the boundary appears to be somewhat arbitrary and should extend further south to the fence line.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
38	DLP Planning on behalf of Talbot Homes	Support – no further comment
39	Bearley Parish Council	<p>Bearley Parish Council (BPC) has been in liaison with Stratford-on-Avon District Council (SDC) Planners on its Neighbourhood Plan (NP), Site Allocations (SAP) and Built Up Area Boundaries (BUAB) since early 2014. The preparation of NP was halted in during the period from April 2015 to July 2016, subject to adoption of SDC of Core Strategy and then to July 2017 awaiting the start of the SAP Consultation. However, BPC continued to inform and liaise with SDC planners and have made their views on BUAB and progress of NP known. The last contribution from BPC was in July 2017 in response to the "Consultation the preparation of Built-Up Area Boundaries for Local Service Villages".</p> <p>The Bearley PC decided to re-start the work on NP in June 2017 to bring the efforts already made to a conclusion. Therefore, the comments made on the July 2017 consultation, were truly reflective of the community's wishes as expressed in the NP Survey conducted as well as discussed and approved by the Neighbourhood Planning Steering Group (NPSG) and repeatedly discussed with SDC planning officers.</p> <p>in response to question 2.6 of the consultation Bearley Parish Council has carefully examined the Guideline BUAB for Bearley included in the "BUABs 16OCT17" document which was also on display at the Drop-in Session on Tuesday 13 February 2018.</p> <p>The Guideline BUAB for Bearley in "BUABs 16OCT17" document is incomplete in that it does not include the two distinct portions Built-Up Area of Bearley within the Parish Boundary, which is also the designated Neighbourhood Plan boundary at Bearley Cross divided by the railway running east to west and the A3400 running north to south.</p> <p>Together these two portions of Built Up Area to the east and west of A3400 constitute about one sixth of the total Built Up Area of Bearley. The Built-Up Area to the east of A3400 includes Countrywide Stores and Bearley Mill whilst the Built-Up Area to the west includes residential properties of Applegarth, Station House, Station Cottage, Oak Cottage, The Bungalow at Bearley Station, Bearley Cross and Belmore House as well as the Cedar Lodge Care Home. Since these Built-Up Areas are within the Parish as well as Neighbourhood Plan Boundary at the entrance to the village from A3400 it is important for the Parish Council to be a substantial part of any planning decisions as permitted by the law.</p>
40	Homes England	<p>The settlement boundary drawn around Mappleborough Green shows three separate areas stretched out along the A435. In reality only the southern most area represents the settlement. The two smaller areas to the north do not have the identity that would suggest a settlement nor a local service village. In the case of the middle settlement this is rather dominated by garden centres and petrol filling stations, rather than dwellings. The northern area also has a large garden centre. Typically it is roadside facilities that have formed these development clusters.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The authority boundary is to the west of these three areas, and it could be argued that the middle and north area have a closer urban and functional connection to the principle settlement of Redditch than they do to the original settlement of Mappleborough Green to the south.</p> <p>In this regard we suggest the inclusion of an area of land between the north and middle areas which would connect to the land allocation on the eastern edge of Redditch. The land would allow for the provision of approximately 40 dwellings on a site around 1ha in size.</p>
41	John Holden	Support – no further comment
42	Brodie Planning on behalf of Valefresco	<p>Hampton Lucy's built up area should identify at least one area as a reserve site. There are up to three areas that could be identified as reserve sites that are available now and are deliverable. Each of these sites could be brought forward as and when required and are capable of delivering up to 25 dwellings each. They are Land south of Stratford Road (A), Land to the North of Stratford Road (B) and Land West of Snitterfield Street (C). There is also a fourth site which could be considered for a future plan period or if the need increases significantly as part of a review. This site, Land to the rear of the Spinney (D), could be delivered as part of a phased extension to the sites to the east and west. Attached is a map of these sites, sites B, C and D have indicative boundaries as all the land to the north is the same ownership. They are based, where possible, close to historic field boundaries.</p>
43	Brodie Planning on behalf of Lioned	<p>Halford Built up area should extend around bowling green as this forms a logical boundary and rounding off to the existing settlement. The site has a strong and defined boundary to the south and this former bowling green that has been disused since 2013 could be developed into well designed discreet residential scheme. The existing and established trees would reduce the visual impact of the site from the south and adjoining properties.</p>
44	Robert Lindsey	<p>I object to the Loxley built up area boundary. I believe the boundary line should be from the end of Four Winds to the left most edge of Home Farm and not as described as it makes the plot of land too narrow for a house to represent the plot width. I will soon be re issuing a planning application refused recently.</p>
45	Rosconn Strategic Land	<p>In respect of g) Halford, the land north of Idlicote Road and immediately south east of The Close should be included within the BUAB of the village. The site was the subject of a planning application (ref: 15/03023/FUL) where the officer's delegated report described describes the site's position within the village. He confirmed that the site sits within the existing built development with dwellings to the north-west and south-east and later on in the report, states that the site is located within the built form of Halford. More latterly, several infill developments have occurred to the south of the site thereby further enclosing the site.</p>

No.	Source	Comment
<p><b>Officer Response</b></p> <ol style="list-style-type: none"> <li data-bbox="253 360 1928 384">1. Noted. There is no intention of including any land within the BUAB that is not already occupied by a building or its associated curtilage.</li> <li data-bbox="253 419 2007 504">2. The land in question is greenfield in nature and part of a larger field on the edge of the village. The proposed boundary line on the submitted plan is arbitrary in nature and does not follow an established boundary line. As such, the land does not comply with the assessment criteria and it is not agreed that the land should be included within the BUAB associated with Moreton Morrell.</li> <li data-bbox="253 539 383 563">3. Noted.</li> <li data-bbox="253 598 2007 746">4. The representation states that the two parcels of land are non-domestic in nature and do not include any built form and should be removed from the BUAB. These parcels of land belong to a property known as The Hermitage and having reviewed the planning history, the location plan submitted with planning application 12/00326/FUL clearly labels them both as 'field' [i.e. non-domestic]. As such, having reviewed the evidence and considered the matter further, it is agreed that the 2 parcels of land are greenfield and non-domestic in nature. Therefore, it is also agreed that they do not meet the assessment criteria and should be removed from the BUAB for the village of Priors Marston.</li> <li data-bbox="253 782 2018 986">5. The representation relates to a triangular piece of land to the north of the railway line running through the village of Wood End, to the rear of the public house 'The Warwickshire Lad'. The site is undeveloped and greenfield in nature and as such does not comply with the assessment criteria for including land within a BUAB. It is acknowledged that the site is being promoted as a rural exception site through the emerging NDP for the Parish. However, the NDP is in the early stages of preparation and has yet to be consulted upon through the 'pre-submission' Regulation 14 consultation in accordance with the Neighbourhood Planning Regulations. However, there is no requirement for rural exception sites (such as this one) to be included within the BUAB of a village to be acceptable in principle (in accordance with Policies CS.15 G and AS.10). For these reasons, it is not agreed that this site should be included within the BUAB for Wood End.</li> <li data-bbox="253 1021 2018 1193">6. It is not agreed that the graveyard on the east side of Sand Pit Farm Road should be included within the BUAB. This is due to the fact that since the consultation, SDC now consider churchyards should be excluded from BUABs. Given the dwelling granted planning permission under application ref: 15/00574/FUL has now been constructed, there is a case for including the residential curtilage of this dwelling within the BUAB. However, given the fragmented and 'loose-grain' nature of built form to the east of Sand Pit Farm Road and the existence of greenfield land/orchard land as well as the old graveyard, it is not agreed that the orchard/paddock area to the north of the new dwelling should be included within the BUAB as it is clearly greenfield in nature and does not comply with the BUAB methodology for this reason.</li> <li data-bbox="253 1228 383 1252">7. Noted.</li> <li data-bbox="253 1287 383 1311">8. Noted.</li> </ol>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>9. It appears the representation is promoting agricultural land to the south of the village as a potential Reserve Site through the SAP. The site does not have planning consent for development and is clearly not part of the settlement in terms of built form. Therefore it is not agreed that the BUAB should be amended to include this parcel of land. In any case, should the site be successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>10. Noted.</p> <p>11. Noted.</p> <p>12. The modern farm buildings and curtilage land at Gaydon Farm have been included within the BUAB as they are in lawful employment use for the storage and display of agricultural machinery and no longer classified as agricultural use. The modern agricultural buildings at Manor Farm were, at the time of preparing the draft BUABs, in agricultural use and as such did not comply with the BUAB assessment criteria. This is not inconsistent in interpretation. However, it is acknowledged that the change of use of the smallest agricultural barn closest to the village to form three dwellings was allowed on appeal in July this year. Therefore, it is agreed that this one barn and associated land to create the residential curtilage for the new dwellings should be included within the BUAB. It is also agreed that the remaining agricultural barns should also be included within the BUAB for the village. This is in part to reflect recent changes to permitted development rights for conversion of agricultural buildings and reflect recent appeal decisions of this nature. It is also to reflect the potential change of use of such buildings to commercial or employment uses. The representation refers to dwellings at the north end of the village being excluded from the BUAB. It is acknowledged that since drafting the BUAB, planning permission has been granted for two dwellings on land between the property known as 'Cornerstone' and The Old Vicarage, thus allowing the application site and The Old Vicarage itself to be included within the BUAB. To include the properties known as 'Windy Ridge' and 'Ferndale' within the BUAB, it would be necessary to include a paddock, which would not comply with the BUAB assessment criteria. As such, it is not agreed that 'Windy Ridge' or 'Ferndale' should be included within the BUAB. The site at Manor Farm House for three dwellings is greenfield in nature and as such does not meet the BUAB assessment criteria. It is not agreed that the site constitutes a "natural round-off to the BUAB" or that it is "within the physical confines of the village" as stated in the representation. The planning appeal has subsequently been dismissed. Therefore, it is not agreed to include land at Manor House Farm within the BUAB.</p> <p>13. The 6 week Regulation 16 'submission' consultation commenced on the Loxley NDP on 27<sup>th</sup> June this year. The representation states that previous comments from the PC have been ignored. This is not the case. SDC have raised concerns in relation to the seemingly inconsistent interpretation of BUAB assessment criteria within the NDP, particularly in relation to residential curtilage. These concerns will continue to be raised by SDC through the NDP process. It is acknowledged, however, that the BUAB for Loxley village within the NDP will take precedence if and when it passes Examination and receives a majority 'yes' vote at referendum.</p> <p>14. Since the drafting of the BUABs for the Revised SAP Scoping consultation, outline planning consent has been granted in relation to application 17/03344/OUT for the erection of three dwellings on greenfield land on the edge of Lighthorne village on Moreton Morrell Lane. For this reason, it is agreed that this site should now be included within the BUAB for the village.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>15. The land in question is greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Wood End. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>16. The BUAB alignment between the property known as 'Four Winds' and Home Farm follows the new northern property boundary created through the grant of planning permission [application 18/00917/FUL refers] for a single dwelling on the land between the two sites quoted. As such, since sites on the periphery of villages with extant planning consent for new residential or commercial development have been included within all draft BUABs, the BUAB as shown is correct and no amendment is required in this instance.</p> <p>17. The lawful residential curtilage associated with the property known as 'Holly Tree Cottage' is as shown on the draft BUAB for Bearley village. This is confirmed in planning applications associated with the property, such as 14/00890/FUL. There is a clear boundary fence between the residential curtilage of the property and land to the north. The land to the rear of Holly Tree Cottage is greenfield in nature and non-domestic. As such, the land does not comply with the assessment criteria for including land within a BUAB. Therefore, it is not agreed this land should be included within the BUAB for the village.</p> <p>18. The Clifford Chambers Neighbourhood Plan includes its own version of a BUAB for the village. The NDP began its minimum 6 week Regulation 14 (pre-submission) consultation late November 2018. The BUAB set out in the NDP has three additional parcels of land included within it, the largest being the site of Rectory Farm off Milcote Road and the amenity land to the south east of Rectory Farm. SDC do not agree that these additional elements should be included within the BUAB for the village due to physical separation. The NDP has yet to be formally submitted to SDC for the 6 week Regulation 16 consultation under the Neighbourhood Planning Regulations. As such, it is in a similar position to other villages within these schedules [i.e. not post-Examination or referendum]. Therefore, officers are of the opinion the SAP needs to consider a BUAB for the village in case the NDP does not reach the end of the process and get 'made'. It is acknowledged, however, that the BUAB set out within the NDP will take precedence if and when it passes Examination and receives a majority 'yes' vote at referendum.</p> <p>19. Points 1 to 3 – please see response to representation no. 12, above since they are identical comments. Point 4 – promotes a Reserve Site to the north of the village of Gaydon. It is understood this parcel of land has been promoted as a potential Reserve Site through the SAP. The site does not have planning consent for development and is clearly not part of the settlement in terms of built form. Therefore it is not agreed that the BUAB should be amended to include this parcel of land. In any case, should the site be successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>20. The land in question has been the subject of recent planning applications for the erection of 5 dwellings, all of which have been refused. The latest application [ref: 18/02563/OUT] was dismissed at appeal on 18<sup>th</sup> June this year. The land is greenfield in nature and would not be classified as domestic curtilage. The site survey plan clearly shows the demarcation of the lawful curtilage/garden land with a timber post and rail fence, in line with the rear garden fence associated with the property to the north of Ashmead House. The site location plan confirms the residential curtilage with Ashmead House outlined in blue and the 'amenity land' beyond outlined in red as the application site. The land is</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		greenfield and non-domestic in nature, it does not comply with the assessment criteria for including land within a BUAB and therefore, it is not agreed that this land should be included within the BUAB for the village.
21.		It is agreed that the modern agricultural buildings at Curacy Farm on the eastern edge of the village should be included within the BUAB, for the reasons outlined in other responses elsewhere in this schedule. However, a much tighter boundary has been proposed than that suggested through the representation. It is not agreed that the Pound Green site and land to the north and east of Pound Green with extant planning permission for a single dwelling should be included within the BUAB. Land to the east of Old School Lane is made up of a small number of large properties with large gardens, resulting in a more dispersed pattern of development on the outer reaches of the village. It is not deemed necessary or appropriate to include these properties within the BUAB. And as such, it is not agreed to include these sites within the BUAB for Lighthorne.
22.		The land promoted through this representation is in agricultural use, therefore greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Clifford Chambers. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.
23.		The land promoted through this representation is in agricultural use, therefore greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Priors Marston. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.
24.		The land promoted through this representation is in agricultural use, therefore greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Moreton Morrell. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.
25.		The representation confirms that the land in question is used ancillary to the residential use of their dwelling. In other words, it is not deemed to be residential curtilage, even by the owners of the land, otherwise the representation would have made this clear. I concur with this view, hence the reason the land was excluded from the draft BUAB as it is greenfield in nature and in non-domestic use. It is not agreed that the land in question falls within the confines of the settlement and it is not surrounded by residential development. For these reasons, it is not agreed to include this parcel of land within the BUAB for Clifford Chambers.
26.		Following the approval of planning permission for 2 dwellings on this parcel of land, it is agreed that the site now be included within the BUAB for Gaydon.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>27. The land promoted through this representation is greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Lighthorne. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p>
		<p>28. The land promoted through this representation is greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Tanworth-in-Arden. The representation refers to a community consultation relating to possible Local Needs Housing to be promoted through the Neighbourhood Plan for the Parish. The Neighbourhood Plan is at an early stage of preparation [pre-Regulation 14 'pre-submission' consultation] and housing policies are yet to be finalised and consulted upon. Should it transpire in the fullness of time that the community wish to promote this site for a Local Needs Housing scheme, the site would not need to be included within a BUAB to be acceptable in principle, since such schemes can be on sites adjacent to settlements in accordance with Core Strategy policy CS.15.</p>
		<p>29. The representation acknowledges that the site being promoted at Danzey Green is outside the settlement of Tanworth-in-Arden and does not actually propose that it should be included within the BUAB, but that it should be considered as a suitable brownfield site for possible future re-development. It is acknowledged that the site is on the Council's Brownfield Land Register. It is not considered appropriate to include the site within the proposed BUAB for the village of Tanworth-in-Arden since it does not comply with the proposed assessment criteria.</p>
		<p>30. The land promoted through this representation is greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Priors Marston. The representation refers to the land being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p>
		<p>31. Land to the east of Shipston Road, Alderminster is agricultural land and therefore greenfield in nature. As such its inclusion would not comply with BUAB methodology. Whilst the site is being promoted as a potential 'self-build' site, there is no guarantee the site will see any development within the Plan period. Additionally, there is no policy requirement for self-build sites to be included within a BUAB. Indeed, if such a site was included within a settlement boundary prior to the dwellings gaining planning consent or being built-out, it would leave the site open to applications for speculative market dwellings, contrary to the site's intended purpose. For these reasons, it is not agreed that the site should be included within the BUAB for Alderminster.</p>
		<p>32. Noted.</p>
		<p>33. The representation refers to the creation of an 'island' BUAB to the west of Bearley Village, including the Sports and Social Club and adjacent employment sites on Snitterfield Road. Since the proposed sites would include a community building (plus its curtilage) and commercial/employment buildings, in principle such a site would comply with the BUAB assessment criteria. This land was not included in the draft BUAB for Bearley due to the separation of these proposed sites from the village by an agricultural field and the playing fields, thus not</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>being commensurate with the village itself. However, their close proximity to the village and the connections with the village are acknowledged. It is also noted that the sites in question have been included within an 'island' BUAB relating to the village as set out within the draft Bearley Neighbourhood Plan (NDP), which concluded its Regulation 14 (pre-submission) consultation in March 2019. Due to their links to the community and potential for re-development in accordance with Green Belt Policy, it is agreed that these sites should be included within the BUAB for the village. However, the new boundary would be a tighter alignment to that being promoted through the NDP to comply with the BUAB assessment criteria. The BUAB for Bearley remains in the SAP due to the fact that the NDP has yet to reach Examination/Referendum. SDC acknowledge that the BUAB in the NDP will prevail once the NDP is 'made'.</p> <p>34. Planning application 16/01619/FUL was granted for the change of use of a former grain store to B2 use and extension to hardstanding for the storage and display of agricultural machinery associated with Ellis Engineering. The associated plans confirm the extent of the land associated with the planning permission and it is evident that this application has been fully implemented. For these reasons, it is agreed that the BUAB be extended at Gaydon Farm to include the lawful curtilage of the commercial business. Land to the south of Kinton Road, Gaydon is agricultural land and therefore greenfield in nature. As such its inclusion would not comply with BUAB methodology. For this simple reason, it is not agreed to include the site within the BUAB for Gaydon. The land is also being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>35. Noted.</p> <p>36. Noted.</p> <p>37. Having re-evaluated the land excluded from the BUAB immediately to the south of Poplar's Farmhouse and to the south of the properties known as 'Poplar' and 'The Firs', it does appear that the land is domestic in nature and forms a large, mature rear garden associated with the farmhouse. Clearly, there are no fences or other features separating this land from the remainder of the plot suggesting a potential 'other use'. As such, it is agreed that the BUAB for Gaydon be amended to include the rear garden area associated with Poplars Farm.</p> <p>38. Noted.</p> <p>39. Please see representation no.33 above, in respect of the 'island' of commercial/leisure land to the west of the village of Bearley. This representation also requests the inclusion of a small number of properties at Bearley Cross in a third 'island' BUAB associated with the village as a whole. These properties are very remote from the village, although within the parish boundary. There are similar enclaves of development on the edges of other villages which have not been included within BUABs due to similar locations remote from the 'host' village. Due to this separation, SDC does not consider the inclusion of these properties would comply with the BUAB assessment methodology and as such their inclusion is not necessary, or appropriate. However, it is acknowledged that this suggestion is being promoted through the draft Bearley Neighbourhood Plan NDP.</p>

No.	Source	Comment
		<p>40. It is not agreed that the two smaller 'northern' BUAB areas for Mappleborough Green don't have an identity that would suggest a settlement. Whilst the central BUAB may have a number of commercial premises, there are a number of dwellings and the village school is also located there. As such, this area is one of the main focal points for the village. Whilst the northern BUAB is dominated by the garden centre, there remains a clear cluster of dwellings on three sides of the commercial site, again with its own identity, typical of a village. Additionally, it is not agreed that the middle and northern areas have a closer urban and functional connection to Redditch. The band of land between Redditch and Mappleborough Green provides a clear and distinct separation between the two areas sufficient to allow Mappleborough Green to retain a rural feel and separate identity. The land to the west of Mappleborough Green is clearly greenfield in nature and not 'built-up' and as such would not comply with the BUAB assessment criteria for inclusion. The land is also being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>41. Noted.</p> <p>42. The land parcels being promoted through this representation are in agricultural use, therefore greenfield in nature and as such do not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed that the four land parcels should be included within the BUAB for Hampton Lucy. The representation refers to the land parcels being promoted as a Reserve Sites. Even if any of the sites were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>43. The former bowling green on the edge of the village of Halford is greenfield in nature and is not 'built-up'. For this simple reason, the inclusion of such a site would not comply with the assessment criteria for including land within a proposed BUAB and it is not proposed to amend the BUAB for this reason. The land is also being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p> <p>44. The BUAB between the property known as 'Four Winds' and Home Farm follows the northern curtilage boundary has been created through the recent grant of planning permission [ref: 18/00917/FUL] for a single dwelling, which is deemed to be an appropriate approach by officers. To include any additional land which would be classified as greenfield in nature [and certainly not domestic/residential curtilage] would not meet the assessment criteria for including land within a proposed BUAB. It is not agreed that any additional land in this locality should be included within the BUAB for Loxley.</p> <p>45. The land promoted through this representation is greenfield in nature and as such does not comply in any way with the assessment criteria for including land within a proposed BUAB. For this simple reason, it is not agreed to include the site within the BUAB for Halford. It is understood that this parcel of land is also being promoted as a Reserve Site. Even if the site were successful in being included within the SAP as a Reserve Site in the fullness of time, the land would still remain outside the settlement boundary due to the fact the land should only be released in accordance with the specific circumstances set out in Core Strategy Policy CS.16 D.</p>

No.	Source	Comment
<p><b>Officer Recommendation</b></p> <ul style="list-style-type: none"> <li>• Exclude two parcels of non-domestic greenfield land associated with the property known as 'The Hermitage' on the eastern edge of Priors Marston from the village BUAB.</li> <li>• Extend the BUAB at Gaydon to include the lawful curtilage associated with Ellis Engineering at Gaydon farm.</li> <li>• Extend the BUAB at Gaydon to include the modern agricultural buildings at Manor Farm.</li> <li>• Include The Old Vicarage and land associated with successful planning application ref: 17/00307/FUL for 2 dwellings within the BUAB for Gaydon.</li> <li>• Extend the BUAB for Gaydon to include the domestic land associated with Poplars Farm on the southern edge of the village.</li> <li>• Extend the BUAB for Lighthorne to include the land associated with successful planning application ref: 17/03344/OUT for 3 dwellings.</li> <li>• Extend the BUAB for Bearley to include an 'island' comprising the community and commercial sites on the Snitterfield Road to the west of the village.</li> </ul>		

**Topic: Part 3 Specific Sites - General**

No.	Source	Comment
1	Hampton Lucy Parish Council	Hampton Lucy Parish Council considers that it is unable to comment on Part 3 Site Location Plans except for the University of Warwick campus at Wellesbourne.
2	Turley on behalf of St Modwen	The approach of the SAP to not include specific sites listed within Policy AS.11 of the Core Strategy is flawed.
3	DLP on behalf of Coln Residential	DLP welcome the specific allocation of this range of employment, education and regeneration site opportunities.
4	Warwickshire County Council	Any sites released must provide safe access and any appropriate highway safety mitigation measures.
<p><b>Officer Response</b></p> <p>Comments 1 and 2 do not require a response.</p> <p>No.2 – various sites listed in Policy AS.11 have been assessed in preparing the SAP.</p> <p>No.4 – this is acknowledged.</p>		
<p><b>Officer Recommendation</b></p> <p>None</p>		

**Topic: Part 3 Specific Sites - Question 3.1 South of Alcester Road, Stratford-upon-Avon**

No.	Source	Comment
1	Anna Corser	Agree - no further comment
2	Susanne Farmer	Agree - no further comment
3	Paul Dunster	Support – no further comment
4	H Farmer	Support – no further comment
5	Bidford-on-Avon Parish Council	Support - no further comment
6	TDH Estates on behalf of Philip Baker Trust	<p>We act on behalf of the beneficiaries of the former Philip Baker Trust, owners of land in the north western part of Stratford town, having previously sold land for the development of houses at Alcester Road and the allocated SUA.2 site. They retain an interest in the SUA.2 site but also own land to the north east and south east of the Wildmoor Roundabout. Accordingly the Trust wish to comment on the proposed changes to Proposal site SUA.2 and to the identification of reserve sites.</p> <p>The majority of this site was allocated in the Core Strategy for Class B1 uses and the relocation of businesses from the Canal Quarter. The Trustees were represented at the Examination in to the Core Strategy arguing that the proposed policy was too restrictive and unworkable. As such the proposed changes more closely align with the case put forward at the Examination and are therefore supported as it is considered that they are likely to assist in bringing the site forward and achieving the original objectives.</p> <p>The SAP proposes to allow the full “traditional” range of employment uses, i.e. B1, B2 and B8, rather than just B1(a) with perhaps the other sub categories of B1(b) and B1 (c). Both the policy as originally formulated and now suggested to be amended allow businesses to relocate from the Canal Quarter Regeneration Zone, which area includes uses beyond B1(a), (b) and (c). The distinction had been justified as reserving part of the site to meet the identified need for 5-10 ha of business park uses - instead it is now proposed to require “a thorough marketing exercise to seek to attract Class B1 (a) office uses to the site”. This as worded would then apply to the whole site rather than just to seeking to satisfy the business park element.</p> <p>The inclusion of car dealerships as a potential use is also supported - such uses are commonly found in employment areas given the area of land that can be required; there are of course such uses within the Canal Quarter Regeneration Zone. The site seems eminently well suited for this use given its location next to the A46.</p> <p>Finally the addition of reference to “bulky goods retail store” is also supported subject to sequential and impact tests. It is however arguable that the SAP process should test whether such a proposal is in accordance with the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>sequential and impact tests now. Paragraph 23 of the NPPF includes the statement that in drawing up local plans, local planning authorities should</p> <p>“allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential uses...it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability”</p> <p>It would appear perverse for a proposal in the adopted development plan to be subject to caveats that go to the principle of the development - para 26 of the NPPF makes it clear that it does not expect the sequential and impact tests to apply to proposals in an up to date development plan.</p>
7	Kate Bryan	Support - no further comment
8	Caroline Dunster	Support - no further comment
9	Tim Pollard	Support - no further comment
10	Gladman Developments	<p>Gladman note the changes proposed to the above policies, and have no issue in principal with what the Council is proposing. However, it is important for the Council to consider what the consequential actions of the proposals may be. The Canal Quarter is identified as being capable of delivering 652 dwellings according to the Core Strategy, it will be important that if the Council makes these changes it evidences that the delivery of what is envisaged in the Core Strategy can still be delivered and that the proposed regeneration of the Canal Quarter can still move forward and be delivered without impacting on the operation of existing businesses which have no desire to be relocated.</p>
11	Turley on behalf of IM Properties	<p>IM Properties broadly support the proposed changes to Proposal SUA.2 South of Alcester Road, Stratford-upon-Avon as set out at paragraph 3.6 of the Paper.</p> <p>We discuss in further detail below the reasons why an updated Proposal SUA.2 is necessary to ensure delivery of the Council's spatial strategy, in line with the matters identified as relevant at paragraph 3.3 of the Paper.</p> <p><b>a) The housing component has now been granted planning permission and is being implemented. Consequently, it can be deleted from any revised allocation. Accordingly, a revised boundary to Proposal SUA.2 is shown in Appendix G.</b></p> <p>IM Properties agree with the reasoning as set out by the District Council to amend the boundary of Proposal SUA.2 in light of the housing component attaining full planning permission (15/03408/FUL) for the erection of 68 dwellings in September 2015.</p> <p><b>b) Liaison with the County Highway Authority has shown that an access off Wildmoor Roundabout or the proposed Western Relief Road is unlikely to be acceptable. As a result an alternative access off the A46 is now being pursued with Highways England. It would be appropriate to reflect all these</b></p>

No.	Source	Comment
		<p><b><i>options in a revised allocation to provide flexibility.</i></b></p> <p>IM Properties support the amendment to the specific requirement of Proposal SUA.2 which now seeks vehicular access directly off the A46, or Wildmoor Roundabout or proposed Western Relief Road. The amendment offers sufficient flexibility and is consistent with paragraph 14 of the NPPF, which states that plan-making should meet objectively assessed need (either housing or employment land), with sufficient flexibility to adapt to rapid change.</p> <p>To reinforce matter (b) as identified by the District Council, IM Properties are in continual discussions with Highways England and Warwickshire County Highways regarding a proposed new roundabout access to the site from the A46. These discussions are taking place in light of further technical work to support the hybrid planning application which has demonstrated that an access off the Western Relief Road or the Wildmoor Roundabout is not feasible for reasons set out below:</p> <ul style="list-style-type: none"> <li>• The District Council has confirmed that the original policy wording only envisaged access from the Wildmoor Roundabout in the event that the Western Relief Road did not come forward (i.e. as a fourth arm on the existing roundabout rather than a fifth arm on an improved roundabout). There now appears to be much more certainty that the Western Relief Road will be delivered. Accessing the site via a fifth arm as part of enhancement works at Wildmoor Roundabout is not deliverable for reasons including design, cost and timing of delivery. Specifically, it would require the roundabout to be enlarged significantly in order to provide sufficient separation between arms, requisite visibility splays and suitable entry path radii. In any event, such an option is in direct conflict with the approved four arm option that it being pursued by Bloor Homes.</li> <li>• The site has only limited site frontage to the Western Relief Road. Due to junction spacing and forward visibility requirements any site access on the Western Relief Road would need to be positioned towards the southern end of the site. The topography of the south east corner of the site, which is considerably lower than the consented Western Relief Road, presents a technical challenge in terms of achieving a suitable road gradient.</li> <li>• An access in the form of a simple priority junction has been considered and has been demonstrated to provide insufficient capacity to accommodate the site allocation.</li> <li>• A priority junction incorporating a ghost-island right-turn lane has been drawn to a conceptual level of detail. It would require widening of the Western Relief Road which is not in IM Properties control. Irrespective of these technical and legal constraints, such a junction is similarly not considered to be of sufficient magnitude to accommodate the level of traffic associated with IM Properties' development proposals. A higher order junction (i.e. a roundabout) would be required.</li> <li>• Providing another roundabout on the Western Relief Road would require the realignment of the consented relief road and would also require third party land to the south. These constraints make such an option undeliverable.</li> <li>• In addition, and importantly, a Severn Trent water main needs to be diverted along the eastern boundary of the site and maintained at a similar level to the existing main. This presents a major challenge to providing access to the site via the Western Relief Road.</li> </ul> <p>On this basis, IM Properties consider that access directly from the A46 represents the most feasible access</p>

No.	Source	Comment
		<p>option and support the policy amendment.</p> <p><b><i>c) Latest evidence has shown there is limited demand in the Stratford-upon-Avon area for Class B1(a) office. On that basis, it would seem appropriate to provide greater flexibility regarding the nature of employment uses that would be acceptable on this site to include manufacturing (Class B2) and logistics (Class B8). However, it remains important to seek to attract office-based companies to the town and this site remains a key opportunity for doing so due to its location and image.</i></b></p> <p>IM Properties support the amendment to the composition of employment uses to include potential for B2 (General Industrial) and B8 (Storage and Distribution) in addition to B1 (Business).</p> <p>There is limited market demand for B1a (Office) floorspace in the District. This is supported by evidence produced by Colliers International confirming the total take up (both take up of new space and 'churn') amounted to 259,594 sq ft (24,117 sq m) during the period 2004 to 2016, which equates to a total annual take up of 21,632 sq ft (2,010 sq m).</p> <p>The above take up rates clearly indicate that the strength of interest for B1 uses at the scale envisaged by Proposal SUA.2 as worded in the Core Strategy is significantly over estimated and is insufficient to provide an investor/developer with the confidence to make the initial significant upfront investment in the site preparation and infrastructure works required to bring the site forward early (and to thus provide a 'relocation site'). In this regard, the policy is contrary to paragraph 173 of the NPPF.</p> <p>The District Council should note that whilst Proposal SUA.2 as currently worded states that "<i>up to 10 hectares will be released</i>" for B1a/b uses, the explanatory text at paragraph 6.1.26 of the Core Strategy clarifies that the B1 allocation is between 5 and 10 hectares. When considering the historical take up of B1 floorspace, even the lower provision of 5 hectares would provide an excessive pipeline for new build floorspace within the plan period.</p> <p>The Illustrative Masterplan submitted with the hybrid planning application proposed a total of 140,000 sq ft of office floorspace. Based on an ambitious view of 10,816 sq ft new take up per year this could provide approximately 13 years of supply based on historic trends.</p> <p>It must also be noted that as part of the pre-application discussions informing the pending hybrid planning application, the District Council appointed independent advisors to assess the viability of Proposal SUA.2 as worded in the Core Strategy. The viability appraisal tested the policy requirements as set out in Proposal SUA.2 and concluded the employment mix as adopted in the Core Strategy is unviable.</p> <p>Given the above, IM Properties welcome the flexibility within the policy regarding the employment use composition, which will ensure the site and associated social and economic benefits can be delivered.</p> <p><b><i>d) There is known to be strong interest from a number of car dealerships to locate on the site. Facilitating this may also prompt certain car dealerships on the Canal Quarter to relocate to this site which would help to deliver the Regeneration Zone.</i></b></p> <p>IM Properties can confirm that there is strong market interest from a number of car dealerships to locate to the site, which includes interest from car dealerships currently located within the Canal Quarter.</p> <p>It is considered that the site offers the opportunity for an agglomeration of car dealerships which could bring</p>

No.	Source	Comment
		<p>together a number of reputable occupiers, consumers and workers to create a strong local market. This could prompt further car dealerships to locate to the site from the Canal Quarter helping to deliver the regeneration zone.</p> <p>IM Properties welcome the inclusion of car dealerships on a maximum of 7 hectares in the composition of uses. This amendment responds to known occupier requirements and reduces the uncertainty of delivering Proposal SUA.2 as worded in the Core Strategy. The amendment will support viability of the site and in light of the considerable upfront infrastructure investment is necessary.</p> <p>The amendment aligns with paragraph 158 of the NPPF, in which a local planning authority should ensure that their assessment of and strategies for employment and other uses are integrated and take full account of relevant market and economic signals, such as strong occupier interest.</p> <p><b><i>e) Discussions with businesses on the Canal Quarter have revealed that there is limited interest in relocating to this site, and far less than the 13 hectares envisaged for this purpose in the existing Core Strategy allocation.</i></b></p> <p>IM Properties welcome the deletion of the following text from Proposal SUA.2 as worded in the Core Strategy: <i>“During the plan period up to 10 hectares will be released, plus additional land to correspond with the area taken up by businesses relocating from the Regeneration Zone.”</i></p> <p>The District Council is currently consulting on the Canal Quarter Regeneration Zone Framework Masterplan SPD, which provides a framework to guide the regeneration and renewal of the zone. A supporting Noise Analysis Technical Work Paper was presented to Cabinet on 27 November 2017, which stated the following at paragraph 1.2:</p> <p><i>“The Canal Quarter site includes land parcels in different land ownerships, including Stratford-on-Avon District Council. Many of these land parcels are occupied by commercial tenants including manufacturing, offices, distribution as well as car sales and repairs. These occupiers will need to be relocated as part of the regeneration programme. However, some occupiers may wish to remain and their existing operations will therefore need to be accommodated in the redevelopment proposals.”</i></p> <p>The Cabinet Report and the SPD do not provide any indication on which businesses wish to relocate to either Proposal SUA.2 or Proposal SUA.4. In addition, paragraph 4.2 of the SPD sets out that: <i>“it is likely that the Canal Quarter will be developed piece-meal or in a ‘jigsaw’ fashion, with individual land parcels being brought forward by individual landowners”.</i></p> <p>In conjunction with the preparation of the SPD, IM Properties have been undertaking direct discussions with Canal Quarter businesses to establish the quantum of development required to accommodate likely business relocations. Despite the discussions being informative, it is clear that the overall quantum of development required to accommodate relocations is significantly less than the 13 hectares (gross) as set out in Proposal SUA.2 in the adopted Core Strategy.</p> <p>Notwithstanding the above, IM Properties would like to re-assert that there is ample opportunity for existing businesses in the Canal Quarter to be able to relocate to the site and a less restrictive policy will facilitate this by enhancing the deliverability of the site.</p> <p>The amendment aligns with paragraph 158 of the NPPF, in which a local planning authority should ensure that</p>

No.	Source	Comment
		<p>their assessment of and strategies for employment and other uses are integrated and take full account of relevant market and economic signals, such as strong occupier interest.</p> <p><b>f) The District Council wishes to provide an opportunity for a comparison/bulky goods (e.g. DIY) retail store to relocate within the town.</b></p> <p>IM Properties support the amendment to the composition of development uses to include a bulky goods retail store on a maximum of 2 hectares subject to a sequential assessment and retail impact assessment. It is necessary to introduce alternative uses such as A1 (Retail) uses in order to both support a commercially attractive return (to further incentivise development of the site) and to respond to known occupier requirements within the District.</p> <p>The impact of introducing a broader range of uses, including A1 (Retail), has been assessed through a Retail Impact Assessment which supports the pending hybrid planning application. The Retail Impact Assessment assesses the impact in respect of the proposed DIY retail store, and concludes that impact associated with the proposal are limited and represent no adverse harm to the vitality and viability of Stratford town centre, and will not prejudice any future planned investment.</p> <p>The assessment also concludes that there are no sequentially preferable alternative sites which are suitable and available to accommodate the proposed bulky goods store.</p> <p>Given the above, the amendment aligns with paragraph 23 of the NPPF in that Proposal SUA.2 will be an appropriate site for a bulky goods store which is in an accessible location, well connected to the town centre.</p> <p><b>Conclusion</b></p> <p>Since the adoption of the Core Strategy in July 2016 and throughout the pre-application stage to the recently submitted hybrid application (Ref: 17/03629/OUT), IM Properties has assessed in detail the feasibility and viability of Proposal SUA.2 and its constituent requirements, particularly in terms of the mix and quantum of uses set out in Proposal SUA.2 and the relocation of businesses from the Canal Quarter Regeneration Zone. This work has culminated in the submission of an application which demonstrates that the ambition of Proposal SUA.2 can be met through a more flexible approach to the composition of uses. This is in order to support the delivery of development and to realise the vision and strategic economic objectives of the adopted Core Strategy.</p> <p>As set out in paragraph 21 of the NPPF, policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. In addition, paragraph 173 of the NPPF, makes it clear that when pursuing sustainable development careful attention should be made to viability and costs in plan-making and decision-taking. Given this national policy context - IM Properties welcome the amendments as set out in the Paper.</p> <p>We trust that the information provided within these representations sets out clearly the support for the amendments to Proposal SUA.2 in the Site Allocations Plan.</p>
12	Monica Fogarty (Warwickshire County Council)	<p>1. Providing that suitable and safe access arrangements can be found, we support this arrangement.</p> <p>2. We note the retail/bulky goods allocation. The County Council as the Highway Authority would wish to see any</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment				
		<p>application supported with a robust retail impact analysis and gravity model of catchment areas for bulky goods. Our experience indicates that the catchment areas for these uses are considerably wider than just the Town. We would want this considered in the traffic impact analysis for this area.</p> <p>The District Council should also satisfy itself that any planning condition specifying “bulky goods” can be legally supported as appropriate in managing retail in this location.</p>				
13	DLP Planning on behalf of Talbot Homes	Support - no further comments				
14	John Holden	Stratford road infrastructure unable to cope with large development in the town.				
15	Carol Allen	Support - no further comment				
<p><b>Officer Response</b></p> <p>Nos.6/12 – a Retail Assessment accompanies the planning application that has been submitted for the site. It shows there are no sequentially preferable and available sites in the town for a bulky goods retail store and that such a store on this site would cause no harm to the vitality and viability of the town centre.</p> <p>No.14 – the impact of developing this site for business uses was assessed during the production of the Core Strategy. The proposed development will be expected to make the necessary improvements to the road network.</p> <p>All other comments are noted but no specific response is required.</p>						
<p><b>Officer Recommendation</b></p> <p>That the proposed amendments to Proposal SUA.2 in the Core Strategy are confirmed as set out below.</p> <table border="1" data-bbox="376 1198 1749 1347"> <tbody> <tr> <td data-bbox="376 1198 808 1299">Where it is to be delivered</td> <td data-bbox="808 1198 1749 1299">South of Alcester Road Approx. <del>23</del> 25 hectares (gross)</td> </tr> <tr> <td data-bbox="376 1299 808 1347">What is to be delivered</td> <td data-bbox="808 1299 1749 1347">Employment uses comprising:</td> </tr> </tbody> </table>			Where it is to be delivered	South of Alcester Road Approx. <del>23</del> 25 hectares (gross)	What is to be delivered	Employment uses comprising:
Where it is to be delivered	South of Alcester Road Approx. <del>23</del> 25 hectares (gross)					
What is to be delivered	Employment uses comprising:					

No.	Source	Comment
		<p>1. <u>Employment uses within Classes B1 (Business), B2 (General Industrial and B8 (Storage and Distribution)</u>                      Class B1(a) office and Class B1(b) research and development uses, although scope for B1(c) light industry will be considered</p> <p>2. Relocation of businesses from the Canal Quarter Regeneration Zone</p> <p>3. <u>Car Dealerships on a maximum of 7 hectares</u></p> <p>4. <u>Bulky goods retail store on a maximum of 2 hectares, subject to a sequential assessment and retail impact assessment</u></p> <p><del>During the plan period up to 10 hectares will be released, plus additional land to correspond with the area taken up by businesses relocating from the Regeneration Zone.</del></p> <p><del>Housing – approx. 65 dwellings on land to the east of the Western Relief Road</del></p>
	When it is to be delivered	Phases 2 - 4 (2016/17 - 2030/31)
	How it is to be delivered	Private sector
	Specific requirements	<ul style="list-style-type: none"> <li>• <del>vehicle access to the employment development</del> directly off <u>the A46, or Wildmoor Roundabout or proposed Western Relief Road</u></li> <li>• improvements to Wildmoor Roundabout as required by Highways England</li> <li>• provision for improvements to A46 adjacent to the site as required by Highways England</li> <li>• extensive landscaping on the southern and western boundaries of the employment development</li> <li>• appropriate treatment and management of mature hedgerows along road frontages</li> <li>• protect and enhance ecological features</li> <li>• frequent bus service into the development</li> </ul> <p><u>A thorough marketing exercise to seek to attract Class B1(a) office uses to the site.</u></p> <p><u>An effective mechanism to ensure that sufficient opportunity is provided for businesses to relocate from the Canal Quarter to the site.</u></p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>If a plot that has been developed on that part of the site allocated for the relocation of businesses from the Canal Quarter Regeneration Zone becomes available it should be marketed for a period of three months in order that another business in the Regeneration Zone has the opportunity to take it up. This provision will be applied for a period of two years from when that plot was originally implemented.</p>

**Topic: Part 3 Specific Sites – Question 3.2 Atherstone Airfield**

No.	Source	Comment
1	Anna Corser	My main concern is screening of any new units and also increased traffic when that is already happening with Long Marston Airfield development.
2	Susanne Farmer	Support – no further comment
3	Alderminster Parish Council	No. There is no inclination amongst business owners in the Canal Regeneration Zone to relocate to Atherstone Airfield. Any businesses choosing to relocate would of necessity either come from elsewhere in the District, or more likely, from outside the District. There would need to be significant improvement to the road system for this proposal to be implemented. In its current state, the A3400 cannot accommodate the increased volume of traffic. Alderminster Parish Council has concerns already about the large number of HGVs using New Road to gain access to the A3400. This road is unsuitable for HGVs and an increased number of vehicles would exacerbate the problem. We understand that the link road between the Waitrose roundabout and the A422 to Banbury was designed to accommodate heavy goods vehicles, but vehicles approaching from the south do not use it, preferring New Road instead.
4	Harry Rowe (Stratford Ramblers)	Support - Provided ROW passing near Ailstone Farm is retained or diverted to retain its rural character as far as possible.
5	Paul Dunster	Support – no further comment
6	H Farmer	Support – no further comment
7	Bidford-on-Avon Parish Council	Support – no further comment
8	Kate Bryan	Support – no further comment
9	Clifford Chambers and Milcote Parish Council	<p>1) Whilst the site is available, development should be to the south and east of the existing development as this is the actual footprint of the old airfield, encroachment on greenfield land to the frontage of the A3400 has an impact on residential properties and a visual impact on the gateway to Stratford upon Avon.</p> <p>2) No development should be put forward until we have a road network to accommodate the increase in traffic movements. The statement of good location to an A road is contrary to good site locations for industrial development as they should be in easy access of our motorway networks. This type of development would be better positioned to the north of Stratford.</p> <p>3) We have seen that there is no interest from businesses who would be willing to locate to this area. We have not seen any prospective call or demand from the private sector, or any reports from the Chamber of Commerce or Advantage West Midlands. There has not been a demand for MNF / or science and technology sites in this</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>area within the last 20 years. Stratford previously had 120 MNF companies, many who have left and relocated to other parts of Warwickshire and the West Midlands due to high cost of land, lack of affordable housing, poor road networks, lack of West Midlands’s authorities support, skill shortages and lack of training in colleges and local Universities. Typically, the largest MNF business in the canal quarter of Stratford is re-locating to Banbury as the site was not suitable for these reasons. We therefore believe that this proposed extension of the industrial area should not be included unless proof of need can be established and the location be reviewed in line with the comments above.</p>
10	JLL on behalf of Alscot Estate	<p>These changes are fully supported by Alscot Estate. However, having reviewed matters, Alscot Estate considers there is further scope to simplify and improve the proposal to the benefit of businesses in the region and the economic wellbeing of the District.</p> <p>The current proposal allocates half the site (5 hectares net) and reserves the remainder (5 hectares net), with this reserve to be released ordinarily only at a point where it is demonstrated that there is insufficient land, either quantitatively or qualitatively, at either Proposal SUA2 (South of the Alcester Road) or in the first phase of Proposal SUA4 to meet the needs of the Canal Quarter or businesses elsewhere in the District. Alscot Estate is no longer convinced that there is a compelling justification for this approach and that it would be better, in terms of positive plan-making, to allocate the whole site (i.e. 10 hectares net) and remove the notion of half of the site being reserved.</p> <p>JLL have produced a separate short statement setting out the proposed changes to Proposal SUA4 and set out the principal reasons for making these changes.</p> <p>Alscot Estate has been in dialogue with Stratford Upon Avon District Council since the adoption of the Core Strategy concerning proposed changes to Proposal SUA4. These discussions have led to the changes proposed by the Revised Scoping and Initial Options, which provide greater flexibility in terms of serving the needs of businesses. Specifically, the proposed changes widen the geographical scope of need to take in, ordinarily, businesses within the District (as opposed to just those in the Canal Quarter) and, exceptionally, businesses outside the District where it will facilitate the relocation of businesses either in the Canal Quarter or elsewhere in the District.</p> <p>These changes are fully supported by Alscot Estate. However, having reviewed matters, Alscot Estate considers there is further scope to simplify and improve the proposal to the benefit of businesses in the region and the economic wellbeing of the District.</p> <p>The current proposal allocates half the site (5 hectares net) and reserves the remainder (5 hectares net), with this reserve to be released ordinarily only at a point where it is demonstrated that there is insufficient land, either quantitatively or qualitatively, at either Proposal SUA2 (South of the Alcester Road) or in the first phase of</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Proposal SUA4 to meet the needs of the Canal Quarter or businesses elsewhere in the District. Alscot Estate is no longer convinced that there is a compelling justification for this approach (for the reasons set out below) and that it would be better, in terms of positive plan-making, to allocate the whole site (i.e. 10 hectares net) and remove the notion of half of the site being reserved.</p> <p>The principal reasons for this approach can be summarised as follows: -</p> <ul style="list-style-type: none"> <li>• The rationale for the reserve is no longer relevant, particularly in respect of the Canal Quarter, having been overtaken by events.</li> <li>• There is an ever pressing, if not greater, shortage of new industrial premises and development land serving the District, particularly in the town of Stratford.</li> <li>• Proposal SUA2 has become a more commercial, rather than employment, based allocation.</li> <li>• Development of Atherstone Airfield will have large upfront costs and could require a greater critical mass in order to be viable.</li> <li>• The current proposal could lead to a piecemeal development, rather than comprehensive delivery of the proposed Master Plan for the whole site.</li> <li>• The proposed revision will help to foster economic growth in the District and would represent positive planning for the area.</li> </ul> <p>The diminishing relevance of the Canal Quarter to the allocation of both Proposal SUA2 and SUA4 is recognised by the District Council in the current proposed changes to both proposals (with reference to paragraphs 3.2, 3.3 (e) and 3.8 of the Revised Scoping and Initial Options). Specifically, it would appear interest from businesses currently located in the Canal Quarter to relocate to either Proposal SUA2 or SUA4 is limited, although this is yet to be tested by the market.</p> <p>Conversely, there is much greater recognition from the District Council than previously that there is a chronic shortage of industrial premises in Stratford town and the wider District.</p> <p>The development of the Canal Quarter will exacerbate this shortage. Indeed, the lack of suitable and available industrial premises and associated available and deliverable development land in Stratford and the wider District has already led to disinvestment by major occupiers (e.g. DCS relocating to Banbury).</p> <p>The lack of suitable industrial premises has been recognised also at a sub-regional level. As a response, the six local planning authorities which make up the Coventry and Warwickshire Housing Market Area and the Coventry and Warwickshire LEP have decided to commission a study on employment market signals. The scope to this study refers to</p>

No.	Source	Comment
		<p><i>"Maintaining a varied supply of employment sites that include both high quality sites and more affordable premises is critical for ensuring the sub-region remains competitive and attractive as a prime business location that enables new business to start up, existing business to grow and established business to move to the area."</i> (paragraph 2.2 to the Project Brief).</p> <p>One of the principal issues addressed by the scope of this study it to understand how current and anticipated supply of employment land meets the needs of the market in terms of a quality and affordability. The LEP (along with the Chamber of Commerce) has identified a shortage of industrial premises across the spectrum (i.e. from new to old) as a particular concern. This has led to a lack of churn of industrial units, which in turn has frustrated the growth of many businesses in the sub-region.</p> <p>The principal reason for the limited churn is the relative lack of development of new industrial units, particularly those in the sub 25,000 sq ft size range. This lack of development is generally because of a very cautious approach by developers to speculative development of this type and size of unit, with viability often marginal due to escalating costs of raw materials (e.g. steel). Such development often requires financial assistance, either through direct grant from the LEP or other sources, or through economies of scale (i.e. being cross subsidised by value generating bigger units).</p> <p>An injection of new industrial units into the wider supply would release older and more affordable units, through established businesses taking the new premises. The older more affordable units would then be free for less well established businesses to take. This would improve the balance between supply and demand considerably, essentially lubricating the wheels of the market for industrial premises.</p> <p>To achieve this end requires a greater range and choice of industrial development land. Moreover, the identified land needs to be as unconstrained and unfettered as possible, with no unnecessary requirements or qualifications in terms of planning policy.</p> <p>Such an approach has been taken with Proposal SUA2. Here, it is recognised that the link with the Canal Quarter is of less relevance. Proposal SUA2 previously distinguished quantitatively between the area of land for new business growth (10 hectares) and the land to be taken up by businesses relocating from the Canal Quarter (13 hectares). Now, this distinction is no longer drawn. Instead, the reference to the Canal Quarter does not specify any particular quantum.</p> <p>In addition, the proposed changes to Proposal SUA2 provide far greater flexibility and breadth for permissible uses. Previously, Proposal SUA2 provided for B1 uses (to provide for growth) and the relocation of businesses from the Canal Quarter. Now, the policy takes in B2, B8, car dealerships and bulky goods retail (A1). This mix of uses provides a much more commercial focus for the site and distinguishes it from the employment focus of Proposal SUA4 - Atherstone Airfield.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The justification for this approach with Proposal SUA2 is provided in paragraph 3.4. Specifically, reference is made to known significant upfront infrastructure, with this including a new access, diversion of a water main and substantial earthworks. It is reasoned that greater flexibility of uses is required in order to deliver the site.</p> <p>Similarly, Proposal SUA4 has a number of infrastructure requirements in order to deliver the site. These include reinforcement of electricity and drainage networks, the completion of the improved road access to Shipton Road, and landscaping (including bunding and tree planting).</p> <p>These will all represent abnormal costs which may affect the viability of the development, depending on the scale of the end development, how the development is phased, and the certainty which can be attached to the current “reserve” area. These are all critical issues, as the upfront costs will be more affordable with a maximum, as opposed to a constrained, level of floor space.</p> <p>The current approach of half allocation half reserve could also compromise implementation of the cohesive Master Plan of the Airfield. It could lead to piecemeal construction, instead of a comprehensive and well planned development.</p> <p>The proposed changes for Proposal SUA4, promoted by Alscot Estate, would simplify and clarify the identification of this strategic employment site for development. It will provide a firmer platform for the submission and consideration of an outline planning application for the whole site, enabling consideration of matters such as scheme layout and infrastructure, in a more comprehensive and co-ordinated manner. Ultimately, it will improve the chances of delivering a high quality development to serve Stratford and foster sustainable economic growth in the District.</p>
11	Caroline Dunster	Support – no further comment
12	Tim Pollard	Support – no further comment
13	Gladman Developments	<p>Gladman note the changes proposed to the above policies, and have no issue in principal with what the Council is proposing. However, it is important for the Council to consider what the consequential actions of the proposals may be. The Canal Quarter is identified as being capable of delivering 652 dwellings according to the Core Strategy, it will be important that if the Council makes these changes it evidences that the delivery of what is envisaged in the Core Strategy can still be delivered and that the proposed regeneration of the Canal Quarter can still move forward and be delivered without impacting on the operation of existing businesses which have no desire to be relocated.</p>

No.	Source	Comment
14	Warwickshire County Council	This is a matter for the Local Planning Authority to determine.
15	DLP Planning on behalf of Talbot Homes	Support – no further comments
16	John Holden	Support – no further comments

**Officer Response**

Nos.3/9 – the principle of the proposed scale of additional business development on the site has already been established by the Core Strategy. Any specific traffic and other impacts relating to specific occupiers will need to be assessed through the planning application process.

No.9 – it is not intended to increase the amount of land identified for business uses only to provide more flexibility in the types of businesses that would be appropriate.

No.10 – the promoters of the site have set out a comprehensive case for providing greater flexibility in the policy regarding appropriate uses and phasing of development. It is evident from the District Council’s discussions with the Coventry & Warwickshire LEP that further provision needs to be made for business development and growth in order to support the local economy. This is acknowledged in the emerging Industrial Strategy for the District. The provision of new business units on this site would provide scope for local companies to expand and release existing units for new occupiers. A more flexible approach to the implementation of the site will provide more scope for investment in the necessary infrastructure. This is reflected in the amended version of Proposal SUA.4 set out below under Officer Recommendation.

No.13 – proposals for the redevelopment of the Canal Quarter are progressing quicker than is anticipated in the Core Strategy and the housing trajectory.

All other comments are noted but no specific response is required.

**Officer Recommendation**

That Proposal SUA.4 in the Core Strategy is amended as follows:

Where it is to be delivered	Atherstone Airfield, east of Shipston Road, <u>Atherstone</u> -on-Stour  Approx. <del>10</del> 19 hectares gross ( <del>5</del> 10 hectares net) <del>plus a 'reserve' of approx. 9 hectares gross (5 hectares net) should it be required,</del> to assist in the
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No.	Source	Comment
		<p>delivery of the Canal Quarter Regeneration Zone (see Proposal SUA.1) <u>and the needs of businesses elsewhere in the District.</u></p>
	What is to be delivered	<p>Employment uses comprising:</p> <ol style="list-style-type: none"> <li>1. The relocation of businesses from the Canal Quarter Regeneration Zone <del>falling within Use Classes B1c, B2 or B8;</del></li> <li>2. The relocation of businesses from elsewhere in the District falling within Use Classes B1c, B2 or B8, <u>including those already operating on other parts of Atherstone Airfield (Alscot Estate);</u></li> <li>3. The relocation of businesses from outside the District <u>falling within Use Classes B1c, B2 or B8</u> but only insofar as this would help to facilitate 1. and 2. above. <del>and not in respect of the 'reserve' unless an exceptional justification is advanced as part of a planning application.</del></li> </ol>
	When it is to be delivered	<p>Phases 2 - 4 (2016/17 - 2030/31) <del>subject to the reserve only being released at a point where it is demonstrated that there is insufficient land, either quantitatively or qualitatively, at either SUA.2 or the first phase of this allocation to meet the needs of businesses relocating from the Canal Quarter Regeneration Zone or businesses based elsewhere in the District, or an exceptional justification is proven as part of a planning application.</del></p>
	How it is to be delivered	Private sector
	Specific requirements	<ul style="list-style-type: none"> <li>• improvements to the access off Shipston Road if required in order to achieve a satisfactory access</li> <li>• mitigation to the local road network where identified in a detailed transport assessment which should accompany a planning application</li> <li>• structural landscaping around the boundaries of the site to consolidate and complement that which already exists</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.3 East of Shipston Road, Stratford-upon-Avon**

No.	Source	Comment
1	Anna Corser	Agree – no further comment
2	Susanne Farmer	Agree – no further comment
3	Councillor Justin Kerridge	This should not be identified for employment land.
4	Paul Dunster	Support – no further comment
5	H Farmer	Support – no further comment
6	Simon Allen Associates	<p>We understand you are proposing two site allocation amendments to the adopted Core Strategy and a number of additional site allocations, which we thoroughly commend as the existing Core Strategy provision for business is inadequate and unsuitable.</p> <p>As a local commercial chartered surveying practice, we have many enquiries from both existing occupiers, particularly in what is now known as the Canal Quarter Re-generation Zone who appreciate that it is intended to re-develop this area for mixed use, particularly canal-side residential.</p> <p>They don't have issues with this, but regrettably, they do have issues with the two employment sites which are currently allocated under the adopted Core Strategy, i.e. IM Properties site at Alcester Road and the Alscot Estate at Alscot.</p> <p>Now IM have published their initial Master Plan, it's clear they are looking for large occupiers who can pay a substantial amount of money for a site or a tenancy. The allocation of land is in substantial portions of two to five acres which is excessive for occupiers in the Canal Quarter.</p> <p>The Alscot Estate is serving a good purpose for those businesses who are located there, but regrettably, does not attract current occupiers of the Canal Quarter Re-generation Zone who do not wish to move to a site three miles south of Stratford, as it's not compatible with their business operation.</p> <p>We therefore, commend your incentive to allocate an additional site to the east of Shipston Road, Stratford upon Avon, adjacent to Waitrose, which will have good infrastructure and we believe be suitable for many occupiers currently in the Canal Quarter Re-generation Zone plus new investment to Stratford upon Avon.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		We would be happy to expand on this in more detail should you so require, but otherwise, we feel this is sufficient for you to give favourable consideration to the additional site allocation, to provide the employment land which is so clearly needed in and very near the town boundary.
7	Bidford-on-Avon Parish Council	Support – no further comment
8	Kate Bryan	Object – no further comment
9	Jamie Bryan	Object – no further comment
10	Councillor Peter Moore	I am concerned to see another greenfield site on the edge of town being allocated for development. Something appears to have gone wrong with the idea of businesses relocating from the canal quarter to the two sites allocated for that purpose. There seems little point in having a plan if it is to be altered so quickly. A review is needed to see what action can be taken to persuade businesses to move, so that SUA.5 is not needed.
11	Clifford Chambers and Milcote Parish Council	We cannot believe that this site is being proposed for the relocation of businesses from Stratford. The road system is already at maximum capacity (with or without the Relief Road) this is NOT an industrial area but will become such if this proposal goes ahead. This proposal will be the beginning of commercial creep and together with the Atherstone Airfield industrial site will blight the whole of the south side of Stratford. If this goes ahead, the southern approach will rapidly become another 'Birmingham Road' within the next 10 Years. DO NOT DO IT.
12	Caroline Dunster	Support – no further comment
13	Tim Pollard	Support – no further comment
14	Gladman Developments	Gladman note the changes proposed to the above policies, and have no issue in principle with what the Council is proposing. However, it is important for the Council to consider what the consequential actions of the proposals may be. The Canal Quarter is identified as being capable of delivering 652 dwellings according to the Core Strategy, it will be important that if the Council makes these changes it evidences that the delivery of what is envisaged in the Core Strategy can still be delivered and that the proposed regeneration of the Canal Quarter can still move forward and be delivered without impacting on the operation of existing businesses which have no desire to be relocated.
15	Warwickshire County Council	All traffic and access matters need to be resolved so that we might support this allocation. We will continue to work with the District Council in these matters. We will continue to work with you to identify safe solutions.
16	DLP Planning on behalf of Talbot Homes	Support – no further comment

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
17	Councillor Kate Rolfe	There seems very little point in having included SUA2 and SUA4 in the core strategy for relocation of sites from the canal quarter if we then turn around and say that because some businesses don't like those two sites we are going to include another option. The businesses had an opportunity to object to the Core Strategy at the time. To now include another greenfield site on the edge of town would be wrong. As the consultation states: 3.14 This site is not allocated in the Core Strategy and is in open countryside. On that basis, the development of the site for a business use of this nature would be contrary to the District Council's current planning policies. We do not need or want another industrial/commercial site on the edge of our town. If we were to make this major change to the Core Strategy and council policy then effectively the Core Strategy is rendered meaningless.
18	John Holden	Object - Stratford road infrastructure unable to cope with large development in the town.
19	Carol Allen	Support – no further comment

**Officer Response**

No.6 – while this response supports the proposed allocation it should be emphasised that it is intended to be used for specific companies currently in the Canal Quarter not for the wider relocation of businesses from there.

Nos.10/11/17 – it is recognised that this site is not identified in the Core Strategy for the proposed purpose. However, it is appropriate to consider whether circumstances that have arisen since that Plan was prepared justifies it being allocated in the Site Allocations Plan in order to help deliver another key component of the Core Strategy.

No.14 – proposals for the redevelopment of the Canal Quarter are progressing quicker than is anticipated in the Core Strategy and the housing trajectory.

No.18 – traffic impact will need to be assessed in deciding whether the site should be allocated in the plan.

All other comments are noted but no specific response is required.

No.	Source	Comment
<p><b>Officer Recommendation</b></p>		
<p>That land east of Shipston Road, Stratford-upon-Avon is allocated as Proposal SUA.5 in the Site Allocations Plan as set out below. (See accompanying site plan)</p>		
<p>Where it is to be delivered</p>		<p>East of Shipston Road Approx. 3 hectares</p>
<p>What is to be delivered</p>		<p>The relocation of specific businesses from Wharf Road within the Canal Quarter Regeneration Zone.</p>
<p>When it is to be delivered</p>		<p>Phase 2 (2016/17 – 2021/22)</p>
<p>How it is to be delivered</p>		<p>Private sector</p>
<p>Specific requirements</p>		<ul style="list-style-type: none"> <li>• provision of a satisfactory access off Shipston Road</li> <li>• extensive structural landscaping around the boundaries of the site</li> <li>• disposition of buildings and activities on the site to avoid unacceptable impact on neighbouring residential uses</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.4 Napton Brickworks**

No.	Source	Comment
1	Susanne Farmer	Agree – no further comment
2	H Farmer	Agree – no further comment
3	Bidford-on-Avon Parish Council	Support – no further comment
4	Historic England	The National Record of Historic Environments (NRHE) indicates the presence of potentially important archaeology. As a consequence we would encourage an early involvement of the County Council's archaeological expertise and reference made to Warwickshire's Historic Environment Record.
5	Woolf Bond Planning on behalf of Rockspring Barwood Southam	We object to the proposed allocation of this site on the basis that there are more appropriate deliverable and developable alternative sites available. The supporting text to the Site Allocations Plan refers to the site's over 20 year long planning history and fundamental viability constraints. Footnote 12 to paragraph 47 of the NPPF is clear that in order to be an appropriate location for housing development there must be a reasonable prospect that the site could be viably developed. It follows that the allocation of this site would fail the tests of soundness, on the basis that it would be inconsistent with national policy and unjustified when considered against the reasonable alternative of allocating other sites.
6	Cerde Planning on behalf of Braemar Property Developments	<p>It is acknowledged that the former Napton Brickworks site does constitute brownfield in accordance with the definition in the NPPF. However, there is concern regarding the impact of the development when considering conformity with housing strategy for the district and the weight that should be afforded to the previously developed land argument given the current state of the site.</p> <p>Residential development on the site would be contrary to the housing strategy for dispersal for development across of the district which seeks to apportion development to settlements relative to their size and facilities. Whilst developments should not have to be located immediately adjacent to a settlement where there remains reasonable access to the facilities and services in the settlement, the proposed residential development on the site would be wholly isolated from a reasonable level of facilities and services. The location would not minimise the need to travel by private car nor encourage travel by sustainable means such as by foot or cycle and given the scale of development in Napton-on-the-Hill there is limited opportunity to encourage the use of public transport.</p> <p>There are benefits to the redevelopment of the site as set out in the consultation document including treatment of contamination, cessation of anti-social activities and management and enhancement of existing habitats. These are benefits although independently none are likely to be afforded more than limited weight given the</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>current level of harm caused and especially when considering that the benefits are likely to be only of very local significance as opposed to district or county significance.</p> <p>The extent of the weight that could be afforded to the improvement to the canal environment and the removal of any eyesore in the landscape are also considered to be limited. The site has been cleared and the remnants of built form are largely screened from view due to the topography of the area and intervening vegetation from public viewpoints, including the canal.</p> <p>When considering the likely impacts of residential development it should be considered that there would be significant harm to the character and landscape of the area. Due to the topography of the area, any likely residential development would include a scale of built form which would be greater than the surrounding vegetation and would be highly visible. Residential development would be contrary to the rural setting especially given the separation from, and relatively large size compared to, Napton-on-the-Hill.</p> <p>It is considered that the site would not be suitable for residential development which would undermine the recently endorsed housing strategy within the adopted development plan. Low scale development associated with the canal may be a feasible option that would limit the impact on the landscape and complement the existing tourism facilities in Napton-on-the-Hill.</p>
7	Cerdea Planning on behalf of Kler Group	<p>It is acknowledged that the former Napton Brickworks site does constitute brownfield in accordance with the definition in the NPPF. However, there is concern regarding the impact of the development when considering conformity with housing strategy for the district and the weight that should be afforded to the previously developed land argument given the current state of the site.</p> <p>Residential development on the site would be contrary to the housing strategy for dispersal for development across of the district which seeks to apportion development to settlements relative to their size and facilities. Whilst developments should not have to be located immediately adjacent to a settlement where there remains reasonable access to the facilities and services in the settlement, the proposed residential development on the site would be wholly isolated from a reasonable level of facilities and services. The location would not minimise the need to travel by private car nor encourage travel by sustainable means such as by foot or cycle and given the scale of development in Napton-on-the-Hill there is limited opportunity to encourage the use of public transport.</p> <p>There are benefits to the redevelopment of the site as set out in the consultation document including treatment of contamination, cessation of anti-social activities and management and enhancement of existing habitats. These are benefits although independently none are likely to be afforded more than limited weight given the current level of harm caused and especially when considering that the benefits are likely to be only of very local significance as opposed to district or county significance.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The extent of the weight that could be afforded to the improvement to the canal environment and the removal of any eyesore in the landscape are also considered to be limited. The site has been cleared and the remnants of built form are largely screened from view due to the topography of the area and intervening vegetation from public viewpoints, including the canal.</p> <p>When considering the likely impacts of residential development it should be considered that there would be significant harm to the character and landscape of the area. Due to the topography of the area, any likely residential development would include a scale of built form which would be greater than the surrounding vegetation and would be highly visible. Residential development would be contrary to the rural setting especially given the separation from, and relatively large size compared to, Napton-on-the-Hill.</p> <p>It is considered that the site would not be suitable for residential development which would undermine the recently endorsed housing strategy within the adopted development plan. Low scale development associated with the canal may be a feasible option that would limit the impact on the landscape and complement the existing tourism facilities in Napton-on-the-Hill.</p>
8	Cerdea Planning on behalf of The Darling Family Trust	<p>It is acknowledged that the former Napton Brickworks site does constitute brownfield in accordance with the definition in the NPPF. However, there is concern regarding the impact of the development when considering conformity with housing strategy for the district and the weight that should be afforded to the previously developed land argument given the current state of the site.</p> <p>Residential development on the site would be contrary to the housing strategy for dispersal for development across of the district which seeks to apportion development to settlements relative to their size and facilities. Whilst developments should not have to be located immediately adjacent to a settlement where there remains reasonable access to the facilities and services in the settlement, the proposed residential development on the site would be wholly isolated from a reasonable level of facilities and services. The location would not minimise the need to travel by private car nor encourage travel by sustainable means such as by foot or cycle and given the scale of development in Napton-on-the-Hill there is limited opportunity to encourage the use of public transport.</p> <p>There are benefits to the redevelopment of the site as set out in the consultation document including treatment of contamination, cessation of anti-social activities and management and enhancement of existing habitats. These are benefits although independently none are likely to be afforded more than limited weight given the current level of harm caused and especially when considering that the benefits are likely to be only of very local significance as opposed to district or county significance.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>The extent of the weight that could be afforded to the improvement to the canal environment and the removal of any eyesore in the landscape are also considered to be limited. The site has been cleared and the remnants of built form are largely screened from view due to the topography of the area and intervening vegetation from public viewpoints, including the canal.</p> <p>When considering the likely impacts of residential development it should be considered that there would be harm to the character and landscape of the area. Due to the topography of the area, any likely residential development would include a scale of built form which would be greater than the surrounding vegetation and would be highly visible. Residential development would be contrary to the rural setting especially given the separation from, and relatively large size compared to, Napton-on-the-Hill.</p> <p>It is considered that the site would not be suitable for residential development which would undermine the recently endorsed housing strategy within the adopted development plan. Low scale development associated with the canal may be a feasible option that would limit the impact on the landscape and complement the existing tourism facilities in Napton-on-the-Hill.</p>
9	Napton-on-the-Hill Parish Council	<p>Napton Parish Council agrees in principle that the Brickyard site should be identified as a reserve site but the scale and form of the development must take account of the emerging Housing Needs Survey and Neighbourhood Development Plan.</p>
10	Turley on behalf of St Modwen	<p>The inclusion of Napton Brickworks as a potential specific site within the SAP is not at this stage objected to in principle* - however, the site is being justified for consideration (paragraph 3.26) because it is a large rural brownfield site - and no other LRBS, such as Meon Vale are being considered alongside it. The approach of the SAP is therefore inconsistent and not transparent.</p> <p>Napton Brickworks does have an extensive and complex planning history, and this has been discussed as being a questionable site in terms of delivery at previous planning appeals based on five year housing land supply. Given this history - dating back to planning permissions granted in 1995, it is a concerning decision by the Council to be advocating its delivery as a Reserve Site.</p> <p>The site could come forwards through the planning application process, without the need for identification, and the associated risk of relying upon such a complex site, within the SAP.</p> <p>*We reserve the right to comment further on the site, once further details of the scheme being promoted are available for comment.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
11	Rosconn	<p>Policy AS.11 already provides an adequate policy framework within which to consider any future redevelopment proposals for the site and it is clear from the planning history that this has not prevented schemes coming forward and being approved by the District Council.</p>
12	GVA on behalf of St Philips	<p>The Plan sets out eight potential strategic allocations within the District of Stratford-on-Avon to support continued growth and demand for housing, as outlined in the Core Strategy. It outlines that the site at Former Napton Brickworks comprises extensive areas of concrete hardstanding and remnants of buildings and is therefore considered brownfield land, in line with the definition provided in the National Planning Policy Framework (NPPF) Glossary. Consequently:</p> <p><i>“Development of this brownfield site would bring a range of benefits including: removal of an eyesore in the landscape, treatment of contamination, cessation of anti-social activities, management and enhancement of existing habitats, and improvements to the canal environment.”</i></p> <p>The site is also identified within the Council’s Brownfield Land Register.</p> <p>Policy AS.11 of the Core Strategy provides the basis for considering development schemes for large rural brownfield sites. It establishes a set of criteria against which brownfield sites in the countryside will be assessed to establish their suitability for development. Whilst the provisions of Policy AS.11 relates to development management and therefore decision making, we consider that similar principles would apply to plan making. We have therefore considered the site and proposed development against the various criteria.</p> <p><i>a. The extent to which the nature of the proposed development would be in the national or local interest.</i></p> <p>The site is owned by St Philips, who intend to develop the site out. Thus, the site would deliver a significant number of dwellings which would contribute to the housing supply for the District, and in particular, Napton-on-the-Hill. The quantum of development proposed totals 80 dwellings, which is around the 12%, or 82 dwellings, allocated to Category 2 Villages under Policy CS.15 (Distribution of Development) in the Core Strategy.</p> <p>The site will deliver a mix of house types and has the potential to also provide self-build plots, in line with the national agenda for housing development.</p> <p>The intention will be for the site to deliver affordable housing to assist in meeting local needs.</p> <p>The site provides an opportunity to enhance its relationship with the Oxford Canal by improving the aesthetic and amenity of the canal network. The development will also provide the opportunity for enhanced canal</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>based leisure and creation through the provision of holiday home lets and a Canal and Rivers Trust Visitor Centre.</p> <p>At present, the site is frequented by trespassers who behave in an anti-social manner, including: riding “scrambler” type motorbikes; drinking alcohol; lighting fires; creating noise; and fly tipping. The redevelopment of the site would ensure that anti-social behaviour is removed from the area.</p> <p><i>b. Whether the form and scale of the proposed development could reasonably be provided elsewhere in the District in a manner that is consistent with the overall development strategy set out in this Plan [the Core Strategy].</i></p> <p>There is little opportunity to deliver the scale of development that can be achieved on this site without impacting upon Greenfield or Green Belt land. Similarly, there are no other brownfield sites that are available, in the village of Napton, or which could deliver the level of residential development without having adverse impacts on visual or landscape amenity.</p> <p><i>c. The extent to which the nature of the proposed development would be beneficial compared with the current use and condition of the site.</i></p> <p>The site is currently an eyesore and contributes little to the local environment. Due to its historic use, the land is contaminated and does not provide a pleasant environment for those using the canal network for leisure and recreation. Additionally, the derelict nature of the site lends itself to anti-social behaviour (as detailed above).</p> <p>The redevelopment of the site would see the reclamation and remediation of the land and would create an attractive environment through the development of high quality housing which celebrates the existing natural features on site. By enhancing the relationship of the site with the canal, providing leisure and tourism opportunities and by developing a nature reserve to enhance the site’s ecological value, it would become a valuable asset to the local community.</p> <p><i>d. The scale and nature of impacts, including visual, noise and lights, on the character of the local area and local communities.</i></p> <p>We have undertaken a number of technical assessments to date that have informed the development proposals, including a Landscape and Visual Impact Assessment. This concludes that the redevelopment of the site would have a minor/moderate adverse visual impact from viewpoints close to the site, and a negligible impact from medium and long distance receptors. Mitigation by way of hedgerow and tree retention and planting will further help to reduce the impact.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>With regard to noise, it is considered that the proposed use, residential dwellings (Use Class C3) would cause minimal noise disturbance to the surrounding landscape. Additionally, due to the location of the site, there are limited sensitive receptors within the immediate vicinity, save for the single existing dwelling located adjacent to the site.</p> <p>As indicated in the Vision Document, enclosed, we have undertaken a noise assessment to inform the development proposals. The results of the assessment have helped to inform appropriate mitigation measures to ensure the development proposals take into consideration the neighbouring commercial uses. It confirms that residential amenity can be achieved through simple design principles without compromising the attractiveness of a new scheme or the relationship of new housing with the canal.</p> <p>It is considered that the proposals would have minimal impacts on light, with any proposed lighting across the development being designed in a sensitive manner using the latest columns and lamps.</p> <p>In addition to the above, the sites undulating topography would result in the proposed development being hidden from many local viewpoints. It is therefore considered that the impact on the character of the area and on local communities would be minimal.</p> <p><i>e. The extent to which features that are statutorily protected or of local importance are affected and any impact on them can be mitigated.</i></p> <p>The site is identified as a Local Wildlife Site (LWS) and provides an Open Mosaic Habitat (OMH), a habitat of Principle Importance. Due to the anti- social use of the site and its lack of ecological management the prospects of the OMH thriving are low. The redevelopment of the site would provide an opportunity for habitats to be managed and enhanced. Further, the ecological appraisal concludes that the development would have the potential to address the presumptions against development from Policy CS6 of the Core Strategy ("Natural Environment").</p> <p><i>f. The scope to minimise the need to travel and promote the use of transport other than the private car.</i></p> <p>The site is within walking distance of the village of Napton-on-the-Hill. The village provides a number of services and amenities, including a primary school, church, local shop, post office and café, pubs and independent professional businesses. The proximity of these reduces the need for travel by private car.</p> <p>Sustainable travel options are provided via bus stops within the village. The closest bus stop is situated along the A425 approximately 0.6km from the site. This provides daily services to Leamington Spa via Southam, Bishop's Itchington and Harbury (bus no. 665) and to Daventry via Staverton (bus no. 65).</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>To enhance connectivity of the site to the village, the redevelopment of the site would include the construction of a pedestrian footpath along the A425 connecting from the site to the existing footpath at the entrance to the village. This can be achieved without the need for third party land.</p> <p>It is proposed that a gateway feature would be introduced on the A425 in order to warn vehicles that they are entering a village environment. It is also proposed that the 30 mph speed limited will be extended to the site entrance.</p> <p><i>g. The absence of development on any area of the site liable to flood risk</i></p> <p>The entirety of the site falls within Flood Zone 1 and the redevelopment proposals would manage flood risk from surface water through the inclusion of Sustainable Urban Drainage Systems.</p> <p>As can be seen from the above, it is evident that the land at Former Napton Brickworks provides an opportunity to reclaim and regenerate a brownfield site, improving the gateway to Napton-on-the-Hill. In addition, redevelopment of the site would meet the village's allocated housing need across one site, rather than multiple smaller sites.</p> <p>With this in mind, we support the allocation, in principle, and recommend that the policy wording should include the quantum of proposed development, up to 80 dwellings, associated earthworks and infrastructure, open space, nature reserve, canal enhancements and Canal and Rivers Trust Visitor Centre.</p>
13	Greenwood Planning on behalf of Mr Sanchez and Mr Revill	<p>Some sustainable residential development is supported here, but the site should largely be retained for business uses. It is remote from the village and its services with no safe and convenient walking route between. The neighbouring uses are all businesses which may cause problems for future residents and vice versa. We wonder what marketing and other evidence there is that the permitted development is not viable and whether this might rely on a high assumed land value.</p>
14	Warwickshire County Council	<p>The site has surface water flooding across much of the central portion. Any future application for development here must be supported by both a Flood Risk Assessment and Drainage Strategy detailing how this water will be managed.</p> <p>There is an expectation that discharge rates from brownfield sites will be attenuated to greenfield rates, and that appropriate measures to prevent pollution to receiving waterbodies are put in place.</p>
15	DLP Planning on behalf of Talbot Homes	<p>Support – no further comments</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
16	Canal and River Trust	<p>The Canal &amp; River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”.</p> <p>The site lies to the east of the Oxford Canal which is in a cutting at this point. With any development close the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc and any allocation will need to make an assessment of the potential impacts and ensure that the quantum of development proposed can be achieved without adversely affecting the waterway.</p> <p>Any buildings, construction work or regrading of the land adjacent to the cutting will have the potential to affect the stability of the slope, and consequently the integrity of the canal itself. As you are aware, land stability is a material planning consideration and is referred to in paragraphs 120-121 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public.</p> <p>We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability, and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.</p> <p>The condition of the existing brick and concrete wharf structures which run for a distance of about 180m northwards from the Brickyard Road Bridge along the site boundary need to be assessed as the stability and durability of these hard elements of the offside bank cannot be guaranteed and any mitigation works need to be identified to determine the suitability / viability of the site for the development proposed.</p> <p>It is understood that there is likely contamination present on the site and any development will need to make a full assessment of this and the risks of contaminants being released into the canal. The extent of any remediation / mitigation works and impact on viability need to be considered.</p> <p>The canal is at a lower ground level than the site and therefore there is the potential for drainage to the canal. The drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways. It is important to ensure that no contaminants enter the canal from surface water or foul drainage.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Any surface water discharge to the waterway will require prior consent from the Canal &amp; River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right- where they are granted they will usually be subject to completion of a commercial agreement.</p> <p>The canal setting currently consists predominately of open fields, linear hedgerows, trees, agricultural buildings and small clusters of settlements. The development of the site would alter the current rural setting and any allocation of the site for residential development would need to take this into account.</p> <p>Any allocation will need to assess the above, clearly define the extent of the developable area of the site setting clear parameters to ensure the canal is not adversely affected through impacts to its structural stability, water quality, character, heritage or ecological function.</p>
17	John Holden	Brownfield site – 2 to 3 bedroom homes for local ownership.
<p><b>Officer Response</b></p> <p>No.4 – an assessment of archaeological remains on the site will be expected of the promoter.</p> <p>No.5 – there is no overriding evidence as to why the site would not be deliverable for some form and scale of housing development.</p> <p>Nos.6/7 – there is provision in the Core Strategy, and in national planning policy, for brownfield sites to be utilised for housing development. While it is accepted that Napton Brickworks is in open countryside it is close to Napton-on-the-Hill and less than 3 miles from Southam. On that basis it has reasonable access to a range of shops and services and is on a regular bus service.</p> <p>No.10 – other large brownfield sites, including Meon Vale, have been assessed in preparing the Site Allocations Plan.</p> <p>No.13 – it is evident from the recent planning history for the site that business development is not attractive or viable.</p> <p>No.16 – the issues raised by the Canal and River Trust need to be addressed thoroughly. There is scope for the Trust to play an active part in the development of the site.</p> <p>All other comments are noted but no specific response is required.</p>		
<p><b>Officer Recommendation</b></p>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
That Napton Brickworks is identified in the Site Allocations Plan as Proposal RB.1 for residential development and associated uses as set out below. (See accompanying site plan)		
Where it is to be delivered	Former Napton Brickworks, Daventry Road, Napton-on-the-Hill  Approx. 10 hectares gross, of which approx. 3.5 hectares net for residential development	
What is to be delivered	<ul style="list-style-type: none"> <li>• Housing – approx. 80 dwellings</li> <li>• Public open space</li> <li>• Nature reserve or similar managed ecological area</li> <li>• Mooring points and facilities for canal users (optional)</li> </ul>	
When it is to be delivered	Phase 2 (2016/17 – 2021/22)	
How it is to be delivered	Private sector, Canal and River Trust	
Specific requirements	<ul style="list-style-type: none"> <li>• restrict housing development to the previously developed parts of the site</li> <li>• produce a comprehensive management plan to be implemented for the whole site</li> <li>• undertake comprehensive archaeological, ecological and geological assessments of the site</li> <li>• secure appropriate treatment of any contamination</li> <li>• retain existing hedgerows and trees along site boundaries wherever possible</li> <li>• ensure the former quarry slopes remain stable to avoid slippage</li> <li>• ensure drainage into the canal is regulated and managed</li> <li>• ensure development does not have an adverse impact on the integrity of the canal</li> <li>• design and layout of the development must be well-related to the canal</li> <li>• design and layout of the development must mitigate the noise impacts of adjacent business uses</li> </ul>	

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>appropriate treatment of Brickyard Lane to provide a high quality walking and cycling route to Napton-on-the-Hill</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.5 University of Warwick Campus, Wellesbourne**

No.	Source	Comment
1	Anna Corser	Agree – no further comment
2	Susanne Farmer	This sounds like something I would support but since there is no indication of the scale required, I do not feel I can comment further.
3	Stratford Ramblers	Yes. Investment in R&D is welcome, and support services should supply some local employment. No doubt the route with public access would be retained.
4	Wellesbourne Matters	Wellesbourne Matters is in favour of such a development as there are significant synergies and similar aims and objectives between the proposed Innovation Campus and Wellesbourne Airfield. It must be noted that the proposed Innovation Campus lies adjacent to the approach and departure path of aircraft arriving and departing Wellesbourne Airfield. Any developments such as tall masts etc should be required to demonstrate that they do not restrict the established aviation operations at Wellesbourne Airfield
5	Hampton Lucy Parish Council	Any developments should be within the existing developed site boundary and should not encroach on adjacent farmland.
6	Bidford-on-Avon Parish Council	We support this development which can be of benefit to the District, County and Country.
7	Tony Buckingham	Support – no further comment
8	Sport England	<p>The site contains a playing field which has most recently been marked out for 4 football pitches (7/8, u9/10, U11/12 and adult). The site has also historically contained a cricket pitch. As the site has been used as a playing field within the last five years and the site encompassing at least one playing pitch of 0.2 ha or more, Sport England would be a statutory consultee for any development which would prejudice the use of the playing field. The proposed approach to the site makes no reference to the playing pitches and the extract of Core Strategy Policy AS.9 does not include text related to the need for additional pitches for mini and junior football, cricket and tennis courts in the Wellesbourne area. Given the above Sport England would object to the proposed allocation of the site as there is no supporting information to explain the Council's position on the playing field (and any ancillary facilities), therefore it has been interpreted that if the site was to be allocated for development that no replacement playing field provision would be made.</p> <p>Whilst the protection of the play field (and any ancillary facilities) would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 74 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy. It would be inappropriate at this stage to be prescriptive on the nature of replacement</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		provision until the new Playing Pitch Strategy is completed. Until this is completed, it will not be clear whether it would be suitable to protect the site, replace it with a new playing field on another site or seek financial contributions in lieu of replacement provision towards priority projects that will address community needs.
9	Kate Bryan	Support – no further comment
10	Historic England	<p>Whilst a distance from the site, the landscape setting of the Charlecote estate, nearby conservation areas and individual heritage assets should be considered to ensure the scale and landscape impact of any development is moderated to avoid overdevelopment and an excessive adverse impact.</p> <p>Low rise building height, low level lighting and structural landscaping will help to minimise harm and ensure effective landscape integration.</p>
11	Steve Taylor (Set Design)	Support – no further comment
12	Wellesbourne and Walton Parish Council	The Parish Council welcome the development of the site as a positive move but assert that any such development should be kept within the existing built up areas and not extend into the green spaces.
13	Warwickshire County Council	<p>This is a matter for the District Council to determine. The County Council wishes to see sustainability matters and access arrangements which are suitable for any development.</p> <p>Flood Risk matters Much of the southern portion of the site around the watercourse is within Flood zone 2 and 3; as such, any proposed development should be in consultation with the Environment Agency.</p>
14	DLP Planning on behalf of Talbot Homes	Support – no further comment
15	Tim Pollard	Support – no further comment
16	John Holden	Support – no further comment
<p><b>Officer Response</b></p> <p>No.3 – it is confirmed that the existing footpath through the site should be retained</p> <p>No.4 – the operational requirements of Wellesbourne Airfield will be taken into account in relation to all development proposals for the site.</p>		

No.	Source	Comment										
<p>Nos.5/12 – it is intended that some further development will take place outside the existing built form of the site but it should be designed to minimise impact on the character of the surrounding area.</p> <p>No.8 – it is recognised that the existing playing field should be retained or replaced in a suitable manner.</p> <p>No.10 – it will necessary to ensure that the setting of Charlecote Conservation Area and constituent listed buildings, and Charlecote House and Park are protected.</p> <p>No.13 – the extent of new development should avoid flood zones and/or show how flood risk would be managed on the site</p> <p>All other comments are noted but no specific response is required.</p>												
<p><b>Officer Recommendation</b></p> <p>That land at the University of Warwick Wellesbourne Campus is identified in the Site Allocations Plan as Proposal WELL.1 for the retention and expansion of research and educational uses as set out below. (See accompanying site plan)</p> <table border="1" data-bbox="356 802 1731 1378"> <tbody> <tr> <td data-bbox="356 802 752 951">Where it is to be delivered</td> <td data-bbox="752 802 1731 951">West of Warwick Road, north of Wellesbourne, Charlecote Parish Approx. 38 hectares (gross)</td> </tr> <tr> <td data-bbox="356 951 752 1067">What is to be delivered</td> <td data-bbox="752 951 1731 1067">Innovation Campus for research and education purposes, with associated staff and student accommodation</td> </tr> <tr> <td data-bbox="356 1067 752 1158">When it is to be delivered</td> <td data-bbox="752 1067 1731 1158">Phase 3 - 4 (2016/17 – 2030/31)</td> </tr> <tr> <td data-bbox="356 1158 752 1249">How it is to be delivered</td> <td data-bbox="752 1158 1731 1249">University of Warwick, private sector</td> </tr> <tr> <td data-bbox="356 1249 752 1378">Specific requirements</td> <td data-bbox="752 1249 1731 1378"> <ul style="list-style-type: none"> <li>• mitigate impact on Charlecote Conservation Area</li> <li>• mitigate impact on the setting of Charlecote House and Registered Park</li> <li>• avoid impact on the Scheduled Monument within the site</li> <li>• avoid development on Flood Zone which crosses the site</li> </ul> </td> </tr> </tbody> </table>			Where it is to be delivered	West of Warwick Road, north of Wellesbourne, Charlecote Parish Approx. 38 hectares (gross)	What is to be delivered	Innovation Campus for research and education purposes, with associated staff and student accommodation	When it is to be delivered	Phase 3 - 4 (2016/17 – 2030/31)	How it is to be delivered	University of Warwick, private sector	Specific requirements	<ul style="list-style-type: none"> <li>• mitigate impact on Charlecote Conservation Area</li> <li>• mitigate impact on the setting of Charlecote House and Registered Park</li> <li>• avoid impact on the Scheduled Monument within the site</li> <li>• avoid development on Flood Zone which crosses the site</li> </ul>
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Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• provide extensive landscaping and areas of open space</li> <li>• retain or reposition existing sports pitches on the site</li> <li>• undertake a comprehensive Transport Assessment to establish the nature of highway improvements required</li> <li>• take into account the operational requirements of Wellesbourne Airfield</li> <li>• retain the footpath which passes through the site</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.6 Priory Square, Studley**

No.	Source	Comment
1	Anna Corser	Agree – no further comment
2	Susanne Farmer	Agree – no further comment
3	Councillor Justin Kerridge	<p>Yes. But not for affordable housing in particular. The type of housing is likely to be flats which does not seem best suited for affordable housing which I would prefer to see with some garden space for families. Also there is some issue of air quality which should not be imposed upon tenants without a choice. As free market accommodation the buyer is more able to make the decision on if they want to live there. I would also like to see these flats or houses built to a very high design quality as it is in the very centre of the village and surrounded by views on all sides (High Street, Alcester Road and Marble Alley. High end apartments and town houses seem to be best suited to this area and would not look out of place. It would be highly desirable to include an element of public space in any proposal to allow public to walk from Alcester Road to High Street in a direct and attractive manner. So some open space and landscaping is very important as is retaining some of the view across the site from High street to the countryside East of Studley. This has the potential to improve Studley and make it a more desirable place to stop and shop and live. It is essential that any development fulfils this promise. Employment uses must be considered carefully as it should not become a stop off place for fast food outlets or any other business that would not enhance the overall rejuvenation of Studley business as a whole. Studley is aiming to broaden the diversity of its retail offer and very careful consideration of what is allowed on this site and how it is developed in conjunction with surrounding uses and future plans is essential.</p>
4	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	<p>The site is only suitable providing any new development is sympathetic to, and in agreement with houses and businesses in close proximity/adjacent to the site. The village centre is already has a high housing burden and an increase in density would affect the ambiance of village setting.</p> <p>It would be preferable to allow for small independent businesses/ shops to be facilitated, restoring the high street atmosphere and ambience within the heart of the village. In addition a Village square or similar community area would be ideally situated on this site as a focal point for the Village.</p>
5	Paul Dunster	Support – no further comment
6	H Farmer	Support – no further comment
7	Bidford-on-Avon Parish Council	Support – subject to support from the local community.
8	Tony Buckingham	Support – no further comment

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
9	Historic England	To avoid harm to the setting and significance of No.1 Priory Square (Grade II listed) the design of any future development should seek to respond to this historic context and be suitably integrated within the townscape to an appropriate scale, massing and proportion.
10	Caroline Dunster	Support – no further comment
11	Woolf Bond Planning on behalf of Rockspring Barwood Southam	We object to the proposed allocation of this site on the basis that there are more appropriate deliverable and developable alternative sites available. The supporting text to the Site Allocations Plan refers to the site's long term vacant nature and in turn potential viability constraints. Footnote 12 to paragraph 47 of the NPPF is clear that in order to be an appropriate location for housing development there must be a reasonable prospect that the site could be viably developed. It follows that the allocation of this site would fail the tests of soundness, on the basis that it would be inconsistent with national policy and unjustified when considered against the reasonable alternative of allocating other sites.
12	Tim Pollard	Support – no further comment
13	Rosconn	The site is a brownfield site within the BUAB of an MRC and so it is not considered necessary for the site to be allocated for such uses which are acceptable in principle.
14	Warwickshire County Council	Support – no further comment
15	DLP Planning on behalf of Talbot Homes	Support – no further comment
<p><b>Officer Response</b></p> <p>Nos.3/4 – it is recognised that the nature and design of dwellings and business space will need to be appropriate to the specific characteristics of the site. However, care needs to be taken about being too prescriptive at the outset as this could fetter suitable schemes coming forward.</p> <p>No.9 – it will be necessary to ensure the adjacent listed building is fully taken into account.</p> <p>No.11 – there is no reason to suspect that a viable and deliverable scheme will not come forward.</p> <p>No.13 – the purpose of allocating the site is to encourage a suitable scheme to come forward.</p> <p>All other comments are noted but no specific response is required.</p>		

No.	Source	Comment
<p><b>Officer Recommendation</b></p>		
<p>That land at Priory Square, Studley is identified in the Site Allocations Plan as Proposal STUD.1 for residential and business development as set out below. (See accompanying site plan)</p>		
Where it is to be delivered	Land at Priory Square, Studley  Approx. 0.3 hectares	
What is to be delivered	Residential and commercial uses	
When it is to be delivered	Phase 2 (2016/17 – 2021/22)	
How it is to be delivered	Private sector	
Specific requirements	<ul style="list-style-type: none"> <li>• create a high quality design to enhance the character of the village centre</li> <li>• ensure the amenity of prospective residents is fully addressed</li> <li>• protect the character and setting of the adjacent listed building</li> </ul>	

**Topic: Part 3 Specific Sites – Question 3.7 High Street, Studley**

No.	Source	Comment		
1	Anna Corser	Agree – no further comment		
2	Councillor Justin Kerridge	Definitely		
3	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	This would have a positive effect on the local economy and encourage small business into the area.		
4	Paul Dunster	Support – no further comment		
5	Bidford-on-Avon Parish Council	In principle yes, but this would require support from the local community as well as some investigation as to whether there is a requirement for such a service.		
6	Caroline Dunster	Support – no further comment		
7	Tim Pollard	Support – no further comment		
8	Warwickshire County Council	Support – no further comment		
9	DLP Planning on behalf of Talbot Homes	Support – no further comment		
<p><b>Officer Response</b></p> <p>All the comments are noted but no specific response is required.</p>				
<p><b>Officer Recommendation</b></p> <p>That land at the former Studley Centre south of High Street is identified in the Site Allocations Plan as Proposal STUD.2 for a business start-up centre as set out below. (See accompanying site plan)</p> <table border="1" data-bbox="353 1265 1731 1380"> <tr> <td data-bbox="353 1265 752 1380">Where it is to be delivered</td> <td data-bbox="752 1265 1731 1380">South of High Street, Studley Approx. 0.1 hectares</td> </tr> </table>			Where it is to be delivered	South of High Street, Studley Approx. 0.1 hectares
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Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
	What is to be delivered	<ul style="list-style-type: none"> <li>• Enterprise Centre comprising small business units</li> </ul>
	When it is to be delivered	Phase 2 (2016/17 – 2021/22)
	How it is to be delivered	Stratford-on-Avon District Council
	Specific requirements	<ul style="list-style-type: none"> <li>• ensure the use of the site does not have adverse impacts on neighbouring community uses</li> <li>• provide sufficient on-site parking for business uses</li> <li>• enhance the overall appearance of the site, including hard and soft landscaping</li> <li>•</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.8 Rother Street, Stratford-upon-Avon**

No.	Source	Comment
1	David Booth	This area is important to people who live outside Stratford upon Avon. It provides community facilities including a theatre and significant parking. This area should not be specifically highlighted as a development area as this could lead to a move from community facilities to commercial and residential development. Parking close to the central areas of Stratford upon Avon is in short supply and on street parking difficult. Any changes to land and property on this site can be dealt with by the normal planning criteria not a specific allocation.
2	Anna Corser	What provision will be made to replace the parking spaces? I think it should remain a car park.
3	Susanne Farmer	<p>Southern half: Yes. Northern half: Yes if the parking is retained.</p> <p><u>Southern half</u> There appears to be a lot of unused office space facing Grove Road, perhaps because the magistrates' court is closed. This area could be put to better use such as one or two bedroom flats. It is important to have a police station in the town though not necessarily at this location.</p> <p><u>Northern half</u> Grove House (Greenhill Street) car park and Rother Street car park are currently separate. I do not know who owns the land for each but it would be much better if these car parks could be joined as it would increase availability and utilisation of spaces.</p> <p>Grove House and Rother Street car parks are both full for large parts of the day throughout the week. On Friday Grove House car park is full from early on, partly because the market traders park their vans there.</p> <p>I think all the parking should be retained, otherwise drivers arriving from the west will be forced to drive through the town centre to the more available parking to the east. Arden Street car park does not appear to have much spare capacity, if any, and people could struggle to park for medical appointments.</p> <p>Stratford ArtsHouse and the United Reformed Church need some immediate parking so that the elderly and people attending evening performances on their own are not deterred. The small amount of parking at Shakespeare Memorial Fountain is not a viable alternative for most performances or events because of the market. (No parking 10pm Thursday to 8pm Saturday.)</p> <p>The trees at the front of Grove House car park should be retained (or replaced with other trees) so that there is some greenery on this corridor.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
4	Paul Dunster	There are lots of vacant premises in this area and the land could be better used, providing that existing car parking is maintained and sufficient new parking is added.
5	H Farmer	Support – no further comment
6	Bidford-on-Avon Parish Council	There is too little information provided as to what the "specific use" envisaged is - therefore the question is too broad.
7	Tony Buckingham	Support – no further comment
8	Kate Bryan	Support – no further comment
9	Historic England	Potentially, this provides an exciting opportunity to enhance the historic environment. We would encourage any potential allocation and subsequent development to be guided by specific policy in the Plan to ensure a complimentary 'heritage led' approach informed by the characteristics, scale and significance of this important and sensitive historic site. Development will need to be sympathetically integrated into the historic environment (rather than the other way round), and positively respond to the scale and form of existing historic structures, the townscape, and, no doubt, important archaeology. Historic England would welcome the opportunity to be involved in the planning and design of this important site.
10	Steve Taylor (Set Design)	Support – no further comment
12	Caroline Dunster	As with several areas of Central Stratford, there are many vacant buildings in this area and the land and buildings could be developed for residential, business and recreational use, which would have a positive impact on the appearance of the area and would be beneficial to both locals and visitors.
13	Tim Pollard	My only objection to development of this area, for example for mixed residential apartments and retail units, would be the loss of valuable and scarce car parking facilities.
14	The Theatres Trust	<p>There are two theatres within the boundary of this proposed site allocation - the Stratford ArtsHouse and the Bear Pit Theatre.</p> <p>Culture and cultural activity helps develop a sense of place and makes communities unique and special. It contributes to the vibrancy of town centres, the tourist and night time economy. Cultural and community facilities support the day to day needs of local communities and help promote well-being and improve quality of life. Participation in cultural events can contribute to social cohesion, reduce isolation and loneliness, encourage learning and the development of skills, as well as provide the entertainment and stimulation needed to develop</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>vibrant communities and grow the economy. There is also a growing awareness of the role that the arts and culture play in attracting and retaining residents and a skilled workforce.</p> <p>The NPPF provides clear directions to local planning authorities about the importance of safeguarding and promoting cultural activities and venues in their areas. To accord with paragraph 70 of the NPPF authorities should ‘plan positively for cultural buildings’ and ‘guard against the loss of cultural facilities and services.’ Paragraph 17 outlines the need to plan for culture to support social well-being and sustainable communities, and paragraph 23 outlines the valuable contribution cultural venues make to the vibrancy and success of town centres.</p> <p>The consultation document suggests this site could provide “a wide range of uses...that would be suitable for this key location”. Although it is acknowledged the document states there “is no expectation that any existing uses in the area should be redeveloped”, there is a risk that some uses that may come forward could undermine the future viability of the existing theatres. In particular, residential uses in this area could give rise to noise complaints from new residents if new development is not appropriately sited or soundproofed. This is not just related to noise emitted from performances, but also from patrons leaving and stage equipment being transported. Any restrictions placed on the activities of those theatres could reduce their viability, thus compromising their role as cultural assets. It is also vital that delivery access to those theatres is maintained.</p> <p>As such, the Trust recommends the removal of this potential site allocation from the Site Allocations Plan. Alternatively, if the allocation is maintained we recommend that it specifies the provision of uses that are compatible with the theatres and other neighbouring uses (such as retail, leisure and employment) and does not include residential (C3). We do not object to land within the allocation (assumed to be the car park) being developed in future, but any such development must be carefully designed so as to complement rather than undermine the two existing theatres.</p>
15	Warwickshire County Council	<p>The County Council supports additional employment land and in particular appropriate space for start-up businesses within the Town.</p> <p>Flood risk matters There appears to be a surface water flow path across the Site and this will need to be considered and managed as part of any proposed redevelopment.</p>
16	DLP Planning on behalf of Talbot Homes	Support – no further comment
17	John Holden	2 to 3 bed room local ownership/housing association housing

No.	Source	Comment						
18	Carol Allen	The magistrates court needs redeveloping but car parking needs to be maintained as the market takes up car parking spaces in Rother Street from Thursday evening until Saturday evening.						
<p><b>Officer Response</b></p> <p>Nos.1/2/3/4/13/14/18 – there is a wish to retain many of the existing uses within the area, in particular car parking and theatre. While these cover a large part of the area identified, there remains an opportunity to utilise it for a range of other activities given its proximity to the town centre. Although development schemes could be considered on their merits, the intention of identifying the area as a specific proposal in the Site Allocations Plan is to recognise the positive opportunity it offers and to provide a basis for considering specific schemes in a wider context.</p> <p>No.9 – it is fully recognised that the historic features on the site need to be fully addressed and incorporated into any development scheme.</p> <p>All other comments are noted but no specific response is required.</p>								
<p><b>Officer Recommendation</b></p> <p>That land bounded by Rother Street, Greenhill Street and Grove Road, Stratford-upon-Avon is identified in the Site Allocations Plan as Proposal SUA.6 for mixed uses as set out below. (See accompanying site plan)</p> <table border="1" data-bbox="356 903 1733 1375"> <tbody> <tr> <td data-bbox="356 903 752 1054">Where it is to be delivered</td> <td data-bbox="752 903 1733 1054">Land bounded by Rother Street, Grove Road and Greenhill Street Approx. 2.4 hectares</td> </tr> <tr> <td data-bbox="356 1054 752 1375">What is to be delivered</td> <td data-bbox="752 1054 1733 1375">Retention of existing activities as appropriate and the redevelopment of specific parts of the site for a range of appropriate uses that could include:                             <ul style="list-style-type: none"> <li>• visitor attractions and accommodation</li> <li>• retail and other Class A commercial uses</li> <li>• offices and other business floorspace</li> <li>• community facilities</li> <li>• residential</li> </ul> </td> </tr> <tr> <td data-bbox="356 1375 752 1375"></td> <td data-bbox="752 1375 1733 1375"></td> </tr> </tbody> </table>			Where it is to be delivered	Land bounded by Rother Street, Grove Road and Greenhill Street Approx. 2.4 hectares	What is to be delivered	Retention of existing activities as appropriate and the redevelopment of specific parts of the site for a range of appropriate uses that could include: <ul style="list-style-type: none"> <li>• visitor attractions and accommodation</li> <li>• retail and other Class A commercial uses</li> <li>• offices and other business floorspace</li> <li>• community facilities</li> <li>• residential</li> </ul>		
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Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
	When it is to be delivered	Phase 2 – 4 (2016/17 – 2030/31)
	How it is to be delivered	Stratford Town Trust, Police Authority, County and District Councils, private sector
	Specific requirements	<ul style="list-style-type: none"> <li>• protect the character and appearance of the Conservation Area</li> <li>• retain listed buildings and those local historic significance</li> <li>• undertake an archaeological assessment for sites when they come forward to be developed</li> <li>• consider the scope to redevelop all or part of the surface car park, in conjunction with Stratford-upon-Avon Town Council</li> <li>• retain existing residential properties in the area unless fully justified</li> <li>• enhance the appearance of Greenhill Street</li> </ul>

**Topic: Part 3 Specific Sites – Question 3.9 Rother Street, Stratford-upon-Avon site boundary**

No.	Source	Comment
1	David Booth	The Rother Street / Grove Road plan should be removed.
2	Anna Corser	Yes – no further comment
3	Susanne Farmer	<p>Parts of Greenhill Street need to be smartened up though none of it except the front of the car park is included within the boundary. It would be a good thing if some of the most run-down properties on Greenhill Street were sold and changed into housing.</p> <p>The Paperway shop has been empty for some time and the office space above appears to be unused and is available to let. It looks to be a decent building from the outside but is let down by the shabby appearance of the closed shop. I appreciate someone must own it but perhaps it could at least have a change of use for something such as housing. I do not think this is a good place for a new shop or restaurant as there is not enough footfall and the shopping is spread too far and wide.</p>
4	H Farmer	On the basis that there is no expectation of any existing uses in the area being redeveloped then yes I agree with boundary definition. However this is a significant area of land and the Greenhill Street frontage is a key corridor into the town for tourists especially those arriving by train. The opportunity should therefore be taken where possible to enhance the look and feel of this area so that it is appropriate for a highly regarded tourist town.
5	Bidford-on-Avon Parish Council	Support – no further comment
6	Tony Buckingham	Support – no further comment
7	Steve Taylor (Set Design)	Support – no further comment
8	DLP Planning on behalf of Talbot Homes	Support – no further comment
9	John Holden	Support – no further comment
10	Carole Allen	Greenhill Street needs to be included as some of the properties are rundown and need some kind of re-development. The car park needs to stay.
<b>Officer Response</b>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>No.1 - identifying the area as a specific proposal in the Site Allocations Plan recognises the positive opportunity it offers and provides a basis for considering specific schemes in a wider context.</p> <p>Nos.3/4/10 – hopefully the regeneration of the area between Rother Street and Grove Road will lead to investment by the owners of properties on Greenhill Street. Greenhill Street itself is to be included in the Stratford Gateway proposal.</p> <p>All other comments are noted but no specific response is required.</p> <p>It is proposed that the site boundary be amended to include all properties in the area to assist in ensuring a comprehensive approach is taken.</p>
		<p><b>Officer Recommendation</b></p> <p>That the boundary proposed in the Site Allocations Plan Scoping Document is amended to include all properties in the area. (See accompanying site plan)</p>

**Topic: Part 3 Specific Sites – Assessment of Land Parcels on edge of Stratford-upon-Avon**

No.	Source	Comment
44	Woolf Bond on behalf of Rockspring Barwood Southam	We note that the Council have produced a document named 'Assessment of land parcels on the edge of Stratford-upon-Avon' in support of the consultation document. This dismisses the majority of sites available adjacent to Stratford-upon-Avon but fails to assess the credible unconstrained alternatives that exist adjacent to other main settlements, including Southam. Until such work is completed the plan will fail the justified test of soundness when considered against reasonable alternatives.
<p><b>Officer Response</b></p> <p>This assessment was solely to inform and justify the proposed approach regarding sites on the edge of Stratford-upon-Avon for business and commercial uses and did not relate to identification of potential reserve sites for housing.</p>		
<p><b>Officer Recommendation</b></p> <p>None</p>		

**Topic: Part 4 Self-Build and Custom Housebuilding - General**

No.	Source	Comment
1	Tim Sharples	The self-build process is a welcomed initiative from the Government which should allow local people to build their own homes to their own design (within agreed parameters) in a location which allows the continuation of family life.
2	Mr and Mrs G Millidge	<p>We write in support of the above proposed draft policy (SAP1 - Self Build and Custom Housebuilding).</p> <p>More specifically we write in full support of the site at west of Glebe Close, Stockton, attached at Appendix G of this document.</p> <p>Having lived in the village for more than 35 yrs. it would enable us to remain within the locality that we are connected to and also provide us with a home that would meet with our family needs.</p> <p>The policy would allow for the local connection to continue and for this to be continued and appropriate for the locality. It would maintain a local connection of occupiers and provide desired housing for the village, whilst maintaining a sustainable and viable village community, in which the services and facilities are continued to be fully supported.</p> <p>We are registered on the Strafford on Avon DC self-build list.</p>
3	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	This part of the consultation document is interesting. In theory it gives scope for a mix of bespoke and innovative designs, individually planned houses on small sites rather whole estates of same high density homes. This kind of housing can enhance the character of an area. However there must be an equal balance of affordable houses in each area.
4	Acres Land and Planning on behalf of the Sharples family	We warmly welcome the Council's decision to include a policy for self-building within the District. Self-build and custom build sites provide a new and different form of housing supply which have been slow to develop in this country. We feel it is unrealistic to expect significant demand to arise within larger settlements or new settlements within Stratford District. Experience tends to show that self-builders are looking for more individual plots within smaller communities such as Napton and Stockton where they can express their individuality. This will normally mean allocating smaller sites either within or on the edge of rural settlements, such as those promoted by Noralle at Napton and Stockton (supporting the Council's draft allocation at 'Land off Glebe Close'.
5	Hampton Lucy Parish Council	The policy outlined in part 4 is acceptable in principle but the Parish Council is unable to make any detailed comments.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
6	Bidford-on-Avon Parish Council	Whereas this is a welcome inclusion to the planning system, it must be duly enforced to ensure it is not "development by the black door".
7	David Lock Associates on behalf of Trenport Investments Ltd	We welcome the proposed policy on self-build and custom housebuilding and consider its proposed wording to be appropriate
8	Rosconn	<p>Under the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local planning authorities are required to permit enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area, with reference to their register. The associated guidance suggests ways in which an authority can best support self-build and custom housebuilding including developing policies in their Local Plan and engaging with landowners who own suitable sites.</p> <p>Rosconn Strategic Land fully support the general principle of including a supportive policy within the SAP, as well as identifying and allocating appropriate sites to meet the need identified on the register within the District.</p> <p>With reference to paragraph 4.10, it is noted that such schemes are exempt from CIL, in accordance with national policy. RSL consider it would be helpful to explain why this is so in order that local communities, which would otherwise benefit locally from the payment of CIL in respect of new housing, can appreciate the reason for doing so and therefore better appreciate why the delivery of such schemes are important. As explained in the NPPG (Reference ID: 25-135-20140612), the government is keen to support and encourage individuals and communities who want to build their own homes and is taking proactive steps to stimulate the growth of the self-build market. One such measure, in view of the significant financial outlay for an individual when building or commissioning a self-build property, is to enable such schemes to be exempt from CIL.</p>
9	Mr G Cole	<p>Under the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local planning authorities are required to permit enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area, with reference to their register. The associated guidance suggests ways in which an authority can best support self-build and custom housebuilding including developing policies in their LP and engaging with landowners who own suitable sites.</p> <p>Sworders support the general principle of including a supportive policy within the SAP, as well as identifying and allocating appropriate sites to meet the need identified on the register within the District.</p>
10	Greenwood Planning on behalf of Mr Sanchez and Mr Revill	The Council's general approach to facilitating self-build and custom-build development is supported. There is a strong need for this type of site, which is supported by Government policy and legislation.
11	Sworders on behalf of Mrs Mac	Under the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local planning authorities are required to permit enough suitable serviced plots of land to meet the demand for

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>self-build and custom housebuilding in their area, with reference to their register. The associated guidance suggests ways in which an authority can best support self-build and custom housebuilding including developing policies in their LP and engaging with landowners who own suitable sites.</p> <p>Sworders support the general principle of including a supportive policy within the SAP, as well as identifying and allocating appropriate sites to meet the need identified on the register within the District.</p>
12	Warwickshire County Council	<p>The County Council supports all creative and alternative methods to increase housing delivery.</p> <p>New houses or groups of smaller developments should also ensure the provision of safe access arrangements to the new homes.</p>
13	John Holden	<p>Major developments should have some allocated land for self build.</p>
14	Acres Land and Planning on behalf of Noralle Traditional Country Homes	<p>We warmly welcome the Council's decision to compose a policy for self-building within the District. Self-build and custom build sites provide a new and different form of potential housing supply which are widely used abroad but have been slow to develop in this country. We feel however, that it is unrealistic to expect demand to arise in any quantity within larger settlements or new settlements within Stratford District. Experience tends to show that self-builders are looking for more individual plots where they can express their individuality and design flair, which will normally mean on smaller sites either within or on the edge of rural settlements.</p>
<p><b>Officer Response</b></p> <p>Most of the comments made under this heading do not need a response as they are of a factual or observational nature, or do not relate to the scope of the Site Allocations Plan. The following comments do require a specific response:</p> <p>No.10 – it would be helpful for the Site Allocations Plan to explain the Government's position in making self- and custom-build dwellings CIL exempt.</p> <p>No.14 – the two new settlements are expected to provide self-build plots. The District Council seeks to negotiate with developers regarding the provision of such plots on other sites.</p>		
<p><b>Officer Recommendation</b></p> <p>Provide an explanation in the Site Allocations Plan to clarify the reason why self- and custom-build dwellings are exempt from paying the Community Infrastructure Levy and the provisions in the CIL Regulations regarding this.</p>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

<b>No.</b>	<b>Source</b>	<b>Comment</b>

**Topic: Part 4 Self-Build and Custom Housebuilding - Question 4.1 Policy**

No.	Source	Comment
1	David Booth	The need for the design code to comply with Core Strategy Policy CS.15 requirements should be clear and specifically stated.
2	Anna Corser	Support – no further comment
3	Susanne Farmer	Support – no further comment
4	Julie Kiszely	Support – no further comment
5	Priors Marston Parish Council	Yes, as long as it forms part of the overall development plan.
6	Sophie Brough	Regarding "Policy SAP: Self Build and Custom Housebuilding" I do not have a problem with point 2. but I feel that point 3. would have a detrimental effect on raising finance to self build a house. After studying various online documents, including articles from the Financial Times, Financial Times advisor, Telegraph and The Mortgage Shop, the overall consensus seems to be that it makes mortgages more difficult to acquire and, if available, a larger deposit would be demanded, the finished house would be de-valued and the house could be difficult to sell. Future potential purchasers would also experience similar difficulties financing the purchase. The majority of self builders want to build a high spec, environmentally friendly house and by adding a clause which restricts funding and re-sale values, it would make it difficult to achieve. A self builder is already taking a financial risk and any clause restricting resale would only exacerbate it. I haven't got a problem with a local clause on the sale of the plots, but I strongly object to any such clause being included on the completed houses.
7	Alderminster Parish Council	In relation to point 2, residents and the Parish Council believe that all plots should be taken up by individuals or households that have a local connection through living or working or have close family in the district. The Council is also concerned that self built or custom built houses may lead to undesirably large houses, unsuited to the environment of the villages in which they are located. In relation to point 3, the Council queries the benefit of the legal agreement to control the re sale of dwellings initially to those who fulfil the criteria in 2.
8	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	Support – no further comment
9	Acres Land and Planning on behalf of the Sharples family	The wording is broadly appropriate however we would suggest that the words, 'may be' should be used instead of 'is' in Criterion 1 of the policy. By the nature of the self-build registers it will be impossible to identify for sure a guaranteed demand or need for the self-build plots from the outset. There needs to be a degree of flexibility to allow for future registrations once people realise a scheme is coming forward. To some extent, in practice, demand for self-building may be supply-led.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
10	Paul Dunster	Support – no further comments
11	Hampton Lucy Parish Council	Support – no further comments
12	H Farmer	Support – no further comments
13	Greenwood Planning on behalf of S Brough	<p>The Council's general approach to facilitating Self-build and Custom-build development is supported. We do, however, object to the proposed imposition of re-sale restrictions on these houses, unless there are genuine policy reasons to do so in particular types of case.</p> <p>We see nothing wrong with a requirement that plots be offered for sale to local people in the first instance. We would have no objection to this restriction being tightened to relate more specifically to the local area around the site. A local connections requirement regarding future sales of the houses, however, is more problematic in particular because of the impact on raising finance.</p> <p>Raising mortgage finance is already known to be difficult for self-builders - see the attached extract from House of Commons briefing paper from March 2017. The Government identified this as an area that needed to be addressed in the 2017 Housing White Paper. Re-sale restrictions are known to cause problems with the availability of mortgage finance as well. Imposing restrictions on the future sales of Self-build and Custom-build houses would create another barrier, making it difficult for people to raise finance to build their homes.</p> <p>Self-build and Custom-build housing is dealt with under completely different legislation and Government policy than local needs/affordable housing. The Council is under a statutory duty to provide sites for Self-build and Custom-build developments and it seems fully appropriate for it to do so without having to equate any allocations to local needs exception sites. We are not aware of this approach being taken by other Councils.</p> <p>If there is to be a restriction on sales of completed houses, it should be limited to a maximum of 3 years from first occupation, which would accord with the period of occupation set out in the Community Infrastructure Levy's definition of Self build.</p> <p>The policy as written lumps 3 different types of Self-build and Custom-build housing sites together.</p> <p>1) Allocation sites - These are being promoted through a development plan process and therefore are not exceptional to normal policies. Therefore there is little reason to impose a requirement on the future sales of the houses.</p>

No.	Source	Comment
		<p>2) Sites within Main Rural Centres and Local Service Villages - These developments would generally be within normal policy so there is no reason to impose a requirement on the future sales of the houses.</p> <p>3) Sites on the edge of Main Rural Centres and Local Service Villages - If these sites are considered to be exceptional to normal policy, then there could be a justification for imposing requirements on the future sales of the houses.</p> <p>We suggest the policy should be re-worded along the following lines, to be a little more clear and positive:</p> <p><b>Policy SAP.1: Self-Build and Custom Housebuilding</b></p> <p>Within and adjacent to Stratford-upon-Avon, Main Rural Centres and Local Service Villages, self-build and custom housebuilding schemes <i>will normally be supported</i> subject to the satisfaction of the following criteria:</p> <ol style="list-style-type: none"> <li>1. There is evidence to show there is a sufficient level of interest from people <i>within the local area</i> [to be defined] to build and occupy such dwellings on the site involved.</li> <li>2. <i>A legal agreement is entered into requiring that all plots be offered in the first instance to individuals or households that have a local connection through living and/or working in the parish or adjoining parishes or by having close family living in that area and in the second instance to people having a local connection by living in or working in Stratford-on-Avon District or by having close family living in the District.</i></li> <li>3. <i>For unallocated sites which are not within the built-up area of Main Rural Centres or Local Service Villages, a legal agreement is entered into in order to control the re-sale of dwellings, requiring that the house is offered for sale initially to individuals or households who satisfy 2. above for the first 3 years following initial occupation.</i></li> <li>4. <i>The proposal would meet other normal development management criteria, as set out in the Development Plan and Supplementary Planning Documents for the area.</i></li> </ol> <p>All such schemes must make the following provisions:</p> <ol style="list-style-type: none"> <li>(a) A Design Code to guide the form of dwellings that are appropriate to the site.</li> <li>(b) A legal access to a public highway (or equivalent) to serve each individual plot.</li> <li>(c) Connections to all services, i.e. electricity, water, drainage, at the boundary of each plot.</li> </ol>
14	Long Compton Parish Council	It is important to clarify that Self Build homes are to be regarded as in addition to the target for new development established in a number of Neighbourhood Development Plans. Without such a clear statement, a number of developers may well see this as a "loop hole" through which limitations set in NDP's can be avoided.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
15	Karen Jones	Self-build and custom builds are meant to provide routes into home ownership for individuals and groups who want to play a role in developing their own homes. (ref: <a href="http://researchbriefings.files.parliament.uk/documents/SN06784/N06784.pdf">http://researchbriefings.files.parliament.uk/documents/SN06784/N06784.pdf</a> ) To be exempt from the Community Infrastructure Levy, the premises must be the sole or main residence for a period of 3 years from completion of the property (ref: Community Infrastructure Levy (CIL) - Form 7: Self Build Exemption Claim Form Part 1). To develop a property and live in it for 3 years is a significant personal commitment and local connections (work and/or family) are likely to be key drivers to this commitment. Therefore, to avoid unintended consequence of property development for commercial purposes (rather than personal use), the definition of SAP.1 (2) should be tighter. For example, more than 80% of plots should be taken up by individuals or households that have a local connection through living and/ or working in Stratford-on-Avon District or by having close family living in the district.
16	Paul Quinney	Support – no further comments
17	Priors Marston Parish Council	Yes - as long as forms part of the overall development plan.
18	Mr and Mrs G Millidge	Support – no further comments
19	Bidford-on-Avon Parish Council	It is too broad and needs tightening up: <ul style="list-style-type: none"> <li>- Home builder should be required to live in the completed dwelling for a minimum of 5 years before selling</li> <li>- Home builder will have to demonstrate financial capability of finalising the construction. Failure to do this may result in development by the back door.</li> </ul>
20	John McGowan	In the light of the points below I strongly object to the local connection test as a blanket policy restriction supported by a legal agreement as proposed in 4.1.3. of the consultation document.  4.1.2 There is no objection in principle with only the initial plot sale being to those with local connections. However it isn't clear why this restriction should be imposed as a specific blanket planning policy issue to self-build plot sales. This would appear to be unprecedented and inconsistent.  4.1.3 I strongly object to a legal agreement restricting the resale of self-built homes into the future tied into local connection tests. The draft policy wording says “.....to control the resale of dwellings initially...” if “initially” means three years only to run concurrently with the existing conditions in relation to exceptions for self-building then I am less concerned. Once the three year period has expired will owners be released from the conditions with no penalties and no requirement to find a buyer with local connections?

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• The House of Commons (HoC) briefing paper published 01 March 2018 points out in section 4. (The Barriers to expansion) and quotes from....</li>   <li>• The University of York's 2013 report which identified a series of challenges to self-build projects including:             <ul style="list-style-type: none"> <li>i. land supply and procurement;</li> <li>ii. access to finance (lenders tend to perceive self-build loans as higher risk);</li> <li>iii. the planning process and variations in planning authority approaches; and</li> <li>vi. general regulation and 'red tape'".</li> </ul> </li>   <li>• The document's purpose is to identify what opportunities there reducing barriers to the self-build movement and recognised what local authorities and government can do to help double the amount of such projects by 2020 (December 2019).</li>   <li>• The Government's guidance paper on Self-build and custom housebuilding ( <a href="https://www.gov.uk/guidance/self-build-and-custom-housebuilding">https://www.gov.uk/guidance/self-build-and-custom-housebuilding</a> ) sets out the responsibilities of planning authorities in connection with restrictive conditions they may choose to apply. These are the local connection test and a solvency test, whether a purchaser can afford to buy the plot. An extract from the guidance is included below.             <p style="margin-left: 20px;">"The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) enables relevant authorities to include up to two optional local eligibility tests. These are limited to a local connection test and a financial solvency test. We expect that relevant authorities will apply one or both of these tests only where they have a strong justification for doing so. They should ensure that they are proportionate and, in the case of the former, we expect these to be introduced in response to a recognised local issue".</p> <p style="margin-left: 20px;">(As updated 28 July 2017)</p> </li>   <li>• As we see from the quoted passage above, it is incumbent upon a planning authority to impose these tests "...only where they have a strong justification for doing so". It is unlikely that the unique housing market sector that self-build projects occupy will <u>always</u> result in them achieving the "strong justification" for imposing the restrictions talked about.</li>   <li>• It would seem that the planning authority currently has the power to choose whether to impose these restrictions. A relevant and current example is Bush Heath Lane in Harbury. There are two development sites, one adjacent to and one opposite the proposed self-build site when completed will provide of over 100 homes. One site has the local connection restriction the other being constructed by a national volume builder does not.</li> </ul>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Local, national and international companies in the area and organisations e.g. NHS, National Grid, Jaguar Land-Rover, often need to bring essential skills in from other areas. Local connection restrictions have the potential to undermine the local economy. This by affecting the ability of workers to move to places affected by these restrictions and employers unable to satisfy their skills requirements.</li> <li>• Restrictions on resale, due to local connection tests, serve as a barrier to those trying to fund these self-build schemes with mortgage borrowing. In these cases it usually means that financing the project is more difficult and the amount which can be borrowed will be smaller. In June 2012 there was an article which mentions these restrictions and the negative impact they have on an area/region.</li> <li>• "Local occupancy clauses are a tricky area for lenders as it can make resale of the property difficult," said Adrian Anderson of Anderson Harris, mortgage broker. (Source – Financial Times - 01 June 2012)</li> <li>• Lenders already see self-build projects to be "a risky business" (Source - HoC Briefing - 01 March 2018) it would be a shame to further increase the sense of risk by limiting resales too and thus further worsening the borrowing options for self-builders by placing blanket restrictions projects when the Government's aim is to increase their options.</li> <li>• This limited access to funding is likely to have an impact on the design and overall quality of a home, or worse it may even exclude some families from becoming self-builders at all.</li> </ul> <p>'Self-build' is a positive movement supported by the 'Right to Build' legislation and constructive changes to national planning policy and SDC's approach to dealing with the issue is supported in principle. However it is felt that some aspects of this local policy, as drafted, could hinder self-building's progress in our part of Warwickshire and deny the Government the ability to achieve its target of doubling self-building and custom-building by 2020.</p> <p>The clear message coming from the Government that local authorities are to remove barriers to self-building and to think very carefully before imposing additional ones, albeit with good intentions but perhaps with unforeseen negative consequences.</p> <p>It would appear that the planning authority holds existing powers to impose local connection restrictions on housing development but importantly only in response to a known and well-defined local issue, and in my view, balanced against other contradictory indicators. A decision should only be taken to impose these restrictions when they are clearly evidenced and understood whilst avoiding the creation of or perpetuating local issues and anomalies.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		Those who do take on the personal and financial challenge of the Government initiative need to be supported in helping them to achieve their aspirations and to create different options, diversity and interest for communities in the local property market. In doing so they are creating the unique character of the places we live into the future.
21	Reuben Bellamy	Self and custom Build Housing is exempt from the requirement to provide affordable housing and CIL in order to encourage its provision. Given the nature of this type of housing it should also be exempt from the Housing Mix requirements of policy CS 19. By definition, it is a type of housing product that is customised to the occupiers needs. For the concept to work, it cannot be right to for the LPA to dictate what type of house the self or custom builder constructs. In terms of the requirement that houses approved under this policy will be subject to a local occupancy test on subsequent sale- the LPA needs to confirm that this will be acceptable to the lenders that will finance the purchase of such products.
22	Rickett Architects on behalf of Mr and Mrs Biggerstaff	It provides for self-build housing on the edge of established settlements.
23	Stansgate Planning on behalf of Mr and Mrs Wythes	<p>Self-build and custom housebuilding is important to the District, particularly given that there are 93 people on the self-build register to date. As such the inclusion of a policy to control it is strongly supported.</p> <p>The policy is appropriately worded and contains appropriate criteria to allow proper consideration of sites. Particular support is given to the recognition that sites should be available 'within and adjacent' to the identified settlements, although given the designation of BUABs the reference should perhaps be altered to 'within or adjacent to the BUABs for Stratford...'. </p>
24	Stansgate Planning on behalf of Dufield Family	<p>The criteria proposed for Policy SAP1 impose a serious constraint upon the delivery of sites that may be suitable for self-build and custom housebuilding. It forms no part of national planning policy or emerging national planning policy which supports the identification of sites for self-build or custom-build that such development should only be undertaken by persons satisfying a local connection policy.</p> <p>Similarly, the imposition of a planning obligation to restrict resale of dwellings to persons with a local connection within Stratford on Avon District is fundamentally flawed and will undermine the value of the property when completed.</p> <p>National planning policy seeks to provide the opportunity and choice for people to undertake self-build and custom-build housing, increasing choice in acquiring a new home. This Local Plan should facilitate - rather than frustrate - this Government objective, by setting out criteria for the release of small sites that may be suitable for self-build /custom-build.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>The Policy should not approach the delivery of self-build and custom-build on the basis of being justified only in exceptional circumstances - hence the unjustified approach by seeking to impose occupancy restrictions, limitations on resale.</p> <p>The criteria for the identification of small sites that may be suitable for self-build should include small brownfield sites that are well located to existing residential development within the rural area of the District.</p> <p>Policy SAP1 should not be so restrictive as to confine the opportunity for self-build to 'within and adjacent to Stratford on Avon, Main Rural Centres and Local Service Villages. The policy should allow for self-build or custom-build on suitable brownfield sites - so making an efficient use of land that has been developed.</p>
25	Caroline Dunster	Support – no further comment
26	Woolf Bond Planning on behalf of Rockspring Barwood Southam	<p>The consultation document (paragraph 4.3) indicates that 93 people are on the Self-Build Register in the District, with 8 of them currently looking for a plot within a larger scheme (references 001, 003, 004, 014, 027, 030, 035 &amp; 082). Consequently, there is very limited demand for requiring self-build within a larger scheme. Without clear evidence of demand for self-build plots within large sites when applications are initial determined, there is a clear risk that the Council's approach will sterilise sites as a result of unmanaged parcels within schemes leading to potential for anti-social behaviour. Consequently, the proposed self build policy should be omitted from the plan and specific site(s) should be identified to satisfy the identified demand.</p>
27	Framptons on behalf of Ellis Machinery Ltd	Support – no further comment
28	Tim Pollard	Support – no further comment
29	Cerdea Planning on behalf of Darling Family Trust	<p>The wording of proposed Policy SAP.1 states 'Within and adjacent to Stratford-upon-Avon, Main Rural Centres and Local Service Villages, self-build and custom housebuilding schemes may be appropriate subject to the satisfaction of the following criteria:'</p> <p>The Council have identified that they expect self-build and custom build plots to be provided within the new settlements. The proposed wording of the policy should similarly reflect the support for self-build and custom build sites plots that are outside of existing settlements being brought forward as part of a wider housing scheme i.e. new settlements such as Stoneythorpe which could be identified through the reserve sites process.</p> <p>The Housing White Paper identified that the main barriers to custom built homes are access to land and finance. With a large proportion of development in the district being delivered through large and strategic allocation sites</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		<p>at existing settlements, these are unlikely to offer opportunities for custom and self builds as these will be delivered through companies seeking to maximise efficiency and density and there is a lack of incentive for the provision.</p> <p>Stoneythorpe proposes a sustainable development that incorporates the highest standards of design and aspirations of Government including the need to facilitate the self/custom build houses. The proposal would include a considerable element of self/custom build houses to meet the needs of the District. The self/custom builds would be encouraged to include innovative design solutions to complement the vision for Stoneythorpe and raise standards both locally and nationally. Due to the availability of land at Stoneythorpe, the provision of self/custom build homes is realistic and deliverable through an integrated approach as part of the wider settlement.</p> <p>The importance of delivering self and custom build homes has been afforded significant weight in appeal decisions by Inspector's in support of the Government's thrust for provision. An appeal, ref: APP/C1570/A/14/2223280, for 22 self/custom build dwellings outside a settlement boundary in Great Dunmow, Essex was approved by an Inspector. The Inspector recognised that the Government have has made a commitment to the provision of 100,000 custom/self build homes over the next 10 years and concluded that 'The proposed development would provide the opportunity for 22 custom/self builders in the District to build their own home, which would go some way towards meeting the needs of this sector within the area. I have, therefore, afforded the provision of custom/self build housing significant weight in my consideration of this appeal.'</p> <p>The proactive allocation of plots at Stoneythorpe to meet a need which will arise in the future reduces the pressure on smaller and medium sized settlements to accommodate plots in less sustainable locations. The above appeal decision demonstrates that whilst the existing proposed policy has regard to provision of self/custom build units at settlements such as Local Service Villages, significant weight would be afforded to the need to provide these which could be considered to outweigh conflicting considerations. Without sufficient provision of sites being pro-actively planned for and brought forward through the plan process members of the public seeking self/custom build plots will look to less environmentally sustainable sites which could be avoided through the provision of plots at Stoneythorpe.</p> <p>In addition to having sufficient land to provide the dwellings, the Darling Family Trust is also proposing to provide finance for those looking to self/custom build. By providing finance, uncertainty of the availability of finance from mainstream lenders for self/custom build projects is mitigated encouraging delivery further. Through the provision of land and finance for self/custom build homes, Stoneythorpe represents a significant solution to both the main barriers to construction outlined in the Housing White Paper and presents a realistic and deliverable opportunity for self and custom build homes.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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		Additional support through Policy SAP.1 for provision on large developments with greater land availability, that are not presently allocated, would encourage and provide incentive for the delivery of these sites.
30	David Lock Associates on behalf of Trenport Investments	Support – no further comment
31	Rosconn	<p>Whilst RSL generally support the wording of the policy, we do have concerns regarding the third criterion which seeks to restrict the initial re-sale of any self or custom build properties to those who satisfy the second criterion. This appears to lack clarity and would be difficult to enforce as the second criterion does not require all self or custom builds to be restricted in this way, so this requirement may be difficult to implement as one would envisage that this requirement would only apply to those plots that were built out by those with a local connection. If this were the case, this would appear to be wholly unequitable as those with a local connection would be financially penalised compared to those that weren't.</p> <p>In referring to the NPPG on Self and Custom Housebuilding, there is no requirement for this to be included in policies on the matter. However, whilst it is expected that relevant authorities will apply a local connection test and/or a financial solvency test in respect of the register, it does state that these should only be applied where there is a strong justification for doing so. In a similar vein, it follows that there should be a strong justification for this requirement to be included within a policy to secure Self and Custom Housebuilding. We are not aware of any evidence to support this requirement and therefore suggest that this criterion should be deleted.</p> <p>It should also be noted that self-build schemes are exempt from CIL, provided anyone who builds or commissions their own home occupies the property as their principal residence for a minimum of 3 years. On the basis that someone building their own home for their own occupation would want to benefit from such an exemption, this is a further incentive for the occupier to remain in the property for at least 3 years. Again, in such circumstances it would therefore appear perverse to request that its future sale should be restricted in the way criterion 3 suggests.</p>
32	RCA Regeneration on behalf of Peter Drew Contracts	We consider sites within and adjacent to villages within the all other settlements could be suitable for self-build homes and custom housebuilding as these sites are likely to be small scale, with less onerous planning gain and proportionate to these settlements.
33	RCA Regeneration on behalf of Duchy Homes	We consider sites within and adjacent to villages within the all other settlements could be suitable for self-build homes and custom housebuilding as these sites are likely to be small scale, with less onerous planning gain and proportionate to these settlements.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

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34	RCA Regeneration on behalf of Alexander Stevenes Construction	We consider sites within and adjacent to villages within the all other settlements could be suitable for self-build homes and custom housebuilding as these sites are likely to be small scale, with less onerous planning gain and proportionate to these settlements.
35	GVA on behalf of St Philips	<p>We support the policy wording contained within Policy SAP.1 “Self-Build and Custom Housebuilding”, which sets out the criteria which proposals must satisfy for self-build/custom housebuilding to be deemed appropriate.</p> <p>It is understood that there are currently 94 people on the Council’s Self-Build Register. At present, one person is seeking a plot in Napton; 34 seeking plots in the Southam area; and 22 registered as “not specified” or as having “no preference”. The proposed development at Napton Brickworks would provide a total of 15 self-build plots which would assist the Council in meeting this demand.</p>
36	Warwickshire County Council	<p>The Policy should be expanded to include reference to a suitable surface water outfall. Part (c) of the scheme provision does refer to drainage; however from our experience this is not specific enough. The scale of these developments is likely to be minor so will not come to the LLFA as statutory consultee. Additionally, the developers for this type of build are likely to be inexperienced and have no knowledge of flooding and drainage.</p> <p>The explanatory note should highlight that there is a hierarchy of surface water outfalls, with preference for infiltration and to existing waterbodies before considering connection to surface water sewers. Additionally, the surface water for any new developments should be managed by above-ground SuDS and released from the site at Greenfield rates rather than a wrongly assumed minimum of 5 l/s.</p>
37	Pegasus on behalf of Rainier Developments	<p>Rainier Developments welcome the inclusion of this policy within the SAP, which is consistent with national policy, as the NPPF specifically states that local planning authorities should plan for a mix of housing and cater for the needs of different groups in the community, including people wishing to build their own homes.</p> <p>It is clear that the demand for this type of housing within Stratford-on-Avon District has been assessed by the Council through their Self-Build and Custom Housebuilding Register and that this policy is a constructive response to this. Rainier Developments consider that Policy SAP.1 is positively worded, and will assist in facilitating the delivery of self-build and custom-build housing within the District.</p>
38	Nexus Planning on behalf of Richard Mann	Support – no further comment
39	Nexus Planning on behalf of Mr Brightman	Support – no further comment

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
40	Nexus Planning on behalf of CEG and Mixed Farms	Support – no further comment
41	DLP Planning on behalf of Talbot Homes	Support – no further comment
42	Canal and River Trust	<p>Self-build and custom build housing is high risk development strategy for the setting of the canal corridor. There is high potential to negatively impact upon the canal as it creates an inconsistent visual character between plots, mixed quality design, construction and differing boundary treatments.</p> <p>Design codes can address this to some extent though further assessment of the impact of self-build and custom housebuilding on 'sensitive locations' such as adjacent to the waterway corridor should be undertaken.</p> <p>Any Design codes would need to include an assessment of the visual impacts from the canal corridor and clearly set out details of design principles to be applied across the whole of any sites being put forward (not just any self-build/custom build areas) boundary treatments, materials etc would also need to be detailed to ensure a consistent approach and limit any adverse visual impact.</p>
43	John Holden	Regards point 3. <i>A legal agreement is entered into in order to control the re-sale of dwellings initially to individuals or households who satisfy 2. above.</i> Would like to suggest this applies to the property for a period of 5 to 10 years from the date of the initial occupation.
44	Brodie Planning on behalf of Valefresco	Support – no further comment
45	Brodie Planning on behalf of Lioned	Support – no further comment
46	Carol Allen	Support – no further comment
47	Acres Land and Planning on behalf of Noralle Traditional Country Homes	The wording is broadly appropriate however we would suggest that the words, 'may be' should be used instead of 'is' in Criterion 1 of the policy. By the nature of the self-build registers it will be impossible to identify for sure a guaranteed demand or need for the self-build plots from the outset. There needs to be a degree of flexibility to allow for future registrations once people realise a scheme is coming forward. To some extent, in practice, demand for self-building may be supply-led.
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p>		

No.	Source	Comment
		<p>Nos.6/13/20/21/24/31 – it is not appropriate to place a restriction on the resale of self-build dwellings for financial and mortgage reasons. Response: having taken into account national guidance and experience regarding this issue, it is recognised that it would not be appropriate to apply such a restriction on the resale of dwellings.</p> <p>No.7/15 – all/most plots should be taken up by people with a local connection. Response: because the provision of plots is required to relate to people on the Self-Build Register it would not be appropriate to overly restrict the take-up of plots in this way.</p> <p>No.9/47 – in criterion 1 the term ‘may be’ should be used instead of ‘is’ to provide some flexibility. Response: it is appropriate to gauge whether there is a sufficient level of interest in the location and the number of self-build plots proposed by a scheme.</p> <p>No.13/29 – structure of Policy should be amended to reflect a range of circumstances and locations where self-build schemes are likely to be proposed and could be appropriate. Response: it is recognised that this will be the case and it would be helpful to distinguish between these circumstances in the wording of the Policy.</p> <p>No.13 – policy should be made clearer about the scope and purpose of legal agreements relating to the occupancy of self-build dwellings. Response: it is agreed that this issue should be clarified.</p> <p>No.14 – should be clarified that Self-Build homes are in addition to target for new development established in Neighbourhood Plans. Response: this is unnecessary as any such schemes that are granted planning permission should be compliant with District Council policies.</p> <p>No.19/43 – home builder should be required to live in completed dwelling for a minimum of 5 years before selling. Response: this would be unreasonable but it is necessary to live in the house for at least 3 years in order for it to be exempt from CIL.</p> <p>No.19 – home builder should have to demonstrate financial capability to finish its construction. Response: this would be too onerous although it is likely that parties involved will have secured finance at the outset.</p> <p>No.21 – need to confirm that Self-Build schemes would not be subject to Policy CS.19 regarding housing mix. Response: it would be appropriate to do so given that provision of self-build units should reflect the preferences of those parties involved in their construction.</p> <p>No.23 – first part of policy should refer to sites being within or adjacent to Built-Up Area Boundaries. Response: it would be appropriate to make this clarification.</p> <p>No.24 – national policy does not support the identification of self-build sites only for those who have a local connection.</p>

No.	Source	Comment
		<p>Response: this is acknowledged but given that the provision of self-build plots is intended to reflect the number of people on the Register and most of these have a connection to Stratford District, it is reasonable to take this factor into account.</p> <p>No.24 – suitable sites should include small brownfield sites that are within rural area of the District but well-located to existing development. Response: it is not appropriate to support self-build schemes on sites that are otherwise contrary to the provisions of the Core Strategy regarding the location of housing development other than as proposed on the basis that such schemes are a form of exception site.</p> <p>No.26 – given limited interest in taking up a self-build plot on larger schemes in the District, specific sites should be identified to satisfy identified need. Response: it is anticipated that the level of demand for self-build will be mostly satisfied on specific sites promoted for the purpose and on single plots that are consistent with policies in the Core Strategy.</p> <p>No.36 – Policy should refer to a suitable surface water outfall being provided and the hierarchy for its provision. Response: this would be appropriate.</p> <p>In addition to the assessment of comments submitted, a number of other issues have been identified by officers which need to be taken into account in finalising this policy:</p> <ul style="list-style-type: none"> <li>• Except in relation to self-build plots which are provided as part of a scheme which meets a housing need identified by a local community, in accordance with Core Strategy Policies CS.10, CS.15.G and AS.10(a), it would not be appropriate for such provision to be made outside the Built-Up Area Boundaries of settlements that are within or adjacent to the Green Belt.</li> <li>• Criterion 1 should refer to each dwelling/plot on the site.</li> <li>• It will be necessary for schemes to satisfy all the relevant site specific issues, not just in relation to design of the dwellings themselves.</li> <li>• A Design Code would not be needed for a single plot or for schemes which are submitted as full planning applications in which the design of dwellings is fully set out.</li> <li>• It will be necessary for a site promoted specifically for self-build dwellings to be subject to a marketing strategy which specifies the length of time required to advertise the availability of plots and their valuation.</li> <li>• The access arrangements should provide for vehicular, pedestrian and cycle movements.</li> <li>• Provision for internet connectivity should be specified.</li> <li>• The section on Self-Build and Custom Housebuilding in the Development Requirements SPD specifies that a phasing plan should be submitted where applicable to ensure CIL is not triggered for the self-build element due to commencement elsewhere on the site.</li> </ul>

No.	Source	Comment
<p><b>Officer Recommendation</b></p> <p>That the following amendments are made to the Policy:</p> <ol style="list-style-type: none"> <li>1. Restructure the policy to reflect the range of circumstances and locations that self-build schemes can be brought forward.</li> <li>2. Amend first paragraph to read 'Within and adjacent to the Built-Up Area Boundaries of Stratford-upon-Avon, Main Rural Centres and Local Service Villages, self-build and custom-build housing schemes are appropriate in principle, except where a site adjacent to a BUAB is within the Green Belt. All such schemes will be required to satisfy the following criteria:</li> <li>3. Amend criterion 1 to read 'There is evidence to show a sufficient level of interest to take-up each dwelling plot proposed on the site.</li> <li>4. Delete criterion 3 relating to controlling the re-sale of dwellings.</li> <li>5. Amend (a) to read 'A Design Code and other technical information to guide the nature of the dwellings and other aspects of development that is appropriate to the site.'</li> <li>6. Amend (b) to read 'A legal access to a public highway (or equivalent) for vehicles, pedestrians and cyclists to serve each individual plot.'</li> <li>7. Insert in (c) a reference to the provision of internet connectivity.</li> <li>8. Insert '(d) Suitable arrangements for surface water outfall.'</li> <li>9. Confirm that Core Strategy Policy CS.19 regarding housing mix and type does not apply to self-build schemes.</li> <li>10. Clarify in the explanation that a Design Code is not required in relation to a scheme for a single plot or those comprising more than one plot which are submitted as full planning applications.</li> </ol> <p>A revised wording of the Policy is set out below which incorporates these proposed amendments. This will be the subject of further refinement.</p> <p>The provision of self-build and custom-build homes will be facilitated in the following ways:</p> <ol style="list-style-type: none"> <li>1. As an integral part of the housing mix in the new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield.</li> </ol>		

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
2.		<p>On reserve housing sites comprising 100 or more dwellings that are released for development, on which at least 5% of the plots should be made available for this purpose.</p>
3.		<p>As individual and small groups of plots within the Built-Up Area Boundaries of Stratford-upon-Avon, Main Rural Centres and Local Service Villages.</p>
4.		<p>On suitable sites adjacent to the Built-Up Area Boundaries of Stratford-upon-Avon, Main Rural Centres and Local Service Villages (except where the site is within the Green Belt), solely for this specific purpose.</p>
5.		<p>On sites allocated in the Plan for this specific purpose. (see Proposals SB.1-6)</p>
<p>All sites promoted in accordance with the above will be required to satisfy the following criteria:</p>		
<ul style="list-style-type: none"> <li>• A legal access to a public highway (or equivalent) for vehicles, pedestrians and cyclists to serve each individual plot.</li> <li>• Connections to all services, i.e. electricity, water, drainage, internet, at the boundary of each plot.</li> <li>• Provision of suitable arrangements for surface water outfall.</li> </ul>		
<p>In relation to sites promoted in accordance with 4 and 5 above, schemes will also be required to satisfy the following criteria:</p>		
<ul style="list-style-type: none"> <li>• There is evidence to show a sufficient level of interest to take-up each dwelling plot proposed on the site.</li> <li>• A legal agreement requiring all plots to be offered in the first instance to individuals or households that have a local connection through living and/or working in Stratford-on-Avon District or by having close family living in the District.</li> <li>• An agreed marketing strategy which specifies the minimum length of time for advertising plots, the appropriate means of doing so, and their valuation.</li> <li>• A Design Code and other technical information to guide the nature of the dwellings and other aspects of development that are appropriate to the site.</li> </ul>		
<p>For sites promoted in accordance with 1 and 2 above, a phasing plan should be submitted to ensure CIL is not triggered for the self-build dwellings due to commencement of construction elsewhere on the site.</p>		
<p>The wording of the explanation to the policy should include the following matters:</p>		
<ul style="list-style-type: none"> <li>• confirm that self-build and custom-build dwellings are exempt from CIL in accordance with national Regulations.</li> <li>• advise that Neighbourhood Plans should consider identifying opportunities for self-build schemes.</li> </ul>		

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• confirm that Core Strategy Policy CS.19 regarding housing mix and type does not apply to self-build schemes.</li> <li>• clarify the purpose and scope of a marketing strategy.</li> <li>• identify key issues that Design Codes should cover, eg. building form, density, footprint of dwellings, building lines, boundary treatment, landscaping, waste facilities.</li> <li>• clarify that a Design Code is not required in relation to a scheme for a single plot or those comprising more than one plot which are submitted as full planning applications.</li> <li>• advise that self-build plots on large housing schemes should be provided in small clusters rather than dispersed as individual plots to help ensure street scene is not unduly discordant.</li> </ul>

**Topic: Part 4 Self-Build and Custom Housebuilding - Question 4.2 Sites**

No.	Source	Comment
<b>General comments</b>		
1	Jayne Whitaker on behalf of Mr and Mrs T W Whitaker	Whilst self-build plots are a great idea in theory, it would be better for residents local to the sites to make the judgement as to the suitability and density of the sites.
2	Paul Quinney	Only for people with local proven connection and on self build register in order of priority as registered.
3	Bidford-on-Avon Parish Council	Support - all subject to approval and support of their local communities.
4	Tony Buckingham	Support all – no further comment
5	Rickett Architects on behalf of Mr and Mrs Biggerstaff	It provides for self-build housing on the edge of established settlements.
6	Steve Taylor (Set Design)	Support all – no further comment
7	RCA Regeneration on behalf of Peter Drew Contracts	Allocation of these sites should not limit other sites in coming forward for the same scale of development.  It is noted that at the time of writing around 93 individuals had registered their interest in self-build properties. To that end, further sites should be supported in principle.
8	RCA Regeneration on behalf of Duchy Homes Limited	Allocation of these sites should not limit other sites in coming forward for the same scale of development.  It is noted that at the time of writing 93 individuals had registered their interest in self-build properties. To that end, further sites should be supported in principle.
9	RCA Regeneration on behalf of Alexander Stevens Construction	Allocation of these sites should not limit other sites in coming forward for the same scale of development.  It is noted that at the time of writing 93 individuals had registered their interest in self-build properties. To that end, further sites should be supported in principle.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
10	GVA on behalf of St Philips	We would suggest that the Plan include the Former Napton Brickworks within the allocations. As identified above, the site can provide up to 15 self-build plots, which would bring the total allocated plots in the Plan to 51, increasing availability against the number of people on the register.
11	M J Thorne	Support all – no further comment
12	Pegasus on behalf of Rainier Developments	Rainier Developments has no comments to make regarding any of the specific sites identified in Question 4.2 specifically for self-build/custom housebuilding.
13	DLP Planning on behalf of Talbot Homes	Support all – no further comments
14	Stansgate Planning on behalf of Mr and Mrs Wythes	<p>Part 4 specifically seeks suggestions of additional land considered suitable, and available, for self-build and custom housebuilding.</p> <p>Land at Allimore Lane, Alcester, is considered to be for self-build and custom housebuilding and has previously been proposed to Alcester Town Council for such a use. A separate Self Build Call for Sites Proforma is submitted which assesses the site.</p>
15	Nexus Planning on behalf of Richard Mann	Land controlled by Mr Mann, to the west of the B4100 Gaydon, could deliver a small proportion of self built plots, subject to further discussion with the Council.
16	Nexus Planning on behalf of Mr Brightman	Land controlled by Mr Brightman, to the east of the B4100 Gaydon, could deliver a proportion of self built plots, subject to further discussion with the Council.
17	Nexus Planning on behalf of CEG and Mixed Farms	Land controlled by Mixed Farms Limited and CEG, north of Banbury Road, south-east of Stratford-upon-Avon could deliver a small proportion of self built plots, subject to further discussion with the Council.
<b>(a) Land east of Shipston Road, Alderminster</b>		
1	Anne Corser	I have already stated that Alderminster has had to absorb a large chunk of development despite having few amenities. There should be no further building there.
2	Alderminster Parish Council	The Council does not agree that land east of Shipston Road, Alderminster should be identified specifically for self build/custom housebuilding. None of the applicants who have registered with Stratford District Council for self

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>build have expressed the desire to build a property in a rural village such as Alderminster, Moreover, all applicants would like to build four or five bedroomed houses. Houses on such a scale on a prominent site would be out of keeping with the rest of the village. Given that Alderminster has already expanded beyond the number of new dwellings allocated under the Core Strategy, any further increase can only be detrimental to the village. It should be noted that the majority of the new houses on the Barwood Development on the Shipston Road remain unsold. It would be illogical to allocate land for any further development under the current circumstances.</p>
3	Karen Jones	<p>According to data released by Stratford-on-Avon District Council, by 31st March 2017 Alderminster had committed to 34 new dwellings. The adopted Core Strategy identifies 32 new dwellings to be both appropriate and achievable for a LSV 4. Alderminster is one of a few LSV4s to have delivered its commitment to new homes. An additional development of 10-15 dwellings would be a significant further increase and is likely to have significant impact on the village infrastructure. However, Alderminster Parish Council would receive no Community Infrastructure Levy (CIL) for infrastructure and community facilities. Assuming an average unit size of 150 square metres and no adopted Neighbourhood Plan, Alderminster loses the opportunity of between £16,875 to £50,625 in CIL to ease the impact of 10-15 additional dwellings. 1 would urge caution to ensure: a), landowners/developers are not using Self-build/ Custom build to monetise land that might not otherwise be granted planning permission', b), Self-build/Custom build is not used as a legal means of tax avoidance; c), the existing local community is not disadvantaged by lack of tax revenue to adapt infrastructure/community facilities in response to increase in local population.</p>
4	Rebecca Lockwood	<p>Land east of Shipston Road, Alderminster (for approx. 10-15 plots) - this land is significantly sloping and as such is not appropriate for building. Other properties along the same hill have been structurally damaged and required underpinning. Building costs would be high and self or custom builders would be unlikely to accept the additional risk or cost of a build.</p> <p>Alderminster has reached its requirement for additional houses as per the Parish Council opinion.</p> <p>6 new houses that are in the process of being built are still not sold, 2 years after going on the market showing that there is not a need for houses in the village.</p>
5	Rosconn	<p>In respect of a) Land east of Shipston Road, Alderminster, Rosconn Strategic Land fully support the identification of this site for custom build to assist in meeting the Council's obligation to provide sufficient sites to meet the needs identified on the Self and Custom Build Register. The site is available, suitable and deliverable, and most importantly is a viable proposition for custom build housing.</p>
6	Warwickshire County Council	<p>Land east of Shipston Road, Alderminster - Although the site itself is not at significant flood risk, there are known flooding issues directly downstream. The proposals put forward should be robust and should not</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		increase the downstream issues. The flow rates for the site should be restricted to Greenfield rates with suitable measures in place to go below 5 l/s if required.
<b>(b) Land west of Bush Heath Lane, Harbury</b>		
1	Harbury Parish Council	Harbury Parish Council has no objection to the inclusion of the site in Bush Heath Lane, Harbury for self-build subject to the homes being restricted to occupancy/ownership by people with a local connection to Harbury. To retain the housing stock for people with a local connection, we would like this to apply to subsequent sales too.
2	Greenwood Planning on behalf of S Brough	<p>We support the allocation of land west of Bush Heath Lane, Harbury for self-build housing. The site is available and has no significant planning constraints. It has been demonstrated that there is considerable demand from people on the Self-build Register for the plots here. Positive discussions have been carried out with Stratford DC Policy and Development Management Officers and written advice provided (ref. PREAPP/00213/17).</p> <p>The Parish Council has commented <i>"No objection subject to a local (Harbury) connection clause"</i>. As above, we have no problem with a legal agreement requiring the plots to be offered to people with a connection to Harbury Parish in the first instance, then broadening out to Stratford on Avon District - subject to resolution of details. As above, the need for a local connections clause controlling the sales of the houses once they are built is disputed.</p>
3	John McGowan	Support
4	Warwickshire County Council	No comment
<b>(c) Land west of Glebe Close, Stockton</b>		
1	Tim Sharples	In relation to Stockton, please see the attached letter [see No.6 below] which explains the benefits to both Stockton Parish Council, and hence the village, and the 1 <sup>st</sup> Stockton Scouts, of extending the BUAB to include the area known as 'Land off Glebe Close'.
2	Mr and Mrs G Millidge	We write to support the inclusion of Land west of Glebe Close, Stockton as an allocated Self build and Custom Housing building site, within the proposed Site Allocations Plan.

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
3	Acres Land and Planning on behalf of the Sharples family	We welcome the inclusion of the site off Glebe Close, Stockton which is being promoted for self-build by my client, the Sharples family. This site has the ability to deliver new homes (of a variety of types and designs which people actually want) within the village, which people may not have been able to access in the past. The allocation of this site will also effectively allow the delivery of the consent for the Scout Hut, which was granted in 2016 but has not been able to be implemented before now, since the two sites are inextricably linked. It will also facilitate the agreement of a lease for the public open space to the north of the site which is owned by the same family.
4	Sport England	The site land west of Glebe Close, Stockton is adjacent to a recreational ground which contains a playing pitch and children's play area. In viewing OS mapping the site is labelled as a recreation ground. However, the planning authority and site promoter have advised that the OS map labelling does not reflect the use of the site with it being private land, which was leased to a local Scout Group for scouting activities. The lease to Scout Group expired in 2007 though the owners of the site have allowed scouting activities to continue. The proposed site sits in a wider field where the Scouts Group in August 2016 have permission for a new Scout Hut (16/0 195 UP UL). In viewing historical imagery of the site from 1999 onwards the site has not contained any sporting or recreational facilities unlike the adjoining field, which was leased to the Parish Council up until 2010 for use as a playing field. Despite the expiration of the lease access has been maintained on the playing field. Given the above it is viewed that the site does not constitute as being playing field land with it not containing a delineated playing pitch and it not forming part of the adjacent recreation ground. However, any proposal for the site should ensure the sporting use of the adjoining playing field land is not prejudiced.
5	Warwickshire County Council	Land west of Glebe Close, Stockton - There appears to be localised surface water flooding at the outer corner of the site. An assessment of the scale of this flooding should be made and appropriate measures implemented.
6	First Stockton Scout Group	<p>I am writing on behalf of the Executive Committee for 1st Stockton Open Scout Group, in response to the above consultation. As current tenants of the identified site, we have a special interest in its possible future development.</p> <p>The site has been the subject of a previous (unsuccessful) planning application by the landowners (15/03449/OUT Land off Glebe Close, Stockton), alongside which an agreement was made for reprovision of Scouting facilities within a smaller area alongside the development plot. A concurrent planning application for a new Scouting facility (16/01951/FUL Playing Field, St Michael's Crescent, Stockton) was successful, however the offer of reprovision was nullified by the refusal of the housing development.</p> <p>At present, 1st Stockton Open Scout Group operates from the site under consideration for Self-Build and Custom Housebuilding. The original lease having expired, the group does not currently have security of tenure</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>and therefore faces the possibility of closure. It is our understanding that, should the site be allocated for Self-Build / Custom Housebuilding and planning permission secured, the landowner intends to honour the original agreement for reprovision of Scouting facilities as follows:</p> <ol style="list-style-type: none"> <li>1. The area contained within the red line on application 16/01951/FUL, including the access track, to be gifted to 1st Stockton Open Scout Group. The land to be used for promoting scouting activity; if scouting activities cease at any time, the land to be returned to the current owners. The access track is currently used by other land owners to access fields beyond the proposed development, so would need to be available for this new access made available.</li> <li>2. In lieu of a separate financial contribution to the new Scout Hut, the landowner to: <ul style="list-style-type: none"> <li>• Gift the land, as noted above.</li> <li>• Provide a foundation for the new scouting facility.</li> <li>• Assist with demolition of the existing building.</li> <li>• Move existing services over to the new location.</li> <li>• Relocate the car parking area.</li> <li>• Provide 'No profit' construction of the new building.</li> </ul> </li> <li>3. 1st Stockton Open Scout Group to be granted continued occupancy of the current premises until completion of the new facility.</li> <li>4. Use of the adjoining Playing Field for wider Scouting activities to be granted.</li> <li>5. The landowner to erect a secure boundary between the development site and the new Scout area, planned to be a 6ft high close-boarded fence.</li> </ol> <p>I can confirm that 1st Stockton Open Scout Group remains in support of the above agreement, which represents the best opportunity for securing the long-term future of this valuable community organisation.</p>
<p><b>Officer Response</b></p> <p>Some of the comments made under this heading do not need a response as they are of a factual or observational nature, or do not relate to the scope of the Site Allocations Plan. The following comments do require a specific response:</p> <p>General comments  Nos.7/8/9 – other sites will be considered for self-build development against the provisions of the policy in the Site Allocations Plan.</p>		

No.	Source	Comment
		<p>Nos.10/14/15/16/17 – the promotion of these site wholly or partly for self-build is noted and they have been assessed accordingly.</p> <p>Alderminster site: Nos.1/2/3/4 – the concerns expressed will be taken fully into account when assessing a specific scheme.</p> <p>Harbury site: Nos.1/2 – the issue of subsequent occupancy controls requires careful consideration. (See response to Question 4.1)</p> <p>Stockton site: No.4 – it is noted that Sport England now accepts that the site is not in recreational use. No.6 – the expectations of the Scout Group are noted and should be incorporated into any scheme promoted on the site.</p>
		<p><b>Officer Recommendation</b></p> <p>The following sites should be allocated in the Site Allocations Plan solely for self-build and custom-build dwellings (see accompanying site plans):</p> <p>Proposal SB.1: North of Allimore Lane, Alcester - approximately 15 plots</p> <p>Proposal SB.2: East of Shipston Road, Alderminster – approximately 15 plots</p> <p>Proposal SB.3: South of Church Street, Hampton Lucy – approximately 10 plots</p> <p>Proposal SB.4: West of Bush Heath Lane, Harbury – approximately 10 plots</p> <p>Proposal SB.5: North of Collingham Lane, Long Itchington – approximately 10 plots</p> <p>Proposal SB.6: North of Dog Lane, Napton-on-the-Hill – approximately 5 plots</p> <p>Proposal SB.7: West of Coventry Road, Southam – approximately 10 plots</p> <p>Proposal SB.8: West of Jubilee Fields, Stockton – approximately 15 plots</p> <p>Proposal SB.9: North of Millers Close, Welford-on-Avon – approximately 10 plots</p>

**Topic: Sustainability Appraisal Report**

No.	Source	Comment
1	WYG on behalf of Barwood Developments	<p>There is no objection raised to the criteria identified in the consultation document that have been utilised in the definition of the Settlement Boundaries. However, the Council’s consideration of criteria for defining boundaries through Sustainability Appraisal (SA) Objectives is inconsistent in terms of application and conclusions.</p> <p>In particular, the application of SA Objective 13: Housing should be reconsidered. Para 5.9 of the Initial Sustainability Appraisal report states that <i>“defining a tight boundary will have positive effects for housing through controlling the location of future development...”</i>.</p> <p>This is objected to. As set out in Section 3.0 above, the Council’s housing target over the Core Strategy period is a minimum and in addition, account should also be taken of other needs which have been identified or which may arise. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises and the impact of drawing tight development boundaries could therefore be neutral or even negative across the Plan period. Furthermore, not allowing flexibility for growth where it is needed could impact the ability of a settlement to sustain shops and services in the long term, to the detriment of the settlement and its community.</p> <p>Failure to identify sufficient land to plan for such growth and also identified local need could also result in groups of people in housing need having to move away due to an insufficient supply of the right types of housing. Settlement boundaries should be revisited to allow for need to be met. This would, in turn have a greater positive effect (Major Positive) in terms of the SA analysis that has already been undertaken.</p> <p>The Initial Sustainability Analysis should be revisited with reference to the provision of housing, and to the ability of settlement boundaries to meet local needs as well as Core Strategy requirements. In turn, this will allow the development boundaries proposed in any future consultation documents to accord with the NPPF’s presumption in favour of sustainable development, as well as significantly boosting housing supply.</p> <p>SA Objective 4: Flooding should also be revisited. As identified on page 4/15, Appendix III of the Initial SA, Core Strategy Policy CS.4 will mitigate against any negative impacts of flooding <i>“with likely residual neutral effects for both options”</i>. Flood risk is effectively managed through a raft of national guidance and also Core Strategy policies and Settlement Boundary delineations will not impact flood risk in any way, as other policies will ensure the matter is adequately dealt with. The impact should therefore be neutral for all development boundary options.</p> <p>Similarly, SA Objection 10: Transport should be reconsidered. Whilst a ‘loose’ development boundary may result in additional traffic in, inter alia, the villages, the provision of additional land for development within revised development boundaries could also ensure that local public transport services are maintained and/or enhanced</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>through additional use by residents, resulting in a beneficial effect. It may also enable future residents to live nearer their place of employment, than is currently the case.</p>
2	WYG on behalf of Bellway Homes	<p>There is no objection raised to the criteria identified in the consultation document that have been utilised in the definition of the Settlement Boundaries. However, the Council's consideration of criteria for defining boundaries through Sustainability Appraisal (SA) Objectives is inconsistent in terms of application and conclusions.</p> <p>In particular, the application of SA Objective 13: Housing should be reconsidered. Para 5.9 of the Initial Sustainability Appraisal report states that "<i>defining a tight boundary will have positive effects for housing through controlling the location of future development...</i>".</p> <p>This is objected to. As set out in Section 3.0 above, the Council's housing target over the Core Strategy period is a minimum and in addition, account should also be taken of other needs which have been identified or which may arise. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises and the impact of drawing tight development boundaries could therefore be neutral or even negative across the Plan period. Furthermore, not allowing flexibility for growth where it is needed could impact the ability of a settlement to sustain shops and services in the long term, to the detriment of the settlement and its community.</p> <p>Failure to identify sufficient land to plan for such growth and also identified local need could also result in groups of people in housing need having to move away due to an insufficient supply of the right types of housing. Settlement boundaries should be revisited to allow for need to be met. This would, in turn have a greater positive effect (Major Positive) in terms of the SA analysis that has already been undertaken.</p> <p>The Initial Sustainability Analysis should be revisited with reference to the provision of housing, and to the ability of settlement boundaries to meet local needs as well as Core Strategy requirements. In turn, this will allow the development boundaries proposed in any future consultation documents to accord with the NPPF's presumption in favour of sustainable development, as well as significantly boosting housing supply.</p> <p>SA Objective 4: Flooding should also be revisited. As identified on page 4/15, Appendix III of the Initial SA, Core Strategy Policy CS.4 will mitigate against any negative impacts of flooding "<i>with likely residual neutral effects for both options</i>". Flood risk is effectively managed through a raft of national guidance and also Core Strategy policies and Settlement Boundary delineations will not impact flood risk in any way, as other policies will ensure the matter is adequately dealt with. The impact should therefore be neutral for all development boundary options.</p> <p>Similarly, SA Objection 10: Transport should be reconsidered. Whilst a 'loose' development boundary may result in additional traffic in, inter alia, the villages, the provision of additional land for development within revised</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>development boundaries could also ensure that local public transport services are maintained and/or enhanced through additional use by residents, resulting in a beneficial effect. It may also enable future residents to live nearer their place of employment, than is currently the case.</p>
3	WYG on behalf of Spitfire Properties	<p>There is no objection raised to the criteria identified in the consultation document that have been utilised in the definition of the Settlement Boundaries. However, the Council's consideration of criteria for defining boundaries through Sustainability Appraisal (SA) Objectives is inconsistent in terms of application and conclusions.</p> <p>In particular, the application of SA Objective 13: Housing should be reconsidered. Para 5.9 of the Initial Sustainability Appraisal report states that "<i>defining a tight boundary will have positive effects for housing through controlling the location of future development...</i>".</p> <p>This is objected to. As set out in Section 3.0 above, the Council's housing target over the Core Strategy period is a minimum and in addition, account should also be taken of other needs which have been identified or which may arise. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises and the impact of drawing tight development boundaries could therefore be neutral or even negative across the Plan period. Furthermore, not allowing flexibility for growth where it is needed could impact the ability of a settlement to sustain shops and services in the long term, to the detriment of the settlement and its community.</p> <p>Failure to identify sufficient land to plan for such growth and also identified local need could also result in groups of people in housing need having to move away due to an insufficient supply of the right types of housing. Settlement boundaries should be revisited to allow for need to be met. This would, in turn have a greater positive effect (Major Positive) in terms of the SA analysis that has already been undertaken.</p> <p>The Initial Sustainability Analysis should be revisited with reference to the provision of housing, and to the ability of settlement boundaries to meet local needs as well as Core Strategy requirements. In turn, this will allow the development boundaries proposed in any future consultation documents to accord with the NPPF's presumption in favour of sustainable development, as well as significantly boosting housing supply.</p> <p>SA Objective 4: Flooding should also be revisited. As identified on page 4/15, Appendix III of the Initial SA, Core Strategy Policy CS.4 will mitigate against any negative impacts of flooding "<i>with likely residual neutral effects for both options</i>". Flood risk is effectively managed through a raft of national guidance and also Core Strategy policies and Settlement Boundary delineations will not impact flood risk in any way, as other policies will ensure the matter is adequately dealt with. The impact should therefore be neutral for all development boundary options.</p>

Site Allocations Plan Revised Scoping and Initial Options Consultation (January – March 2018) – Analysis of Comments

No.	Source	Comment
		<p>Similarly, SA Objection 10: Transport should be reconsidered. Whilst a ‘loose’ development boundary may result in additional traffic in, inter alia, the villages, the provision of additional land for development within revised development boundaries could also ensure that local public transport services are maintained and/or enhanced through additional use by residents, resulting in a beneficial effect. It may also enable future residents to live nearer their place of employment, than is currently the case.</p>
4	WYG on behalf of Follett Property Holdings	<p>There is no objection raised to the criteria identified in the consultation document that have been utilised in the definition of the Settlement Boundaries. However, the Council’s consideration of criteria for defining boundaries through Sustainability Appraisal (SA) Objectives is inconsistent in terms of application and conclusions.</p> <p>In particular, the application of SA Objective 13: Housing should be reconsidered. Para 5.9 of the Initial Sustainability Appraisal report states that “<i>defining a tight boundary will have positive effects for housing through controlling the location of future development...</i>”.</p> <p>This is objected to. As set out in Section 3.0 above, the Council’s housing target over the Core Strategy period is a minimum and in addition, account should also be taken of other needs which have been identified or which may arise. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises and the impact of drawing tight development boundaries could therefore be neutral or even negative across the Plan period. Furthermore, not allowing flexibility for growth where it is needed could impact the ability of a settlement to sustain shops and services in the long term, to the detriment of the settlement and its community.</p> <p>Failure to identify sufficient land to plan for such growth and also identified local need could also result in groups of people in housing need having to move away due to an insufficient supply of the right types of housing. Settlement boundaries should be revisited to allow for need to be met. This would, in turn have a greater positive effect (Major Positive) in terms of the SA analysis that has already been undertaken.</p> <p>The Initial Sustainability Analysis should be revisited with reference to the provision of housing, and to the ability of settlement boundaries to meet local needs as well as Core Strategy requirements. In turn, this will allow the development boundaries proposed in any future consultation documents to accord with the NPPF’s presumption in favour of sustainable development, as well as significantly boosting housing supply.</p> <p>SA Objective 4: Flooding should also be revisited. As identified on page 4/15, Appendix III of the Initial SA, Core Strategy Policy CS.4 will mitigate against any negative impacts of flooding “<i>with likely residual neutral effects for both options</i>”. Flood risk is effectively managed through a raft of national guidance and also Core Strategy policies and Settlement Boundary delineations will not impact flood risk in any way, as other policies will ensure the matter is adequately dealt with. The impact should therefore be neutral for all development boundary options.</p>

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5	WYG	<p>There is no objection raised to the criteria identified in the consultation document that have been utilised in the definition of the Settlement Boundaries. However, the Council’s consideration of criteria for defining boundaries through Sustainability Appraisal (SA) Objectives is inconsistent in terms of application and conclusions.</p> <p>In particular, the application of SA Objective 13: Housing should be reconsidered. Para 5.9 of the Initial Sustainability Appraisal report states that <i>“defining a tight boundary will have positive effects for housing through controlling the location of future development...”</i>.</p> <p>This is objected to. As set out in Section 3.0 above, the Council’s housing target over the Core Strategy period is a minimum and in addition, account should also be taken of other needs which have been identified or which may arise. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises and the impact of drawing tight development boundaries could therefore be neutral or even negative across the Plan period. Furthermore, not allowing flexibility for growth where it is needed could impact the ability of a settlement to sustain shops and services in the long term, to the detriment of the settlement and its community.</p> <p>Failure to identify sufficient land to plan for such growth and also identified local need could also result in groups of people in housing need having to move away due to an insufficient supply of the right types of housing. Settlement boundaries should be revisited to allow for need to be met. This would, in turn have a greater positive effect (Major Positive) in terms of the SA analysis that has already been undertaken.</p> <p>The Initial Sustainability Analysis should be revisited with reference to the provision of housing, and to the ability of settlement boundaries to meet local needs as well as Core Strategy requirements. In turn, this will allow the development boundaries proposed in any future consultation documents to accord with the NPPF’s presumption in favour of sustainable development, as well as significantly boosting housing supply.</p> <p>SA Objective 4: Flooding should also be revisited. As identified on page 4/15, Appendix III of the Initial SA, Core Strategy Policy CS.4 will mitigate against any negative impacts of flooding <i>“with likely residual neutral effects for both options”</i>. Flood risk is effectively managed through a raft of national guidance and also Core Strategy policies and Settlement Boundary delineations will not impact flood risk in any way, as other policies will ensure</p>

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6	Natural England	<p><b>Sustainability Appraisal Report incorporating SEA</b></p> <p><b>Consultation question 1:</b>  <b>Are there other relevant policies, plans, programmes, and sustainable development objectives that will affect or influence the Site Allocation plan?</b></p> <p>Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> <li>• Green infrastructure strategies</li> <li>• Biodiversity plans.</li> <li>• Rights of Way Improvement Plans.</li> <li>• River basin management plans.</li> <li>• AONB and National Park management plans.</li> <li>• Relevant landscape plans and strategies.</li> </ul> <p><b>Consultation question 2:</b>  <b>Do you agree that the baseline data collected in Appendix 2 is appropriate to the Site Allocation Plan Review?</b></p> <p>Natural England advise including baseline data (and a related indicator) on the critical loads, levels, and background levels of pollutants, and in particular nitrogen deposition and oxides of nitrogen (both associated with vehicular usage) for designated sites of National importance (Sites of Special Scientific Interest - SSSIs) and sites of European importance (Special Protection Areas - SPAs, Special Areas of Conservation - SACs and Ramsars). This information can be found on the APIS website. The protection of designated sites is covered e.g. in paras 118 and 119 of the NPPF, along with air quality which is covered in para. 124. Please see attached Annex A for further advice on sources of local plan evidence on the natural environment.</p> <p><b>Consultation question 3:</b>  <b>Do you have, or know of, any additional baseline data which should be added to that already listed?</b>  Please see response to Q2 above.</p>

No.	Source	Comment
		<p><b>Consultation question 4:</b>  <b>As far as you are aware, are there any inaccuracies or anomalies in the data presented?</b>                      We are not aware of any inaccuracies in the data.</p> <p><b>Consultation question 5:</b>  <b>Do you agree that these are the key sustainability issues for the Site Allocation Plan Review?</b>                      In point 3.13 you highlight a potential for ‘biodiversity loss’ due pressure of development. The SAP review should seek to apply net gain principles to proposals designated within.</p> <p><b>Consultation question 6:</b>  <b>Are you aware of any issues which, in your opinion, should be added, or any that should be removed?</b>                      Please see response to Q5 above.</p> <p><b>Consultation question 7:</b>  <b>Are the objectives suitable in the context of the Site Allocation Plan?</b>                      The SA3 objective emphasises the protection of designated sites. There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We therefore suggest adding to the Sustainability Objectives indicators to ensure that current ecological networks are not compromised, and future improvements to habitat connectivity are not prejudiced.</p> <p>The SA7 objective highlights emphasis to protect and conserve natural resources one of which being agricultural land. This SA objective should seek to give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource which underpin our well being and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver, for example:</p> <p>1. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) <i>‘The Natural Choice: securing the value of nature’</i> (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:</p> <ul style="list-style-type: none"> <li>• A Vision for Nature: ‘We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely’ (paragraph 2.5).</li> </ul>

No.	Source	Comment
		<ul style="list-style-type: none"> <li>• Safeguarding our Soils: ‘Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife’ (paragraph 2.60).</li> <li>• Protect ‘best and most versatile’ agricultural land’ (paragraph 2.35).</li> </ul> <p>2. The conservation and sustainable management of soils also is reflected in the National Planning Policy Framework (NPPF), particularly in paragraphs 109 and 112. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to:</p> <ul style="list-style-type: none"> <li>• Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.</li> <li>• To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.</li> <li>• Ensure soil resources are conserved and managed in a sustainable way.</li> </ul> <p>3. To assist in understanding agricultural land quality within the plan area and to safeguard ‘best and most versatile’ agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new ALC survey, for any sites they wished to put forward for consideration in the Local Plan</p> <p>4. General mapped information on soil types is available as ‘Soilscapes’ on the <a href="http://www.magic.gov.uk">www.magic.gov.uk</a> and also from the LandIS website <a href="http://www.landis.org.uk/index.cfm">http://www.landis.org.uk/index.cfm</a> which contains more information about obtaining soil data.</p> <p>5. Further guidance for protecting soils (irrespective of their ALC grading) both during and following development is available in Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, to assist the construction sector in the better protection of the soil resources with which they work, and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst</p>

No.	Source	Comment
		<p>maintaining a healthy natural environment, and we would advise that the Code be referred to where relevant in the development plan.</p> <p>SA8 should consider; The Site Allocation Plan is likely to generate additional nitrogen emissions as a result of increased Traffic generation which can be damaging to the natural environment.</p> <p>The effect on local roads in the vicinity of the proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a great distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local air quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.</p> <p>Regarding effects on general air quality (regional and national), we advise that in addition to assessing local air quality effects, consideration should also be given to national air quality impacts resulting from diffuse pollution over a greater area. The UK government has international commitments to reduce national emissions of pollutants and consideration should be given the impacts that occur on a regional, national and international scale and which also contribute to background concentrations.</p> <p><b>Consultation question 8:</b> <b>Are there any other additional objectives that should either be included or removed?</b> No comment.</p> <p><b>Consultation question 9:</b> <b>It may be necessary to rank the objectives to assess options. Do you have any comments on those which hold particular importance?</b> We have no comments on this, however due regard must be given to legislative framework, for instance European sites and species are afforded the highest level of importance and protection.</p> <p><b>Consultation question 10:</b> <b>Do the indicators provide a relevant measure for the associated objectives? If not, then please suggest additional indicators.</b> As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).</p>

No.	Source	Comment
		<p>The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Natural England considers the indicators in the SEA document to provide relevant measures for the associated objectives on the whole (although please see Q7, above). Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following additional indicators could also be appropriate to include in the SEA document:</p> <p><b>Biodiversity:</b></p> <ul style="list-style-type: none"> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance (e.g. SSSIs, SPAs, SACs etc.).</li> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations</li> </ul> <p><b>Landscape:</b></p> <ul style="list-style-type: none"> <li>• Amount of new development in AONB with commentary on likely impact.</li> </ul> <p><b>Green infrastructure:</b></p> <ul style="list-style-type: none"> <li>• Percentage of population having access to natural greenspace within 400 metres of their home.</li> <li>• Hectares of accessible open space per 1000 population.</li> </ul>
<p><b>Officer Response</b></p> <p>A response to the comments on the SA/SEA that accompanied the consultation will be included in the SA Report which will be published alongside the submission version of the SAP.</p>		
<p><b>Officer Recommendation</b></p> <p>None</p>		

## Site Allocations Plan Further Focused Consultation (January-March 2019)

### Analysis of Comments

<b>Contents</b>	<b>Page No.</b>
General – all other comments	2
Question 1 - Do you agree with the identification of a Birthplace / Gateway Cultural Quarter in Stratford-upon-Avon?	10
Question 2 - Do you agree with the boundary of the Birthplace / Gateway Cultural Quarter Zone?	16
Question 3 - Do you agree with the proposed policy principles for the Birthplace / Gateway Cultural Quarter Zone?	19
Question 4 - Should the Quinton Railway Technology Centre at the former Long Marston Deport site near Long Marston be specifically identified in the Site Allocations Plan?	24
Question 5(a) - Safeguard land for A46 improvements at Junction of A46 and A422 Alcester Road (Wildmoor)?	48
Question 5(b) Safeguard land for A46 improvements at Junction of A46 and A3400 Birmingham Road (Bishopton)	54
Question 5(c) - Safeguard land at Junction of A46 and A439 Warwick Road (Marraway)	57
Question 6 Do you agree with the proposal for an Employment Exceptions Sites Policy?	60

## Topic: General - All other comments

No.	Respondent	Summary of Comments
1	<b>Sport England</b> - Rajvir Bahey	In reviewing the documents Sport England raise no comments.
2	<b>HS2 Ltd</b> - Peter Attwell	We have no comments to make
3	<b>Warwickshire County Council</b> - Jasbir Kaur	<p>The County Council as the Local Flood risk Authority made detailed comments on the site allocation plan in February 2018. These comments still stand and should be read alongside this consultation.</p> <p>All new developments should include Sustainable urban Drainage Systems, and site allocation plans should look to address flood risk and surface water drainage within them.</p> <p>For additional information about SuDS, please visit our website  <a href="https://www.warwickshire.gov.uk/floodpreappadvice">https://www.warwickshire.gov.uk/floodpreappadvice</a></p>
4	<b>National Grid</b> (Wood PLC) - Lucy Bartley	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.
5	<b>Coventry and Warwickshire LEP</b> - Bill Blincoe	The CWLEP welcomes this set of proposals as a further positive step to develop a number of key economic themes established in the adopted Core Strategy(2016). The economy of the sub region is changing rapidly and it is important that policy frameworks remain up to date and relevant to the changing economic environment .These proposals focus on four sets of key proposals which are dealt with as they appear in the consultation document.
6	<b>The Coal Authority</b> - Melanie Lindsley	I can confirm that the Coal Authority has no specific comments to make on this current consultation.
7	<b>Public Health Warwickshire</b> - Gemma McKinnon	<p>In relation to the above local plan consultation, WCC Public Health has the following comments to make:</p> <p>We recommend that as part of the Sustainability Appraisal / Strategic Environmental Assessment process an Health Impact Assessment (HIA) is carried our to ensure that health and wellbeing is considered within any proposals from the outset.</p>

No.	Respondent	Summary of Comments
		We are keen to be involved with these proposals as they progress.
8	<b>Highways England - Eri Wong</b>	Following our review of the latest iteration of the Site Allocations Plan (SAP) for Stratford-on-Avon District, we can confirm that Part 1 Birthplace/Gateway Cultural Quarter, Part 2 Quinton Rail Technology Centre and Part 4 Employment Exception Sites as proposed do not suggest any material impacts on the SRN at the present stage beyond those already indicated during the development of the adopted 2016 Core Strategy and subsequent draft submission consultation. Therefore, we have no comments regarding these three parts.
9	<b>South Staffordshire District Council - Edward Fox</b>	<p>South Staffordshire Council consider that the opportunity should be taken within the Site Allocations Plan to include a commitment to an early Local Plan Review. It is suggested that the scope of the review should include a commitment to testing the evidence that has emerged since the adoption of the Core Strategy regarding the HMA shortfalls. South Staffordshire Council was similarly required to include a Local Plan Review policy into our Site Allocation's Document by our Inspector.</p> <p>Consideration should also be given to indicating within the Site Allocations Plan that the release the reserve sites identified in the SAP will be considered as making a contribution towards the GBHMA shortfall in line with the 50/50 distribution proposed in the GL Hearn study.</p>
10	<b>Bovis Homes</b>	<p>Bovis Homes has previously submitted representations to the 'Revised Scoping and Initial Options Consultation' in March 2018 and more recently the draft 'Strategic Housing Land Availability Assessment 2018' in September of last year.</p> <p>Bovis control a significant parcel of the land to the east of Southam that has been proposed as a 'Reserve Housing Site' in the emerging 'Site Allocations Plan'. We have a number of concerns with the way in which our representations have been treated to date. Indeed, the consultation draft version of the SHMA advises that there has been no contact from the owner of this site as part of the promotion of this document. This is clearly not the case and it appears the evidence put in front of the Council by my colleagues has not been taken into account in the preparation of the SHMA or the emerging Site Allocations Plans to date.</p> <p>Land east of Southam - Background</p> <p>The land in Bovis's control is 30.6 hectares in size, as identified by the plans attached in Appendix A of these representations. It is envisaged that 15 hectares could come forward for development providing circa 450 dwellings, with the balance being available for the delivery of a one form entry primary school and public open space. The site is immediately adjacent the built edge of Southam with existing areas of residential development to the south and west. It is in close proximity to Core Strategy Housing allocation SOU.3 - South of Daventry Road, Southam, which is expected to deliver 530 dwellings. This site now has planning permission.</p> <p>The site itself comprises a number of agricultural fields separated by well-maintained hedgerows with supporting</p>

No.	Respondent	Summary of Comments
		<p>agricultural buildings in the south-west corner. The site boundaries are well defined.</p> <p>Two public rights of way (PROWSMT9 and PROWSM8) and a bridleway (SM30) cross the site. The development could take advantage of these existing connections to the town. They can be upgraded in order to ensure the development is well connected to the town centre via the existing footpath network to the west of the A43. Improving the A423 crossings is a significant advantage of the scheme.</p> <p>The land to the north of the site comprises a series of fields, beyond which is the A46 and an active quarry. The land to the east of the site comprises fields extending into further rural land. The village of Stockton is approximately 1 kilometre to the north-east.</p> <p>The A43 forms the western boundary of the site. There is a strong hedgerow incorporating well established woodland along the A43 corridor adjacent to the edge of the site.</p> <p>The southern boundary of the site is formed by the River Stowe. Large mature trees follow the path of the river.</p> <p>The northern boundary of the site is formed by a well maintained hedgerow with a recent plantation of woodlands adjacent, whilst the eastern boundary is identified by a strong hedgerow.</p> <p>The site has good access to a range of services and facilities. A variety of the services and facilities are within 400 metres of the site, including two primary schools, a Coop, library, Post Office and public house. All of the town centre is within the 800 metre isochrone.</p> <p>Warvvickshire County Council Education has confirmed that a new primary school will be required at Southam to accommodate any new development of a significant scale. It is our understanding this is the only site capable of providing land for a new primary school to meet this requirement.</p> <p><b>The Opportunity</b></p> <p>The Vision Statement has been prepared demonstrating how the site can be brought forward for development. The Vision Statement was submitted alongside the regulation 18 consultation representations of March 2018 and our SHMA response of September 2018. The Vision Statement was informed by a LVIA alongside various other technical reports. The site presents the opportunity for the logical and sustainable growth of Southam in an easterly direction. The site is well connected and located, with close proximity to existing services and facilities. Over half the site will be used for uses other than residential, including significant green infrastructure, providing the opportunity to deliver large areas of public open space and other facilities. The site provides the opportunity to deliver:</p> <ul style="list-style-type: none"> <li>· A high quality residential development within an attractive natural setting that protects the key landscape and visual assets of the site.</li> </ul>

No.	Respondent	Summary of Comments
		<ul style="list-style-type: none"> <li>· Green infrastructure providing a connected network of open spaces, footpaths, cycleways and recreational uses.</li> <li>· Circa 430 new dwellings, meeting the needs of both market and affordable homes across a range of house types and tenures.</li> <li>· This is the only site of sufficient size in the town to deliver the land for a new primary school, if required.</li> <li>· A new at grade safe pedestrian crossing across the A423 and Daventry Road, providing easy access to the town centre, and ensuring the development is well connected to the existing amenities of the town centre and is accessible to all.</li> <li>· A significant amount of new public open space, opening the site to a range of informal recreational uses, to the benefit of the residents of the development and the existing residents of Southam.</li> <li>· Significant new landscaped areas and planting to enhance biodiversity and to assist in assimilating the development into its surroundings and local landscape character.</li> </ul> <p>As the site is being promoted for a house builder, it is capable of delivering 'new housing promptly, to address any housing shortfall that may arise during the course of the plan period. With two outlets, the site could be capable of delivering around 100 dwellings per annum for the Borough. This sets the site apart from sites being promoted by land owners and land promoters, which will inevitably have a longer lead in times, as a developer will need to be found.</p> <p>Promotion through the Core Strategy</p> <p>The land east of Southam is promoted as a potential housing site, through the 'Core Strategy - Proposed Modifications in Response to Inspector's Interim Conclusions', consultation process, as an alternative to allocation 'SOU.3 - south of Daventry Road'. As part of this process, the Council raised two main issues with the proposed allocation of the site.</p> <p>Issue one - Landscape Sensitivity: In order to inform the Core Strategy, White Consultants prepared a Landscape and Sensitivity Assessment (June 2011) that, amongst other things, assessed the sensitivity of broad areas of land for development from a landscape perspective. This study identifies the majority of the land around the edge of Southam as either of high, high/medium or medium landscape sensitivity.</p> <p>The land in Bovis Homes's control forms part of a appraisal parcel 'S001'. It is suggested that this appraisal site is of high/medium landscape sensitivity, restricting its development potential. The assessment parcel does, however, include additional land to the north of the land in Bovis's control. This land is of a higher landscape sensitivity than land in the control of Bovis, as it is at a notably higher level. It is, therefore, our view that the Landscape and Sensitivity Assessment does not properly assess the suitability of Bovis's land interest for development.</p> <p>In order to address this issue, the aforementioned Vision Statement is supported by a full LVIA that accurately reflects the extent of the promoted land. The findings of the LVIA are summarised in section five of the Vision Statement. Taking a landscape-led approach to the development, it has been established that the site is capable of delivering a high quality residential development that can be set within a contained and generous landscape</p>

No.	Respondent	Summary of Comments
		<p>framework that protects and links all landscape, visual, ecological and drainage assets of the site.</p> <p>Issue two - Access: When the site was initially promoted through the Core Strategy process, an access strategy was not in place. WSP has now undertaken a transport appraisal (attached as an appendix to the Vision Statement) that confirms that a suitable access can be established. WSP has been in ongoing discussions with the County Council regarding an access solution. In August 2018 WSP held a pre-application meeting with officers of WCC Highways, following which they issued information to address the comments raised at the meeting, to support the development of a four arm roundabout to serve the scheme. WSP has not received a response to the submission, despite numerous requests for a response. They are, however, of the view that the proposed highways access arrangements are entirely appropriate.</p> <p>As detailed in our representations to the SHMA, evidence of the information provided within the consultation submissions to date has not been properly taken into account by the local authority. There are a number of errors in the SHMA document relating to legal constraints, land ownership, landscape impact and various other matters that have been addressed in the submission to date. We have a number of significant concerns that the SHMA is being used to inform the emerging plan and incorrectly records the suitability of the site for development.</p> <p>Representations</p> <p>The purpose of the 'Further Focus Consultation' is to consult upon specific proposals that have emerged since the previous consultation undertaken in spring 2018. The series of proposed allocations and revisions to the document are identified within the consultation document. We support further consultation being undertaken on-sites where new evidence has emerged relevant to the Site Allocations Plan.</p> <p>As referred to above, there is clearly substantial evidence in support of the allocation of my client's site as a Reserved Housing Site, that has not been properly taken into account by the local authority. This is despite evidence being submitted early in the local plan review process. It is our view that the Further Focused Consultation Document should have identified the possibility of the land to the east of Southam being identified as a reserve housing site, outlining suitability for the development identified by the Vision Document and the technical reports submitted in relation to the site to date. It is our view that the consultation document, in itself, is largely flawed, as it fails to take proper account of the potential to allocate land east of Southam, and other potential allocations that are in a similar position, through the Site Allocations Plan.</p>
11	<b>Environment Agency</b> - Miss Jane Field	Having reviewed the additional sites proposed for allocation, we have no objection to their inclusion within the plan, subject to any applications being submitted for proposals on this land being compliant with overarching development management policies e.g. in relation to the assessment and remediation of contaminated land.
12	<b>Natural England</b> - Hazel Mcdowall	We do not have any significant comments to make but we do have some general points to make that apply across all of the allocations.

No.	Respondent	Summary of Comments
		<p>Wider Landscapes</p> <p>For the larger sites we would recommend that a Landscape and Visual Impact Assessment is carried out and its conclusions should inform each sites development specification.</p> <p>The landscape character of each area should be conserved and enhanced. When the specifications are developed the following could be considered:</p> <ul style="list-style-type: none"> <li>· Avoiding development on sensitive areas of the site or particular landscape features to minimise landscape impact (e.g. specifications relating to building height or soft landscaping).</li> <li>· Retaining and enhancing topography of the site and landscape features such as stone walls, streams, hedges and mature trees on site and provide for successional tree planting.</li> <li>· Landscape plan for site (or landscape enhancement incorporated into any scheme for Green Infrastructure/open spaces).</li> </ul> <p>Biodiversity</p> <p>Factors to consider include whether the allocation will make management of nearby SSSIs and Local Sites less viable e.g. via urbanisation, or lead to severance or isolation of that site or preclude making future links between this site and other sites.</p> <p>Brownfield sites of biodiversity value</p> <p>If any of the sites are of high biodiversity value then appropriate mitigation measures should be secured for the interest features</p> <p>Priority and protected species and habitats</p> <p>Where the site is likely to adversely affect priority and protected species and habitats then appropriate mitigation measures should be specified.</p> <p>Biodiversity Net Gain</p> <p>All of the sites should enhance biodiversity, delivering net gains where possible. In particular, for site specifications consider:</p> <ul style="list-style-type: none"> <li>· Enhancement of existing features, especially on-site hedges, wetlands, woods, aged and veteran trees, watercourses and any geological features.</li> </ul>

No.	Respondent	Summary of Comments
		<ul style="list-style-type: none"> <li>· New habitat creation measures.</li> <li>· Proportion of green roofs on commercial buildings.</li> <li>· Bird and bat boxes.</li> <li>· Biodiversity plan for site (or biodiversity incorporated into any scheme for Green Infrastructure/open spaces).</li> <li>· Measures to protect/enhance/link neighbouring/nearby SSSIs or local sites.</li> <li>· Maximise the biodiversity contribution of any SUDS.</li> </ul>
13	<b>Network Rail</b> – Diane Clarke	<p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <p>Allocations that have a correlation to an increase in station patronage should include engagement with Network Rail. Transport Assessments (TA) should consider the potential for increased footfall from developments to impact stations, as well as vehicle parking / cycle storage at stations. Any enhancements required by increased footfall to be fully funded by developers.</p>

**Officer Response**

A number of the comments made on this subject require a specific response:

No.3 – Flood risk has been and will continue to be taken into account in the preparation of the SAP.

No.9 – Not necessary as the commitment to undertake a review is already set out in Policy CS.17 of the adopted Core Strategy. The Site Allocations Plan provides an interim measure to meet any needs in the short-term acknowledging the length of time strategic plan-making can take.

No.10 - As set out in the consultation document, the Council is not looking to identify additional sites for housing other than reserve sites. The identification of these will be based on the Council’s Strategic Housing Land Availability Assessment (SHLAA) technical work as endorsed by The Cabinet in June 2019. The site East of Southam has been assessed as part of the SHLAA available to view at [www.stratford.gov.uk/siteallocations](http://www.stratford.gov.uk/siteallocations).

No.	Respondent	Summary of Comments
No.12		<p>In respect of biodiversity, the Council has recently adopted its Development Requirements Supplementary Planning document (SPD), Parts M and N of which provide further detailed advice and guidance on Landscape Design and Trees, and Biodiversity and Green Infrastructure, respectively. In respect of landscapes, both the SHLAA technical work and accompanying SA/SEA have considered landscape impacts. However, it is agreed to refer specifically to landscape impacts in the proposals for Napton Brickworks, Wellesbourne Campus and the Quinton Rail Technology Centre as well as insert a new reference to landscape in the Employment Exception Sites policy.</p>
No.13		<p>Noted.</p>
<p><b>Officer Recommendation</b></p> <p>N/a</p>		

DRAFT

## Topic: Question 1 - Do you agree with the identification of a Birthplace / Gateway Cultural Quarter in Stratford-upon-Avon?

Ref	Respondent	Summary of Comments
1	<b>Rebekah Owens</b>	I agree that much improvement is needed in that area and that as it stands, it is not much of an enticement to visitors. My principal concern is that the proposed area covers the property I am currently renting and so naturally I have some sense of insecurity about where my property will fit into all these changes - if, indeed, it even remains a residential property and is not appropriated for another use. I would prefer, if it is at all possible to know in advance if the new proposals include making changes to the residential properties, even if only so that I can make plans.
2	<b>James Furness</b>	Support - no further comment
3	<b>Morrison Park Home Estates – R. Perrin</b>	Support - Because Stratford is a prime tourist destination
4	<b>Laura Taylor</b>	I agree with the identification of a Birthplace gateway but I fail to see why more businesses and houses should be demolished/renovated to provide for further hotels and restaurants. Tourism is a key part of Stratford's future but so are the locals and more effort should be made to develop the shopping experience for locals as well as tourists at the centre of the town. After all tourists visit Shakespeare's Birthplace but they also purchase goods from our shops....or at least they used to before all the high street shops were replaced with cafes, restaurants and hotels
5	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support - no further comment
6	<b>Michael Brockington</b>	Support - no further comment
7	<b>T Pearson</b>	<p>Having visited your exhibition and read your documents, I feel that the Birthplace/Gateway Cultural Quarter is totally wrong. Principally because it addresses the wrong question. The objective as I understand it is to improve the town for tourists and locals alike. To achieve this objective would be to create a win-win situation, and thus is to be applauded. If your plan did attract more tourists the town pavements would be even more crowded and this would be to the inconvenience of the local population, a win-loose.</p> <p>In detail I feel-</p> <ol style="list-style-type: none"> <li>1. Agree an improvement @Arden St.- Clopton Rd. is required, but we are only talking about a couple of buildings that have to be dealt with. see pt 3</li> <li>2. Don't know what this means.</li> </ol>

Ref	Respondent	Summary of Comments
		<p>3. Most tourists arriving along this route are by car / bus and would pass quite quickly anyway.</p> <p>4. See pt 3 The whole of B'ham road need improving.</p> <p>5. This already exists.</p> <p>6. The car park by the health centre, serves the health centre and I see little wrong with it. To change would be inconvenient to locals.</p> <p>7. This car park is unattractive, but stands well back, and along with the bus drop off serves a useful purpose for short stay and disabled tourists. To move it will be negative for tourists.</p> <p>8. These health facilities are modern and functional and are well located on the edge of the town, with adjacent car park and hospital (with its quick x-ray facility). To move it would be a great loss to the local population.</p> <p>9. Don't see any relevance.</p> <p>10. The proposals would neither enhance or improve the vitality of the town, but do the very opposite.</p> <p><b>The Alternative.</b></p> <p>The axis that needs drastic improvement is that from the railway station / new bus stops along Greenhill into town. This railway station is what generates pedestrian flow into the town. I ask you to stand at the crossing at the junction of Alcester Rd. and Arden St. when a train arrives. After walking down the new wide path from the station it changes to a very narrow, overcrowded path, that is really quite dangerous, especially if there are pushchairs, prams and mobility scooters also crossing. All the pavements in the town are quite narrow and have problems with tourist crocodiles stopping at key points. The solution to these problems are to make all the pavements wider as has been done in Henley St. itself. This I believe can be done by a one-way system (attached a proposal for this)</p> <p>This I believe should be the better use of 'Site Allocation', and would be a really win-win for the town.</p> <p>...</p> <p><u>Current Situation.</u></p> <p>The town currently feels dominated by vehicular traffic, often congested, and overcrowded pavements. Congestion is caused by both delivery vehicles and blue badge parking on the roadway. Crowding on the pavements is bad at the bus stops and particularly outside of MacDonald's. The town is also pleased to have many visitors, often in crocodiles, wishing to travel along the 'Historic Spine' and stop outside of the Shakespeare properties to view them. At present there is no clear safe route for this and there is a particular</p>

Ref	Respondent	Summary of Comments
		<p>pinch point outside of Barclay’s Bank.</p> <p><u>Proposal to improve the flow of traffic and pedestrians.</u></p> <p>The basic proposal is to introduce a one-way road system to the town allowing the pavements to be made wider. These wider pavements could be in the style of Henley Street allowing delivery vehicles and blue badge parking off the roadway, thus smoothing the flow for other traffic. The general ambiance could be improved by adding planting within the wider pavements. The ‘Historic Spine’ would now be a clearly defined route along wide paths. Wider pavements outside all the SBT properties and the Registry Office would allow groups to stand without blocking the path.</p> <p>Greenhill, Wood Street and Bridge Street would be one way south, Bridge Street being bus only; High Street and Rother Street one way west; Ely Street one way reversed; Church Street and Chapel Street one way east; Sheep Street one way south; Old Town, between Southern Lane and Church Street, one way north; and Waterside one way reversed from Sheep Street to Bridgefoot. The entry to Bridge Street from Bridgefoot would be closed, all traffic from the south being sent around Guild Street. Thus creating a number of gyratories within the town. The whole area also subject to a 20mph speed limit with raised pedestrian crossings to further slow the traffic.</p> <p>All bus services would make a stop at Greenhill/Wood Street and terminate at Bridge Street. Buses would wait at these stops only to put down and pick up passengers. Buses between services would then wait either in Windsor Street or on Greenhill. All services would then start at Greenhill/Wood Street.</p> <p>The Christmas market could be accommodated on the wider pavements without the need to have buses diverted from the standard route. Similarly the Mop Fairs could also be accommodated on the wider pavements, with a temporary safety barrier erected along the side of the road way to separate it from the buses. High Street and Rother market would be closed for the Mop and any larger items that could not be accommodated could be on the car park between Rother market and Grove Road.</p> <p>Traffic lights within the town could be removed and better raised crossings for pedestrians introduced, traffic lights on the gyratory would remain as at present. The traffic light sequence at the end of the Alcester Road would be changed to allow straight on, left and right turns from Grove Road, Alcester Road and Arden Road, then for pedestrians. The slip turn from Alcester to Arden Roads could be paved over to give a wider pathway and the barriers removed to allow diagonal crossing of this junction by pedestrians. This would greatly improve this difficult and overcrowded crossing and give a wide path from the station all the way along the ‘Historic Spine’. The only problem would be congestion on Arden Road caused by Birmingham Road, the solution to which might be the opposite of the town and make the pavements narrower and widen the road to improve traffic flow.</p>
8	<b>Historic England</b> – Rohan	The initiative and associated investment provides a welcome opportunity to enhance ones experience of this historically important area of the town. Historic England would welcome the opportunity to participate in the

Ref	Respondent	Summary of Comments
	Torkildsen	proposed Visioning and Masterplanning Framework SPD due to the heritage significance of Stratford.
9	<b>Stratford Ramblers</b> – Harry Rowe	This should enhance the experience of pedestrians in the town
10	<b>Warwickshire County Council</b> – Jasbir Kaur	We support this matter
11	<b>Peter Emmerson</b>	If used properly, this should facilitate the sensitive, high quality development of an area that currently includes some very run-down, semi-derelict properties, that gives a very poor impression of the town when approaching from the north. It is an opportunity to create an approach to the town which would be fitting for an international tourist destination. It is also an opportunity to replace the neglected Windsor Street (so-called) Shoppers' Carpark, which is a disgrace to the town.
12	<b>Coventry and Warwickshire LEP</b> – Bill Blincoe	The initiative to create this part of the Town Centre as a Cultural Quarter, building on the existing Shakespeare's Birthplace facilities and visitor attraction is welcomed. The CWLEP Strategic Economic Plan identifies tourism and the visitor economy as one of its four "Strategic Pillars" of its future strategy and a key to continued economic growth. The CWLEP is keen to support proposals that fit within these future priorities.
13	<b>Gateway One Limited (Jones Lang LaSalle)</b>	Yes. In principle, my client is in support of the identification of the proposed Quarter, subject to considerations highlighted in answering questions 2 and 3 below.
14	<b>Stephen Ollerenshaw</b>	I agree with the reasons set out in the consultation document and have nothing further to add.
15	<b>Shakespeare Birthplace Trust</b> – Mark Armstrong	<p>The SBT supports the integrated and ambitious partnership thinking as to how Stratford on Avon rises to a series of challenges, including transport, access, quality of environment, protection of historic assets, cultural content, visitor experience and global positioning.</p> <p>In principle the designation of a defined area should assist with this process as a context for future decisions on land use, environmental impact, transport, employment, economic regeneration, visitor engagement and historic/cultural content.</p> <p>The SBT would welcome the opportunity to play a lead role in working with SDC and other partners to help develop the policy principles outlined in this consultation and work to achieve integrated master planning.</p>
16	<b>Federation of Small Businesses</b> – Lee Osborne	<p>The FSB can agree with the identification of a birthplace / gateway cultural quarter in Stratford upon Avon. Small businesses in the tourism and hospitality sector, and high street businesses should be able to benefit from this initiative which aims to present an attractive image of the town centre and to improve the quality and appearance of the main corridors and gateways to the town centre which looks to have a positive impact on footfall.</p> <p>Tourism clearly plays an important role to the local economy in Stratford and this initiative should look to</p>

Ref	Respondent	Summary of Comments
		<p>encourage further spend to help drive economic growth in the local area, benefitting the local economy and small businesses.</p> <p>We would welcome further information setting out a vision and framework to deliver the development and meet the policy principles. Any development carried out must provide sufficient communication regarding disruption to existing small businesses.</p>
17	<p><b>Stratford and Town Transport Group</b> – Joseph Baconnet</p>	<p>The proposal itself brings some challenges at a time of considerable change in the landscapes of town centres. Concern about whether the proposed mix of uses (particularly A3) will stretch the town centre too far. Retail and leisure should be seen as complimentary.</p> <p>In this location, the provision of employment floorspace or uses that draw in town centre users should be prioritised over others.</p> <p>There is significant concern relating to the number of hotel rooms the town can sustain and there isn't a quantified need for further C1 uses.</p> <p>Questions:</p> <p>1 - yes.</p>
18	<p><b>Dorsington Parish Council</b></p>	<p>The overall proposal makes sense, but there are risks that we feel need to be addressed, namely: - too many restaurants - not enough quality retail outlets, especially non national chains - not enough small residential units, particularly above shops.</p>
19	<p><b>Royal Shakespeare Company</b> – Catherine Mallyon</p>	<p>This answer is in response to Qs 1 - 3 of the consultation: Stratford, town and district, contains cultural venues, organisations and visitor attractions of international standard and great interest. As these are all already contained within a comparatively small footprint, it feels unhelpful to designate a Cultural Quarter within this area. Especially given that the proposed area does not include, for example, the RSC, with its RST, Swan and TOP theatres. A focus on Stratford as a Cultural Town/District provides the best way to support and develop the various relevant cultural, tourist, visitor experience, and creative economy objectives contained within the Local industrial and Economic Plan and the Core Strategy. A visitor to Stratford would be most surprised to be guided to a Cultural Quarter that did not include the RSC Theatres, New Place, KES etc. The 'Historic Spine', from the Birthplace to Holy Trinity Church gives a flavour of the genuinely unique and extraordinary culture of Stratford; and there is of course much more besides. Defining the important Gateway Quarter as THE Cultural Quarter runs the risk of underplaying the far wider cultural importance of the town itself. We agree that the development of the Gateway Quarter is essential for Stratford and we agree with the proposals for that area. Suggested alternative names could be: Gateway Quarter; Birthplace Quarter; Birthplace Gateway.</p>
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p> <p>No. 1 – Concerns are noted. The purpose of the Gateway Quarter is to identify a broad area within which the Council would support in</p>		

Ref	Respondent	Summary of Comments
<p>principle proposals to enhance and revitalise the area. Whilst the Council is looking to facilitate regeneration, the initiative will be with private landlords. As such, the inclusion of a property within the Gateway Quarter does not automatically mean that a particular property would be included within any proposal; that would be up to individual landlords. It is advised that the tenant liaises with the landlord to understand what their intentions for the property are.</p> <p>No.4 – The intention of the Gateway Quarter is to bring underused properties back into use and revitalise the area through the appropriate re-use of buildings. The intention is not to just provide more hotels and restaurants but support a range mix of uses including residential and businesses. Its identification for cultural purposes primarily stems from the presence of the Birthplace Trust and the need to provide better public realm for visitors arriving by coach. The proposal specifically seeks to ensure that the existing town centre offer is not diluted; rather the Quarter provides additional space for a range of new uses in an accessible location on the edge of the town centre.</p> <p>No.7 – The comments about the wider public realm and impact on traffic in the town are acknowledged and noted. However, much of the issue raised are beyond the scope of the Site Allocations Plan. The Council, in partnership with stakeholders, will be embarking on a project to look at the long-term vision for the town. In respect of Greenhill Street, it is agreed to incorporate this within the Gateway Quarter as it does form an important gateway to the town especially for those visitors arriving by rail. See responses and recommendations in respect of Q2.</p> <p>No.17 – The comment about increasing footfall is well-founded. This proposal is an attempt to do just that be revitalising an edge of town centre area to bring in additional uses that then help sustain the vitality of the whole town centre. See also response to No.18.</p> <p>No.18 – Concern about the exact nature of the uses is noted, however the full extent of the Gateway proposal is located with the defined town centre (see the Core Strategy Policies Map and Policy CS.23). As such, new retail developments in this area is consistent with the existing policy approach. However, having said that, the draft proposal does require that ‘the vitality of the existing town centre is not diluted’. The intention of referencing a broad range of uses was to ensure that the development potential was not stymied. It is hoped that a comprehensive approach could kick-start renovation of flats above shops.</p> <p>No.19 – Noted and agreed; the whole town needs to be promoted as a cultural destination.</p>		
<p><b>Officer Recommendation</b></p> <p>1. Rename the proposal as ‘Stratford-upon-Avon Gateway Quarter’.</p>		

## Topic: Question 2 - Do you agree with the boundary of the Birthplace / Gateway Cultural Quarter Zone?

Ref	Respondent	Summary of Comments
1	<b>James Furness</b>	Support - no further comment
2	<b>Andrew Braizer</b>	I am the managing agent for the Arden Court on Arden Street. I would like to understand the significance of Arden Court being included in the boundary for the Birthplace and Cultural Quarter.
3	<b>Morrison Park Home Estates – R.Perrin</b>	Seems reasonable
4	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support – no further comment
5	<b>Stratford Ramblers – Harry Rowe</b>	The area should include pedestrian corridors between the area and (a) the railway station, (b) the bus station, (c) the canal towpath, to encourage walking and discourage car use.
6	<b>Warwickshire County Council – Jasbir Kaur</b>	We support this matter
7	<b>Peter Emerson</b>	The proposed boundary would seem to cover the area that requires development/planning, although the line of the southern end of the boundary in Henley Street (north of the MAD Museum) seems a trifle arbitrary.
8	<b>Gateway One Limited (Jones Lang LaSalle)</b>	No. In principle, the boundary is generally acceptable, connecting Henley Street with the Canal Quarter. However, to ensure a holistic and connected approach to the development of the area, it would be prudent to include both 10 and 11 Elm Court. These are currently outside of the proposed boundary shown in Appendix A to the Consultation Plan.
9	<b>Stephen Ollerenshaw</b>	I would extend the boundary North so that it starts at Western Road. The reasons for this is the building on the Western side of the Birmingham Road (between Western Road and Arden Street) would detract from any development and a redevelopment of this side of the Birmingham road would improve the feeling of a gateway into the town (following the poor development that has been allowed to happen in the past such as the Maybird and unattractive car dealerships on the main route into the town). This would also better integrate and link up with the proposed canal development area.
10	<b>Shakespeare Birthplace Trust – Mark Armstrong</b>	<p>The SBT acknowledges that defining the boundaries of the Quarter can be complex, however, to think ahead to the longer term and with greater ambition may require a widening of the boundaries of the current proposal, for example to include the area around Birmingham Road, Windsor Street and Henley Street. In addition the treatment of the coach park and multi-story car park will be critical.</p> <p>While it is not possible to propose specific outcomes at this stage it may be useful to consider including adjoining areas such as all of the properties facing onto the intersection of Windsor Street, Guild Street and Birmingham Road and the whole of the Windsor Street and south to Rother Street. Thought should also be given</p>

Ref	Respondent	Summary of Comments
		to extending the Quarter to include g of Henley Street to its confluence with Bridge Street and Union Street.
11	<b>Stratford and Town Transport Group</b> – Jospeh Baconnet	The boundary should be drawn to include Guild Street itself and the SPD needs to be clear about the future of areas adjacent to the Quarter - such as employment uses occupied by prominent employers (e.g: Lodders).
12	<b>Dorsington Parish Council</b>	The Parish Council considers that the boundary should be extended to include the Alcester Road junction at Greenhill Street down to Rother Street. This would cover the gateways from Alcester and Bidford on Avon. Greenhill Street is not the most impressive key drive through route into the town centre.
13	<b>Coventry and Warwickshire LEP</b> – Bill Blincoe	We note the accompanying plan defining the boundaries of the proposed area. Given that a "whole area approach" to the identity and improvement of the scheme is required we wonder why the residential street frontages such as along Birmingham Road and Mansell Street are excluded? The streetscape outside these dwellings is an important part of the proposed Quarter and, where relevant, needs to be coordinated and any street works undertaken with environmental proposals in the main area identified.

14

**Officer Response**

A number of the comments made on this subject require a specific response:

No. 2 - The purpose of the Gateway Quarter is to identify a broad area within which the Council would support in principle proposals to enhance and revitalise the area. Whilst the Council is looking to facilitate regeneration, the initiative will be with private landlords. As such, the inclusion of a property within the Gateway Quarter does not automatically mean that a particular property would be included within any proposal; that would be up to individual landlords.

No.5 – Noted. One of the purposes of identifying this area is to strengthen and improve pedestrian links. The comment relates to the connectivity to the wider area and as part of the public realm improvements, it would be expected that such connections are not just well-signposted but are attractive people-friendly routes to actively encourage walking and cycling.

Nos.7 & 8 – Agreed.

No.9 – Noted, but this area is within the identified Canal Quarter Regeneration Zone (the boundaries of the two Quarters are contiguous) and as such it is not necessary to duplicate the proposals set out in the Canal Quarter Masterplan (see [www.stratford.gov.uk/canalquarter-spd](http://www.stratford.gov.uk/canalquarter-spd)).

Nos.10 & 11 – See response to No.12 in respect of extending the area to include Greenhill Street. The difficulty when defining any area is where you end it and it would be tempting to incorporate much of the town centre. However, doing so would be beyond the scope of the Site Allocations Plan. There must also be a reasonable likelihood that the area identified could practicably come forward for development. This is why the boundary, as far as possible, excludes individual residential properties (albeit acknowledging that there are some homes within the area). The Council, in partnership with stakeholders, will be embarking on a project to look at the long-term vision for the town.

Ref	Respondent	Summary of Comments
<p>The defined area needs to reasonably relate to the context identified in Policy AS.1 of the adopted Core Strategy which does reference the main corridors and gateways of the town. On that basis it is reasonable to extend the area to include Greenhill Street. The proposal should however, specifically acknowledge the role that adjacent areas could play in delivering improvements even if they fall outside the designated area.</p> <p>No.12 – Agreed. Greenhill Street is also an important gateway into the town centre, particularly for those visitors arriving from the west and from the railway station. Greenhill Street itself is could benefit from rejuvenation. There is also the added benefit of linking in with the proposed Rother Street area identified in the Revised Scoping Consultation published in Spring 2018.</p> <p>No.13 – Agreed in part. In conjunction with response to No.8, it would be logical to include the frontages along the southside of Birmingham Road within the Quarter. However, given that the majority of properties on Mansell Street are residential, it is not proposed to include these within the area. See also response to Nos.10 &amp; 11.</p>		
<p><b>Officer Recommendation</b></p> <ol style="list-style-type: none"> <li>1. Proposal to be amended to specifically refer to legibility including sign-posts and public realm improvements to provide better links to the railway station and canal.</li> <li>2. Amend the boundary of the Gateway Quarter as follows:             <ol style="list-style-type: none"> <li>a) to include the library on Henley Street</li> <li>b) to include 10 and 11 Elm Court, off Arden Street</li> <li>c) to include Greenhill Street and Rother Street</li> <li>d) to include the land east of the library on Guild Street</li> </ol> </li> <li>3. Proposal to be amended to specifically refer to improvements to adjacent areas to help facilitate a more comprehensive improvement to the public realm. These would be considered on a case-by-case basis.</li> </ol>		

## Topic: Question 3 - Do you agree with the proposed policy principles for the Birthplace / Gateway Cultural Quarter Zone?

Ref	Respondent	Summary of Comments
1	<b>James Furness</b>	Support - no further comment
2	<b>Harold Rowe</b>	Reference to "main corridors and gateways" should include enhancing footpaths and towpaths in the area.
3	<b>Morrison Park Home Estates – R.Perrin</b>	Support - no further comment
4	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support - no further comment
5	<b>Historic England – Rohan Torkildsen</b>	<p>To help ensure future development positively responds to the scale, character and charm of historic Stratford, and in so doing satisfy your Core Strategy Policy AS.1, it may be helpful to include an additional specific policy principle.</p> <p>It will be vital that future development positively responds to the character and appearance of the Conservation Area to accord with S72 of the Planning (Listed Buildings and Conservation Areas) Act, and that the scale and form of any future 'landmark' building at this gateway is sympathetic to the fundamental historic appeal of the wider townscape. A landmark building needn't, and shouldn't, be out of scale with the historic context of the town. Due to the national and international significance of the town, the success of any new landmark building should be judged by its design excellence and how it assimilates with the attributes of the place and how it complements Stratford's unique selling point (USP).</p> <p>To help inform the proposed Masterplanning and public realm and movement improvements could I recommend reference to Historic England's Streets for All Guidance. <a href="https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all">https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all</a></p>
6	<b>Stratford Ramblers – Harry Rowe</b>	The reference to improving the quality and appearance of the main corridors and gateways should explicitly mention pedestrian routes/footpaths, and the canal towpath.
7	<b>Warwickshire County Council - Jasbir Kaur</b>	We support this matter
8	<b>Peter Emmerson</b>	Support - no further comment
9	<b>Warwickshire Wildlife Trust – Annie Oatway</b>	We would like to see the use of green infrastructure promoted as part of the rejuvenation of the Birthplace/ Gateway Cultural Quarter. Stratford-upon-Avon has a rich, attractive natural environment which locals and tourists enjoy alongside the historic and cultural heritage.

Ref	Respondent	Summary of Comments
		<p>Green infrastructure can help bring nature into the town creating a pleasant environment and also helping with climate resilience as vegetation can help clean the air, reduce the urban heat island effect, manage water and provide improved health and wellbeing.</p> <p>We note that the town already has good examples of green infrastructure re; the green wall by Bell Court and the street trees.</p> <p>We would like to see the policy principles include green (and blue) infrastructure.</p>
10	Gateway One Limited (Jones Lang Lasalle)	<p>No. My client is in agreement with the content of the proposed policy, with the exception that the focus of the uses should be towards residential. Instead of it being 'mixed-use' development, it should instead be 'residential-led mixed use'. In this location, residential will work in viability terms, but other commercial uses can only be viable with residential taking the greater part of the development.</p> <p>This will have a number of benefits:</p> <ul style="list-style-type: none"> <li>· It enables the redevelopment of the proposed Quarter to be viable and deliverable. Without residential, the redevelopment would likely be unviable and would not be delivered;</li> <li>· It encourages sustainable urban living, with homes being within easy walking distance of shops, services and public transport; and</li> <li>· It helps to maintain the Council's housing land supply (more detail below).</li> </ul> <p>By providing residential as a key part of the mix, it is proposed that the following uses could be facilitated at The Gateway:</p> <ul style="list-style-type: none"> <li>· Hotel (boutique only, or boutique and budget);</li> <li>· Specialised/niche retail/ leisure uses;</li> <li>· Offices; and</li> <li>· Car parking.</li> </ul> <p>In terms of the Council's housing land supply, it is to be noted that in the most recently published Housing Trajectory (dated August 2018) which covers the period up to 31 March 2018. For Stratford-upon-Avon town, it is projected that 3,561 houses will be delivered in the plan period, against a target of 3,500. While this is above target, it is only marginally above target, and any unforeseen slippage on one of the larger sites would lead to an under provision in the largest urban area in the district. Including my client's site as a residential-led opportunity will help to maintain the Council's housing land supply in the town as well as the wider district.</p> <p>Furthermore, it is understood that there has been some slippage in delivery terms in Stratford town. The following figures have been provided by Policy Officers, and these are compared with the target in the Core Strategy for up to the end of 2018/2019:</p>

Ref	Respondent	Summary of Comments
		<ul style="list-style-type: none"> <li>· SUA.1 Canal Quarter - 82 completed, against target of 82;</li> <li>· SUA.2 South of Alcester Road - 68 completed, against a target of 68;</li> <li>· SUA.4 North of Bishopton Lane - none completed (reserved matters needs to be determined), against a target of 125; and</li> <li>· West of Shottery - none completed, against a target of 200.</li> </ul> <p>Therefore, in terms of allocated sites in Stratford town, there is a shortfall of 225 against a total of 375. This is a significant shortfall in the early stages of the plan period. Consequently, giving more scope for residential within the proposed Quarter will support the Council's housing targets should the slippage continue or worsen.</p>
11	<b>Stephen Ollerenshaw</b>	I agree with the reasons set out in the consultation document and have nothing further to add.
12	<b>Shakespeare Birthplace Trust</b> – Mark Armstrong	<p>The SBT acknowledges that the future cultural offering will be and is broader than currently outlined in this proposal and would wish to see significant effort in the future, to define both the identity and the role of the historic spine in its journey to New Place, the School Room, Hall's Croft, Holy Trinity Church and the RSC.</p> <p>The SBT welcomes the opportunity for joint working for greater promotion of the global brand of Shakespeare. There should be a real drive in the policy to embed a rigorous approach to ensuring that the character, flavour and scale of new build and or conversions reflect the scale, materials and aspect of the historic buildings in the Quarter to provide aesthetic and experiential continuity and ensure a unique sense of place and provide a sympathetic context for both visitors and residents.</p> <p>While it is not possible to define the type and mix of any uses for any flagship new build at this stage, we would recommend that consideration be given to exploring cultural, community or educational purposes as core criteria. By way of a specific comment, the SBT relies heavily on the close proximity and access to the current coach park and would expect this to be protected as a matter of course.</p> <p>It will become important to ensure that people using the town, such as visitors and residents, are put at the heart in terms of design and access routes. Given the rapid change towards to a lower impact means of transportation in the built environment clarification should be given to how policies will be adapted to future proof such We would hope that all new pedestrian routes also link to nearby key transit points such as the train station in the Arden Quarter and provision of coach/car park zones.</p>
13	<b>Federation of Small Businesses</b> – Lee Osborne	<p>The traditional town centres changing, small businesses in particular are facing a perfect storm of spiralling business rates, and ever-increasing rents. On top of this, high parking charges, poor infrastructure and the loss of vital banking services, have added to the woes of small businesses. We can therefore agree with the proposed policy principles stated in the consultation document to ensure that a mix of uses will be supported including leisure, office space, restaurants and hotel accommodation.</p> <p>The provision of accessible parking, within a sustainable transport plan, is also integral to the success of local</p>

Ref	Respondent	Summary of Comments
		<p>shops and businesses. It is the first experience that consumers travelling by car have when they arrive and the last they have when they leave. FSB is therefore keen for parking policies to actively encourage visitors and improved public car parking facilities should help support this.</p> <p>We also welcome the intentions to meet economic objectives around providing opportunities for existing companies to expand and to attract new businesses to the town, improving the night time economy and supporting the provision of a creative industries hub in or well-related to the town centre.</p>
14	<b>Stratford and Town Transport Group</b> – Joseph Baconnet	<p>3 – broadly Support for</p> <ul style="list-style-type: none"> <li>· New permeable and legible pedestrian route from the junction of Arden Street, Clopton Road and Birmingham Road to Windsor Street</li> <li>· Improvements to the junction of Arden Street, Clopton Road and Birmingham Road in terms of highway and pedestrian flows and the quality of the public realm</li> <li>· To take account of and fully integrate with the proposals for the adjacent Canal Quarter Regeneration Zone.</li> </ul> <p>The economics of a new gateway building may lead to higher value uses which undermine Stratford’s business strength, but the key principles of enhancing the traffic and pedestrian flows in that area should be prioritised.</p>
15	<b>Dorsington Parish Council</b>	<p>Dorsington Parish Council confirms support, but would re-iterate comments noted in Q1 in respect of potential risks, namely: - too many restaurants - not enough quality retail outlets i.e. non national chains - not enough small residential units, particularly above shops</p>
16	<b>Coventry and Warwickshire LEP</b> – Bill Blincoe	<p>The main “policy principles” outlined in the Consultation are supported and reflect the ambition to regenerate this important part of the Town. We look forward to working with the Council and its other partners and stakeholders to develop the proposals outlined in detail.</p>

**Officer Response**

A number of the comments made on this subject require a specific response:

Nos.2 & 6 - Noted. One of the purposes of identifying this area is to strengthen and improve pedestrian links. The comment relates to the connectivity to the wider area and as part of the public realm improvements, it would be expected that such connections are not just well-signposted but are attractive people-friendly routes to actively encourage walking and cycling.

No.5 – Agreed – the proposal should positively responds to the scale, character and charm of historic Stratford-upon-Avon.

No.10 – The proposal enables a mix of uses within the Gateway Quarter, including residential. It is considered that the Masterplan Supplementary Planning Document should provide further clarity and detail in this respect in order to maintain flexibility and not hinder this town centre location from adapting to rapid change. Additional residential development is already acceptable in principle in accordance with

Ref	Respondent	Summary of Comments
<p>Core Strategy Policy CS.15(A). The Council is confident that it can continue to demonstrate a 5 year housing land supply.</p> <p>No.12 – Noted and agree with reference to education although draft proposal allows for such uses within use class D1. In respect of connectivity, see response to Nos.2 &amp; 6. In respect of future proofing, the best way to achieve this is to maintain a degree of flexibility and not be overly prescriptive especially for those proposals that will come forward over a long time period.</p> <p>No.13 - Noted. The Council is aware of the parking issues hence the preparation of the Stratford Area Transport Strategy as an initial piece of work. It is expected that further work will follow in due course in this respect.</p>		
<p><b>Officer Recommendation</b></p> <ol style="list-style-type: none"> <li>1. Proposal to be amended to specifically refer to legibility (i.e. sign-posts and public realm improvements to provide better links to the railway station and canal).</li> <li>2. Proposal to be amended to refer to future development positively responding to the character and appearance of the Conservation Area and historic townscape of Stratford-upon-Avon. Reference will also be made to Historic England's Streets for All guidance.</li> <li>3. Proposal to be amended to refer to green and blue infrastructure.</li> <li>4. Explanatory text to be inserted to clarify the mix of uses including cultural, community and educational purposes.</li> </ol>		

## Topic: Question 4 - Should the Quinton Railway Technology Centre at the former Long Marston Deport site near Long Marston be specifically identified in the Site Allocations Plan?

Ref	Respondent	Summary of Comments
1	<b>Councillor Peter Barnes</b>	Full support part2. Quinton tech park need rail link to London
2	<b>Steve Price</b>	I am responding in relation to the above, specifically in relation to the Rail Technology Centre at Long Marston which I feel needs to be clarified and protected but also needs guarantees that any future reinstatement of the Stratford upon Avon to Honeybourne railway line is also included and protected without hindrance from any possible future development.
3	<b>Councillor Peter Barnes</b>	Concern over no 2 were there is some land for sale in site
4	<b>Andy Haines</b>	Support - no further comment
5	<b>James Furness</b>	Indifferent
6	<b>Noel Davis</b>	With the huge increase in housing in the vicinity we need more opportunities for rural employment. This facility offers high quality skilled work which promotes the sustainability of local communities.
7	<b>Paul and Christine Cooper</b>	We wish to support the important work being carried out by Quinton Rail Technology Centre, given that Central Government Policy is to encourage developments in rail transport then this company should be wholeheartedly absorbed into any long term planning for the area and allowed to expand their activities as appropriate. They already employ some 250 mainly highly skilled personnel, there is the longer term potential for this site to become an even more significant rail technology centre.
8	<b>Stratford Rail Transport Group</b> - J Morgan	<p>Stratford Rail Transport Group (SRTG) fully supports the formal designation of the Quinton Rail Technology Centre within the Stratford Site Allocations Plan. However, any designation must give recognition that part of the proposed area shown in Appendix B of the consultation, is also covered by Local Plan Policy CS.26 Transport and Communications, D. Transport Schemes, safeguarding of the former Stratford-Honeybourne railway line for reinstatement for rail use, and as such, as a Local Plan Policy, will take precedence over other uses within the area defined in the Site Allocations Plan, Appendix B.</p> <p>The adopted Stratford Local Plan, 2016, states: -</p> <p>“Policy CS.26 Transport and Communications D. Transport Schemes The Council will support the strategic transport schemes set out in the Infrastructure Delivery Plan, subject to the outcome of detailed assessment where appropriate. Land will be safeguarded for these schemes as necessary and also for the possible reinstatement of the railway line southwards from Stratford railway station to Long Marston. There is a presumption against development that would prejudice the implementation of any individual scheme that is safeguarded to the extent to which it is shown on the Policies Map. Schemes and initiatives that address local issues, such as community transport, road safety, parking, congestion and air quality will be supported subject to assessment.”</p>

Ref	Respondent	Summary of Comments
9	<b>Morrison Park Home Estates</b> – R.Perrin	Support - no further comment
10	<b>Adam Hudson</b>	Support - no further comment
11	<b>Inland Waterways Association</b> - Dr G J Nicholson	Support - no further comment
12	<b>Michael Brockington</b>	<p>I fully support the formal designation of the Quinton Rail Technology Centre, within the Stratford Site Allocations Plan. However, no provision is made in the plan for the possible expansion of this rail site. In addition any designation must give recognition to that part of the proposed area, shown in appendix B of the consultation document, is also covered by Local Plan CS 26 Transport and Communications D, Transport Schemes, safeguarding the route of the former Stratford-upon-Avon - Long Marston - Honeybourne railway line, for reinstatement for rail use, and, as such, as a Local Plan Policy, must take precedence over other uses, within the area, as defined on the Site Allocations Plan, Appendix B. Further the deviation of the original railway route, round three industrial/commercial units, built on the former track bed, as set out in the Core Strategy, MUST allow for a double track railway, from the former Milcote railway station, through Long Marston to Honeybourne, as envisaged by Arup in their rail study of 2012. The question arises as to whether the Quinton Rail Technology Centre will require a northern rail link, at some time in the future, as their only rail link, to the national network, is via the short rail link to Honeybourne on the North Cotswold Line. The adopted Stratford Local Plan, 2016, states:- Policy CS26 Transport and Communications D Transport Schemes. The Council will support strategic transport schemes, set out in the Infrastructure Delivery Plan, subject to the outcome of detailed assessment, where appropriate. LAND WILL BE SAFEGUARDED FOR THESE SCHEMES, AS NECESSARY, AND ALSO FOR THE POSSIBLE REINSTATEMENT OF THE RAILWAY SOUTHWARDS FROM STRATFORD-UPON-AVON RAILWAY STATION, SOUTHWARDS TO LONG MARSTON. THERE IS A PRESUMPTION AGAINST DEVELOPMENT THAT WOULD PREJUDICE THE IMPLEMENTATION OF ANY INDIVIDUAL SCHEME THAT IS SAFEGUARDED TO THE EXTENT TO WHICH IT IS SHOWN ON THE POLICIES MAP. Schemes and initiatives that address local issues, such as community transport, road safety, parking, congestion and air quality, will be supported, subject to assessment. Finally, I consider the Meon Vale Business Park should also be protected in the Site Allocations Plan, to avoid any part or all of the Business Park being closed, at any time in the future, in favour for even more housing.</p>
13	<b>Clifford Chambers Parish Council</b> – Leslie Moseley	On behalf of Clifford Chambers Parish Council. We would wish to support the need for continued employment opportunities at this site and therefore support the principle of providing further employment opportunities particularly in semi-skilled and engineering jobs. We not though wish to see this site expand its activities until the road infrastructure has been significantly improved. The current level of traffic along the B4632 already causes problems for residents of Clifford Village and in the wider parish area and the introduction of more commuter traffic along with additional large low loaders is not desirable until improvement are made.
14	<b>Roger and Jenny Waller</b>	Might we respond to the consultation regarding the above site. We would urge you to safeguard this site for the preservation of the workers jobs which given the falling numbers of employees at large employers such as JLR

Ref	Respondent	Summary of Comments
		<p>which will have a bearing on the uptake of the enormous number of houses being built in this area. We are told by Government that the way forward for mass transportation is via rail as road traffic will be unsustainable in the future, there will need to be a large investment in advancing technologies for the railways and Quinton could easily become a centre of excellence employing more highly skilled employees.</p> <p>As an industrial centre it is not a huge producer of noise to interfere with the houses that are already being built nearby and may even offer employment to facilitate purchases of these properties.</p> <p>Might we urge you to consider safeguarding this site and even offering help to ensure this area has every opportunity to become a centre of excellence for rail innovation.</p>
15	<b>Harry Rowe</b>	Important to support technology-based industries. This is a personal view, rather than a Ramblers one.
16	<b>Warwickshire County Council – Jasbir Kaur</b>	We support this matter
17	<b>Network Rail – Diane Clarke</b>	<p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <p>Network Rail has the following comments in respect of the Quinton Rail Technology Centre:</p> <p>Network Rail is in agreement that maintaining its track access would be critical for its continued operation.</p>
18	<b>Coventry and Warwickshire LEP – Bill Blincoe</b>	<p>These proposals are particularly welcomed and fully supported .The idea of developing the existing facilities and consolidating the growth of the rail related businesses and organisations already based at this location has good potential to develop this part of the sub region as a "centre of excellence " with an ability to attract new investment .The proposals if and when adopted will add the weight of the adopted development plan to the potential of these rail based facilities .It will also reduce the threat to the loss of this important group of rail related that cannot easily be located elsewhere.</p> <p>The C&amp;W sub region has a strong tradition of advanced engineering skills and the strength of the automotive industry illustrates the benefits of developing focal points dedicated to particular specialist sectors and supported by a pool of skilled labour .The transferability of engineering and technical skills between sectors creates good potential for this new initiative to develop based on access to a pool of skilled labour .We note in particular the research emerging at the centre in relation to battery powered rail facilities and the parallels and cross fertilisation that might occur with similar developments in the sub regions automotive sector .</p> <p>We note that the area subject to the designation is relatively small and tightly drawn around the track laid at the</p>

Ref	Respondent	Summary of Comments
		<p>site. We wonder if this proposed development plan allocation should have a more extensive boundary which might in the future facilitate expansion of the centre and its facilities? The site is owned by a third party but nevertheless it may be appropriate for the District Council to reflect its ambition for the expansion and development of the site by identifying a larger footprint for the centre.</p>
19	<b>St Modwen Homes (Turley)</b>	<p>Turley is instructed by St. Modwen Developments Ltd (St. Modwen) to submit representations to the Site Allocations Plan (SAP) Regulation 18 "Further Focused Consultation" (February 2019). The representations specifically respond to Question 4 of the consultation; "Should the Quinton Rail Technology Centre (QRTC) site at the former Long Marston Depot site near Long Marston be specifically identified in the Site Allocations Plan?". The consultation document states that the proposal is for the QRTC to be specifically identified in the SAP with support for "railway-related research and development and railway related employment development".</p> <p>St Modwen has owned the site referred to in the Core Strategy as the "Long Marston Engineer Storage Depot" (Policy AS.11) for over a decade. It is now known as Meon Vale, comprising a mixed-use development which includes a well-established residential community with c.400 dwellings and supporting facilities and infrastructure completed since 2013 and permission granted for a further 650 dwellings which are being delivered in phases.</p> <p>Meon Vale encompasses the QRTC, which is currently occupied by Motorail (UK) Ltd and used for train maintenance and storage.</p> <p>As the landowner of QRTC and the wider Meon Vale site, St Modwen supports the continued use of the QRTC in the short term but considers that a specific policy designation in the SAP for rail-related research and employment uses is inappropriate and unnecessary for the following significant reasons:</p> <ol style="list-style-type: none"> <li>1. The Core Strategy already provides clear policy support for the protection and expansion of employment sites such as QRTC over the plan period. Policy CS.22 "Economic Development" supports the expansion of businesses in their existing locations subject to detailed development management considerations. It also states that existing employment sites should not be redeveloped or converted unless it is no longer viable or appropriate for a business purpose and "a rigorous assessment of each proposal will be undertaken". This policy is supported by "Development Management Considerations" to assess proposals for the loss of employment land / floorspace. Furthermore, Policy AS.11 sets out appropriate uses at Meon Vale as a "Large Rural Brownfield Site" and explicitly includes "other forms of employment that makes use of the rail connection to the site". The Development Plan therefore already provides clear support for the protection and expansion of QRTC in the period to 2031 and, as such, it is unnecessary to introduce another layer of policy support and protection through the SAP.</li> <li>2. You will be aware that St. Modwen has promoted further phases of mixed-use and residential-led development at Meon Vale, including the QRTC site, which it has referred to as "the Rail Loop" and, following discussions with Stratford-on-Avon District Council, has requested that this land be assessed through the SHLAA process. St. Modwen supports the existing rail-related use in the short-term but considers that the western</li> </ol>

Ref	Respondent	Summary of Comments
		<p>areas of Meon Vale provide a highly sustainable opportunity to deliver an extension to the mixed-use community utilising brownfield land, expanding on the existing and growing new settlement at Meon Vale. The potential for additional homes at Meon Vale is identified and acknowledged in the Core Strategy at paragraph 5.2.10 and policy AS.11 (2). Indeed, the Secretary of State endorsed Meon Vale as a sustainable location in July 2014, when determining an adjacent appeal (APP/H1840/A/13/2202364, paragraph 13).</p> <p>For the above reasons, St Modwen considers that sufficient flexibility should be retained in the Development Plan, as currently exists, to ensure that the most sustainable form of development can be delivered at Meon Vale in the long-term. This is entirely consistent with national planning policy (NPPF; paragraphs 11(a), 81(d) and 120).</p> <p>The QRTC, as part of the wider Meon Vale brownfield site, with a significant residential precedent, fulfils the main criteria for consideration for future residential development, whether wholly, or in part (to help enable any future employment expansion, which given the highly specialised nature of the proposed policy wording may prove unviable). To adopt such a restrictive policy as currently proposed in the draft SAP would prejudice this opportunity for potential future housing and supporting facilities to meet growing local need in the future. On behalf of our Client, we therefore, respectfully request that the policy is reconsidered to enable sufficient flexibility and ensure productive and full use of the site through and beyond the short-medium term.</p> <p>As a final point, it must be recognised that the majority of the QRTC site (and adjoining land) already benefits from planning permission for a leisure village with outline planning permission granted in April 2015 (Ref. 14/01186/OUT) - a copy of the approved Parameters Plan is enclosed.</p>
20	<p><b>Minister for Business and Industry</b> – Richard Harrington MP</p>	<p>QRTC is not just a local asset but a facility that is linked into the increased technological developments being carried out by the rail industry itself. This includes developing technologies that will help decarbonise the sector through the development of battery and Hybrid technologies (including hydrogen)- The work being carried out by Vivarail. Porterbrook and University of Birmingham in this arena will see the development of low carbon trains and contribute to the UK reducing its emissions. The University of Birmingham also plays a pivotal role in developing and delivering the technology to deliver a digitally enhanced railway - a key deliverable within the Rail Sector Deal.</p> <p>QRTC has the opportunity to become a centre of excellence demonstrating UK capability in rail but also cross over into other sectors like automotive where cars and trains will interact or have similar technological developments. This links strongly with the WMCA Industrial Strategy which is the national leader in autonomous vehicles and associated technologies.</p>
21	<p><b>Stephen Ollerenshaw</b></p>	<p>I am not personally familiar with the site but my assumption that this is a “brownfield” development and as such would be a good example of the council finding ways of redeveloping previous light industrial sites, which I support. Assuming there is a need for a rail technology site this seems like a sensible idea. I would also support other uses of this area should the rail technology use not be required provided this is genuine brownfield development.</p>

Ref	Respondent	Summary of Comments
22	<p><b>Porterbrook Leasing Company</b> – Kevin Eley</p>	<p>The main purpose of these representations is to express Porterbrook’s strong support for the specific identification and safeguarding of QRTC in the Site Allocations Plan (“SAP”). These written representations outline and explain Porterbrook’s support for the specific identification of the site in the SAP.</p> <p>The Contextual Background</p> <p>QRTC is located 7miles (11.3km) to the south-west of Stratford-upon-Avon and approximately 0.8miles (1.2km) to the south-west of Long Marston Airfield, where it is proposed that 2,100 homes are to be developed by 2030. QRTC is a privately owned and independent rail testing and trialling site and extends to over 120acres (49hectares). It is home to the only looped rail test track in the UK and is used extensively for reliability and mileage accumulation testing and trialling. In addition, it provides opportunities for trial and development experience in rail and other sectors including the Emergency Services, defence, manufacturing, education and automotive sectors as well as being the largest and most extensive rail storage facility in the UK.</p> <p>Further services provided at QRTC include:</p> <ul style="list-style-type: none"> <li>· Impact testing;</li> <li>· Product Approval;</li> <li>· Product Development;</li> <li>· Publicity and Public Relations;</li> <li>· Training;</li> <li>· European TSI and EN15227 scenarios 1 and 2 High speed impact testing;</li> <li>· Engineering Workshops;</li> <li>· Lifting Equipment (JCB Loadall, Rail Crane 7.5 tonne, Heavy and Light Forks); and</li> <li>· Short to Long-term Storage Facilities.</li> </ul> <p>QRTC has a long history dating back to its years as a Royal Engineers supply base in the Second World War. The site was decommissioned by the Ministry of Defence in the late 1990s and it was at this point where QRTC became privately owned. In 2005 Motorail Logistics took over the site and in 2006 Porterbrook began storing traction and rolling stock at QRTC.</p> <p>Porterbrook specialise in the leasing of all types of railway stock and associated equipment. Porterbrook’s investment to date in the UK rail market totals £2.7billion in new trains and over £300 million in the refurbishment of the existing fleet. This overall investment has resulted in, amongst other things, the introduction of 2,300 new passenger vehicles, over 2,000 new freight vehicles and the development of eco-friendly rail technologies.</p> <p>There is a permanent onsite staff presence at QRTC of upwards of 150 staff members spread across a number of organisations including Motorail UK Ltd, Chrysalis Rail, VivaRail Ltd, Rail Alliance and Formula Rail Ltd. This is in addition to the many jobs that Porterbrook and others at the QRTC support in the rail industry and its supply</p>

Ref	Respondent	Summary of Comments
		<p>chains.</p> <p>The evidence base for specifically identifying QRTC in the SAP is extensive and robust, and is strongly supported by Porterbrook as being an important step in protecting rail usage and development at the site. The following paragraphs consider the policy context, evidence base and other factors which underpin the need to safeguard (and support further investment into) the QRTC facility.</p> <p>Policy (Existing and Proposed)</p> <p>National Policy</p> <p>There is a wide-ranging policy and research evidence base which supports the maintenance and growth of rail infrastructure across the UK, inclusive of those sites which are of significant economic and research value such as QRTC. The Government's Industrial Strategy, published in November 2017 outlines the Government's long-term approach to Industrial Investment and provides a policy framework against which major private and public-sector investment decisions can be made with confidence.</p> <p>The Industrial Strategy itself identifies that key infrastructure projects deliver the wider ambitions of the Industrial Strategy and that Rail Research and Innovation will enable collaboration between the rail industry, universities, small and medium-sized business (SMEs), and infrastructure owners to deliver innovations for both High Speed Rail and the existing rail network.</p> <p>The importance of Science and Research in infrastructure and the role infrastructure plays in supporting economic growth is further identified in the Government's National Infrastructure Delivery Plan 2016 - 2021 ("NIDP") (March 2016). The NIDP identifies that the Government's vision is to provide a world class train service that drives economic growth and exceeds customer expectations. The NIDP identifies that Rolling Stock Companies (ROSCO's), such as Porterbrook, own most of the coaches, locomotives and freight wagons used on UK railways which are then leased to train operating and freight operating companies. ROSCO's, and Porterbrook in particular, have invested heavily in replacing older trains with newer vehicles. The ability of Porterbrook to invest heavily in new vehicles is largely facilitated by the ease of accessibility and connectivity of rail stock to key research, storage and development sites such as QRTC.</p> <p>The National Policy Statement for National Networks ("NPS") (2014) further identifies that there is a national need to deliver improvements to rail infrastructure as a driver for the country's economic growth. The NPS sets out Government policies for nationally significant rail and road infrastructure projects for England. It recognises that railways are a vital part of the UK's transport infrastructure as drivers of economic growth and social development.</p> <p>Regional Policy</p>

Ref	Respondent	Summary of Comments
		<p>The West Midlands Region is home to significant infrastructure hotspots focussed in Birmingham and Warwickshire (Barbour ABI, 2018), these hotspots are largely aligned with the delivery of the national High-Speed Rail project, HS2. It is through the catalysing power of High Speed Rail that the West Midlands is developing as a hub for existing rail infrastructure. The Midlands Rail Hub Plan, published by Midlands Connect, proposes an additional 36 freight paths across the Midlands per day which will carry an additional £22billion worth of goods every year. Four of the UK's five main freight routes pass through the Midlands and the role of storage and rail research facilities in centralised locations such as QRTC will help to facilitate the release of the extra capacity the Midlands railway network needs to support businesses and the wider region.</p> <p>Coventry and Warwickshire's Local Enterprise Partnership (CWLEP) Green Paper Consultation response to the national Industrial Strategy identifies that there are significant Rail opportunities across Coventry and Warwickshire and that the facilities at QRTC are unique in terms of rail linked storage and testing facilities. This is also echoed in the West Midlands Industrial Sector Evidence Pack published by the West Midlands Combined Authority (WMCA) in September 2018.</p> <p>District Policy</p> <p>Stratford-on-Avon District Council adopted their Core Strategy in July 2016. The Core Strategy provides the spatial vision for Stratford-on-Avon as a District and sets out Development Strategy and planning policies for the area, including the allocation of strategic sites to guide infrastructure and service provision.</p> <p>Policy AS.11 of the Core Strategy document encourages proposals for the re-use and redevelopment of previously developed sites in the countryside with the Former Engineer Resources Depot at Long Marston (of which QRTC forms a part) identified as an opportunity for future (re)development. Acceptable uses which can be considered on the wider site, as outlined in Policy AS.11 include leisure-related activities and accommodation, residential dwellings, employment uses within Use Classes B1, B2 and B8 and other forms of employment that make use of the rail connection to the site. In the context of this policy and in line with the approach included in the Site Allocations Plan current consultation, it will be important to ensure a robust policy framework which safeguards the QRTC facility and facilitates future investment in it.</p> <p>The Local Industrial and Economic Development Strategy (December 2018) identifies that Stratford is well placed in terms of connectivity, with well-established rail and road infrastructure. However, Stratford has low job self-containment with only 47% of residents actually working in the district, this figure is economically unsustainable and provides little economic resilience for the District.</p> <p>The opportunity which QRTC provides in terms of employment, research and development (R&amp;D) is an important economic sector for the District. It is recognised in Stratford's Industrial and Economic Development Strategy that innovation plays a critical part in growth and productivity and that these opportunities prevail at QRTC, with Rail being a key sector in the District that can be significantly enhanced and developed further.</p>

Ref	Respondent	Summary of Comments
		<p>Contribution to Economy</p> <p>As identified in Stratford’s Industrial and Economic Development Strategy, Stratford has low job self-containment and suffers from the potential threat of a lack of infrastructure capacity. The role that QRTC plays in Stratford’s economy is important. The QRTC facility is a significant market leader in UK Railway Research and is a recipient of significant investment on the basis of its industry leading status.</p> <p>Coventry and Warwickshire is the recognised centre for the UK’s most significant transport R&amp;D, and offers a range of advanced engineering consultancies, prototype specialists and contract manufacturers; QRTC contributes to this nationally recognised significance and forms one of a small number Centres of Excellence for Railway Testing used by UKRRIN (UK Rail Research and Innovation Network, which is a partnership between the rail industry and a number of universities). QRTC is also a partner to UK Tram and Innovate UK. Over 150 people are based at QRTC, and this is in addition to the many jobs that Porterbrook and others at the QRTC support in the rail industry and its supply chains. QRTC also hosts a number of trade and training events including the annual Rail Live event which is the most comprehensive outdoor rail industry event in the UK and the largest outdoor Rail event in Europe. This event facilitates the drawing together of over 5,000 visitors, 250 exhibitors and displays upwards of over £0.5billion of rail plant equipment.</p> <p>The Uniqueness of QRTC and its Service to Rail</p> <p>A Baseline Report conducted by the Rail Safety and Standards Board (RSSB) in 2011 concluded that there is a national lack of key testing facilities and that there is a need for the better utilisation of existing test and trial facilities.</p> <p>QRTC forms one of only three main test tracks in the UK with the other two Rail Innovation and Development Centres (RIDC) located at RIDC Melton and RIDC Tuxford located in Leicestershire and Nottinghamshire respectively. The following summarises some of the main factors which underline the uniqueness of the QRTC facility and its associated importance to rail:</p> <ul style="list-style-type: none"> <li>· QRTC is the only privately owned and independent rail testing and trialling site in the UK, which means that it can offer operational freedom and accessibility to industry providers which cannot be found at other testing and trialling sites. The site is able to operate 24/7 and onsite site operational staff all have extensive trials and development experience in both rail and other sectors, including defence, automotive and manufacturing.</li> <li>· It is the only facility in the UK able to offer full scale crash testing to European TSI standards and is used extensively by the Emergency Services for full scale incident simulation and for the training of Counter-Terrorism teams.</li> <li>· It is home to the UK’s only specifically built light rail test facility and is the only site to offer a looped test track in the UK. The looped test track is 2.4km in length and allows for extensive testing, trialling and product</li> </ul>

Ref	Respondent	Summary of Comments
		<p>development.</p> <ul style="list-style-type: none"> <li>• QRTC is the largest and most extensive rail storage facility in the UK, consisting of some 20km of storage sidings, the site also has a storage capacity for approximately 1,000 items of rolling stock</li> <li>• with 4 hectares of open hard-standing based storage and approximately 2000sq.m of covered storage, along with associated handling equipment and crange. ROSCOs form a significant proportion of QRTC's client base due to the sites accessibility and connectivity to the national rail network.</li> <li>• The site is home to the 'Innovation Hub'; which is the only on train facility for small to medium sized enterprises to trial and display innovative products.</li> <li>• QRTC has close partnerships with a number of academic and research institutions including BCRRE (The Birmingham Centre for Railway Research and Education) who has partnered with Rail Alliance</li> <li>• and has a presence on site. This partnership encourages members of the Rail Alliance community to engage directly with BCRRE specialists across a large number of research and industry areas.</li> </ul> <p>QRTC links in to the national rail network at Honeybourne connecting directly to the national rail network via the Worcester to London line. At present there is no direct link between Honeybourne and Stratford, however a 2012 feasibility study by Arup Consultants concluded that the currently dis-used railway could be reinstated for trains to run between Stratford and Honeybourne. The potential for re-instatement combined with QRTC's existing offer is representative of the need to maintain and support ongoing rail use and development at QRTC.</p> <p>QRTC plays a leading role in the development of rail hydrogen and battery technology, although a different industry this provides opportunities for coordination with the national automotive battery centre being established in Coventry, as identified in the SAP and Stratford's Industrial and Economic Development Strategy. The WMCA identifies in its West Midlands Industrial Strategy that due to the intertwined nature of automotive, rail and other industries throughout the West Midlands many firms in the future won't work exclusively in the rail sector but will work collaboratively across sectors. As a Centre of excellence for UKRRIN QRTC is extensively used by companies for the delivery of Innovate UK and RSSB (Rail Safety and Standards Board) and is regularly used for testing and trialling in addition to product development. Over the past four years the site has actively been the delivery partner for over 150 suppliers. QRTC could have an important role in such cross-industry development.</p> <p>Difficulty in Relocation</p> <p>As previously identified, the offer at QRTC is unique and its relocation would offer significant and particular challenges.</p> <p>Significant investment has been made at QRTC, with over £3.2million being invested at the facility just by Porterbrook. The nature of the site and its buildings, including its test track and other infrastructure, are ideally suited for the nature of activities undertaken at the site.</p> <p>Replicating this facility elsewhere would be highly complex and difficult to achieve. Any relocation and</p>

Ref	Respondent	Summary of Comments
		<p>development of the new facility to a safe and acceptable standard would take at least 24months to develop (once a new site is found) plus then the specialist recruitment and training of personnel. This time frame would be in addition to the initial scoping of alternate sites which would take significant additional amounts of time and investment. Requirements for stationary infrastructure such as fixed track and connections to the National Railway, and the requirement to be located in freight active areas, significantly limit options for relocation.</p> <p>If QRTC needed to relocate, there are no alternate sites within Stratford District or the surrounding area and as such the relocation would result in the development of testing facilities outside of the West Midlands in areas such as Scotland, Wales or the North of England where disused Steel Works provide development opportunities and there is the desire to become contributors to being Global Centres of Rail Excellence. The significant direct and indirect economic benefits arising from the QRTC facility would therefore be displaced to outside of the area.</p> <p>Additional Comments</p> <p>In addition to our strong support for the proposal in the Site Allocations Plan to safeguard the QRTC for railway-related R&amp;D and railway-related employment development, Porterbrook observe that the allocation drawing identified in the Further Focused Consultation Appendix B excludes a large number of rail storage sidings and does not include the eastern part of the test loop. These facilities form an integral part of the QRTC facility. We therefore request that the Allocation Plan be updated to reflect the actual boundary of the site and extend the line to the east to incorporate the entirety of the test loop and additional storage sidings. A plan showing the suggested realignment of the allocation boundary (shown edged red) is appended to this Comment Form at Appendix A.</p> <p>Summary</p> <p>Porterbrook wish to express its strong support for the proposal in the Site Allocations Plan to safeguard the QRTC for railway-related R&amp;D and railway-related employment development.</p> <p>QRTC is a recognised centre of excellence for the rail industry. It is also a unique facility for the rail industry, being the only one in the UK to offer: a looped test track; full scale crash testing to European TSI standards; and a specifically built light rail test facility. Its contribution to the railway industry, and the economy more generally, is therefore significant. The importance of the QRTC is recognised in various evidence base and policy documents which, along with the other points set out in these comments, underpin its proposed safeguarding in the SAP.</p>
23	<b>Invest in Warwickshire – Ian Flynn</b>	<p>Invest in Warwickshire is a service within Warwickshire County Council and provides inward investment services on behalf of the county of Warwickshire, working closely with the five district and borough councils, Coventry City Council, Coventry &amp; Warwickshire Local Enterprise Partnership/ CW Growth Hub, West Midlands Combined Authority, Midlands Engine and Department for International Trade.</p> <p>Since 2016, Invest in Warwickshire has led on the Midlands Engine Opportunities in Rail Programme, on behalf</p>

Ref	Respondent	Summary of Comments
		<p>of CWLEP and the 9 LEP areas of the Midlands Engine to promote the Midlands rail supply cluster.</p> <p>The work has included extensive research on the Midlands rail supply chain. The Midlands includes a presence from 4 rail OEMs: Bombardier (Derby), Alstom (Wolverhampton), CAF Rail (Coventry) and Vivarail (Long Marston), and expertise and supply in rolling stock design, engineering, test, manufacture and refurbishment; signalling and systems including new digital technologies; infrastructure; and design and consultancy.</p> <p>The region is a major force in low carbon powertrain including battery energy and storage and hydrogen propulsion, light rail technologies, and autonomous technologies.</p> <p>The University of Warwick WMG, and partner Transport Design International based at Clifford Chambers near the QRTC, is at the forefront of Very Light Rail technologies and are working on the Revolution Train and the Coventry VLR project.</p> <p>The University of Birmingham BCRRE (Birmingham Centre for Rail Research and Education) is the largest university rail department in the UK, and a lead university in UKRRIN, UK Rail Research and Innovation Network, the university partnership working together on Rolling Stock, Infrastructure and Digital Technologies. BCRRE is a leader in the deployment of hydrogen propulsion in rail, and the Hydrogen Hero demonstrator has been tested and developed at the QRTC. BCRRE is working with Porterbrook, the rolling stock leasing company, to develop the Flex hydrogen powered train. The QRTC site can become a major UK centre of excellence for rail low carbon powertrain development and testing.</p> <p>The Quinton Rail Technology Centre at Long Marston is one of few UK rail mainline linked test and development tracks in the UK, and plays a vital role supporting the Midlands and UK rail supply chain.</p> <p>We therefore welcome the Regulation 18 Further Focused Consultation (February 2019) by Stratford District Council, which includes the Quinton Rail Technology Centre and proposes the inclusion of the site within the Site Allocations Plan.</p> <p>Reviewing the map in the appendices published as part of this consultation, we wondered if the boundary on the map accurately reflects the extent of the QRTC site - it appears a part to the north should also be included.</p> <p>This unique site provides excellent facilities for the UK rail supply chain, and opportunities for the region to grow the rail supply chain, as the UK Government continues to invest heavily in rail over the next 15 years. This includes of course the H52 Programme, but also unprecedented investment in heavy and light rail and other mass transit solutions, both for HS2 connectivity, but also the renewal of and addition to the UK rail network.</p> <p>We are supportive of the planning authority here in its desire to support current rail technology uses and future development of the site compatible with the long-term function of the site for rail research and development and specialist manufacture and engineering.</p>

Ref	Respondent	Summary of Comments
24	<b>Department for International Trade</b> – Campbell Anderson Keir	<p>QRTC is not just a local asset but a facility of national and international significance, linked to the increased technological developments being carried out by the rail industry and major research universities here with an interest in rail technology. This includes developing technologies that will help decarbonise the sector through the development of battery and hybrid technologies (including hydrogen).</p> <p>The site includes rolling stock manufacturer Vivarail, a US owned company and a pioneer of light rail technology, and the centre has the potential to attract further international investors to this site and to the wider Midlands area. This will have benefits to the capability of the UK rail supply chain offering export potential as well as increased employment and economic growth which are key priorities of the Rail Sector Deal, published in December 2018, as part of the Governments modern Industrial Strategy.</p> <p>We would welcome the retention of this site for rail R&amp;D, engineering and manufacture, to support the supply chain and further foreign direct investment opportunities here and elsewhere in the UK.</p>
25	<b>RPS Consulting</b> – Cameron Austin-Fell	<p>RPS support the identification of the former Long Marston Depot site as the Quinton Rail Technology Centre within the SAP. This is because the Council considers that it offers unique rail-related research and development and rail related employment development opportunities. It would promote economic growth and prosperity for the benefit of the District, which in turn would produce a demand for housing in sustainable locations to meet the needs of potential future employees.</p> <p>Employment and housing have an entwined relationship and it is clearly beneficial, and broadly recognised, for them to be located in proximity to deliver sustainable communities and growth. The National Planning Policy Framework (NPPF) (at Paragraph 8) states that:</p> <p><i>“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity. . . ”</i></p> <p>Paragraph 104 of the NPPF states that:</p> <p><i>“planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities...”</i></p> <p>In addition to supporting the identification of the Quinton Rail Technology Centre within the SAP, RPS also support the inclusion of the Site at Goose Lane within the SAP as a housing allocation and encourage the Council to give this full consideration before publishing the Regulation 19 version (Submission Version) of the SAP later this year. The reasoning for this is set out below.</p> <p>The site is approximately one mile from the site of the proposed Technology Centre, as shown on Figure 2 below [map enclosed].</p>

Ref	Respondent	Summary of Comments
		<p>As stated above, the Site is promoted by a national housebuilder and the residential development of the Site would deliver a sustainable housing development as there are existing services offered in the adjoining villages. The Site is of sufficient size to provide additional community services if required and its close proximity to the Quinton Rail Technology Centre would reduce commuting times for employees and in turn reducing carbon emissions, consistent with the NPPF.</p> <p>The adopted Core Strategy provides the context for the SAP and states that its intention is to identify additional sites for housing to supplement strategic sites identified in the Core Strategy when it was adopted in July 2016. This was to create flexibility in the housing supply to address any potential shortfalls and to meet housing needs arising outside of the District.</p> <p>The Council now state that sufficient housing provision will be delivered within the Core Strategy (and through planning permissions) to meet housing requirement to 2031 and that as such the focus of the SAP will now be on identifying 'reserve sites' in accordance with Policy CS.16: Housing Development, with sites being released if one or more of the following circumstances identified in Part D of the policy apply:</p> <ul style="list-style-type: none"> <li>- To rectify any identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Stratford-on-Avon District;</li> <li>- To contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath;</li> <li>- To contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities;</li> <li>- To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District.</li> </ul> <p>Although the Council state that sufficient housing will be delivered over the plan period, there is still a requirement to release additional land for development, so the Council can achieve this. The slippages in Gaydon Lighthorne Heath, as demonstrated within the Council's 'Housing Site Schedule' of 31/03/17 and 31/03/18, may undermine the future five-year housing land supply position and RPS considers that the identification of additional housing sites through the SAP process is necessary to ensure that flexibility is available to avoid this situation. The Site that RPS are promoting as part of this consultation response would make a positive and sustainable addition to the Council's housing land supply.</p> <p>Development Potential of the Site</p>

Ref	Respondent	Summary of Comments
		<p>The Council consulted on a new Strategic Housing Land Availability Assessment (SHLAA) from 14 August - 14 September 2018. This updated and superseded the previous versions and was produced to specifically inform the identification for the reserve housing sites. The majority of the Site was considered within the SHLAA, albeit as two separate parcels of land (sites 18 and 19), as can be seen in figure 3 below: [map enclosed]</p> <p>The parcels 18 and 19 are the eastern and northern end of the site and measure 4ha and 3.3ha respectively. They were both considered to be 'not deliverable' overall and were considered to be at the low end of the matrix for 'availability' and 'suitability-environmental' due to the potential impact on the character of the settlement(s) and upon coalescence. However, parcel 18 scored highly for 'suitability - technical' and parcel 19 was considered to be 'likely to be deliverable' due to provision of vehicle access. Both were considered to be 'likely to be deliverable' in terms of achievability.</p> <p>As the site now forms a single potential development site, that is being promoted by a national housebuilder and would be delivered as a single parcel this should address any concerns raised over deliverability and availability. In addition, RPS considers that a comprehensive design process would ensure that the concerns highlighted within the SHLAA relating to the settlement character and coalescence could be mitigated against.</p> <p>RPS would encourage the Council to re-appraise the site against the criteria within the SHLAA, as a single site with a developer in control of the site, in advance of publishing the Regulation 19 Submission version of the SAP.</p> <p>Although the site adjoins both Lower and Upper Quinton, it is not intended to develop its entirety, but to deliver a sympathetic proposal that will strengthen the buffer between settlements and reduce intervisibility through positive landscaping proposals. The broad parameters are shown in Figure 4 below: [plan enclosed]</p> <p>RPS consider that the site is in a suitable location for future development and should be considered as part of the next stage of plan making for the SAP. The SAP seeks to identify 'reserve sites' in-line with Part D of Policy CS.16. Quinton Rail and Technology Centre is a major employment site, hence why as part of this consultation it may have its own specific allocation. The policy recognizes that net growth of job creation at employment sites leads to additional housing need. Whilst this policy refers to Jaguar Land Rover, it would seem reasonable that this principle can also be applied to the proposed Technology Centre.</p> <p>The Site is in close proximity to the proposed Technology Centre and its development would help to provide a positive balance of housing and employment land that would promote sustainable development and sustainable patterns of commuting. Its promotion through the development plan process should be supported in advance of the Regulation 19 submission.</p> <p>The major national housebuilder referred to above is keen to positively engage with both the Local Planning Authority and the local community to deliver a scheme that addresses local needs for the benefit of both</p>

Ref	Respondent	Summary of Comments
		<p>existing and proposed residents. This will include a comprehensive landscape buffer that will deliver public open space, with new tree planting that will also enhance the ecological value of the site. Further proposals will include children's play equipment and other recreational provision for young adults and the elderly. Such facilities would be more beneficial to the local community over the existing agricultural use and such proposals can be further discussed as the process moves forward.</p> <p>Conclusion</p> <p>This representation has been made under Regulation 18 and supports the identification of Quinton Rail Technology Centre in the SAP and considers the need to ensure that there is a suitable balance between jobs and housing. RPS considers that the Site can deliver a sustainable development that would complement and enhance the technology centre through the provision of additional local housing and sustainable patterns of commuting. The site should be considered a 'reserve site' and is available to address any shortfall in housing that may arise in the future.</p> <p>The site could be developed whilst maintaining an extensive green buffer towards Upper Quinton to maintain the character of the villages and the setting of the AONB. The developable site forms a logical extension to a sustainable village and is well connected to the surrounding area; and therefore represents an appropriate location for consideration as part of the SAP.</p>
26	<b>Environment Agency</b> – Miss Jane Field	<p>We recommend that Warwickshire County Council advise on Part 2 in relation to Quinton Rail Technology Centre, within the context of their remit for surface drainage, given the number of ordinary watercourses and ditches within and adjacent to the allocation boundary.</p>
27	<b>Motorail (Long Marston) Limited</b>	<p>These representations are submitted by Motorail (Long Marston) Limited (trading as Quinton Rail Technology Centre (QRTC)) in respect of QRTC at the former MoD Long Marston Depot site near Long Marston, Stratford-on-Avon.</p> <p>The main purpose of these representations is to express QRTC's strong support for the specific identification and safeguarding of QRTC in the Site Allocations Plan (SAP). This submission provides a brief outline and explanation of QRTC's support for the specific identification of the site in the SAP.</p> <p>Background</p> <p>QRTC as a business has been on site at Long Marston since 2005. With the active support and collaboration of our landlord, St Modwen, it has steadily grown to become a thriving rail cluster. It is the only privately owned and fully independent rail testing and trialling site in the UK and extends to over 120 acres (49 hectares). It is home to the only looped rail test track in the UK and is used extensively for reliability and mileage accumulation testing and trialling. In addition, it provides opportunities for trial and development experience in rail and other sectors including the Emergency Services, Defence, Manufacturing, Education and Automotive sectors. It is also the largest and most extensive rail vehicle (Passenger and Freight) storage facility in the UK.</p>

Ref	Respondent	Summary of Comments
		<p>From start-up in 2005 to our current status in 2019 we have grown steadily, concentrating on meeting the emerging needs of the sector as any SME would. Our business model is highly collaborative, working with both our landlord and the needs of the sector in the broadest sense. Our current major partners on site at the moment are as follows:</p> <p>&gt; VivaRai  - Is a start-up company that is spearheading the development of new technology in the rather conservative Rail Vehicle sector; in particular in the fields of hybrid, battery and hydrogen power systems (along with their associated technologies and supply chain). It came to Long Marston because it needs the ability to test development trains which are unable yet to go on the mainline. The test track is vital for that purpose. It is also crucial for it to have a direct connection to the Network Rail mainline as this enables finished trains to be further tested and indeed to be easily delivered to customers. Additionally, the space to store trains and to be able to erect additional buildings as the business grows is very important. This company represents a Foreign Direct Investment (FDI) into the region from the USA of in excess of £20M.</p> <p>&gt; Porterbrook Leasing (PB) - PB specialise in the leasing of all types of railway stock and associated equipment; it's investment to date in the UK rail market totals £2.7billion in new trains and over £300million in the refurbishment of the existing fleet. This overall investment has resulted in, amongst other things, the introduction of 2,300 new passenger vehicles, over 2,000 new freight vehicles and the development of eco-friendly rail technologies. They are a key partner to QRTC and provide strong synergies to our other customers. They have been storing vehicles at QRTC since 2006 and remain our most vibrant partner.</p> <p>&gt; Chrysalis Rail - Are a maintenance and refurbishment company who work with us to provide support to both the companies who have rolling stock in store on site and to the same owners whose vehicles are in traffic across the UK but require servicing, maintenance or modification work. This company is providing key installation support to PB and the University of Birmingham in the creation of Hydro Flex, the UK's first Hydrogen powered train. Their business represents an area of significant growth potential.</p> <p>&gt; R&amp;D Partnerships - Whilst a number of our collaborations are commercially confidential we are proud of the extensive work we do with the University of Birmingham (Birmingham Centre for Rail Research and Education (BCRRE) who are one of the leading such organisations in the world - their letter of support is at Annex A), UK Tram/LR SSB (Light Rail Safety and Standards Board) both of whom have made submissions in support of our case and are attached as Annexes B and C to this brief. QRTC facilities have been used by over 450 companies across the past 5 years as part of the Rail Alliance/Railway Safety and Standards Board (RSSB), leading to over £10M in increased sales.</p> <p>&gt; Training and Development Partnerships - we embrace a really diverse range of organisations, ranging from providing facilities for Network Rail to produce safety films in support of keeping the railway safe, the trade and artisan skills with major employers to support to apprenticeships, the Office of Rail and Road (ORR) in terms of support to the training of Her Majesty's Railway Inspectors (via Cranfield University) and crucially we provide</p>

Ref	Respondent	Summary of Comments
		<p>training support to a wide range of Emergency Services, Special Forces and Counter-Terrorism agencies (as an example we have enclosed a letter of support from West Mercia Police as Annex D to this submission).</p> <p>&gt; Rail Live - QRTC is home to the Rail Live show which is the UK railway's equivalent of the Farnborough Air Show (on a smaller scale). This show is produced by Bauer Media annually and attracts over 5000 visitors and over 450 exhibitors from all over the globe. It is predominantly a showcase event for UK PLC.</p> <p>Economic Benefits</p> <p>From our humble beginnings in 2005 we have grown steadily. Over the last 3 years we have gone from a staff of circa 20 to over 150 as at today. Many of these people are local and about 10% have been trained/re-trained to work in the railway environment. We believe that there is considerable potential to increase both the numbers and diversity of opportunity on site at QRTC to in excess of 250 FTE. Another aspect to this would be that with stability would come considerable training potentials. We are already working closely with the likes of the Warwickshire College Group (WCG) to build training and development for local young people into our plans, along with providing retraining opportunities to people whose primary trade may be suffering a down turn (for example we have just taken on a new member of staff displaced by the current downturn at JLR).</p> <p>Stratford's Industrial and Economic Development Strategy identifies that the area has low job self-containment and suffers from the potential threat of a lack of infrastructure capacity. The role that QRTC plays in Stratford's economy is therefore important. The QRTC facility is a significant market leader in UK Railway Research and is a recipient of significant investment on the basis of its industry leading status. You have received, under separate cover, a statement of support from the Minister for Business and Industry BEIS outlining the importance of QRTC (copy is attached at Annex E). The proximity of QRTC to the new Garden Village (GV) development at Long Marston Airfield (LMA) is important. We believe that there is a great deal of potential synergy to be exploited in the wider development of the links between the opportunities that arise from further development at QRTC and the need for sustainable anchor business themes at the LMA GV.</p> <p>The Coventry and Warwickshire region is widely recognised as the UK's most significant transport R&amp;D hub, and offers a range of advanced engineering consultancies, prototype specialists and contract manufacturers; QRTC contributes to this nationally recognised significance and forms one of a small number Centres of Excellence for Railway Testing used by UKRRIN (UK Rail Research and Innovation Network, which is a partnership between the rail industry and a number of universities). QRTC is also a partner to UK Tram and Innovate UK.</p> <p>What makes QRTC so special?</p> <p>&gt; QRTC is the only privately owned and independent rail testing and trialling site in the UK, which means that it can offer a level of operational freedom and accessibility to industry providers which cannot be found at other testing and trialling sites. It provides to the rail sector what MIRA Horiba does to Automotive. The site is able to</p>

Ref	Respondent	Summary of Comments
		<p>operate 24/7 and onsite site operational staff all have extensive trials and development experience in both rail and other sectors, including defence, automotive and manufacturing.</p> <p>&gt; It is the only facility in the UK able to offer full scale crash testing to European TSI standards and is used extensively by the Emergency Services for full scale incident simulation and for the training of Counter-Terrorism teams. It provides a unique range of training and development opportunities in a live/realistic environment but off network.</p> <p>&gt; It is home to the UK's only specifically built light rail test facility and is the only site to offer a looped test track in the UK. The looped test track is 2.4km in length and allows for extensive testing, trialling and product development.</p> <p>&gt; QRTC is the largest and most extensive rail storage facility in the UK, consisting of some 20km of storage sidings, the site also has a storage capacity for approximately 1,000 items of rolling stock with the potential to build more to meet the emerging national shortage of off network storage capacity for new and old fleets. ROSCOs (Freight and Passenger) form a significant proportion of QRTC's client base due to the sites accessibility and connectivity to the national rail network.</p> <p>&gt; It provides the area with a unique ability to anchor and sustain a diverse range of jobs and employment in a sector that has seen and will continue to see growth for the next 10 to 20 years. With this employment comes training and development opportunities in an area desperate for employment. The supply chain benefits locally, regionally and nationally are immense.</p> <p>Amendment to the Proposed Footprint</p> <p>Finally we would like to submit that the area being considered for Allocation is in fact not quite correct and that it would represent a sub-optimal use of the current site. It would be our submission that the demise represented at Appendix B of the SAP needs amending to reflect the actual demise as per the revised map at Annex F (to include the area shaded yellow).</p>
28	<b>L&amp;Q Estates (Pegasus Group)</b>	<p>The Site Allocations Plan Further Focused Consultation proposes to specifically identify the Quinton Rail Technology Centre in the Site Allocations Plan. This is based on the Council's Local Industrial and Economic Development Strategy which cites the Quinton Rail Technology Centre as a Case Study relating to Growing Businesses and Start-ups in Aim 1: The Best Place to Start and Grow a Business.</p> <p>Aim 1 acknowledges that Rail alliance "sits at the very heart of the rail supply chain" and noting that an annual outdoor rail exhibition is staged at Quinton Rail Technology Centre annually and various rail-related test are carried out at the Rail Technology Centre in connection with product development, certification and training.</p> <p>L&amp;Q support the proposals of Stratford-on-Avon District Council to identify the Quinton Technology Centre in the emerging Site Allocations Plan. The support for rail-related research and development as well as enabling</p>

Ref	Respondent	Summary of Comments
		<p>development that helps the long-term future of rail activities on the site is fully supported. This will maximise the unique and specialised rail role this area has for freight as well as for product development and rail technology research and development that currently takes place at the Technology Centre.</p> <p>The identification of the Quinton Rail Technology Centre as a specific allocation in the Site Allocations Plan will assist in the economic growth of this location adjacent to Long Marston Airfield Garden Village which will be a new settlement of 3,500 new homes and associated uses within the adopted Stratford-on-Avon Core Strategy, which provides the strategy for the growth of the District up to the period 2031.</p>
29	<b>Stratford and Town Transport Group</b> – Joseph Baconnet	Support. Particularly if it's formal allocation allows for applications for funding to support its development
30	<b>Birmingham Centre for Railway Research and Education</b>	<p>We consider that the Quinton Rail Technology Centre (QRTC) at Long Marston should be specifically identified in the proposed Site Allocations Plan (SAP).</p> <p>The Birmingham Centre for Railway Research and Education (BCRRE) is part of the School of Engineering at the University of Birmingham. With over 150 academic and professional services staff and more than 500 postgraduate students, we are the largest specialist railway research, education and innovation institution in Europe.</p> <p>BCRRE has a significant interest in QRTC - who are a strategic partner of ours. A significant amount of our work requires use of the specialist facilities at QRTC to test, trial and validate our world- leading research and innovation activities.</p> <p>A current example is our work in developing the UK's first hydrogen train ('HydroF ex'), in partnership with a number of Midlands rail businesses including Porterbrook and Chrysalis who are both also tenants at QRTC. HydroF ex will be launched in June 2019 at the Rail Live trade show (held at QRTC) and will gain significant industry, media and political attention.</p> <p>In addition, we have recently integrated the Rail Alliance into BCRRE. The Rail Alliance is a leading enterprise support network for rail SMEs and associated organisations, providing direct business support, networking and events, at the heart of the UK rail supply industry. With this move, we now have a full-time presence on the QRTC site and a direct interest and stake in the long term future and development of the site.</p> <p>QRTC is a critical part of our work and we have plans to develop our presence there in the coming years in support of all of our research, innovation and education activities. With long term certainty, we plan to significantly invest in new facilities at the site that will allow us to increase our innovation and testing and trialling work, as well as our education and training activities in a practical environment.</p>

Ref	Respondent	Summary of Comments
		<p>QRTC is central to our plans and we very much hope that the Stratford District Council will specifically identify QRTC in the Site Allocations Plan to allow for longer term planning and investment - which in turn will boost investment in facilities that will drive an increase in jobs and economic activity at QRTC.</p>
31	<p><b>UK Tram</b> – James Hammett</p>	<p>UKTram is the authoritative and recognised voice of the light rail sector in the UK and Ireland (set up as requested by government). We represent operators, promoters, manufacturers, contractors and consultants involved not only in tramways and metros but also the expanding ultra and very light rail and personal rapid transit sectors.</p> <p>The current and previous Governments have acknowledged the important role that light rail can play in transforming our towns and cities and UKTram has stepped up to the challenge of helping the sector to grow and become more relevant and vibrant across the country as a whole.</p> <p>The light rail test track facility at QRTC is unique and is a pivotal factor in developing a strong and vibrant local, regional and national light rail manufacturing and supply chain. With this comes the potential to support UK manufacturing, jobs and skills development. The technologies that are in place at Long Marston are, award winning, highly innovative and potentially world class in terms of capability and export potential.</p>
32	<p><b>Light Rail Safety and Standards Board</b> – Peter Cushing</p>	<p>The Light Rail Safety &amp; Standards board (LRSSB) has been created to provide expert support to the light rail industry of the British Isles driving sustainable improvements in safety and efficiency of the tramways and light rail systems.</p> <p>The LRSSB was formed following the tragic accident on the Croydon Tramlink system. On the morning of 9th November 2016 an ‘in service’, Croydon bound tram overturned on the Southbound curve at Sandilands junction having entered the curve at a speed greatly in excess of the posted maximum of 20 km/h. As a result of the overturning 7 passengers were killed and 62 were injured, (including the driver), many seriously.</p> <p>The Rail Accident Investigation Branch, RAIB, subsequently investigated the incident and published their final report at the beginning of December 2017. Their report contained 15 recommendations aimed at both the London Trams system, but also at the tram industry in the UK more widely.</p> <p>UKTram and the Office of Rail and Road (ORR), called a meeting of the industry together at which it was agreed to establish an Independent Review Group to consider RAIB recommendation 1 regarding setting up an industry body responsible for ensuring better co-operation on safety and standards, this has led to the formation on the new organisation the Light Rail Safety and Standards Board.</p> <p>The Light Rail Safety and Standards Board recognise that the ability to test and trail new product that enhances the safety of light rail systems is of paramount importance to the sector and of course public safety. QRTC provides the only “off network” facility in the UK where the interfaces between Tram, people and road vehicles can be tested to ensure optimal safety performance, without compromising operation safety on current networks. We consider the facilities at QRTC as a vital asset with great to enhance the industries capability and safety level.</p>

Ref	Respondent	Summary of Comments
33	<b>Warwickshire and West Mercia Police</b> – Mark Colquhoun	<p>I have responsibility for the Warwickshire and West Mercia Police Firearms School based at Hindlip Hall, Worcestershire. This facility is responsible for training all of Warwickshire and West Mercia Police's firearms officers.</p> <p>The nature and scope of firearms training within the police service has undergone significant change over the past few years. The increase and changing nature of the threat to our communities, particularly around terrorism has dictated that firearms officers must be able to respond effectively and professionally in a more complex policing environment.</p> <p>Key to us being able to safeguard the public against some of these emerging threats is the ability to train for reality and expose officers to training environments that as best we can replicate those they may face during an actual incident. This means that we are increasingly seeking to train officers at off-site at venues that offer unique challenges to develop their skills. These venues can be difficult to source, and once lost are becoming increasingly hard to identify suitable alternatives.</p> <p>One such venue is the Quinton Rail Technology Centre (QRTC). This unique venue allows our officers to be trained in respect of firearms tactics in relation to trains and buses / coaches. Training for tactical interventions in these forms of transport is a relatively new feature of police firearms training and something that simply can't be done without access to the real thing. As can be imagined there simply aren't alternative venues able to facilitate training of this kind and were the venue to become unavailable to us in future, it would undoubtedly have a detrimental impact on our current training program and our ability to mitigate some of the current threats faced by the public.</p>
34	<b>Dorsington Parish Council</b>	<p>Dorsington Parish Council feels that this approach is critical to the long term sustainability of this site. There are far too few employment opportunities relative to the increases in housing developments within the immediate vicinity. Links to universities and the development of high tech business units should be part of the overall core strategy. It is imperative that this centre is NOT designated as another housing development site.</p>
35	<b>Cotswold District Council</b> – Matthew Britton	<p>Core Strategy Policy CS.26 identifies that <i>"Land will be safeguarded for... the possible reinstatement of the railway line southwards from Stratford railway station to Long Marston. There is a presumption against development that would prejudice the implementation of any individual scheme that is safeguarded to the extent to which it is shown on the Policies Map."</i></p> <p>The proposed allocation of Quinton Rail Technology Centre does not form part of the former track bed of the Cheltenham to Stratford-upon-Avon main line. However, we note that the track bed now has several industrial buildings on it to the south of Station Road and next to Quinton Rail Technology Centre. To reinstate this railway line, these buildings will either have to be removed or, more likely, that a deviation to the railway line is provided.</p> <p>We are unaware of the land ownerships or other safeguarding measures in place to enable the reinstatement of this route via a deviation. However, the current allocation boundary would allow development directly to the east of the former route, and any development on this land could limit options in future. We welcome any clarity</p>

Ref	Respondent	Summary of Comments
		<p>you can provide on this matter and, in particular, whether further consideration has been given to how a deviation route would be provided and safeguarded, which could form part of the allocation policy on this land.</p>
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p> <p>Nos.2, 8 &amp; 12 &amp; 35 – This proposal would not impede any possible future re-instatement as it relates to land adjacent to the safeguarded route which has already been safeguarded in the Core Strategy. However, the proposal will be clarified to confirm this.</p> <p>No.2 - Indirectly, additional economic activity at this location would most likely have a beneficial impact on the business case for any future re-instatement.</p> <p>No.13 –Traffic concerns noted. Any planning application would be accompanied by an appropriate transport assessment in order to assess and mitigate, as appropriate, any impacts.</p> <p>No.17 – Noted.</p> <p>Nos.18, 23 &amp; 35 – Concern regarding the site boundary is noted and will be clarified.</p> <p>No.19 – Comments noted as is the existing policy framework set out in the adopted Core Strategy However, given (a) the national importance of the QRTC, (b) its economic potential, and (c) the requirement for connection to the rail network, the Council considers that it is appropriate to specifically identify the site within the Site Allocations Plan. It is considered that the proposal provides adequate flexibility regarding future uses by acknowledging that ‘enabling development’ may be appropriate. The Council understands that the holiday accommodation component of the extant permission is unlikely to be implemented.</p> <p>Nos. 20, 22, 23, 24, 30 &amp; 33 - The wider and national importance of this site is noted.</p> <p>No.25 – As set out in the consultation document, the Council is not looking to identify additional sites for housing other than reserve sites. The identification of these will be based on the Council’s Strategic Housing Land Availability Assessment (SHLAA) technical work as endorsed by The Cabinet in June 2019. The site at Goose Lane has been assessed as part of the SHLAA available to view at <a href="http://www.stratford.gov.uk/siteallocations">www.stratford.gov.uk/siteallocations</a>.</p> <p>No.26 – Noted.</p>		
<p><b>Officer Recommendation</b></p>		

Ref	Respondent	Summary of Comments
		<ol style="list-style-type: none"> <li>1. Proposal to be amended to clarify that the route of the former railway is safeguarded and this proposal will not impede on that safeguarding.</li> <li>2. Amend site boundary to reflect operational area of the site.</li> <li>3. The Proposal and the accompany text to be amended to refer to national importance of the Quinton Rail Technology Centre and its linkages to the national, regional and local economies.</li> <li>4. Amend proposal to specifically identify the issue of flooding and surface water drainage.</li> <li>5. Amend proposal to refer to retention of operational rail connection.</li> </ol>

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## Topic: Question 5(a) - Safeguard land for A46 improvements at Junction of A46 and A422 Alcester Road (Wildmoor)?

Ref	Respondent	Summary of Comments
1	<b>Andy Haines</b>	Improving the A46 should be a significant priority for Stratford BEFORE any other roads or industrial estates are considered. It would be reckless to entertain any other infrastructure pieces before current infrastructure is enhanced.
2	<b>James Furness</b>	Support - no further comment
3	<b>Morrison Park Home Estates – R.Perrin</b>	Enhances opportunities to make more effective use of nearby land close to a major highway with links to the motorway network
4	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support - no further comment
5	<b>Michael Brockington</b>	I fully support the land be safeguarded for road improvement for the A.46 improvements, at the three sites. However surely land should also be safeguarded at two other A. 46 sites, at the Temple Grafton/Billesley junction and at the junction with the road to Binton and Welford-on-Avon, both of which are extremely dangerous.
6	<b>Stratford Ramblers – Harry Rowe</b>	A46 is a busy and dangerous road, especially from Alcester to Wildmoor
7	<b>Warwickshire County Council – Jasbir Kaur</b>	We support this matter
8	<b>Coventry and Warwickshire LEP – Bill Blincoe</b>	The A46 is a critical growth corridor for the Coventry and Warwickshire sub region. This is acknowledged in the Core Strategy but also in the Strategic Investment and Development Plan produced by the West Midlands Combined Authority (WMCA). Whilst the proposals to safeguard land to facilitate A46 improvements is in principle welcomed, it must also be recognised that these key highway intersections are all likely to support additional allocated growth. Therefore, the safeguarding of land around the junctions should not prevent the implementation of development proposals that seek to implement the adopted plan or other proposals that are considered acceptable in land use terms that in turn would be access and serviced from these key junctions.
9	<b>South Worcestershire Councils – Wychavon District Council</b>	<p>This response is made under the Duty to Cooperate. The South Worcestershire Councils (SWC) of Malvern Hills, Worcester City and Wychavon welcome the opportunity to comment on this aspect of the plan and support the proposal to safeguard land for A46 improvements at the junction of A46 and A422.</p> <p>The SWC are currently undertaking a review of the South Worcestershire Development Plan (SWDP). Highways England's long term plan to upgrade the A46 to the M40 is acknowledged and the SWC will consider the need (in consultation with Worcestershire County Council) to include a similar A46 safeguarding policy in the relevant</p>

Ref	Respondent	Summary of Comments
		<p>infrastructure policies in the development plan. Consideration will be given to either a policy that names the specific junctions identified below or an overarching policy that covers the length of the A46 in Wychavon district.</p> <ol style="list-style-type: none"> <li>1. A44/A46 Evesham by pass (by The Valley)</li> <li>2. A46 Evesham by pass/Badsey Road</li> <li>3. A46 Evesham by pass/Vale Park</li> <li>4. A46 Evesham by pass/A44 Oxford</li> <li>5. A46 roundabout/Cheltenham Road</li> </ol>
10	<p><b>Highways England</b> – Eri Wong</p>	<p>Regarding Part 3 A46 Safeguarding we note that the proposal is intended to facilitate future improvements to the A46 within Stratford-on-Avon District and to introduce a presumption against development that would prejudice the implementation of highway improvement schemes at Wildmoor, Bishopton and Marraway junctions in particular.</p> <p>We note that a need for improvements at these three locations was identified during the development of the adopted 2016 Core Strategy and the Infrastructure Development Plan (IDP) underpinned by its Strategic Transport Assessment evidence base. However, there are no details provided regarding the mechanism for safeguarding land and there are no details of a package of highway improvement schemes available at this stage with any funding committed.</p> <p>Highways England supports any efforts to improve these junctions and the concept of a strategic upgrading of the A46 route through the Midlands, however, there are no current proposals in the Road Investment Strategy (RIS1) for the route in the Stratford area and it is not known whether any proposals for the route will be included in RIS2 up to 2025.</p> <p>Safeguarding of land for Highways England major schemes only occurs once a preferred route has been confirmed. Safeguarding by the Local Planning Authority may be considered appropriate with regard to indicative A46 schemes as set out in the transport evidence base for the Core Strategy, or any further evidence base presented in conjunction with the SAP or draft submission plan, but safeguarding beyond this may have limited justification, the case for which will have to be made by Stratford-on-Avon District Council.</p> <p>Highways England has met with local planning and highway authorities again recently to discuss a strategy for the A46 in Stratford-on-Avon and we will continue to work collaboratively with partners to help ensure local growth can be safely accommodated where possible. We would welcome continued engagement during the development of the SAP and the draft submission plan to allow us to confirm our position.</p>
11	<p><b>Warwickshire Wildlife Trust</b> – Annie Oatway</p>	<p>The verge/land to the east of the A46 in this location is a designated Local Wildlife Site (LWS) known as Cadle Pool Farm Meadow. The site was last surveyed in 2011 and is designated for its semi-improved grassland that is used for recreation by residents.</p> <p>We object to the loss or destruction of a LWS; they are of county importance for nature conservation and a key</p>

Ref	Respondent	Summary of Comments
		<p>component of our ecological network.</p> <p>We also recommend that the site is prioritised for re-survey by the LWS team as the 2011 survey report could now be out of date.</p>
12	<b>IM Properties (Turley)</b>	<p>IM Properties generally support the District Council's proposals to build a strong, competitive economy by seeking to address inadequate infrastructure. This is in accordance with paragraph 81c of the National Planning Policy Framework ("NPPF") (February 2019).</p> <p>However, the District Council should ensure that any such 'additional specific proposals' in the Site Allocations Plan do not prejudice the delivery of Proposal SUA.2 and the pending hybrid planning application at land south of Alcester Road (A46). The NPPF is clear that building a strong, responsive and competitive economy should be coordinated with provision of infrastructure and that planning policies should help to create the conditions in which businesses can invest, expand and adapt.</p> <p>Given this, IM Properties welcome careful consideration towards the safeguarding of land for local A46 highway improvement schemes so that land allocated for economic development is not sterilised.</p> <p>IM Properties agree with the context for establishing local interventions to improve the A46 corridor given the importance of the A46 corridor to the Midlands economy. This context is set out at paragraph 2.1.2 of the Midlands Connect 'A46 Corridor Study - Stage One Enhanced Strategic Case' ("the Strategic Case") (November 2018), which states that 22% of England's goods and services are exported from the A46 corridor; whilst the storage and distribution sector and manufacturing sector account for 20% and 16 % of all economic output respectively.</p> <p>The agreed objectives for investing in the A46 corridor for each geographical level are set out at paragraph 2.1 of the Strategic Case. The objective for local intervention (i.e. at local authority level) is explicit in that it should support the delivery of local employment sites to build a strong and more balanced economy. This Midlands Connect objective is endorsed by IM Properties.</p> <p>IM Properties has worked closely with the District Council, Warwickshire County Council and Highways England, during the pre-application stage and post-submission stage of the pending hybrid planning application to ensure the proposals will provide suitable mitigation and not result in severe impacts on the A46.</p> <p>IM Properties support the principle of improvements to the A46 and at the junctions identified within the District. However, it is not clear how the District Council has identified the extent of the safeguarded land for each highway unction improvement scheme. IM Properties therefore seek confirmation from the District Council that the identified A46 highway improvement schemes, contained within the SAP, do not conflict with the development proposals subject to the current pending hybrid planning application, and would not lead to issues of potential blight</p>

Ref	Respondent	Summary of Comments
13	Stephen Ollerenshaw	<p>While I understand the benefits of the proposal to safeguard land for potential improvements to the A46, I am only in favour of such improvements if they are carried out sympathetically. Therefore I would like the council to place conditions on the use of this land as follows:</p> <ul style="list-style-type: none"> <li>· Any improvements would take account of the proximity of the green belt and would not be a gateway for development in the surrounding green belt areas.</li> <li>· Consideration would be given to the impact to existing residential areas in respect of such developments, including without limitation eliminating any additional noise or emission pollution risk.</li> <li>· Improvements must be subject to not affecting aesthetic quality of the “green boundary” to the town which is an important part of the core plan.</li> <li>· Improvements must include non-vehicular access to the town through the incorporation of safe walkways and cycle paths to improve more environmentally friendly ways of accessing the town and ensuring that residential areas are not “cut off” from the town in using these modes of transport.</li> </ul> <p>If conditions covering the above are included in the land reservation then this would help allay concerns.</p>
14	<b>Portal Business Solutions on behalf of Philip Baker Will Trust</b>	<ol style="list-style-type: none"> <li>1. The Land was removed from the Green Belt and included in the Urban Build area of the Town in the adopted Core Strategy 15 years ago.</li> <li>2. The planning application for seven residential units in 2011 was opposed by Warwickshire CC (as Highways Authority) on grounds of inadequate access and was consequently refused by Stratford DC</li> <li>3. On Appeal, the Inspector dismissed WCC’s grounds of objection, but upheld the refusal on the new ground that foliage of certain trees on the A46 embankment at the western end of the Ridgeway Bridge obscured the view of approaching traffic from the proposed vehicular access to the development</li> <li>4. Since this negotiations have taken place with the Highways Agency for the removal/pollarding of the trees in question - these negotiations are continuing</li> <li>5. The proposal to designate the whole of the field as a restricted “safeguarded” area pending the future improvement of the A46 at the junction with the A439 is both unreasonable and unnecessary</li> <li>6. The planning application for seven houses left as an undeveloped open space a substantial paddock at the southern end of the field</li> <li>7. It is submitted this open space is more than adequate to accommodate any future works for the repositioning of the Alcester Road Roundabout and widened approach roads when taken in conjunction with the substantial Highway verges surrounding the current traffic island</li> <li>8. The safeguarding proposal which will blight the field from further housing development for many years is</li> </ol>

Ref	Respondent	Summary of Comments
		<p>wholly disproportionate and inappropriate</p> <p>9. In the course of the Inquiry into the earlier proposed Core Strategy the Inspector concluded the inclusion of the narrow field within the Green Belt was an anomaly having been separated from Wildmoor, its mother farm, by the building of the A46 By Pass and was incapable of economic agricultural use. He therefore proposed use for Housing subject to acceptable access.</p> <p>10. The prevention of the field being developed for housing is in contravention of the Governments current policy to encourage the building of houses to meet the current housing crisis.</p>
15	Federation of Small Businesses – Lee Osborne	<p>The consultation document notes that the A46 is a mix of single and dual carriageways with roundabouts, 'T' junctions, and slip roads.</p> <p>The FSB can agree that these inconsistent standards result in a road that has poor resilience, suffers from congestion and has a record of poor road safety. The road can also act as a barrier, dividing communities with large volumes of traffic and creating an unattractive environment for those towns and villages along its route. Small businesses are overwhelmingly reliant on roads, with nine in 10 firms placing high value on the road network according to FSB research. Rural businesses are especially likely to rely on roads as they often report little or no access to public transport links like rail or buses. Therefore more strategic planning to ease congestion across the A46 road network would help small businesses.</p> <p>Congestion on local roads is identified as one the main issues negatively affecting small businesses, and is viewed as more detrimental that congestion on motorways. This is an indication of the relative importance given to different parts of the road network. All road users will start and end their journey on the local road network, so congestion at any point in the end to end journey will cause frustration. Congestion can cause significant disruption, delay and frustration to small business owners. Many small business owners operate with tight margins, so any delay to goods or services being procured or delivered can cause significant damage to the financial viability of an individual business.</p> <p>As a result the FSB can agree in principle with safeguarding to implement improvements. However we would like further clarity on the timescales involved before further developments are rejected. We believe there is a need for greater emphasis to be placed on funding and delivering local schemes. Directing funds towards reducing local congestion would have a significant economic benefit through alleviating congestion on the local road network.</p>
16	<b>Stratford and Town Transport Group</b> – Joseph Baconnet	Support
17	<b>Dorsington Parish Council</b>	Support - no further comment to add

Ref	Respondent	Summary of Comments
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p> <p>No.5 – Noted, however, the rationale for safeguarding is not to address safety concerns per se but to seek to ensure that any future upgrading can be implemented.</p> <p>Nos. 8 &amp; 12 – It is confirmed that the purpose of the safeguarding is to ensure future proposals do not prejudice potential future upgrading. Land south of Alcester Road is an allocated site within the adopted Core Strategy and the Council is supportive of this site coming forward for development.</p> <p>Nos.11 &amp; 14 – Agreed. It is not considered appropriate to safeguard an existing Local Wildlife Site.</p> <p>No.13 – noted although these considerations should be addressed in the detailed design of any scheme. This proposal simply relates to the safeguarding of land.</p>		
<p><b>Officer Recommendation</b></p> <ol style="list-style-type: none"> <li>1. Extent of safeguarding to be revised to exclude the Cadle Pool Farm Meadow Local Wildlife Site.</li> <li>2. Explanatory text to be amended to clarify the relationship to the delivery of SUA.2</li> </ol>		

## Topic: Question 5(b) Safeguard land for A46 improvements at Junction of A46 and A3400 Birmingham Road (Bishopton)

Ref	Respondent	Summary of Comments
1	<b>Andy Haines</b>	Improving the A46 should be a significant priority for Stratford BEFORE any other roads or industrial estates are considered. It would be reckless to entertain any other infrastructure pieces before current infrastructure is enhanced.
2	<b>James Furness</b>	Support - no further comment
3	<b>Morrison Park Home Estates – R. Perrin</b>	Enhances opportunities to make more effective use of nearby land close to a major highway with links to the motorway network
4	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support - no further comment
5	<b>Stratford Ramblers - Harry Rowe</b>	Land should be reserved for providing a safe crossing between footpaths SB1 and SD 147.
6	<b>Warwickshire County Council – Jasbir Kaur</b>	We support this matter
7	<b>Peter Emmerson</b>	<p>Whilst I agree that it is prudent to safeguard the land identified in Appendix C, I feel that the text tables accompanying the assessment (pages 10-11 and 20) are incomplete. I accept that the dualising of the A46 is probably necessary at some point in the future to accommodate the ever-increasing traffic and that this probably requires a fly-over or underpass to separate local and long distance traffic. I write as a resident of Bishopton Hamlet and my concern is that the detailed engineering plans for any fly-over or underpass at the A46/A400 junction at Bishopton pay proper attention to the need to preserve and enhance the safety and environmental conditions for the residents of the hamlet and for local people using the Recycling Centre at Burton Farm.</p> <p>I propose the following additions to the charts referred to above: Pages 10-11: Biodiversity and Geodiversity: "The area includes two ancient oak trees, which support a wide range of insect, lichen and fungal life." Accessibility and Transport: "This would be of special benefit to residents of Bishopton Hamlet and for visitors to the Recycling Centre at Burton Farm." Barriers for Rural Communities: "This would be of special benefit to residents of Bishopton Hamlet, which is at present somewhat cut off from the town by the A46." Settlement identity: "The area is adjacent to Bishopton Hamlet, which forms a distinct outlying community. It is essential</p>

Ref	Respondent	Summary of Comments
		<p>that proposals for road improvement take into account the needs of these residents of the Town. The area is also adjacent to the Deserted Medieval Village (DMV) of Bishopton, which is an important heritage asset whose setting must be protected as far as possible from the impact of road development. Page 20: Neutral effects: First bullet point: "However, the proximity of the DMV of Bishopton must be borne in mind at all stages of the design process and the impact on the setting of the DMV mitigated as far as possible." Minor positive effects: Third bullet point: "This is especially true for the residents of Bishopton Hamlet, which lies to the north west of the safeguarded area."</p>
8	<p><b>South Worcestershire Councils –</b> Wychavon District Council</p>	<p>See response to Q5a</p>
9	<p><b>Stephen Ollerenshaw</b></p>	<p>While I understand the benefits of the proposal to safeguard land for potential improvements to the A46, I am only in favour of such improvements if they are carried out sympathetically. Therefore I would like the council to place conditions on the use of this land as follows:</p> <ul style="list-style-type: none"> <li>· Any improvements would take account of the proximity of the green belt and would not be a gateway for development in the surrounding green belt areas.</li> <li>· Consideration would be given to the impact to existing residential areas in respect of such developments, including without limitation eliminating any additional noise or emission pollution risk.</li> <li>· Improvements must be subject to not affecting aesthetic quality of the "green boundary" to the town which is an important part of the core plan.</li> <li>· Improvements must include non-vehicular access to the town through the incorporation of safe walkways and cycle paths to improve more environmentally friendly ways of accessing the town and ensuring that residential areas are not "cut off" from the town in using these modes of transport.</li> <li>· Care should be taken to ensure that existing vehicular access to Bishopton Hamlet is not significantly affected, for example right turn from the A46 onto Lane End should not be prevented or there should be some direct access from the Bishopton Roundabout.</li> </ul> <p>If conditions covering the above are included in the land reservation then this would help allay concerns.</p>
10	<p><b>Town Transport Group –</b> Joseph Baconnet</p>	<p>Support</p>
11	<p><b>Dorsington Parish Council</b></p>	<p>Support – no further comments to add</p>
12	<p><b>Highways England –</b> Eri Wong</p>	<p>Regarding Part 3 A46 Safeguarding we note that the proposal is intended to facilitate future improvements to the A46 within Stratford-on-Avon District and to introduce a presumption against development that would prejudice the implementation of highway improvement schemes at Wildmoor, Bishopton and Marraway junctions in particular.</p>

Ref	Respondent	Summary of Comments
		<p>We note that a need for improvements at these three locations was identified during the development of the adopted 2016 Core Strategy and the Infrastructure Development Plan (IDP) underpinned by its Strategic Transport Assessment evidence base. However, there are no details provided regarding the mechanism for safeguarding land and there are no details of a package of highway improvement schemes available at this stage with any funding committed.</p> <p>Highways England supports any efforts to improve these junctions and the concept of a strategic upgrading of the A46 route through the Midlands, however, there are no current proposals in the Road Investment Strategy (RIS1) for the route in the Stratford area and it is not known whether any proposals for the route will be included in RIS2 up to 2025.</p> <p>Safeguarding of land for Highways England major schemes only occurs once a preferred route has been confirmed. Safeguarding by the Local Planning Authority may be considered appropriate with regard to indicative A46 schemes as set out in the transport evidence base for the Core Strategy, or any further evidence base presented in conjunction with the SAP or draft submission plan, but safeguarding beyond this may have limited justification, the case for which will have to be made by Stratford-on-Avon District Council.</p> <p>Highways England has met with local planning and highway authorities again recently to discuss a strategy for the A46 in Stratford-on-Avon and we will continue to work collaboratively with partners to help ensure local growth can be safely accommodated where possible. We would welcome continued engagement during the development of the SAP and the draft submission plan to allow us to confirm our position.</p>
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p> <p>No.1 – Noted although as part of the Strategic Road Network, the A46 is the responsibility of Highways England. SDC is a member of the A46 Partnership, a grouping of organisations that have come together to promote the need for investment and improvements to the A46.</p> <p>No.5 – Noted although this needs to be addressed in the detailed design of any scheme. This proposal simply relates to the safeguarding of land.</p> <p>Nos.7 &amp; 9 – noted although these considerations should be addressed in the detailed design of any scheme. This proposal simply relates to the safeguarding of land.</p>		
<p><b>Officer Recommendation</b></p> <p>n/a</p>		

## Topic: Question 5(c) - Safeguard land at Junction of A46 and A439 Warwick Road (Marraway)

Ref	Respondent	Summary of Comments
1	<b>Andy Haines</b>	Improving the A46 should be a significant priority for Stratford BEFORE any other roads or industrial estates are considered. It would be reckless to entertain any other infrastructure pieces before current infrastructure is enhanced.
2	<b>James Furness</b>	Support - no further comment
3	<b>Morrison Park Home Estates – R. Perrin</b>	Enhances opportunities to make more effective use of nearby land close to a major highway with links to the motorway network
4	<b>Inland Waterways Association – Dr G J Nicholson</b>	Support - no further comment
5	<b>Historic England – Rohan Torkildsen</b>	A46 Safeguarding, Marraway. The intention to safeguard land to enable potential future junction works are noted. A commitment should be made within the Plan to ensure an appropriate design response to minimise potential harm to the setting of the adjacent Grade II listed Farmstead and ensure that due regard is made to S66 of the Planning (Listed Buildings and Conservation Areas) Act.
6	<b>Stratford Ramblers – Harry Rowe</b>	Support - As 5a)
7	<b>Warwickshire County Council – Jasbir Kaur</b>	We support this matter
8	<b>South Worcestershire Councils – Wychavon District Council</b>	See response to Q5a
9	<b>Stephen Ollerenshaw</b>	<p>While I understand the benefits of the proposal to safeguard land for potential improvements to the A46, I am only in favour of such improvements if they are carried out sympathetically. Therefore I would like the council to place conditions on the use of this land as follows:</p> <ul style="list-style-type: none"> <li>Any improvements would take account of the proximity of the green belt and would not be a gateway for development in the surrounding green belt areas.</li> <li>Consideration would be given to the impact to existing residential areas in respect of such developments, including without limitation eliminating any additional noise or emission pollution risk.</li> <li>Improvements must be subject to not affecting aesthetic quality of the “green boundary” to the town which is an important part of the core plan.</li> </ul>

Ref	Respondent	Summary of Comments
		If conditions covering the above are included in the land reservation then this would help allay concerns.
10	<b>Town Transport Group</b> – Joseph Baconnet	Support
11	<b>Dorsington Parish Council</b>	Support – no further comment to add
12	<b>Highways England</b> – Eri Wong	<p>Regarding Part 3 A46 Safeguarding we note that the proposal is intended to facilitate future improvements to the A46 within Stratford-on-Avon District and to introduce a presumption against development that would prejudice the implementation of highway improvement schemes at Wildmoor, Bishopton and Marraway junctions in particular.</p> <p>We note that a need for improvements at these three locations was identified during the development of the adopted 2016 Core Strategy and the Infrastructure Development Plan (IDP) underpinned by its Strategic Transport Assessment evidence base. However, there are no details provided regarding the mechanism for safeguarding land and there are no details of a package of highway improvement schemes available at this stage with any funding committed.</p> <p>Highways England supports any efforts to improve these junctions and the concept of a strategic upgrading of the A46 route through the Midlands, however, there are no current proposals in the Road Investment Strategy (RIS1) for the route in the Stratford area and it is not known whether any proposals for the route will be included in RIS2 up to 2025.</p> <p>Safeguarding of land for Highways England major schemes only occurs once a preferred route has been confirmed. Safeguarding by the Local Planning Authority may be considered appropriate with regard to indicative A46 schemes as set out in the transport evidence base for the Core Strategy, or any further evidence base presented in conjunction with the SAP or draft submission plan, but safeguarding beyond this may have limited justification, the case for which will have to be made by Stratford-on-Avon District Council.</p> <p>Highways England has met with local planning and highway authorities again recently to discuss a strategy for the A46 in Stratford-on-Avon and we will continue to work collaboratively with partners to help ensure local growth can be safely accommodated where possible. We would welcome continued engagement during the development of the SAP and the draft submission plan to allow us to confirm our position.</p>

**Officer Response**

A number of the comments made on this subject require a specific response:

Nos. 5 & 9 – noted although these considerations should be addressed in the detailed design of any scheme. This proposal simply relates to the safeguarding of land. There are separate existing statutory mechanisms to ensure any harm is mitigated.

Ref	Respondent	Summary of Comments
<b>Officer Recommendation</b> n/a		

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## Topic: Question 6 Do you agree with the proposal for an Employment Exceptions Sites Policy?

Ref	Respondent	Summary of Comments
1	<b>James Furness</b>	Support - no further comment
2	<b>Morrison Park Home Estates -</b> R.Perrin on behalf of	Supports wealth creation
3	<b>Inland Waterways Association -</b> Dr G J Nicholson	The Inland Waterways Association (Warks branch) supports all sections of the Site Allocations Plan
4	<b>Faybrook Limited -</b> Matthew Lynwood	<p>We support the council in seeking to identify opportunities to encourage employment which is not based around either high quality offices or logistic based. We agree that through the ability to change use of former employment land to residential, there has been a significant loss of sites for employment, especially sub-prime locations.</p> <p>My clients own a 1.5Ha site on the edge of Bidford upon Avon (West of Broom Road, BID 14 in the LPA MRC register) that is used for horticulture that would make a suitable opportunity to provide employment use. The site is located adjacent to existing settlements (Bidford and Broom), already has a built up footprint and is located on a road that is accessible by car, foot and cycle.</p>
5	<b>Stratford Ramblers -</b> Harry Rowe	Reference to safe access by foot is welcomed.
6	<b>Warwickshire County Council -</b> Jasbir Kaur	We support this matter
7	<b>Coventry and Warwickshire LEP -</b> Bill Blincoe	<p>This initiative is fully supported. The proposals have the potential to make an important contribution to increasing the supply of employment land to meet the growing and current shortfall of available land. They also offer potential to bring forward employment land at lower costs away from "premium" locations and where accommodation to meet locally generate needs might be provided.</p> <p>The consultation document highlights the issues that have driven and underpin this initiative. The commercial criteria identified relating to 10% of floorspace being provided at a maximum of 80% of market rates seems reasonable and allows flexibility.</p> <p>We wonder if reference should be made to the use of Section 106 or similar agreements that may be used to</p>

Ref	Respondent	Summary of Comments
		secure these market subsidies and ensure that they run with the land after any changes in ownership?
8	<b>Cerda Planning -</b> Michael Robson	<p>The consultation draft document makes clear that there is evidence of a shortage of available and affordable sub-prime employment land which is defined as second hand premises and premises of less than 20.000sq ft.</p> <p>The cause of this market failure, it is suggested in the consultation draft, appears to be firstly that allocated employment sites are coming forward for more profitable employment uses such as logistics and secondly as a consequence of government policy driving the conversion of brown field employment sites to housing stock.</p> <p>The proposal is to address these issues through a more relaxed approach to the provision of employment land through exception sites policy.</p> <p>National policy contained within the NPPF is clear about the importance to be placed upon the delivery of employment land.</p> <p>Indeed, paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It follows that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p> <p>Further to this, paragraph 82 emphasises the need to provide for ‘clusters or networks of knowledge and data-driven, creative or high technology industries at a variety of scales and in suitably accessible locations.’</p> <p>Set in this context, despite the Framework not containing a dedicated employment exceptions policy, the concept of exception sites in policy is not unusual.</p> <p>This is a long-standing approach to increase the delivery of affordable housing. Paragraph 77 of the NPPF, relating to these housing exception sites, states that local planning authorities ‘should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs.’</p> <p>In the same way that the NPPF aims to encourage the provision of affordable housing, a principle which underpins its rural housing exceptions policy, it demonstrates a need to provide the conditions for businesses to ‘invest, expand and adapt’, with particular reference to providing for ‘clusters or networks of knowledge and data-driven, creative or high-technology industries.’</p> <p>In that sense, the concept of taking forward an exceptions policy dealing with employment land draws support from and can be said to be consistent with the provisions of the NPPF.</p> <p>Thus, the concept of an employment exception site policy in the local plan is already considered to be consistent with 3 out of the 4 premises of soundness in plan-making outlined by paragraph 35 of the National Framework:</p>

Ref	Respondent	Summary of Comments
		<p>the policy would be equally positively prepared, justified, and effective as those which seek to oversee the growth of regular employment sites. In this way, all that remains is to demonstrate its own consistency with national policy.</p> <p>This is subject to there being an evidential basis for bringing forward employment land through an exceptions policy.</p> <p>In this regard, national industrial statistics across recent years have indicated a clear expansion of knowledge-intensive, high-technology enterprises, so much so that they have necessitated their own 'quaternary' industrial sector. Whilst the percentage of UK GDP coming from the service sector has increased from 45% to about 80% over the last 70 years, the most significant details lie in the breakdown of the service sector itself:</p> <p>Knowledge-intensive services came to make up just over 45% of the UK economy by 2007; a significant increase from the 25% in 1975. Furthermore, of all services deemed to be knowledge-intensive, professional scientific and technical business is the fastest growing, almost doubling its employment numbers between 1979 and 2010.</p> <p>The government has demonstrated its awareness of this significant industrial change through the national industrial strategy white paper. It is clear in its support for ideas which drive UK competitiveness and allow this form of industry to flourish, stating that 'it is fundamental to the quality of our work and ensures our place as a world leading knowledge economy.'</p> <p>The only conclusion that can be reached is that this restructuring of the economic base has created a demonstrable requirement for additional employment land. These demands are distinct from the logistics sector and thus capturing this employment need through an exceptions policy is justified as a means to driving higher economic growth. Within Warwickshire, and in particular Stratford, this warrants taking an alternative approach to that contained within the core strategy. For example, in circumstances where higher value employment uses such as logistics account for substantial tracts of employment land being taken up, the ability of Stratford to meet the needs of the quaternary, knowledge-intensive service sector is heavily constrained.</p> <p>Further, we would support the concept as set out in the justification to employment exception sites, but there is a clear relationship between the provision of new homes and jobs and that a sufficient quantum of new employment land should be identified and allocated in order to meet the expected number of jobs generated from the Core Strategy housing requirement for the plan period to 2031. Because the Core Strategy is envisaging delivering more housing than the OAN would suggest in the current plan period to 2031 so too must the Core Strategy work harder in delivering additional economic growth for the district.</p> <p>Cerda Planning Ltd, on behalf of the Darling Family Trust, support the concept of employment exception sites as set out within the Regulation 18 Further Focused Consultation in respect of the Site Allocations Plan for Stratford-on-Avon District to accompany the Core Strategy.</p>

Ref	Respondent	Summary of Comments
		<p>The approach that is being taken can be said to be positively prepared since it is providing a strategy which has the potential to increase the delivery of employment land to meet needs and the ongoing re-structuring of the economic base in the district; it is justified as a consequence of being an appropriate strategy taking in to account the reasonable alternatives; it can be effective and deliverable over the plan period; and consistent with national policy enabling the delivery of sustainable development in accordance with the policies in the Framework.</p>
9	<b>Rainier Developments (Pegasus)</b>	<p>The Site Allocations Plan Further Focused Consultation proposes the inclusion of an Employment Exceptions Sites Policy. This is on the evidence that there is a shortage of available and affordable 'sub-prime' employment land across Stratford-on-Avon District.</p> <p>Paragraph 80 of the NPPF emphasises that planning policies should help create the conditions in which businesses can invest, with paragraph 81 of the NPPF setting out that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p> <p>With this in mind the District Council's proposals to include an Employment Exceptions Sites Policy in response to the evidence contained within the Local Industrial and Economic Development Strategy is supported by Rainier Developments.</p> <p>It is important to ensure that a supply of employment land continues to come forward in Stratford-on-Avon District to support sustainable growth and to address the imbalance with the majority of the working population currently working outside of the District. In addition, the supply of employment land and jobs should be aligned to the provision of new homes across the District both in terms of quantum and spatial distribution, further promoting sustainable economic growth. Outside the main town of Stratford-upon-Avon, it is important to ensure that employment opportunities in the Main Rural Centres, including Shipston-on-Stour and Wellesbourne, and the Local Service Villages, including Harbury and Long Itchington, are also supported in principle to promote sustainable growth and provision of local jobs.</p> <p>The proposed Employment Exceptions Sites Policy seeks to consider proposals for employment development, not specifically provided for in Policies CS.22 and AS.10 of the Core Strategy, on their own merits. It is agreed that any proposals for B1, B2 and B8 uses outside of the built-up area should be located on the edge of, or in close proximity to, the settlement. Such proposals for employment should then be assessed against the relevant policies within the Development Plan in determining their acceptability as defined by the criteria currently identified within the proposed Employment Exception Sites Policy.</p> <p>It is important to highlight paragraph 84 of the NPPF which sets out that planning policies should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. The NPPF goes on to state that in</p>

Ref	Respondent	Summary of Comments
		<p>these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable. This should be reflected in any Employment Exceptions Sites Policy within the Site Allocations Plan.</p> <p>Whilst Rainier Developments support the need to encourage the use of previously development land and existing sites within the built-up area, it is important to recognise that such sites may not be appropriate nor suitable for employment uses. Under such circumstances appropriate edge of settlement sites for employment uses should be supported through the Employment Exceptions Sites Policy.</p> <p>In summary Rainier Developments support the proposed inclusion of an Employment Exceptions Sites Policy within the emerging Site Allocations Plan for the District.</p>
10	<b>IM Properties (Turley)</b>	<p>IM Properties welcome the introduction of policy for employment exception sites, which will help to support the objectives of the District Council's 'Local Industrial and Economic Development Strategy' (December 2018) to deliver new jobs and attract new inward investment from the UK and abroad.</p> <p>It is agreed that employment exception sites should be located on the edge of or in close proximity to the existing settlement boundaries (i.e. Stratford-upon-Avon) in order to meet a general or specific need for employment floorspace.</p> <p>IM Properties support the approach to justifying employment exception sites on the basis of a requirement to demonstrate evidence of the need for employment floorspace and assessing the appropriateness of the location for its intended use. The confirmation that development falling within Use Classes B1, B2 and B8 is appropriate in principle is welcomed.</p> <p>However, IM Properties recommend that the emerging policy is amended to include a policy principle that ensures that District wide employment land need is firstly met on allocated sites, such as Proposal SUA.2, before 'employment exception sites' are considered.</p>
11	<b>Stephen Ollerenshaw</b>	<p>I strongly disagree with the proposals for an Exceptions Sites Policy.</p> <p>The statement says that sites will be "Where such sites will be located outside of the built-up area of a settlement they should be located on the edge of, or in close proximity to, the settlement". This implies that these areas have the potential to reclassify or downgrade areas of the Green Belt and therefore increase the possibility of development in the Green Belt. The Green Belt is a fundamental benefit to the town, ensuring that brownfield and existing sites are redeveloped and renewed. Therefore the protection of the Green Belt is important not just for the green areas immediately around the town (stopping development "creep") but also to ensure the town centre areas are redeveloped over time and not left empty while developers focus on cheaper greenfield sites.</p>

Ref	Respondent	Summary of Comments
		<p>We are seeing major changes to the high street, town centres and now retail parks. It seems likely that areas that would previously have been allocated to retail spaces may need to be allocated for other uses such as wider employment need. These spaces are better connected to the town centre and are more attractive places to work and have positive knock on effects to the use of the town centre. It is far better to reallocate these spaces than open the door to development in green spaces that we will never get back.</p>
12	<p><b>CEG (Nexus Planning)</b></p>	<p>I write on behalf of my client, CEG, in response to the above consultation. Land at Gaydon/Lighthorne Heath (GLH) is largely controlled by CEG including the majority of the 100 hectares at the southern end of the Policy Proposal GLH area, which is currently allocated to enable the expansion of Jaguar Land Rover ("JLR") to meet its business needs.</p> <p>We previously responded to the Issues and Options consultation on the Site Allocations Plan (SAP) in a letter dated 9<sup>th</sup> March 2018 and advised that since the adoption of the Stratford-on-Avon Core Strategy, CEG had received no clarification from JLR on its aspirations for the employment land at GLH or a request to advance any land negotiations. A year later, this remains the case.</p> <p>We note that Section 4 of the SAP relates to 'Employment Exception Sites', identifying that there is a shortage of available and affordable 'sub-prime' employment land namely 'second-hand' premises and premises of less than 20,000sqft. We agree that need exists for such employment floorspace but as detailed in our previous representations, CEG understands there to be a significant pent up demand for employment floorspace on the M40 corridor in the sub-region, not only due to obvious connectivity of such land with the strategic highway network but also due to the high level constraints (such as Green Belt) affecting other parts of the strategic highway network in the area.</p> <p>We further note that as part of SAP proposals to address the need the Council has identified, proposals will only be supported where at least 10% of the gross internal floorspace is provided at a maximum of 80% of local market rents. There is nothing in national policy or guidance which advocates a requirement to include such provisions and we would suggest that any existing affordability issues are due to a lack of supply, which could be remedied through the proposed Employment Exception Sites approach and a review of the Core Strategy to address wider employment needs that were not known during the preparation of the Core Strategy.</p> <p>Whilst we fully agree that planning policy needs to be flexible and respond to change, we are nevertheless concerned that the Employment Exceptions Site approach could lead to the ad-hoc delivery of employment floorspace in less sustainable locations across the District, rather than forming part of a coherent and plan-led strategy - as supported by national planning policy. Indeed, the 100 hectares of employment land with Policy Proposal GLH is clearly considered to be a sustainable location for employment growth, and we would further suggest that it is well placed to meet wider sub-regional needs, but its overly restrictive and personal allocation serves as an impediment to economic growth, rather than to encourage it. The Employment Exceptions Site approach should therefore be seen as an interim approach, pending an expedited review of the Core Strategy to fully address local and sub-regional employment needs.</p>

Ref	Respondent	Summary of Comments
		<p>Having regard to the above, our position can be summarised as follows:</p> <ul style="list-style-type: none"> <li>· we agree that employment needs exist that are not currently planned for within the Core Strategy - this would include smaller and larger employment floorspace;</li> <li>· we do not consider the affordable employment floorspace requirement to be justified and consider that this can be resolved through adequate supply being planned;</li> <li>· we continue to consider that the personal restriction of the 100 hectares of employment land at GLH should be amended to allow at least some employment development that is not directly associated with JLR; and</li> <li>· in light of the significant demand for employment floorspace in the District and wider sub-region, we consider that a review of the Core Strategy should be undertaken to specifically address this issue and provide an up to date strategy that responds to the latest evidence.</li> </ul>
13	<p><b>Federation of Small Businesses</b> - Lee Osborne</p>	<p>FSB members across Warwickshire and Coventry inform us they do not feel there is adequate availability of industrial and leisure space across the region. The issue of employment land and incubation space is a challenge across the region and is currently having an impact on supporting scale-up businesses.</p> <p>The FSB wants to see within local plans and planning policies initiatives to encourage a range of affordable local business premises available, both to encourage new enterprises and allow existing businesses to grow. We also would like to see the pressure to convert employment land for housing to be resisted in areas where there is a shortage and note that this policy is seeking to remedy the balance by encouraging employment development on sites otherwise not identified for development.</p>
14	<p><b>Stratford and Town Transport Group</b> - Joseph Baconnet</p>	<p>Support. As long as it does not accelerate the move of employment away from the supporting town/village centres and that there is adequate travel provision.</p>
15	<p><b>Dorsington Parish Council</b></p>	<p>It is imperative that there is a strong local relationship created between the provision of new homes and sites specifically designated for employment, by encouraging a wide range of employment opportunities close to new homes. In doing so, it is also important to attract a mix of national companies together with smaller local enterprises/workshops which can benefit from a wide ranging local labour force, thus ensuring the long term sustainability of development sites within the Stratford Upon Avon district. Quinton Rail Technology Centre is a prime example of a site that should be specifically identified as an employment development site in the Site Allocation Plan to take advantage of the local labour market already living in the area following the building of a substantial number of new homes in Long Marston and Quinton. This has the benefit of also reducing travel time to work and congestion on roads.</p>
16	<p><b>A C Lloyd Homes</b></p>	<p>We fully support the proposed policy for employment exception sites, and strongly agree that there is a current</p>

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	<b>(Delta Planning)</b>	<p>shortage of developable employment land available. The policy would result in additional jobs in rural areas, encourage employment development and prioritise sites accessible by pedestrians, cyclists and public transport. Our client is looking to promote a site in Southam which will be submitted to the call for sites process and meets the criteria for being outside but adjacent to the settlement. We attach a site location plan and a illustrative layout scheme.</p> <p>The site is suitably sized (7.2 Ha) and well placed for employment development, yet falls within open countryside. The site sits south of Leamington Road, and adjacent to the existing industrial area to the east. HS2 will cut through the south western corner of the plot, creating a strong, long term defensible boundary to the south.</p> <p>With regards to the policy detail, we do wish to raise concerns surrounding the aspect of 10% affordable floorspace and its implementation in particular. Very few local authorities have brought in such policies and those that have are all situated in London and the South East, where significantly high rental and land costs exist which are prohibitive for small businesses. The policies themselves are very recently implemented or under review and have significant evidence bases demonstrating a marked need for such a policy. We have seen no evidence base to justify the need for this policy in Stratford and such would have to come forward for this policy to be satisfactory. The affordable workspace strategies in London involve the transfer of a proportion of the development (around 10%) to a range of providers including not for profit organisations and other small employment and business sites procured through S106 money. There are no such organisations in the Stratford area which could facilitate the management of these commercial sites. Our key points of contention are as follows:</p> <ul style="list-style-type: none"> <li>· There is little precedent for this policy detail and the examples that do exist are heavily evidence based. This detail is seemingly without satisfactory backing and figures such as 80% of market rents are seemingly arbitrary.</li> <li>· There is no mechanism for the delivery of this policy. There are no social landlords for commercial space and as stated above there are no organisations in the area that could fill this role.</li> </ul>
17	<b>L&amp;Q Estates (Pegasus Group)</b>	<p>The Site Allocations Plan Further Focused Consultation proposes the inclusion of an Employment Exceptions Sites Policy. Stratford-on-Avon District Council set out in the Focused Consultation that this is based on the evidence that there is a shortage of available and affordable ‘sub-prime’ employment land across Stratford-on-Avon District.</p> <p>Paragraph 80 of the NPPF emphasises that planning policies should help create the conditions in which businesses can invest, with Paragraph 81 of the NPPF setting out that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p>

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		<p>The District Council's proposals to include an Employment Exceptions Sites Policy in response to the evidence contained within the Local Industrial and Economic Development Strategy is supported by L&amp;Q Estates.</p> <p>It is important to ensure that a supply of employment land continues to come forward in Stratford-on-Avon District to support sustainable growth and to address the imbalance with the majority of the working population currently working outside of the District. In addition, the supply of employment land and jobs should be aligned to the provision of new homes across the District both in terms of quantum and spatial distribution, further promoting sustainable economic growth.</p> <p>The adopted Core Strategy includes a new settlement at the Long Marston Airfield (known as Long Marston Garden Village) close to the villages of Long Marston and Lower Quinton. Proposal LMA: Long Marston Airfield sets out that approximately 3,500 dwellings will be delivered, 2,100 of which will be in the period to 2031. Alongside the residential proposals, Long Marston Airfield Garden Village is proposed to deliver a range of shops and services to include community and leisure facilities, a community hub, police office, two primary schools, a secondary school, 13 hectares of employment land, of which no less than 10% should be in the form of small business workshops and the construction of a South Western Relief Road (SWRR) on the western edge of Stratford as an integral part of the proposal.</p> <p>The mixed-use allocation at LMA Garden Village will provide a range of accessible services, facilities and employment opportunities that are convenient and accessible to the new community and the local area.</p> <p>To the south of the LMA Garden Village is the former Long Marston Depot now known as Meon Vale. This area has been redeveloped for housing and employment development by Persimmon Homes and St Modwen Developments.</p> <p>L&amp;Q Estates land interests on Land at Station Road, Long Marston lie immediately to the south of the LMA New Settlement and immediately to the north of Meon Vale. Land at Station Road, Long Marston also lies immediately to the north of the Quinton Rail Technology Centre which the Focused Consultation is seeking to identify as a specific allocation in the SAP.</p> <p>A Contextual Development Plan is provided as Drawing P17-2929_O1-01 which shows the relationship between Land at Station Road, Long Marston with LMA Garden Village, Meon Vale, Quinton Rail Technology Centre, the existing highway and freight line network.</p> <p>Land at Station Road, Long Marston is suitable, available and mixed-use development is achievable and deliverable. The locational advantages of the site are evident in considering the proximity of the site to the LMA Garden Village, the consented residential and employment development at Meon Vale and the proposals for support for rail related research and development and rail related employment development at Quinton Rail Technology Centre. In this regard it is important to ensure that employment opportunities are also supported in principle to promote sustainable growth and provision of local jobs. Mixed use development on Land at Station</p>

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		<p>Road, Long Marston would assist in supporting the employment at Meon Vale, the proposals for railway related research and development and railway related employment develop at the proposed Quinton Rail Technology Centre and the mixed use LMA Garden Village.</p> <p>The proposed Employment Exceptions Sites Policy seeks to consider proposals for employment development, not specifically provided for in Policies CS.22 and AS.10 of the Core Strategy, on their own merits. The proposal in the current consultation set out that where such sites will be located outside of the built-up area of the settlement they should be located on the edge of, or in close proximity to, the settlement to meet a general or specific need for business floorspace and employment. Applicants will also be expected to demonstrate that there are not suitable and/or available sites within the built-up area.</p> <p>The proposal for an employment exception sites sets out that proposals will need to be thoroughly justified by the applicant, taking account of economic and social benefits that would accrue from the proposed development and the impact it would have on the character of the area and the local community.</p> <p>It is important to highlight paragraph 84 of the NPPF which sets out that planning policies should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. The NPPF goes on to state that in these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable. This should be reflected in any Employment Exceptions Sites Policy within the Site Allocations Plan.</p> <p>Whilst L&amp;Q Estates support the need to encourage the use of previously development land and existing sites within the built-up area, it is important to recognise that such sites may not be appropriate nor suitable for employment uses. Under such circumstances appropriate edge of settlement sites for employment uses should be supported through the Employment Exceptions Sites Policy.</p> <p>The draft proposed policy sets out that the proposed development will be assessed against specific factors include at part (a) and part (b) of the proposal. In terms of part (a), this sets out that the evidence of need for opportunities for business uses and jobs to be provided, talking into account the Council's Local Industrial and Economic Development Strategy. The evidence base to support Development Plan documents update and change, it is considered that this should be reflected in the wording of criteria (a).</p> <p>In addition, to align with the emerging Site Allocations Plan the criteria listed at part (b) of the draft proposal should refer to the relationship to Quinton Rail Technology Centre. This is given that the District Council are proposing to identify Quinton Rail Technology Centre as an allocation in its own right and furthermore given that rail related and other enabling development that helps to secure the long-term future of rail activities at the Quinton Rail Technology site is being supported by the District Council. The location of future employment development on a site close to and adjoining the Quinton Rail Technology Centre may therefore be appropriate. As set out above Land at Station Road, Long Marston presents an opportunity for a mixed-use development.</p>

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		<p>On a final point the final bullet point of part (b) relates to the provisions of relevant policies in the Core Strategy. This should be revised to also refer to other provisions of the SAP currently being proposed such as the proposed allocation of the Quinton Rail Technology Centre.</p> <p>In summary L&amp;Q Estates support the proposed inclusion of an Employment Exceptions Sites Policy within the emerging Site Allocations Plan for the District.</p>
<p><b>Officer Response</b></p> <p>A number of the comments made on this subject require a specific response:</p> <p>No.4 - It is not the intention of this policy to identify specific sites; rather, to provide a mechanism to enable the Council to support suitable proposals should they come forward.</p> <p>No.7 – Noted. It is proposed to amend the policy to refer to mechanisms such as s106 to ensure that the affordable rents remain for future occupiers.</p> <p>No.8 – Noted. As set out in the consultation document, the Council is not looking to identify additional sites for housing other than reserve sites. The identification of these will be based on the Council’s Strategic Housing Land Availability Assessment (SHLAA) technical work as endorsed by The Cabinet in June 2019. The site at Stoneythorpe has been assessed as part of the SHLAA available to view at <a href="http://www.stratford.gov.uk/siteallocations">www.stratford.gov.uk/siteallocations</a>.</p> <p>Nos.9, 10, 11 &amp; 14 – Noted. It is proposed to strengthen the criteria within the draft policy to ensure that applicants have to consider alternative sites within the built-up area to also include the locality, to ensure that there aren’t more preferable sites on the edge of the settlement.</p> <p>No.11 - This policy will not override Green Belt policy; any schemes brought forward under this policy would also have to comply with Core Strategy Policy CS.10 Green Belt and maintain the openness of the Green Belt. There may be instances under this policy where brownfield sites within the Green Belt came forward for development.</p> <p>No.12 – See response to Nos.9 &amp; 10 in respect of the application of a sequential test. In respect of the 100ha site at GLH, given its size, scale and location adjacent to J12 of the M40, it is considered that this site is of regional importance. It therefore performs a very different function to that proposed to be dealt with via the employment exception sites policy which is about meeting more of a local need. It is therefore considered appropriate that the future of the 100ha is properly considered through any review of the Core Strategy and is beyond the scope of the Site Allocations Plan.</p> <p>No. 15 - Comments noted; the purpose of this policy is to enable a better balance between homes and jobs but in a flexible and balanced way.</p>		

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		<p>No.16 - It is not the intention of this policy to identify specific sites; rather, to provide a mechanism to enable the Council to support suitable proposals should they come forward. In respect of the provision of affordable the Coventry and Warwickshire Employment Land and Market Signals Study identifies the need for affordable rents and notes that average rents are 50-60% of new build unaffordable rents. In respect of delivery, Warwickshire County Council Economy &amp; Skills Service manages a portfolio of employment sites and premises across the District and is one example of a public sector organisation that could assist in the delivery of such schemes. However, it may be that the site owner wishes to retain responsibility for management of such units with the Council monitoring the situation to ensure rents are available at agreed rates.</p> <p>No.17 - It is not the intention of this policy to identify specific sites; rather, to provide a mechanism to enable the Council to support suitable proposals should they come forward. However, it is agreed that the policy should be amended to cross refer to the Development Plan as a whole and not just the Core Strategy.</p>
		<p><b>Officer Recommendation</b></p> <p>The following amendments are proposed:</p> <ol style="list-style-type: none"> <li>1. For clarity, policy to be renamed to better reflect its purpose as enabling additional employment development to meet needs.</li> <li>2. Policy to be amended to strengthen consideration of alternative sites in the locality.</li> <li>3. Explanatory text is to be amended to specifically refer to s106 and legal agreements regarding 80% market rates.</li> <li>4. Policy to be amended to specifically refer to the Development Plan as a whole rather than just the Core Strategy.</li> <li>5. To provide clarity, the explanatory text is to be amended to refer which organisations the Council will expect the affordable component is transferred to.</li> </ol>