

Stratford on Avon Site Allocations Plan (SAP): SA Report Appendix VI Representations to Consultations & Responses

Section of SA Report	Consultee (Ref Number) & Comments	Responses & Action Taken
SAP Revised Scoping & Initial Options Regulation 18 Consultation¹ January 2018		
The SAP comprised four Parts: 1 Approach to identifying Reserve Housing Sites; 2 Definition of settlement (built up areas) boundaries; 3 Approach to Specific Sites; 4 Self-Build & Custom Housebuilding. The Initial SA Report included sustainability appraisals of these four Parts.		
Environment Agency		
	No comments on the SA at this stage	
Historic England		
	No comments in the SA at this stage	
Natural England		
SA/SEA	The representation refers to SA/SEA consultation questions 1-10 which appear to be relevant to a SA Scoping Report; these questions do not appear to relate to the Q1.1-1.4; Q2.1-2.6; Q3.1-3.9; Q4.1-4.2 consultation questions listed in the revised SAP scoping.	Noted with thanks but wonder if there has been some confusion as the consultation in January 2018 was on the initial sustainability appraisal assessments & their findings. It was not about SA scoping <i>per se</i> since the SA of the SAP used the same SA framework (SA Scoping 2014) as that of the Core Strategy – but refined to include identified thresholds & criteria of significance that are specifically relevant to the site allocations level planning. The initial SA report also included updated information and did explain what

¹ <https://www.stratford.gov.uk/planning-regeneration/sap-revised-reg-18-scoping-consultation.cfm>

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		how and what was being assessed at this stage.
SA Objective No 3 Biodiversity	SA3 Objective emphasises the protection of designated sites. We suggest adding to the SA Indicators to ensure that ecological networks are not compromised and future improvements to habitat connectivity are not prejudiced.	SA Objective No 3 has 7 decision-aiding questions (a-g) that cover both designated and non-designated biodiversity; Q3f specifically refers to linking fragmented habitats.
SA Objective No 7 Natural Resources	The SA objective protects and conserves natural resources one of which is agricultural land. This should give appropriate weight to the roles performed by the area's soils. These should be valued as multi-functional resources which underpin our wellbeing and prosperity.	Noted with thanks and understood. The thresholds of significance as set out in the SA framework remain valid and relevant for assessment of sites options.
SA Objective No 8 Reduce Pollution	The SAP is likely to generate additional nitrogen emissions as a result of increased traffic generation which can be damaging to the natural environment. 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.	Noted with thanks. SA No 8 includes consideration of traffic emissions. We note & understand the reference to 200m from DMRB and as used in HRA. There are no designated sites within the Stratford on Avon Local Plan boundary; there are 3 designated sites some 10 km beyond the LPA boundary. The HRA (2014) of the Core Strategy did not identify any adverse effects – alone or in-combination.

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WYG on behalf of Barwood Homes; Bellway Homes; Spiffire Properties; Follett Property Holdings		
SA Objective 13 Housing & Para 5.9 SA Report (Jan 2018)	The application of SA No 13 Housing should be reconsidered. Para 5.9 states that “defining a tight boundary will have positive effects for housing through controlling the location of future development...”. This is objected to. Drawing a tight settlement boundary is likely to restrict the ability of settlements to respond to development where need arises, and the impact could be neutral or even negative. 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.	The Initial SA para 5.9 noted that there is still some flexibility in the definitions of settlement boundaries. The SA found minor positive effects for both the tight and loose boundaries; it found minor negative effects for no boundary.
SA Objective No 4 Flooding SA Appendix III	Core Strategy Policy CS4 will mitigate against any negative impacts of flooding. Flood risk is managed through a raft of national guidance and also CS Policies and Settlement Boundaries. Therefore, the impact should be neutral for all settlement boundary options.	Yes, agreed that the CS and other policies will provide mitigation measures such that all options would be neutral with regard to flooding.
SA Objective No 10 Transport	Whilst a loose settlement boundary may result in additional traffic, the provision of additional land for development within revised development boundaries could also ensure that public transport services are maintained and/or enhanced through additional use by residents, resulting in a beneficial effect.	The SA found major positive effects for tight boundary, minor positive effects for loose boundary, and minor negative effects for no boundary. The SA assumed the thresholds of 400 & 800m as defined for identifying significance. It is accepted that the 3 options assessed were 3 approaches and that such distances are unknown at this stage such that there is some uncertainty & we suggest adding (?) to the SA findings would be appropriate.

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	<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>	<p>Matter for plan-making. The Core Strategy does not provide for amendments to Green Belt boundaries to provide for housing development. Furthermore, a detailed Green Belt Review has not been undertaken to inform any such amendments. The SHLAA has shown that there are sufficient sites elsewhere in the District such that it is not necessary to consider sites in the Green Belt.</p> <p>The SA identified issues for congestion & air quality in certain settlements; also, issues for landscape effects.</p>

SAP Further Focused Consultation Regulation 18 Consultation² SA Addendum Report February 2019		
Additional specific development proposals that had emerged since the previous consultation in spring 2018. SA Addendum Report addressed - A. Gateway / Cultural Quarter Zone • B. Quinton Rail Technology Centre • C. A46 Safeguarding – Wildmoor • D. A46 Safeguarding – Bishopton • E. A46 Safeguarding - Marraway • F. Employment Exception Sites Policy		
Warwickshire County Council Public Health		
	We recommend that as part of the Sustainability Appraisal / Strategic Environmental Assessment process an Health Impact Assessment (HIA) is carried out to ensure that health and wellbeing is considered within any proposals from the outset.	SA Framework Objective No 14 Safeguard & improve community health, safety & wellbeing. Thus, each emerging element of the SAP has been tested through SA & including consideration of health & wellbeing from the outset.
Environment Agency, Historic England, Natural England		
	No comments received at this stage.	

² <https://www.stratford.gov.uk/planning-regeneration/site-allocations-plan.cfm?frmAlias=/siteallocations/>

Proposed Submission SAP Regulation 19 Consultation SA Report (June 2019)		
Historic England		
Sites SA	The considerations of significance, harm and mitigation are not considered in the Sustainability Assessment information for the sites. The matrices indicate negative impacts and uncertain impacts on heritage at a number of sites with no clear evaluation of those impacts.	The Council is undertaking additional heritage assessments in order to inform the SA assessments. This heritage evidence base will be used to inform the heritage assessment indicators within the SA
Environment Agency & Natural England		
	No comments received at this stage	
Cotswold Conservation Board		
Sites & Cotswold AONB	Reserve housing sites should only be considered for the Cotswold AONB (including settlements that overlap with - but extend beyond - the AONB boundary) if they have not been identified in the SA and the SHLAA as having: -Major negative significance/effects on factors that contribute to natural beauty (e.g. landscape, heritage and biodiversity) -High landscape sensitivity -Minor negative significance / effects on multiple factors that contribute to natural beauty The Respondent clarifies that the representation relates to the following settlements: -Brailes -Ilmington -Long Compton -Quinton -Tysoe	Exclude Amber sites located in AONB
Long Compton Parish Council		
Long Compton sites	The assessment of sites with Long Compton should have taken into account the impact of the identified reserve housing sites on the Cotswold AONB, and the consideration of Long Compton's waste and water management infrastructure.	The landscape assessment within the SA is based upon the Council's Landscape Sensitivity Assessment of Local Service Villages which takes into account a range of factor including the Cotswold AONB. It is considered that issues such as waste and water management can be satisfactorily addressed at the planning application stage

Kathryn Bailey		
Site CLIF.02	It has been assessed as a minor negative effect for access but considers that it should be scored as a major negative effect	SA traffic indicator in Site CLIF.02 amended to neutral
Bromley Planning on behalf of O'Brien Developments Ltd		
Sites LONG14.A & B	A number of comments in relation to the SA, summarised as follows: -Page 74 incorrectly identifies site LONG.14B as LONG.14A -Page 133 of Appendix VIII states there are 5 amber sites but the map shows 6 amber sites -Page 134 of Appendix VIII reference is made to LONG.14A but it should be LONG.14B	Typographical errors in the SA corrected
Cerda Planning on behalf of Darling Family Trust		
SA & sites selection process	The SA process has not been robustly undertaken as all standalone settlement options assessed in the SHLAA were disregarded for the purposes of SEA considerations. The Respondent's view is that the options assessed in the SA have not been sufficiently broad and have been limited only to site options at existing settlements; in effect there has been a pre-SEA site sifting process at SHLAA stage, which has caused none of the new settlement options to be taken forward to the SA for testing. As such the Respondent considers that standalone settlement options have been prematurely removed from the assessment process and the SA is flawed in this regard.	Add additional information to the SA regarding the Council's assessment of Large Rural Sites and the rationale for which are included within the SA for assessment
Avison Young on behalf of Solihull College & University Centre		
SUA	Whilst the SA assesses SUA.8, it does not assess any reasonable alternative sites and does not, as a result, undertake any form of comparison between those sites and SUA.8 As a consequence the Respondent considers that the SA has not demonstrated that the allocation of SUA.8 is the most sustainable option and as such considers that the Plan is not justified in relation to this allocation and is therefore unsound.	As a result of changing circumstances regarding the land at SUA.8 this site is no longer considered appropriate for allocation within the SAP and will be removed from any future SA testing.
Gary Cressman		
Site TYS.B	The SA states that there is uncertainty in landscape impact as there may be potential to mitigate adverse impacts. The Respondent notes that at a planning appeal for this site the inspector ruled out the use of planting as mitigation due to the temporary nature of planting in the setting of historic buildings. The Respondent therefore considers that the policy of selecting this site is unsound as the basis of its selection involved baseless assumptions concerning mitigation.	Further heritage assessment undertaken
RPS on behalf of Miller Homes		
Site BID.C	Overall, the SA assessment of the site is generally in line with other sites at Bidford and also generally positive. However, the Respondent considers that the assessment is not	The assessment is based on a methodology which determines how

	completely accurate and requires updating in relation to: -Natural Resources (agricultural land quality and minerals) -Transport	a particular indicator is scored. In relation to site BID.11 it is located within a Mineral Safeguarding Area and contains the best and most versatile agricultural land which results in the negative assessment for these indicators. Similarly, with the accessibility indicator, as the site is over 400m from local facilities it has scored a minor negative assessment. The methodology is applied to ensure consistency of assessment.
Dr Michael Sanderson		
Sites in NDPs	The flowchart on page 4 should be revised to incorporate: 1-The NDP process 2-A formalisation of the sustainability decision-taking on SEA mitigation to ensure that the LSV allocation determined in the SAP is agreed in conjunction with the NDP owners or, in the absence of an NDP, by the agreement of a plan led statement or agreement to the mitigation.	Incorporates scenario testing to take into account existing NDPs
Mr Stephen Nicholson		
Site STR.11	The SA explains in para. 4.3 how recent case law has clarified that the public should be given the opportunity to comment on the appraisal of alternatives based on the Council's reasons for accepting and rejecting options. In relation to the selection of specific reserve housing sites the Respondent considers that this SA is the first time the public has access to the alternative sites assessed and the reasons for selection. The Respondent considers that this should have been done earlier as part of the Regulation 18 consultation and the resulting public comment taken into account before commencing the submission stage. The Respondent considers that the SA is not sufficiently developed to support the SAP in relation to the adoption of policy and the selection of specific Reserve Housing Sites additional housing over the housing requirement and strategic sites confirmed in the adopted Core Strategy. The scope of the SA does not allow alternative strategies for the scale of total housing provision in Reserve Housing Sites, including a Do-Nothing Option to be assessed. The Respondent considers that this could result in unsound conclusions. The Respondent considers that the SA has not dealt with potential cumulative impacts and therefore major negative impacts are not addressed by appropriate and specific mitigation. The Respondent makes particular reference to site STR.11 and concerns about how	Overall, cumulative effects are introduced in paragraphs 5.17-5.19 of the SA and discussed throughout section 7. The SA undertakes site assessments at a relatively high level to determine the potential suitability of sites for development in sustainability terms. More detailed assessments including a full assessment of mitigation solutions would be undertaken at the planning application stage. Specifically, in relation to STR.11 effective landscape mitigation measures will be required and any

	<p>this site has been assessed in the SA and that the SA objectives have not been updated by the local objectives in the Neighbourhood Plan.</p>	<p>development would need to take into account the impact on existing properties. Any access arrangements will need to be approved by the County Council Highway Authority. In relation to highway capacity, this is currently being reassessed and will form part of the evidence base for the next version of the SAP the SAP will include more detailed scenario testing of a range of options including a Do-Nothing option.</p>
Residents Group		
STR.11	<p>The Respondent considers that the SA does not adequately cover the assessment of alternatives and includes only a superficial assessment of environmental effects. The Respondent has particular concerns over the following assessments for site STR.11: - Resulting Traffic Congestion -Major negative impacts on landscape -Access of Banbury Road -Alternative Strategies for Reserve Housing Overall, the Respondent considers that the SA is a work in progress which is not yet sufficiently developed to support the SAP in relation to the adoption of policy and the selection of specific Reserve Housing Sites and the potential implementation of additional housing over the housing requirements and the strategic sites confirmed in the Core Strategy. Further, the Respondent considers that the scope of the SA does not allow alternative strategies for the scale of total housing provision in Reserve Housing Sites, including a Do-Nothing Option to be assessed, which the Respondent considers could result in unsound conclusions.</p>	<p>As above</p>
Redrow Homes		
Site at Goose Lane, Lower Quinton	<p>The Respondent considers that the site at Goose Lane, Lower Quinton should be considered within the Sustainability Appraisal as a potential reserve housing site. The Respondent considers that the site is well located to the settlement of Lower Quinton, identified for growth by the Council, and is capable of delivering wider benefits to the settlement beyond housing, including community facilities and open space. More generally, the Respondent raises concerns that whilst the Council has undertaken an exercise of assessing each of the sites in the SA there are no alternative options</p>	<p>It is considered appropriate for the SA to only assess sites that have been identified as 'amber' within the SHLAA and not 'red' sites as these have already been assessed as being unsuitable.</p>

	<p>presented, and options have not been tested against each other. Although six sites for Lower Quinton have been included within the SA, these are all preferred options by the Council and none have been discounted. The Respondent considers that there are a number of alternative sites (16 further in total) which could have been tested through the SA, yet no options have been considered. The Respondent considers that the SA does not provide a sufficient range of results that can give certainty that these sites represent sustainable options. The Respondent would have expected the Council to consider not just alternative land parcels but also consider site size as an issue, as a means to draw out meaningful differences in the SA. As all the tested sites within the SA are small scale there are limited possibilities for exploring the relative benefits/disbenefits of site options and as a consequence, the SA leaves very little between the site options. The Respondent suggests that one option that could have been considered is whether it would have been more beneficial to include 6 small sites versus one large site and the relative pros and cons of each. On this front, it would be recommended that the Council include larger non-strategic sites that are more capable of delivering different outcomes that can be tested against options including as assortment of small sites. To conclude, the Respondent considers that it cannot be reasonably assumed that the Council has selected the most appropriate sites, informed by testing through the SA, and that the Council's preferred selection of sites bear no relationship to the process of testing alternatives in the SA, which appears to present a prejudged process of site selection.</p>	<p>(SHLAA) identifies the land at Goose Lane as 'amber' sites and as such is included within the SA for the Preferred Options. The SA for the Preferred Options SAP includes scenario testing relating to site size</p>
Rosconn Strategic Land		
STR.C	<p>The Respondent considers that the SA disingenuously states that site STR.C is 'slightly isolated from the existing residential development' when in reality the centre of the site is over 400m from the BUAB as the crow flies, more so when considering pedestrian connectivity. The Respondent also notes that the SA finds that the site would give rise to Major Negative Effects in respect of landscape, mineral resources, best and most versatile agricultural land and air quality, whilst also having minor negative effects in terms of climate change and protecting settlement identity. The Respondent suggests that this SA assessment all indicated how highly unsustainable the site is for residential development and considers it extremely questionable why this site has been allocated over and above more suitable and sustainable sites.</p>	<p>The assessment that the site STR.C is slightly isolated from existing development and thus having a minor negative effect on settlement is considered to be appropriate and no change is proposed. All of the site options are to be reconsidered for the Preferred Options version of the Site Allocation Plan</p> <p>Site STR.26 removed from Preferred options SA as updated SHLAA assesses site STR.26 to be unsuitable for housing development due to the</p>

		adverse impact on settlement form and character and coalescence with Tiddington.
Rosconn Strategic Land		
Scenarios	The Respondent notes that a number of scenarios were discounted as not being reasonable alternatives, one that was omitted was a scenario that excluded sites in the Main Rural Centres, this not being suitable or reasonable as these are the most sustainable locations in the District. The Respondent also notes that the SA concludes that of the 7 scenarios tested, there was no real difference in sustainability terms. The Respondent considers this surprising when considering that the Core Strategy has identified a settlement hierarchy with those settlements higher up being far more sustainable than those lower down the order and which was to be a fundamental factor in identifying reserve sites, as detailed in Part D of Policy CS.16. As such, the Respondent would expect the SA to have identified one or more scenarios, based on directing reserve sites to more sustainable locations in the District, to have performed better than scenarios that directed more growth to lower tier settlements. The fact that this has not been the case suggests either some scenarios that are reasonable alternatives were omitted from the assessment, or otherwise there has not been a consistent approach to assessing various scenarios.	Paragraphs 4.19-4.20 explain the reasoning for identification of alternative scenarios. Further explanation on identification and refinement of possible reasonable alternatives is provide in paragraphs 7.46-7.48 and reasoning for rejection of certain options explicitly summarised in Table 7.3. The SA for the Preferred Options SAP will consider a range of scenarios for the distribution of reserve housing sites. This includes the testing of a range of options based on the settlement hierarchy.
Rosconn Strategic Land		
Sites ALC.A & B	The SA highlights minor negative effects in respect of flooding, although it is not clear what evidence has been used to inform this, whether the assessor was aware of the difficulties being experienced on the adjacent sites and whether any further detailed investigations have been undertaken by the Council or those promoting the site to demonstrate that an adequate drainage strategy can be delivered. The Respondent also notes that minor negative effects are also identified in respect of Landscape for both sites, whilst ALC.B also has minor negative effects in respect of	Detailed investigations in relation to drainage would take place at planning application stage and appropriate mitigation would be required to be put in place to enable residential development to take place on either of the sites. The

	heritage and climate change, plus major negative effects in respect of agricultural land, suggesting the loss of best and most versatile land.	Environment Agency have not objected to either ALC.12 or ALC.13 being identified as Reserve Housing Sites. The Council does not intend to identify Reserve Housing Sites that are located within the Green Belt as this would be contrary to both national policy and the Council's adopted Core Strategy
Spitfire Bespoke Homes		
ETT.2	The suggestion that the capacity of the site should be for 9 dwellings does not make best and most efficient use of the site and the capacity should be based on a holistic analysis of the site suggesting that the site is capable of delivering significantly more units than is proposed. The Respondent makes a number of comments in relation to the following assessments within the SA for site ETT.A/ETT.02: -Landscape -Heritage - Highway -Biodiversity -Housing supply.	The capacity of the site takes into account that development is only likely on the southern part of the site. Further heritage assessment undertaken
Jonathan Thompson Land & Consultancy on behalf of Rectory Homes Ltd		
Site LMAR.09	The Respondent welcomes the fact that the Council undertook a thorough assessment of all proposed sites to consider suitability, availability and achievability. In relation to site LMAR.09 the respondent notes that the SA assessment for the site was found to primarily have a neutral effect with several minor positive effects and there was a limited minor negative effect, which demonstrates the site as appropriate for development.	No action needed
St Laurence's Church Parochial Church Council		
LIG.06	Number of errors in the SA assessment of site LIG.06 in relation to the following objectives which overstates the minor positive effects and understates minor and major negative effects: -Heritage -Landscape -Climate Change: Traffic -Climate Change: Green Infrastructure -Accessibility and Transport -Settlement Identity	Further heritage assessment undertaken
RPS on behalf of Taylor Wimpy Strategic Land		
Scenarios	There is no assessment of reserve sites in the SA for locations associated with Redditch and it is considered that the SA should have considered potential options at this location. The Respondent notes that whilst an assessment of the sites at Mappleborough Green has been included within the SA, there is concern that there are no alternative options presented and specifically no options beyond Mappleborough Green 'local needs' scale development. The Respondent questions	Ensure that the SA for the Preferred Options SAP includes scenario testing relating to site size. Add additional information to the SA regarding the Council's assessment

	<p>what the purpose/role of the 3 sites at Mappleborough Green is, and if it is to deliver cross boundary development needs then alternative sites (specifically the site at Lower Clopton Farm) should have been considered through the SA process. The Respondent considers that the SA has not tested options against each other and it is suggested that the purpose of the SA is to explore the reasonable potential options for growth in order that the SA can meaningfully assess different options to inform and assist the plan making process. The Respondent expected that the Council would have considered not just alternative land parcels but also consider site size as an issue, as a means to draw out meaningful differences in the SA, capable of delivering future cross boundary needs associated with Redditch. As the 3 tested sites at Mappleborough Green effectively make up one site, it is recommended that the Council include larger strategic sites that are more capable of delivering different outcomes that can be tested against options including an assortment of small sites.</p>	<p>of Large Rural Sites and the rationale for which are included within the SA for assessment.</p>
Tiddington Village Residents Association (TVRA)		
TIDD.03	<p>The Respondent considers that there are a number of factors that have not been fully or sufficiently considered in the SA; 1-There is no mention of the refused called-in appeal on the Hamilton Road site TIDD.03 2-Under 'deliverability' there are references to the Neighbourhood Plan but only in the context of whether or not it allocates reserve sites. The SA does not consider NDP Policy SSB3 which allocates site 3 as woodland and open space. 3-The site would mean the loss of high quality agricultural land which is not given sufficient consideration in terms of landscape impact.</p>	<p>Site. TIDD.03 removed from the SAP and SA.</p>