

Appendix 1 - comments from Stratford-on-Avon District Council

This analysis contains a number of initial general comments about the Neighbourhood Plan, followed by a schedule of more detailed policy related points.

General Comments:

Whilst welcoming publication of the Plan and commending the work of the Town Council and local community in its production, there are two main practical concerns:

- The Plan contains a large number of policies that either overlap with other policies in the Plan or repeat policies set out in the Stratford-on-Avon District Core Strategy. In many instances this may contribute little in the way of “added value” or the provision of clear criteria against which proposals can be designed. It is recommended the Plan be reviewed and where appropriate redrafted to reduce the level of overlap and duplication and – more importantly – to provide clear guidelines for all parties on site/location specific issues. There is a need to emphasise where the NDP differs from or goes beyond the policies of the Core Strategy, rather than just repeating them in full.
- Many of the policies are ambiguous and difficult to interpret/apply in practice. It is recommended the Plan be reviewed and where appropriate redrafted to make it more effective overall.

The Plan will have implications for the respective development programmes of the District Council and its partner housing associations, and it is important that further consideration is given to those issues.

Any perceived criticisms, where made, are solely intended to draw attention to issues that it is necessary or desirable to address in order to assist the Town Council and local community in producing a Plan that is credible, deliverable and – above all – effective in meeting the diverse local housing needs of the largest settlement in our District. SDC representatives would be happy to meet and work with the Town Council to discuss any of those issues further and identify practical solutions.

For the avoidance of doubt, where there are cross-references to the Core Strategy, they are to the Submission version dated June 2014, unless otherwise stated. This is because the Plan purports to be based on that version of the Strategy.

It is helpful for the plan to identify the unusual demography of the town, and from that to derive particular requirements for development. However, there must be sufficient evidence to demonstrate that any such requirements can be applied on all significant sites, with a consequential effect on viability, housing delivery, urban design etc.

The draft is well laid out and illustrated. However, could it be shorter, clearer and more usable with a greater focus on where the NDP has an evidenced case to differ from/go beyond the Core Strategy policy norm?

Several of the policies appear to be highly restrictive, either by failing to recognise that the Council must balance the 'pros and cons' of multiple policies, or that they may render sites unviable or undevelopable – it is presumed that this is not the intended consequence of the wording.

The draft comes up with some interesting and attractive proposals for the town – but these ideally must be given much greater strength and deliverability by including a clear indication of anticipated timescales, sources of funding and the lead body responsible for implementation.

The Plan evidently has strength as a result of drawing on a range of expertise from many local people. However with the progress of time, some elements of the plan have already been overtaken by events. For example there is arguably little need for a detailed specification for the Home Guard Club at Tiddington when this site now benefits from Planning Permission.

Given the sustainability of the town and its status as the main settlement in the District and the increase in OAN arising as a result of the further work required by the Inspector, the overall level of housing provision in the draft plan is likely to be inadequate.

While the plan has many worthy ideas and proposals, in the absence of any clear allocation of responsibility and funding sources it is unclear how it will be delivered.

From the date the Deregulation Bill 2015 was given Royal Assent (26.3.15), Local Planning Authorities and Qualifying Bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases. Particular standards or requirements for energy performance are considered later in this response.

There is felt to be a need for more emphasis on stimulating the town's evening economy and providing more leisure activities targeted at young people and families to drive and increase footfall in the town centre.

Inward Investment is important to the economy of the town and reference needs to be made to the fact that the District Council has commissioned Warwickshire County Council through their Invest in Warwickshire service to promote the town and wider district to investors, businesses developers and agents as a great place to do businesses. This will be further supported by an Inward Investment Package specifically for the town which is currently in development with Stratforward, SDC and WCC.

The recently launched Destination Management Plan for Shakespeare's England sets out a framework of priority for the visitor economy for the region for the next 10 years. It is important that this document is referred to as part of the aspirations in the NP (Copy available on request).

Dementia Community - Some reference to working towards establishing a Dementia Community would be welcomed and should be part of the aspirations contained in the Health and Community section.

Policy related comments:

| Policy related comments: | | |
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| | | General |
| Content | Contents pages | <p>Policy H3 begins on p.20, not p.19.</p> <p>Policy H4 begins on p.21, not p.20.</p> <p>Policy TC12 begins on p.53, not p.52.</p> <p>Policy CLW4 begins on p.102, not p.104.</p> <p>A number of policies state start and end pages but the majority just quote the start page. The page numbering needs to be amended for consistency.</p> |
| Plan | Objectives | The objectives are referenced A, B C... under each section and as such the Neighbourhood Plan contains seven Objective A's. It would be more helpful to give each objective a unique reference (e.g. 5A, 5B, 6A, 6B) depending on which section they relate to. |
| 1 | Page 9 | The statement intimates that the Town Council will be responsible for the implementation of the Plan. This is misleading: implementation will be a shared responsibility. More importantly, no consideration has been given to the implementation process. In particular, the District Council and its partner housing associations will have an important role to play. |
| 2 | Page 11 | <p>Statement in relation to emerging Core Strategy (June 2014 version) is noted along with recognition of likelihood of further changes.</p> <p>Final sentence of fourth paragraph – as written, it appears to suggest that SDC is the Qualifying Body, not Stratford Town Council. This requires re-drafting.</p> |
| 3 | Page 14 | The housing allocation for Stratford should be acknowledged as a minimum, not a target. |
| 4 | Vision | <p>The inclusion of the Stratford-upon-Avon Vision Statement is welcomed. However, nowhere in the Plan is there any discussion as to how its delivery will be monitored and reviewed; nor are there any targets or benchmarks to provide a meaningful basis against which progress towards achievement of the Vision Statement can be assessed.</p> <p>Third bullet point – suggest add following to the end "...for shops, services and jobs"</p> <p>Fourth bullet point – suggest wording is amended to read "The town will be better at accommodating and managing visitors"</p> <p>Fifth bullet point – congestion 'no longer being an issue' may need to be clarified as not establishing the unrealistic expectation that it can be completely eradicated. An alternative form of wording could be "...and congestion will have been reduced and</p> |

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| | | managed effectively” |
| | | Section 5 – Housing |
| 5 | Housing Section -General | A number of policies in this section relate to development in general as opposed to just housing and it would be more appropriate to move them to other sections (e.g. Policies H1, H2 and H4 to a new Development Strategy section or the Built Environment section and Policy H5 to the Built Environment section). Also, there ought to be an overarching housing policy for Stratford-upon-Avon town akin to Policy H3 to set the scene for the allocation policies in Section 12. |
| 5 | Housing Section -General | Consideration may need to be given to the inter-relationships between Policies H6 & H7 and H8 & H9 in terms of relating to housing size mix, and whether the presentation of these well-intentioned policy objectives can be improved and clarified to ensure that it is clear to applicants what tenure and size mix would be required on any individual site. The Lifetime Homes standard has been superseded by the Housing Standards Review. The reference in Policy H8 should be deleted (see comments in respect of Policy BE6). |
| 5 | New Policy | It is noted that there is no reference to the potential need for small-scale specialised housing accommodation. The inclusion of such a policy is recommended in order to complement Policies H8 and H9 and “future proof” the Plan. One such proposal is already being prepared for a site owned by Warwickshire County Council at Mulberry Street, Stratford-upon-Avon. A specific proposal for an additional site allocation is therefore suggested (see Section 12). |
| 5 | Page 17 - 4 th para | Publication date of Neighbourhood Plan is May 2015. The Core Strategy Inspector’s Interim Report was published March 2015. Paragraph 216 of the Core Strategy Inspector’s Interim Report refers to the possibility of needing to increase housing in Stratford-upon-Avon to meet the increased Objectively Assessed Need. The Neighbourhood Plan’s statement that “ <i>there is no current indication that the housing allocation for Stratford-upon-Avon Main Town will increase</i> ” is incorrect. It is likely that the housing requirement for Stratford-upon-Avon town will increase under the Core Strategy. The Neighbourhood Plan will need to be revised to reflect this increase and any additional site allocations. In particular, Policies H1 and H3 will need to be amended accordingly. |
| 5 | Policy H1 | <p>The built-up area boundary for Stratford Town as shown on the proposals map (Figure 2) appears identical to the existing Local Plan boundary and is out of date. The Neighbourhood Plan is an opportunity to draw the boundary in advance of this being done in the Site Allocations Plan. As a minimum, it should be amended to encompass the (five) existing housing commitments (also shown on Figure 2) with consideration given to the inclusion of SUA.2 on the Alcester Road. Similarly, the built-up area boundary for Tiddington should include the proposed allocations. The built-up area boundary for Alveston appears, on the map evidence, to be drawn ‘loosely’. This is not in itself a problem, other than to query how consistent the Alveston boundary is compared to the tighter drawing of Stratford-upon-Avon and Tiddington boundaries. Generally speaking, a ‘looser’ boundary will generate a greater demand for infill development.</p> <p>Is there a contradiction between the statement in Policy H1 that proposals for development outside the built-up area boundaries will be strongly resisted unless allocated, and the statement in the accompanying explanation that states that</p> |

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| | | <p>previously developed land within the Neighbourhood Area (i.e. potentially outside of the built-up area boundaries) would normally be considered sustainable and suitable?</p> <p>Are conversions/subdivisions/replacement dwellings resisted outside BUABs?</p> <p>As worded, this policy is more restrictive than the NPPF. It could identify areas where constraint is necessary if the evidence base supports it, but to guide all new development to identified sites is contrary to the NPPF which requires LPAs to identify an on-going 5 year housing land supply.</p> <p>By implication, this Policy supports development on “windfall” sites, by virtue of the cross-reference to Core Strategy Policy CS.15. These are more likely to be smaller sites, which significantly limits the potential affordable housing yield.</p> |
| 5 | Policy H2 | <p>Would query whether the strategic gap as identified on the proposals map between Stratford-upon-Avon and Tiddington should extend north of the B4086 in order to properly fulfil the aims and objectives of this policy. The accompanying explanation refers to <i>“The built up areas of the Neighbourhood Area are surrounded by attractive countryside which contribute significantly to the character of the area. Progressive encroachment of the countryside by infilling parcels of greenfield land on the edges of the built up areas has begun to erode this character and further development should be avoided unless clear positive benefits for the Neighbourhood Area can be demonstrated”</i>. Whilst not disagreeing with this statement, the attractiveness or otherwise of the countryside is irrelevant to the designation of the strategic gap. The function of the strategic gap is to maintain the separate and distinctive identity and character of individual settlements taking into account their landscape setting in the wider countryside regardless of the quality of that countryside.</p> <p>Has the distinctive character of each settlement been identified?</p> |
| 5 | Policy H2 Explanation | <p>The first paragraph has a wider application and would be better placed in explanation to Policy H1. Expand second paragraph to justify the extent of each Strategic Gap.</p> <p>There appears to be an inconsistency, in that paragraph one suggests further development on the edges of the existing built-up areas should be avoided unless clear positive benefits for the neighbourhood area can be demonstrated, but paragraph two states more categorically that strategic gaps should be maintained with no further development.</p> |
| 5 | Policy H3 | <p>The allocation of up to 92 homes on two sites in Tiddington is welcomed and conforms to the approach to Local Service Villages (LSV) as set out in Policies CS.15 and CS.16 of the Submission Core Strategy. A further reserve allocation would provide more certainty that the full housing needs are capable of being met. It is also noted that there is no reference to windfall development in Tiddington in Policy H3. Does this approach contradict Objective A?</p> <p>It is noted that there are no allocations proposed for Alveston and that its housing needs are expected to be met through windfall development. Whilst not convinced that this approach by itself provides sufficient confidence that the housing needs of Alveston would be met in the plan period, if it is considered that the reliance on windfall development is the right approach for</p> |

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| | | <p>Alveston (as opposed to an allocation), then the Neighbourhood Plan should build in some flexibility and identify a reserve housing site or sites (in Alveston or Tiddington) and include a mechanism to bring these forward for development should the rate of windfall development in Alveston not be as expected.</p> <p>It would be helpful if the explanation included a table to provide clarity as to how the housing needs are being met for each village (e.g. setting out the housing target, the number built since 2011, the number expected to be built (i.e. with planning permission), the number proposed to be allocated, and the number expected to come forward as windfall). Is the title of this policy appropriate, since the policy includes reference to windfall development, which by definition is not allocated?</p> <p>The justification in the accompanying explanation that further allocations cannot be accommodated is not considered adequate. Firstly, planning is about balancing different, and often competing, demands and whilst it is acknowledged that the ambition of the Neighbourhood Plan is to resist development on greenfield sites, this has to be balanced with the need to provide for an adequate amount of housing. Moreover, to what extent does this 'justification' contradict the approach of Policy H1 of setting built-up area boundaries within which development will be focused, even on greenfield sites within these boundaries. Secondly, it is noted that there is reference to Tiddington being considered less sustainable than other locations within the Neighbourhood Plan Area. If this is the case, then the Neighbourhood Plan should compensate for this by providing to meet Tiddington's housing needs in these more sustainable locations. As drafted, the Neighbourhood Plan ignores the issue.</p> <p>The policy should clarify that windfall development is appropriate in Tiddington as well as Alveston. Suggest insert "small-scale" in both instances.</p> |
| 5 | Policy H3 Explanation | Suggest adding the following form of wording to the second paragraph "There is scope for small-scale infilling and redevelopment within Tiddington." |
| 5 | Policy H4 | <p>Policy H4 states that there is a "<i>general presumption against the loss of greenfield land</i>" and introduces the very high test of needing to demonstrate "<i>exceptional circumstances</i>". Whilst such a test is rightly applied in the Green Belt, it would appear unduly onerous and contrary to both the Core Strategy and the NPPF to seek to apply it to greenfield land in general. Such an approach also appears to contradict the aims of Policy H5 which permits the development of garden land, which is designated as greenfield land. A cross reference to Policy BE8 would also be appropriate. Suggest it is replaced with something along the lines of "...must clearly demonstrate specific and relevant circumstances to justify development."</p> <p>This Policy could potentially prejudice the delivery of the proposed Extra Care Housing scheme on land off Corelli Close, Bishopton, presently being promoted by Housing and Care 21 and Warwickshire County Council, even though that site is located within the proposed Built-up Area Boundary for Stratford-upon-Avon. At best, the requirement to demonstrate "exceptional circumstances" introduces a significant and unwelcome element of uncertainty in respect of this proposal and sits uncomfortably with the delivery of the underlying objectives of Policy H8. For the above reasons it is recommended that consideration be given to the inclusion within the Plan of a specific allocation to provide a positive framework within which the</p> |

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| | | <p>proposed scheme can be considered. See proposed new Policy SSB1A in comments relating to Section 12 of the Plan.</p> <p>Clause (c) seems to set a higher bar than Clause (a). Does this present a conflict?</p> |
| 5 | Policy H4 Explanation | In second paragraph neither a presumption against the loss of greenfield land nor the presence of exceptional circumstances (for land outside the Green Belt) is consistent with the NPPF. |
| 5 | Policy H5 | <p>The purpose of the Neighbourhood Plan should be to ensure that development makes a positive contribution to the Neighbourhood Area. It is suggested that criterion (a) is amended so that Policy H5 takes the opportunity in every case to seek to "<i>preserve and enhance</i>" the character of the area and not just "<i>protect or enhance</i>". There may be a consistency issue between criterion (b) and the Built Environment policies of the Neighbourhood Plan. It is queried as to why garden development must not be "<i>at odds with the existing settlement character or pattern</i>" as stated at criterion (b) but development elsewhere, assessed using the Built Environment policies, must simply respond to local character. The aim of criterion (c) is appreciated, but query whether its practical application would result in no development of garden land. Would the following be a more appropriate form of words that would achieve the same aim: "<i>Not significantly impact upon the amenities of neighbouring properties</i>"? It would also be helpful in the accompanying explanation to set out which considerations would be taken into account e.g. privacy, loss of daylight, noise etc.</p> <p>In criterion (b) suggest replace "is at odds" with "conflicts".</p> |
| 5 | Policy H6 | <p>Objection is raised to the revised affordable housing mix in the Neighbourhood Plan on pure policy terms. It is substantially different to the mix in the Core Strategy and if every NP was to go down this route the Council would be unable to deliver the mix in the Core Strategy and meet identified District wide needs. This is important because Stratford town is supposed to be meeting a District wide need.</p> <p>Firstly, this policy identifies what it purports to be three specific departures from Core Strategy Policy CS.17:</p> <p>(i) <i>Summary:</i> 1st bullet point states "<i>The requirement for and provision of affordable housing within the Neighbourhood Area will continue to be monitored throughout the Plan period in order to ensure that the most up-to-date evidence is used to identify the current need. Such evidence will be used to inform the provision of affordable housing on qualifying sites.</i>"</p> <p><i>Observations:</i> On a procedural point, Policy CS.17 does not explicitly deal with its own review so this criterion doesn't really create any real "added value" for the Plan. More substantively, this situation is really no different from anywhere else within the District. But it is important to note that any evidence would need to relate specifically to this Neighbourhood Area, as opposed to the District as a whole, to be of any real utility.</p> <p>(ii) <i>Summary:</i> 2nd bullet point and Table 1 identify an affordable housing mix different to that in the Core Strategy (implicitly, the table in Part B of Policy CS.18).</p> |

Observations:

- The proposed affordable housing mix in Table 1 differs significantly from that set out in Core Strategy CS.18. It would appear that the mix in question may derive from Table 8.15 of the January 2013 SHMA. This is a demographic projection for the period 2008-2028, and so not directly comparable with the assumptions underpinning the proposed Core Strategy provision for the Neighbourhood Area.
- Attention is drawn to the importance of catering for working age single person and childless couple households to ensure the long-term sustainability of the communities within the Neighbourhood Area. These are the households who most struggle to find any accommodation that is affordable in the area – not least because they are generally not regarded as high a priority for affordable housing as households with children and older person households.
- Nevertheless, whilst the Plan correctly acknowledges the problems faced by single person and childless couples, the proposed solution is considered unworkable and will probably lead to fewer affordable homes being developed.
- It is highly unlikely that any housing association will agree to develop as many as 43% one bedroom properties. Such a high proportion of units is regarded as unsustainable – not least because many of the households in these units will go on to form larger households but will find it difficult to move to either alternative housing association or other accommodation that is affordable because demand for such homes is high. In addition, in order to minimise potential management issues arising from concentration of similar households in one location, housing associations generally prefer to develop a range of property sizes and types on any one site.
- It would be useful to discuss this issue with the Town Council in more detail to better understand what primary research is available at a local level to drive the preferred stock mix.
- It is unclear whether the optimum mix is intended to apply as an average across the Neighbourhood Area (in which case robust monitoring arrangements would be essential) or, alternatively, in relation to individual schemes (in which case it would probably be so unduly prescriptive as to be unworkable).

(iii) *Summary:* 3rd bullet point is a measure to prevent the avoidance of affordable housing provision.

Observations: On a point of fact, Policy CS.17 does not explicitly deal with this topic. This is a District-wide issue and it is expected it will be addressed in the forthcoming Development Requirements SPD.

Secondly, the Policy raises certain additional issues:

- (i) The Policy states “*This Plan supports the completion of an up to date Housing Needs Survey for the Neighbourhood Area*”. The commitment to undertake such a survey is most welcome. However, further consideration needs to be given to the delivery of this project – possibly outside the scope of the Plan itself.

(ii) The explanatory text (p.24) includes a number of criteria which are in effect policy requirements. Briefly, these require:

- Tenure blind development.
- Affordable homes in clusters of no more than 12 units.
- Tenure mix to be well integrated into layout.
- For smaller scale developments (less than 10 units) “the tenure mix should support “the existing pattern of tenures or introducing new tenures as appropriate”.
- Management of communal areas must be adequately addressed.

These issues are of District-wide significance, and it is expected that they will be addressed within the proposed Development Requirements SPD. If the Town Council nevertheless wish for these issues to be addressed within the Plan, it is recommended they are incorporated within a specific Policy.

With respect of the 4th bullet point, this point isn’t really understood. The relevant Core Strategy thresholds would militate against on-site provision and this Plan itself isn’t proposing any alternative, lower, thresholds. Finally, it is observed that, with the exception of the Canal Regeneration Zone and two sites at Tiddington, there are no other identified sites against which the implications of the proposed stock mix in Table 1 can be specifically assessed.

The threshold of including adjacent land is difficult to work and doesn’t this pre-judge whether planning permission would be granted for adjacent land? Delivery of 42% 1 bed units will be likely to be via apartments – is this the required outcome? Concern is raised that the last bullet point referring to taking account of adjacent land to meet certain thresholds is not lawful.

The explanation section should refer to latest evidence base, rather than include a table that becomes out of date quickly.

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| 5 | Policy H7 | <p>This promotes a different mix to that set out in Core Strategy Policy CS.18; based on the January 2013 SMHA (Should Table 7.2 should be Figure 8.17?). Given the significantly different stock profile proposed for affordable housing under Policy H6/Table 1, concern is raised over the ability to create “tenure blind” schemes.</p> <p>More generally, similar concerns are raised in relation to the application of the Policy (similar to Policy H6). It appears from the second paragraph this Policy merely seeks to achieve an optimum stock profile across the Neighbourhood Area as opposed to specifying a required mix for individual sites. Operationally, this Policy will be very difficult to apply and monitor.</p> <p>The final paragraph of the policy refers to the provision of an appropriate mix of homes for employees, managers and senior executives. It is not clear what this is trying to achieve. Suggest text is deleted or if retained, more appropriately worded e.g.”...an appropriate mix of homes to meet the full range of housing needs, including for those in all areas of work.”</p> |
| 5 | Policy H7 Explanation | Should refer to latest evidence base, rather than include a table that becomes out of date quickly. |
| 5 | Policy H8 | <p>The first line should read “ageing”.</p> <p>It is unclear whether this Policy is aimed primarily at conventional housing schemes, as opposed to schemes catering specifically for older people.</p> <p>It applies two different thresholds: (i) 20 or more units to include homes “designed for an ageing population” including a requirement for at least 10% of dwellings to be bungalows “unless there are site specific reasons why this would not be appropriate”; (ii) 10 or more units – to be built to Lifetime Homes standard, in accordance with Policy BE6 (25% until 2020, 100% from 2020). See comments under Section 8 relating to Built Environment and Design and appropriateness of reference to Lifetime Homes. The policy does not explain why or how these thresholds have been chosen. This will require explanation and justification. What sort of ‘site specific reasons’ are envisaged that could allow a proposal to be acceptable and not meet these targets?</p> <p>The main concerns are essentially operational – around ambiguity – and failure to address the issue of care provision. In practice, the number of sites to which this Policy would apply (by virtue of the relevant thresholds) is likely to be limited.</p> |
| 5 | Policy H9 | <p>What is meant by ‘priority’ in the first line of the Policy?</p> <p>The explanation states that 2 bed developments should be via apartments if near the town centre but not by apartments elsewhere. There is no mention of what 1 bed units should comprise of (surely apartments) and there is a disconnect with the desire to have 42% 1 bed affordable units, which if provided via apartments would only be allowed near the town centre thus there would be a high concentration of 1 bed units in the town centre and none elsewhere which would result in an unbalanced mix of people in developments.</p> |

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| | | <p>How is the statement 'close to the town centre' to be interpreted? It may be more appropriate to say "Proposals for housing sited and designed to attract single people and occupiers with young families will be supported".</p> <p>Whilst supporting the sentiment of this Policy, it would appear to be impossible to apply operationally. There is no explicit prioritisation as between this Policy and Policy H8: the practical effect is to make implementation of both policies unworkable.</p> |
| | | Section 6 – Employment |
| 6 | Page 28 | Fourth paragraph of text on p.28 – Replace "More direct..." with "Major..." |
| 6 | Objective A | The District Council's Corporate Strategy has been revised, so the Town Council need to check that NP is still consistent with the current version. |
| 6 | Policy E1 | There needs to be some acknowledgement of the new PD rights re: changes of use |
| 6 | Policy E2 | <p>The second paragraph refers to development proposals on site SUA.2 being considered against the criteria set out in the Site Specific Brief. What is this document, and who is responsible for producing it?</p> <p>Final point – there needs to be some acknowledgement of scale/proportionality?</p> |
| 6 | Policy E3 | Does not allow for any conflicts with other policies which go against the balancing exercise of pros & cons of proposals. |
| 6 | Policy E4 | Whilst acceptable in principle, as worded here the policy is looking to control the different elements of use by specifying separate access points and the requirement of certain types of internal accommodation. The policy as drafted is too restrictive and clause (e) is attempting to control certain elements which can be achieved through permitted development rights. |
| 6 | Policy E4 Explanation | Add to end of 2nd paragraph "...and assessed accordingly." |
| | | Section 7 – Town Centre |
| 7 | Page 34 | In all the bullet points following "Our expectations..." the word "town" should be replaced with the word "centre". |

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| 7 | Figure 2 | Is the current position within the Plan the most appropriate place for the proposals map? Given that the map is referred to in so many other policies and sections of the Plan, it would be better placed at the beginning or end of the Plan, or produced as a separate document as an appendix. There is a lot of information on this map and it is very 'busy'. It is difficult to pick out all the detail at A4. Some of the colours and denoted areas are very similar in shade and could be confused. Could it be produced at A3 to provide clarity? If this is not possible, perhaps separate maps should be produced showing the various individual layers or constraints. |
| 7 | Objective A | <p>Insert "a" between "from" and "market" in the first sentence.</p> <p>In 3rd bullet point replace "primary" with "out-of-centre".</p> <p>In last bullet point replace "edge of town" with "out of town centre"</p> |
| 7 | Policy TC1 | Policy appears to be aspirational and/or dependent on other local authorities to undertake, and should therefore be set out in a separate section of the Plan. |
| 7 | Policy TC1 Explanation | All key stakeholders would need to be on board and supportive but also needs to represent multi-disciplinary issues covered by section and policies. |
| 7 | Policy TC2 | <p>Core Strategy Policy CS.22 – Retail Development and main Centres, states: "Retail (Class A1) should remain the predominant activity at ground floor level on the primary shopping streets in Stratford town centre as defined on the Policies Map. At least 60% of the total gross floorspace at ground floor level on each primary street should be retained in this use". Therefore, the requirement in Policy TC2 for retail use to achieve a minimum 90% coverage is not consistent with CS.22. It is most likely that the majority of the streets listed do not even achieve this proposed standard at present. There is no evidence or justification as to how the % figures quoted in Policy TC2 has been reached or why they need to be at such levels.</p> <p>Restricting such streets to only 10% non-retail is not likely to be possible as they probably already contain a larger % of non-retail units. The vitality of a town Centre is not based on how many shops it has but on how many people want to use its buildings. Part of vitality and viability of the town is that retail is mixed with other services, offices, leisure and cultural uses. The town centre is not just about shopping. The demand for retail use may change over the next 20 years. The stores or type of retail offered cannot be controlled.</p> |

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| 7 | Policy TC3 | There is no current District Council commitment to a town centre shop front scheme, so this Policy is clearly 'aspirational' as drafted. It is not specified how free architectural advice will be achieved and who will be responsible, or which architects would be involved and how would they become 'partners' in the scheme. |
| 7 | Policy TC4 | The fourth bullet point refers to buildings but there are none within the area identified in Figure 3. The same bullet point talks of 'consistent uses'. Should this read 'complimentary uses'? The wider issue of sensitive conversion of existing buildings should be covered by other policies |
| 7 | Policy TC5 | The first bullet point should read "Rother Street" not "Rother Market". Should second bullet point read "spaces" rather than "streets"? Under 'Phase 2', replace the word "inclusion" with "demolition" and the final sentence should read "Proposals for its replacement should:" |
| 7 | Policy TC5 Explanation | As there is no opportunity to vary the manner in which an extant planning permission can be implemented, it perhaps should be more evident that the policy will require a fresh application to secure the changes sought. |
| 7 | Policy TC6 | 150 square metres is unreasonably small, not justified and contrary to Policy CS.22 in the Core Strategy. |
| 7 | Policy TC7 | Whilst supporting the sentiment, the Policy fails to "add value", particularly when the acceptability in principle of residential development appears to be established by Policy H1. |
| 7 | Policy TC7 Explanation | In 2nd line insert the word "centre" after "town". In 3rd line replace "town" with "centre". In paragraph 2 of the Explanation to the Policy, reference is made to appropriate locations for housing developments to include the Birmingham Road and the canal frontage. It is not considered that these locations could be classified as 'town centre'. The final sentence of the explanatory text states that any new development must make appropriate provision for parking. If this is critical, it should be part of the Policy itself. Welcome the re-use of upper floors of properties, which is an important way to preserve historic buildings but schemes need to be sensitively designed to avoid harm. Any harm would need to be thoroughly justified and outweighed by public benefits (NPPF). Parking and amenity implications may need to be relaxed to encourage bringing upper floors back into use. |

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| 7 | Policy TC8 | <p>Station Road and Station Road approach will be enhanced as part of the re-development of the Cattle Market site.</p> <p>Should bullet point 1 refer to uses at ground level only?</p> <p>Bullet point 4 talks about introducing stricter controls over the display of advertisements, but does not state what these would be, taking into consideration existing deemed consent for certain advertisements.</p> <p>Bullet point 5 refers to the Shop Fronts Design Guide, but does not state whether this is a new or existing document; where it can be viewed, who is responsible for its production and the status of the document. This needs clarification.</p> |
| 7 | Figure 5 | <p>The red line on the map denoting the area of the EIA does not include the shops/buildings lining the streets to which the policy would refer.</p> |
| 7 | Policy TC9 | <p>There's not enough land to provide all of the uses identified so suggest wording is amended to read something like "...for mixed uses that may include retail..." It is unclear who will produce a masterplan and design brief.</p> <p>There is no specific Policy in the Core Strategy relating to this area of land. However, a re-development of the area could be assessed through points under the various topic headings under Core Strategy Policy AS.1. A policy of this type looking to 'safeguard' land for future development and looking to resist 'piecemeal development' will be difficult, if not impossible to implement, particularly in a town centre location where there are a large number of separate land owners. In effect, such a policy would look to stop individual landowners to implement works to their own land and buildings. The planning system cannot prevent the submission of individual applications and each application must be considered on its merits on a case-by-case basis.</p> |
| 7 | Policy TC10 | <p>The policy appears to be quite prescriptive in terms of the uses and aspirations for this general area. Should the policy not be more flexible/proactive to include other uses such as retail and residential uses which may be required to make any scheme financially viable and would be an acceptable town centre use?</p> <p>Given the number of landowners in the area the production of a wide ranging master plan for schemes may be difficult to achieve and may potentially put off smaller projects that may have some real regeneration potential. Would it be beneficial to remove reference to piecemeal development?</p> <p>It is unclear what is meant by "higher education". Is there evidence to support this?</p> <p>The cultural quarter is also bounded by Mansell Street and the first sentence of the Policy should be amended to reflect this. The issues outlined in Policy TC9 relating to the wish to prevent piecemeal development apply here, too.</p> |
| 7 | Policy TC11 | <p>Who is responsible for producing the design brief? What resource and funding is available?</p> |

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| 7 | Policy TC12 | It may be preferable to refer to the Bridgeway area generally. |
| 7 | Policy TC13 | <p>It is unclear who will take the lead in progressing such schemes.</p> <p>This policy appears aspirational in nature. Section A (Transport Strategy) of Core Strategy Policy CS.25 (Transport and Communications) states that SDC and WCC will work together to achieve the objectives and implement the proposals in the Local Transport Plan, with particular emphasis on encouraging modal shift with greater use of more sustainable forms of transport and improving the safety of all road users. There may be scope to discuss improvements with WCC, but without WCC 'buy-in' the proposals will not be implemented.</p> <p>When would the 6 month experimental closure of High Street commence?</p> |
| 7 | Policies TC13-TC18 and Policies INF1-INF6 | A number of the transportation policies/proposals conflict with the position being taken by the County Council (see letter from Warwickshire County Council dated 15 May 2015 to Neighbourhood Plan Team) or otherwise contain transportation initiatives for which there is no known costing and little supporting evidence. |
| 7 | Policy TC14 | <p>It is understood that Windsor Street Car Park has a limited future and replacement parking will be provided in the redevelopment of the area covered in policy TC10.</p> <p>As drafted, the policy is partially 'land-use' (relating to the protection of existing car parks and creation of new car parks) and partially 'aspirational' (in respect of setting up a Car Park Advisory Body). The aspirational element of the Policy should be within an appendix to the Plan. Therefore, consideration should be given to 'splitting' this policy.</p> |
| 7 | Policy TC15 | This policy is aspirational and should be located within an appendix to the main Plan. |
| 7 | Policy TC17 | <p>Windsor Street is referred to but is not covered within the EIA identified in Figure 9. In the last bullet point, there may be alternative means of providing pedestrian/cycle routes through the Canal Quarter.</p> <p>The red line on the associated Figure 9 map does not appear to cover all the areas mentioned in the various bullet points within the Policy. This requires checking and clarification.</p> |
| 7 | Policy TC18 | This policy is aspirational and should be located within an appendix to the main Plan. |
| | | Section 8 – Built Environment and Design |
| 8 | Page 62 | Perhaps revise paragraph 3 to clarify the distinction between pre-application advice from the District Council and pre-application engagement with the Town Council and other local stakeholders? |
| 8 | Objective A | The appreciation of the importance of good design set out in this Objective is welcome. |

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| 8 | Policy BE1 | <p>In criterion (a) suggest replacing “functions” with “spaces”. Whilst the ability to move freely and effectively is supported, does criterion (a) require further thought and clarification as to whether this is just by foot, by a range of transport modes, or by all transport modes?</p> <p>Definition of large-scale development is set too low to be able to achieve many of the criteria identified. Suggest a more suitable threshold should be around 50 dwellings or 2,000sqm of business/commercial floorspace.</p> <p>As drafted, this only applies to “large-scale developments” defined as 10 or more dwellings. This implies that developments of 9 or fewer dwellings need not be of a high standard of design and layout.</p> <p>Objectives of Urban Design also include Character, Continuity and enclosure, Quality of Public Realm, and adaptability.</p> |
| 8 | Policy BE2 | The second point in this policy is too restrictive. |
| 8 | Policy BE3 | <p>The bulk of Policy BE3 refers to the need for a Master Plan or Contextual Plan for sites of 10 or more homes that demonstrates how wider issues such as integration and infrastructure have been taken into account in generating each proposal. In this respect, this policy goes further than the site layouts that usually accompany planning applications. Ensuring that proposals fully understand the local context - not just in terms of character but in terms of demonstrating an appreciation of how the site relates and functions to the wider area - may be a reasonable policy objective, but could perhaps be better incorporated into Policy BE1.</p> <p>It is unclear how the requirement in Policy BE3 to <i>“take account of recent and future development in the area”</i> would work in practice. Firstly, which area is being referred to: the local area or the Neighbourhood Plan area? If it is the former, how is this defined/agreed or if it is the latter, is this reasonable? Secondly, what is actually meant by future proofing? Is it simply to ensure that the layout of every site is designed to enable access to adjacent sites should they come forward for development at a later stage? Alternatively, is the policy trying to introduce a degree of resilience and versatility into buildings to ensure that they can more easily adapt to changes of use, such as Core Strategy Policy CS.18? If so, this policy objective may be better suited to Policy BE6. Thirdly, there is a danger that Policy BE3 is seeking to place a requirement on individual proposals that is actually the responsibility of the Development Plan itself. It is the role of the Core Strategy and Neighbourhood Plan to ensure a co-ordinated approach to development across the Neighbourhood Plan area; to set out the additional infrastructure requirements associated with the planned level of development; and to establish the general approach to dealing with development proposals. In respect of the references to assessments and provision of infrastructure, these requirements may be better suited to specific infrastructure policies in the Neighbourhood Plan, although it may be helpful to include a cross-reference in this policy to re-emphasise the importance of proposals taking a holistic approach.</p> <p>Despite the policy title, there is no reference to design code in the policy wording of BE3. Instead, the accompanying explanation includes a useful definition. The explanation also encourages the use of design codes for smaller sites yet there is</p> |

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| | | <p>no actual policy requirement for their use on larger sites. Design codes can be useful tools but are generally applicable over a wide area where control over the more detailed design aspects is desirable, such as materials, architectural styles, building lines etc. For example, they can form part of a planning application / Master Plan on very large strategic sites that may be built over a number of phases to ensure a consistency of design quality. Alternatively, they can be prepared for existing local areas setting out the design requirements that individual proposals would need to comply with and would then be assessed against. e.g. akin to a design guide. Design codes would not normally form part of an application for a small site since the same outcomes can usually be achieved through the imposition of planning conditions.</p> <p>It is inappropriate to require the Master plan/contextual plan to take account of recent and potential future development in an area, other than to show how the development integrates into the existing or future known community.</p> <p>Policy CS.25 of the Core Strategy covers the need for a Transport Assessment where appropriate. The Master Plan should show schools and medical facilities if these can be justified on site but in all but the most strategic sites (over 500 dwellings) these will generally be funded through CIL receipts and will not be part of the planning application process.</p> |
| 8 | Policy BE4 | <p>This policy goes further than Core Strategy Policy CS.9 in that it sets a threshold for the use of the Design Review Panel for all applications of 10 or more homes. It is unclear as to the degree that a Neighbourhood Plan can seek to apply more onerous policy requirements. Having said that, the issue may be one of justification and whilst at District level it would not be appropriate to set such a requirement, it may be the case that it is wholly appropriate for the Neighbourhood Plan to set such a requirement, provided it was supported by robust justification.</p> <p>Local Design Review Panel – will this be seen as objective and how will such a panel make use of relevant urban design expertise? Who will select the makeup of the Panel and how would it be regulated?</p> |
| 8 | Policy BE6 | <p>The Government has abolished the Code for Sustainable Homes and the Lifetime Homes standards requirements. They have been replaced by the Housing Technical Standards Review with many aspects moved from regulation in the planning system to a component of Building Regulations. There is potential for optional higher standards to be sought (e.g. in respect of accessibility) but these must be set out in the Core Strategy. Policy BE6 therefore needs to be revised to reflect the emerging Core Strategy. It is understood that Building for Life 12 remains as it differs from Code for Sustainable Homes and the Lifetime Homes as it does not set policy standards or requirements. Instead, it is a tool for the assessment of good design. In that respect, it may be more appropriate for reference to the use of Building for Life 12 to be included in Policy BE1 or as a separate standalone policy. The requirement for the use of Building for Life 12 is considered to be consistent with Core Strategy Policy CS.9 as both would result in high quality design outcomes.</p> <p>Notwithstanding changes at national level which will undoubtedly impact on this Policy, there are likely to be important implications for the Council's partner housing associations when developing schemes. In practice, the requirement for all developments from 2020 onwards to achieve 100% Lifetime Homes compliance (unless unviability can be demonstrated) could in practice hamper delivery of schemes. The Town Council is invited to consider whether their proposed approach would align</p> |

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| | | with the guidance in the NPPF and with policies in the emerging Core Strategy. If there is any divergence, it would be good practice to identify the specific local circumstances that are considered to justify this approach. This will assist the Council's partner housing associations in making informed investment decisions. |
| 8 | Policy BE7 | The policy requirement repeats Core Strategy Policy CS.4 (B) 'Water Environment and Flood Risk'. |
| 8 | Policy BE8 | <p>The approach to density within Policy BE8 requires clarification, perhaps incorporating the statement in the accompanying explanation that higher densities will be supported on sites with a high level of accessibility. Such an approach would result in the efficient use of land. It would also be appropriate to provide further clarity as to what the Neighbourhood Plan considers to be locations with a high level of accessibility. A recognised standard is 400m/5min walk from public transport. Is the reference to "<i>public transport stations</i>" in the accompanying explanation meant to include bus stops?</p> <p>Criterion (b) is not entirely consistent with the NPPF (see paras. 17 and 111) although recent Government statements have emphasised the use of brownfield land. Criterion (d) is not entirely consistent with the NPPF (see para. 112). The final paragraph is more of a design issue and might be better placed in Policy BE1.</p> <p>Has consideration been given to retaining/providing public space; new landscaping; quality of the public realm and integration of all land uses?</p> |
| 8 | Policy BE9 | <p>Criterion (c) is not appropriate. There should be room for variety and innovation depending on context and the sensitivity of the building or area affected.</p> <p>Combined information boards as listed at criterion (d) have significant visual impact. Ideally they should be avoided.</p> |
| 8 | Policy BE10 | <p>Arguably, the changes to the planning system have muddied the water in respect of the role and status of supplementary guidance. Firstly, the status of any supplementary advice depends on whether it has been formally adopted as a Supplementary Planning Document (SPD) and prepared in accordance with the Local Planning Regulations and can be used as part of the decision-making process or whether it is simply supplementary planning guidance and has been endorsed by Council as such. If the former, the SPD needs to clearly state which policies it is providing supplementary guidance on. Since the three documents referred to pre-date the Core Strategy, all three would need to be re-adopted against the Core Strategy (assuming they are still consistent with it). It is unclear as to whether SPD can be adopted against Neighbourhood Plan. Notwithstanding this, the National Planning Policy Framework (NPPF) is clear that "<i>Supplementary planning documents should only be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens of development</i>" (NPPF, paragraph 153). It should be noted that most of the District Council's existing SPDs fall on the adoption of the Core Strategy.</p> |

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| 8 | Policy BE11 | <p>Should be "town's" in 2nd line.</p> <p>Will the physical extent of the town's 'historic spine' be known to all readers of the document? Perhaps consideration should be given to mapping this spatially, in order to make it easier to interpret policy.</p> <p>The Policy repeats Local Plan and existing Planning Conservation Policy.</p> |
| 8 | Policy BE12 | <p>It would be helpful to include maps indicating the Stratford Town and Alveston Conservation Areas.</p> <p>The policy needs to be worded more positively. The wording of the second sentence does not strictly adhere to the wording of the NPPF, since the NPPF does potentially allow for some harm to heritage assets. NPPF para's 128-134 should be utilised to ascertain any requirement for re-drafting and look to replace the word "preserve" with "protect" for consistency with national policy.</p> |
| 8 | Policy BE13 | <p>The policy needs to be worded more positively. The wording of the second sentence does not strictly adhere to the wording of the NPPF, since the NPPF does potentially allow for some harm to heritage assets. NPPF para's 128-134 should be considered and look to replace the word "preserve" with "protect".</p> <p>SSSI's are not part of the Historic Environment. Reference should be removed to a separate policy, perhaps in Section 11.</p> |
| 8 | Policies BE11, BE12 and BE13 | <p>The Neighbourhood Plan is an opportunity to capitalise on the unique heritage of Stratford-upon-Avon. The three policies BE11, BE12 and BE13 are somewhat lost in the Built Environment section and arguably the Neighbourhood Plan would benefit from a separate Design and Historic Environment section comprising Policies BE1-BE5 and BE11-BE13. Notwithstanding this, reference is made in Policy BE13 to unregistered Historic Parks and Gardens. The Neighbourhood Plan could be more proactive and identify these along with any other non-designated heritage assets that the Neighbourhood Plan wishes to offer additional protection to.</p> |
| 8 | Objective C | <p>It is unclear what a "<i>non-conforming use</i>" is and how this may be defined?</p> |
| 8 | Policy BE14 | <p>Is this policy, which as written gives no additional in-principle support for replacement dwellings, actually necessary and could not all proposals for dwellings simply be assessed under the other built environment/design policies? The policy should be clear whether it is supportive of replacement dwellings in principle.</p> <p>Reference to Lifetime Homes in Policy BE14 should be deleted (see comments in respect of Policy BE6).</p> <p>Policy needs to be more positively worded and to encourage enhancement of areas by better design rather than just respecting existing character. For example, higher density could lead to greater quality for buildings and spaces.</p> <p>In the explanation, is it appropriate to include the sentence relating to good quality dwellings not being demolished to meet a</p> |

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| | | personal preference or desire? This is stifling personal choice. Nowhere in National policy does it state that you cannot replace an unlisted dwelling just because it is in good condition. |
| 8 | Policy BE15 | <p>Should the scope of the policy be expanded to include a presumption against demolition of existing buildings capable of restoration, reuse and conversion? Why for example, does Policy BE15 not support conversion and significant extension? There appears to be nothing in the Neighbourhood Plan to prevent an applicant proposing an alternative means to achieve the same end result, i.e. the demolition of existing and erection of a larger building. Arguably, this alternative approach would be far less sustainable and contribute far less to sense of place.</p> <p>As written, the policy is too restrictive, particularly if applied to buildings in the urban area.</p> |
| 8 | Policy BE16 | <p>The use of the term <i>"empty or unused spaces"</i> (which requires definition in order to prevent misuse and/or unintended consequences), is queried. Would the term 'vacant plots and buildings' be more appropriate and still achieve the same policy aim? In respect of upper floors above shops, whilst the accompanying explanation provides some clarity, should Policy BE16 specify what the appropriate uses are in order to encourage them e.g. office, residential? Is it appropriate to include reference to upper floors in this policy about empty spaces? It may be that the upper floors are not empty but simply underused. Reference to vacant upper floors may resolve any potential policy tension.</p> <p>In final paragraph suggest "and other uses" is inserted after "shops".</p> |
| Section 9 – Natural Environment | | |
| 9 | General | In the second paragraph of introduction it is too onerous and inappropriate to state that all new housing developments must provide garden and food growing space. |
| 9 | Policy NE1 | <p>Are there resources to designate and maintain the two Local Nature Reserves proposed?</p> <p>It is unclear who is expected to designate these LNRs. The Town Council can do this but it would need these powers delegated to it by the County or District Council._</p> |
| 9 | Policy NE2 | <p>It is uncertain how this policy would sit with any proposal to make the river navigable to the NE of Stratford in the Neighbourhood Area.</p> <p>Delete "active" as it is not defined and unnecessary.</p> |

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| 9 | Policy NE3 | <p>In the second paragraph "large-scale" is not defined.</p> <p>It is considered too onerous and impractical to ask all development to incorporate 2 year old native trees and hedges in planting schemes. Since planting is not covered by planning legislation, this requirement could not be implemented and enforced, particularly in smaller scale development proposals.</p> <p>Possible suggested re-wording of policy in order to tie-in with recognisable national standard: <u>"All new development will be expected to protect mature healthy trees and hedges where appropriate, as per BS 5837: 2012 Trees in relation to design, demolition and construction. Where this is not possible appropriate, new trees and hedges should be planted to replace those lost. All Most new developments should incorporate planting of appropriate new tree and hedge planting nursery of a suitable size and species stock (minimum of 2 years old) native trees and hedges in their plans. The new hedge or shrub planting should be implemented as per the recommendations in BS 4428:1989 Code of practice for general landscape operations and any new tree planting should be carried out in accordance with BS 8545:2014 Trees from nursery to independence in the landscape. Large-scale developments will need to demonstrate that they have been landscape led in order to avoid retrofitting of poor quality or token landscaping landscape design".</u></p> |
| 9 | Policy NE4 | Biodiversity Action Plan - appears to be aspirational and/or dependent on other local authorities to undertake, and should therefore be set out in a separate section of the Plan. |
| 9 | Policy NE4 Explanation | First line of second paragraph – replace the word "achieve" with "achieving". |
| Section 10 – Infrastructure | | |
| 10 | Page 85 | In 3 rd paragraph of introduction, suggest "advertisement" is replaced by "promotion". In 5 th paragraph "lying" should be replaced with "laying". |
| 10 | Policy INF1 | <p>Initiatives to Reduce Peak Time Travel appear to be aspirational and/or dependent on other local authorities to undertake, and should therefore be set out in a separate section of the Plan.</p> <p>In (3) is it being suggested that additional spaces at Church Street and the rail station would be achieved by providing a decked car park? This is likely to be difficult to achieve at the former due to heritage constraints.</p> <p>In (5) it is unclear how the Clopton Road junction could be repositioned given the recent planning permission for Warwick House.</p> |

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| 10 | Objective B | The first paragraph states the two main pedestrian river crossings are of poor quality and that there is no crossing suitable for cycles, wheelchairs or people with other mobility aids. It would be helpful to list which river crossings the Plan is referring to within the Policy as well as the explanatory text. The tramway bridge is accessible from the Bancroft Gardens and surrounding roads able to accommodate wheelchairs and buggies, so the statement as drafted may not be entirely accurate. |
| 10 | Policy INF3 | The policy states that all development proposals should demonstrate pedestrian and cycle links. However, it may be too onerous for all proposals to be expected to do this. Such a requirement should be aligned to 'major' development only. In the Explanatory notes to this Policy, it refers to the possibility of a new bridge. Should there be an associated separate policy to investigate this possibility? |
| 10 | Policy INF4 | Who is it intended should lead on this project? Has consideration been given as to who would pay for the bridge? |
| 10 | Objective C | In 2 nd line replace "lying" with "laying". In last line, it is unclear how new developments at Lighthorne Heath and Wellesbourne are relevant to this issue. |
| 10 | Policy INF5 | The beginning of the final paragraph should read "The District Council and various other parties..." |
| 10 | Policy INF6 | This policy appears aspirational, as drafted. |
| 10 | Policy INF6 Explanation | The 3 rd line should read "...consideration should be given to other..." |
| 10 | Policy INF8 | The policy lends support to the provision of a new secondary educational facility south of the river and a new Special Education Needs school south of the river. The explanation goes much further in suggesting that land adjacent to the new retail developments to the south west of Trinity Mead would be considered suitable for such developments. There is no supporting material which suggests this site is more favourable than any others, nor any supporting development that might help to cross-subsidize these new facilities. The inclusion of this reference to a particular site appears unfounded. |
| Section 11 – Community, Leisure and Wellbeing | | |
| 11 | General (p.98) | It is inaccurate to state that 'Stratford's recent dramatic expansion in housing has not been matched by the provision of new or enhanced community and leisure facilities and open spaces'. Housing developments have provided for additional open space and the refurbishment of the Stratford Leisure Centre through S106 agreements. |
| 11 | Policy CLW1 | Suggest the 1 st paragraph also specifies "or is to be replaced by a new facility of at least an equivalent standard." |
| 11 | Policy CLW2 | This policy requires re-working if it is going to be useful in collecting S106 money. Looking further ahead, how will it fit with a CIL tariff? Will it be a redundant policy then? |

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| 11 | Policy CLW3 | <p>This is expressed more as an ambition than as a policy capable of implementation in land use planning terms. Furthermore, "mixed tenures" in and of themselves won't address this issue: accessibility and access to care are likely to be of greater significance in this context. In any case, its fit with Policies H6 and H8 is unclear. See also the proposed new extra care allocation policy in Section 12.</p> <p>Suggest insert "and a range of dwelling types" after "tenures".</p> |
| 11 | Policy CLW4 | <p>Second paragraph, insert "as valuable open spaces within the neighbourhood area" between the words "identified...and development".</p> <p>Areas (a) to (f) as listed are deemed to satisfy criteria for LGS designation. Why don't the others meet the criteria? What are the criteria the locations have been assessed against (i.e. paragraph 77 of the NPPF)? This should be specified, for clarification.</p> <p>(j) should read "Welcombe".</p> |
| 11 | Figure 11 | <p>The map is not clear. There are many other layers on the map not relevant to this policy, making the map 'busy' and difficult to decipher at this scale. Could it be simplified, for clarity?</p> |
| 11 | Policy CLW5 | <p>The open space standards for new development are set out in Core Strategy Policy CS.24, supported by an Open Space Needs Assessment. The Council wishes to avoid any confusion or uncertainty being created as a result of reference to an additional standard (Natural England's Greenspace Standard) to this framework.</p> <p>In 1st paragraph "large-scale" is not defined.</p> <p>Policy Explanation - The 2014 Open Space, Sport and Recreation Assessment confirms that there is an existing deficit in play space for children and young people against the District Council's recommended standards. The shortfall identified in the provision of mini and junior football pitches and junior rugby pitches, reported in the Playing Pitch Strategy 2011, is to be reviewed in a revised Playing Pitch Strategy for the District to be produced later this year.</p> |
| 11 | Policy CLW6 | <p>Parts (a) and (b) are laudable but it is unclear how readily they can be achieved either physically or in terms of land ownership and who would be ultimately responsible for implementation/funding/monitoring the policy. It seems to be an aspirational policy as written.</p> |
| 11 | Policy CLW6 Explanation | <p>Because Figure XXX is not provided it is unclear where the green corridor or 'necklace' of footpaths/cycle routes is located and thus whether some/all of the footpaths already exist and how many are proposals.</p> <p>There is a statement "Such maintenance shall be provided for by new development through CIL" . It is unclear whether this document is stating that Stratford Town Council intends to use some of its share of CIL receipts for the maintenance of open space, or if it is requesting that the District's share of CIL should be used in this way. Recommend this is modified to read either "The Town Council will use its CIL receipts to maintain open spaces" or "The Town Council will apply for additional CIL</p> |

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| | | funding to maintain open spaces”. |
| 11 | Policy CLW7 | In the 1 st paragraph, “large-scale” is not defined. It is too onerous to expect all new development (regardless of scale) to demonstrate prioritisation of new walking or cycling opportunities. Planning permission could not be refused for a single dwelling just because the application has ‘failed to encourage’ a new cycling opportunity. The policy is aspirational in nature. |
| 11 | Policy CLW7 Explanation | Expectation set out in final paragraph would seem unreasonable in most cases – should check with County Highway Authority that this is the appropriate mechanism. |
| 11 | Policy CLW10 | The suggested policy requirement that all new houses have gardens of 60 square metres requires justification. Why is the figure of 60sqm considered appropriate? It is unlikely to be possible to secure allotments through S106 as this would not comply with CIL regulation 122. The Town council could use its CIL contributions to support allotment provision or it could apply for additional CIL funding to meet this need if it is exacerbated by further growth. It further requires that developers of apartments should contribute to the provision of allotments by way of S.106 or CIL contributions (on a point of fact, the latter is wrong). |
| 11 | Policy CLW11 | Strategic Developments that generate the need for an additional primary care facility can be expected to pay towards this through S106 (under CIL regulation 123 up to five developments can pay for a single item of infrastructure). In general any facilities that meet the cumulative needs of a number of developments (and in some cases some of the existing population) will need to seek CIL funding from the District Council. The proposed policy wording as drafted is not CIL compliant. |
| 11 | Policy CLW13 | In the 2 nd paragraph “large-scale” is not defined. |
| 11 | Policy CLW14 | The need to support and not stifle opportunities for renewable and low carbon energy development is welcomed, in line with the NPPF. Criteria 2 of the policy relating to arrangements for parking and servicing appear to be unrelated to this policy. If it considered appropriate and necessary for the policy, an explanation why this considered appropriate would be helpful. The policy seems to replicate the requirements of Core Strategy CS.3 ‘Sustainable Energy’. If there is no third criterion, (4) should be renumbered. |
| 11 | Policy CLW14 Explanation | Explanatory Notes: The two paragraphs are rather repetitious. |

| Section 12 – Site Specific Briefs | | |
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| 12 | Figure 12 | It is uncertain whether the proposed canal bridge/tunnel and new road crossing as shown are achievable. |
| 12 | Figure 13 | Delete "Town Square" from heading. |
| 12 | Policy SSB1 | <p>Amend title of policy to "Stratford-upon-Avon Allocation – Canal Quarter Regeneration Zone" for consistency with Core Strategy.</p> <p>In the first sentence of the policy, delete 'brownfield and derelict land' and insert 'previously developed land and buildings'.</p> <p>In a) replace the word 'Inappropriate' with 'Existing'</p> <p>In c) delete "A continuous corridor of at least 5 metres in width on at least one side of the canal..." and replace with "A linear park alongside the canal..."</p> <p>At the end of the final sentence of the policy, add the following text: "...and a Framework Master Plan Supplementary Planning Document will also be prepared".</p> |
| 12 | Policy SSB2 | <p>The policy is generally consistent with Proposal SUA.2 in Core Strategy but it makes no reference to intention that 10 hectares is allocated for new businesses to the town and a further 10 hectares would be made available for companies to relocate from the Canal Quarter. It is unclear what is meant by "at least 20 hectares" as this is the amount of land identified on Figure 13.</p> <p>Note: the Council has proposed some further modification to this Core Strategy proposal.</p> |
| 12 | Policy SSB4 | <p>In (c) seeking an access through it to another site is likely to be unachievable unless parties come to an agreement.</p> <p>For (f), see previous comments.</p> <p>Is this policy still required following resolution to grant planning permission subject to signing of S106 legal agreement?</p> |
| 12 | Policy SSB4 Explanation | Should reference to Figure 12 in fact be to Figure 14? |

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| 12 | Policy SSB5 | <p>In first line of policy it should read "Margaret Court".</p> <p>In (b) it is considered unreasonable to only reflect the needs of Tiddington.</p> <p>For (d), see previous comments.</p> <p>The policy indicates the site is allocated for around 60 houses. However, the map accompanying the consultation questionnaire shows the Tiddington Fields site split in to 2 parcels (2A for 60 dwellings and 2B for 70 dwellings) and labelled together as 'site 2' on the map. This suggests the capacity of the proposal is significantly greater than the 60 dwellings proposed. It is unclear how the land will be utilised, or alternatively whether there is an error in the extent of the development area proposed.</p> <p>This site is in multiple ownerships and concern is raised as to the likelihood of its timely delivery in the absence of a clear strategy for delivery. Of particular concern is whether the non-standard allocation arrangements proposed for the affordable housing (indicative yield c.21 units) would work or even achieve their desired objective. By way of background, the current allocation arrangements (embedded in S.106 Agreements) provide for eligibility 'cascade' based on standard local connection criteria and normally starting with the host parish. Without a cascade (in effect a guarantee that any affordable homes will be able to be let) no housing association will choose to develop any homes. In this case, defining a first-tier local connection to "Tiddington" could be very problematic due to the need to define "Tiddington" by reference to a specific geographical area. This difficulty could be compounded by the requirement for a minimum 5-year local connection (the current standard requirement is for a minimum of one year). As a consequence, it is possible to envisage some unintended and perverse outcomes. The District Housing Enabler would be happy to work with the Town Council to explain how nomination and allocation arrangements work, and identify practical solutions to the issues raised.</p> <p>This is likely to come forward as a formal outline application in summer 2015. It would be helpful if the Neighbourhood Development Plan emphasised the need to provide a landscaped buffer to the site at a reasonable depth so as to ensure a more definitive edge to the Tiddington Fields site.</p> <p>Criterion (d) seems to be repetition of an earlier policy.</p> <p>What are the standards that criterion (e) talks about?</p> <p>Where would the proposed 5Ha community woodland outlined in criterion (f) go?</p> |
| 12 | Policy SSB5 Explanation | Should read "Margaret Court". |
| 12 | New Policy SSB1A | <p>Insert in Section 12 as follows:</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Policy SSB1A – Stratford-upon-Avon Housing Allocation: Bishopton Extra Care Housing</p> </div> |

Land off Correlli Close, Bishopton (identified on the Proposals Map) is allocated for the development of an Extra Care Housing scheme comprising approximately 80 apartments and associated facilities.

Development on this site for this purpose will be supported subject to the following provisos:

- (a) Criteria (1) to (4) of Part C of Core Strategy Policy CS.18 being met.
- (b) No objection to the loss of the former school playing field from Sport England.
- (c) Incorporation of the public footpath running along the eastern boundary of the site into the landscaped grounds.

Explanation

Warwickshire County Council, as Adult Care Authority, in conjunction with its development partner, Housing and Care 21, are working to deliver a county-wide programme of Extra Care Housing schemes on sites owned by the County Council. Such schemes aim to provide self-contained residential accommodation to enable older people to continue to live independently, and provide an attractive alternative to the need for some older people to enter residential care homes. This is a particular issue for the Neighbourhood Area because of its demographic profile. The District Council's Housing Strategy 2015-2020 similarly includes an action to promote the development of further specialised housing with care schemes.

One of the sites included in the County Council's programme is land off Corelli Close, Bishopton, as identified on the Proposals Map. It was formerly in use as playing fields for the former Marie Corelli School, but is now surplus to the County Council's requirements. Funding has been secured from the Homes and Communities Agency to enable the development of an affordable Extra Care Housing scheme on this site comprising approximately 80 apartment and associated facilities.

Draft Notes following meeting on 14 July 2015 between Members of the Stratford Town NDP Group; District Councillors Saint, Brain and Organ; Tony Perks and Robert Weeks of SDC:

1. Town Centre Strategic Partnership - SDC is supportive of this but suggested that the policy should be sufficiently flexible to allow for someone other than Stratforward to take on the role at a later date if necessary.
2. Town Square – The NDP Group are encouraged by the new owners so far but feel it is important that good quality materials should be used in the scheme. Tony Perks said that SDC had already taken the concerns about materials on board. The NDP Group also mentioned that if the scheme is successful the draft policy allows for further expansion into the NCP carpark at a future date. Should the scheme fail Town Square might be a suitable venue for residential development.

3. Shop Fronts - SDC is supportive of extending the scheme to other parts of the town centre but questioned where the funding would come from. Possible use of CIL money.
4. Out of Town Centre Shopping - The NDP Group flagged a relatively low threshold in the NDP of 150m² to encourage making town centre units work (this may involve reconfiguration) rather than building new units out of town. SDC did not object but will take a look at the threshold.
5. Trial closure of High Street - SDC is supportive of a pilot scheme which might also be applied elsewhere in the District.
6. Design review panels - SDC is happy to support in principle but not prepared to commit resource. One approach might be for this to be administered by the Town Council using CIL money. The need to update the Stratford-upon-Avon Design Guide was also discussed. Councillor Chris Saint supported the principle of updating the design guide and committed to having this done once the Core Strategy is in place.
7. Congestion and Birmingham Road - SDC to take a more holistic approach to traffic. CIL will help.
8. Parking in the Town Centre - SDC was supportive of the creation of a Car Park Advisory body providing it was advisory and did not have executive powers.
9. Environmental Improvement Areas - There was a brief discussion about the rationale behind these, the importance of soft landscaping and how they could be made to work in practice including the use of planning conditions. Again, SDC were supportive of what these policies are aiming to achieve.
10. Core Strategy changes in response to inspector's report - The proposed changes to the Core Strategy will not affect many of the draft policies in the Neighbourhood Plan although we will need to consider the implications including the impact of more traffic entering the town from the west. Councillor Chris Saint explained some of the rationale behind the proposals.