

Response from Ladders Solicitors RE Land adjacent to Tiddington Road, Tiddington

## Stratford Neighbourhood Development Plan Pre-Submission Consultation Public Response Form

The Stratford Neighbourhood Plan Steering Group has prepared a pre-submission Neighbourhood Development Plan for the Stratford upon Avon Neighbourhood Area and is inviting you to comment by **11.59pm on Friday 3 July 2015**.

In order for your response to be taken into account when the Neighbourhood Development Plan goes to Stratford on Avon District Council for Examination your contact details are needed and also to keep you informed of future progress.

All comments will be publicly available on the Stratford Neighbourhood Development Plan website once they have been analysed, and will be identifiable by name (and organisation where applicable). Please note that any other personal information provided will be processed in line with the Data Protection Act 1998 and not made available on the website.

**Please fill in your contact details below**

Full Name:
LODDERS SOLICITORS LLP
Organisation represented (where applicable)
THE TRUSTEES OF THE LATE MARGARET JEAN READING DISCRETIONARY TRUST
Capacity in which commenting on Plan (eg Resident, Business/Work in Area, Residents' Association Rep, Statutory Consultee)
ON BEHALF OF TRUSTEES
Address:
NUMBER TEN, ELM COURT, ARDEN STREET, STRATFORD UPON AVON
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CV37 6PA
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victoria.longmore@loddors.co.uk

Please make sure any additional pages are clearly labelled/addressed or attached.

Please send your completed form by **11.59pm on Friday 3 July 2015** to

**Freepost RTJX-GHEE-ZUCS, Stratford-on-Avon District Council, Consultation Unit,  
Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6BR**

**Many Thanks - your support is appreciated**



Our Ref: LA/VL/REA00032/00013

Your Ref:

10 July 2015



Stratford Neighbourhood Development Plan  
Stratford-on-Avon District Council  
Consultation Unit  
Elizabeth House  
Church Street  
Stratford upon Avon  
CV37 6BR



Dear Sir/Madam

**Representations to Stratford Neighbourhood Development Plan Pre-Submission Consultation - Land adjacent to Tiddington Road, Tiddington**

On behalf of The Trustees of the Margaret Jean Reading Discretionary Trust and in relation to land adjacent to Tiddington Road, Tiddington (as shown on the attached plan) I write in response to the current Stratford Neighbourhood Development Plan Pre-Submission Consultation.

This letter ~~raises~~ objections to the extent of the proposed built up area boundary around Tiddington and the amount of housing catered for in the village. This letter concludes that the proposed Neighbourhood Plan is not sufficiently flexible to accommodate growth and that it will not enable effective delivery of the Stratford-upon-Avon Core Strategy. This letter proposes that the built up area boundary should be extended to include additional land as shown on the attached location plan, and that the housing delivery targets should be consistent with the draft Core Strategy.

The Stratford Neighbourhood Development Plan will form a part of the development plan and it needs to be consistent with the other development plan documents, including the District Council's Core Strategy. National planning policy advises that Neighbourhood Plans should not undermine the strategies of Local Plans (National Planning Policy Framework, paragraph 184).

Section 5 of the Neighbourhood Plan relates to the provision of new homes and Policy H3 proposes the allocation of around 90 homes in the village of Tiddington to meet local needs and assist in delivering housing in accordance with the Core Strategy. However, it is considered that this Policy is not in accordance with the Core Strategy. Core Strategy Policy CS.16 states that the Category 1 settlements should accommodate approximately 450 homes of which no more than around 25% should be provided in an individual settlement (113 homes).

The supporting text for Policy H3 in the Neighbourhood Plan further exposes the inconsistency with the Core Strategy stating:

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*"This plan proposes that the allocation for Tiddington should be below the maximum..."*

For this reason it is considered that the level of delivery proposed in the Neighbourhood Plan is clearly not in accordance with the requirements of the Core Strategy.

Policy CS.16 of the draft Core Strategy States that:

*"The scale of housing development that is appropriate in each village is specified in Policy CS.16 Housing Development. Development will take place:*

- *on sites to be identified in the Site Allocations Development Plan Document;*
- *on sites identified in a Neighbourhood Plan; and*
- ***through small-scale schemes on unidentified but suitable sites within their Built-Up Area Boundaries (where defined) or otherwise within their physical confines**" [my emphasis]*

The supporting text to Policy H3 of the Neighbourhood Plan states that development in Tiddington should be:

***limited to the specific sites indicated in Section 12** for the following reasons:*

- *Development would be on greenfield sites*
- *Infrastructure constraints including traffic congestion on the Clopton Bridge make Tiddington less sustainable than other locations identified within the Neighbourhood Development Plan area." [my emphasis]*

From the above it is apparent that the Neighbourhood Plan is seeking to impose additional restrictions on development in Tiddington to those proposed in the Core Strategy. It is considered that this approach is inconsistent with the requirements of the NPPF and will prejudice the effective delivery of the Core Strategy in so far as it relates to Tiddington.

Furthermore, it is considered that there is little justification to single Tiddington out in the Neighbourhood Plan for different treatment from the other four Category 1 settlements. Tiddington is one of five Category 1 service villages identified in the draft Core Strategy (with Bishop's Itchington, Harbury, Long Itchington and, Quinton) yet the wording of draft Policy H3 effectively seeks to reclassify Tiddington as a less sustainable location and one less suitable for development. This approach is at odds with the provisions of the Core Strategy and the requirements of the NPPF and again it is considered that it will serve to prejudice the effective delivery of the Core Strategy.

The Stratford-upon-Avon Core Strategy has not yet to be formally adopted, and progress is pending further consultation and examination by the Inspector. It is noted that the Inspector's first report into the proposed Core Strategy, received in March 2015, advised that the Council needs to *"revisit the Objective Assessment of Housing Need [OAN] because the labour market adjustments that are contained in the supporting evidence are not justified and fail to demonstrate that an adequate labour force supply will be available to meet the projected job growth within the District"*.

The full extent of the Council's housing requirements are therefore unknown at the present time.

The proposed built up area boundary shown in the Neighbourhood Plan is drawn tightly around the village. This places a severe constraint on future development within the village. The proposed site allocations are noted (which fall largely outside the built up area boundary) however the plan provides no flexibility in the event that these identified sites are unable to deliver the anticipated levels of development. The land shown edged red on the attached plan is well located to accommodate additional growth to the northern side of Tiddington Road and its inclusion within the built up area boundary would enable greater flexibility within the Neighbourhood Plan.

It is noted that this parcel of land is also identified as an 'amenity open space' and that it forms a part of the proposed strategic gap. Through the allocation of the land edged red as a proposed site for development, or even its inclusion within the built up area boundary, the opportunity would exist to pursue a development which provided a better quality, and more accessible form of open space. Development could also be designed in such a way so as to clearly define the limits of Tiddington.

In conclusion, it is considered that the proposed Neighbourhood Plan is inconsistent with the requirements of the Core Strategy and contrary to the provisions of the NPPF. It is suggested that amendments are made to the plan to enable housing delivery in accordance with the Core Strategy and to allow flexibility for development proposals. Specifically the following amendments should be made:

- the built up area boundary should be extended to include additional land as shown on the attached location plan, and;
- the housing delivery targets should be consistent with the draft Core Strategy.

I trust the contents of this letter are clear but please do contact this firm if you have any queries.

Yours faithfully



For and on behalf of Lidders Solicitors LLP

Direct Telephone: 01789 206119

Email: [victoria.longmore@lidders.co.uk](mailto:victoria.longmore@lidders.co.uk)

Land north of Tiddington Road - Stratford-upon-Avon



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