

Response from Savills RE Land adjacent to Kissingtree Lane, Wellesbourne Road and Church Lane, Alveston

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:
Graham Jones / Alex Hales
Organisation represented (where applicable)
Savills
Capacity in which commenting on Plan (eg Resident, Business/Work in Area, Residents' Association Rep, Statutory Consultee)
Comments submitted on behalf of private landowner
Address:
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Post Code:
Email Address:
GRJones@savills.com / AHales@savills.com

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

2 July 2015
L 15072 AH Neighbourhood Plan Submission Doc Reps Alveston 2015 (3)



Stratford Neighbourhood Development Plan
Stratford-on-Avon District Council
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Dear Sir/Madam

Representations to Stratford Neighbourhood Development Plan Pre-Submission Consultation - Land adjacent to Kissingtree Lane, Wellesbourne Road and Church Lane, Alveston.

Savills is appointed by Mr Chris Swan in respect of his land interest at Alveston. The following representations are made in response to the current Stratford Neighbourhood Development Plan Pre-Submission Consultation. These representations are made predominantly in relation to the proposed designation and extent of the designated 'Built Up Area Boundary' around Alveston. Concern is raised that the proposed Neighbourhood Plan will not be compatible with, and will prejudice the delivery of, the objectives of the Stratford-upon-Avon Core Strategy.

The proposed built up area boundary for Alveston is shown in purple on the extract from the Draft Neighbourhood Plan provided as Figure 1 below:

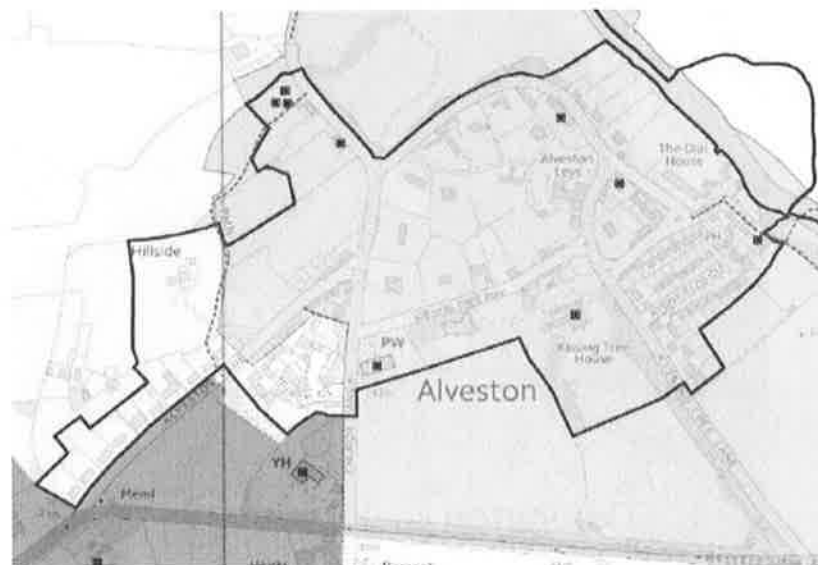


Figure 1: Extract from Draft Stratford Neighbourhood Development Plan

The Stratford Neighbourhood Development Plan will form a part of the development plan and should be compatible with documents in the Local Plan hierarchy. This includes the development plan documents prepared by Stratford-upon-Avon District Council, particularly the Core Strategy. The Core Strategy has been subject to examination with further evidence work currently being undertaken by Stratford District Council.

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The National Planning Policy Framework (NPPF) states, at paragraph 184, that neighbourhood plans should reflect policies contained in local plans and plan positively to support them. Paragraph 184 continues:

“Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”

The introductory text to the ‘Housing’ section of the proposed submission Neighbourhood Plan indicates that the housing target for Stratford-upon-Avon in the current draft of the Core Strategy is approximately 2,700 dwellings during the plan period (2011 to 2031). Additional housing is proposed for both Tiddington and Alveston. Alveston is a Category 4 settlement and the text of draft Core Strategy Policy CS.16 states that Category 4 settlements should accommodate “approximately 400 homes in total, of which no more than around 8% should be provided in an individual settlement”.

The Neighbourhood Plan reflects this and states that proposed modification to Policy CS.16 provides for up to “32 houses in Alveston with no minimum”. This represents the proposed 8% of the 400 dwellings to be directed to the Category 4 settlements. From the wording of this text, it is clear that the 8% figure is an approximation. Accordingly, although no minimum figure for Alveston is prescribed, (as the Neighbourhood plans indicates), it is equally correct to point out that the figure of 32 dwellings should not be taken as a maximum figure either.

The proposed built up area boundary is drawn tightly around the village centre. The majority of Alveston is a designated Conservation Area., The village centre contains several Listed Buildings. These heritage considerations place a considerable constraint on development within the proposed built up area boundary.

Figure 2 below is an extract from the Environment Agency Flood Map. Flood Zones 2 and 3 are shown shaded blue. It is clear from this map that a substantial portion of the land within the northern half of the proposed built up area boundary falls within the functional flood plain – where residential development should be resisted.

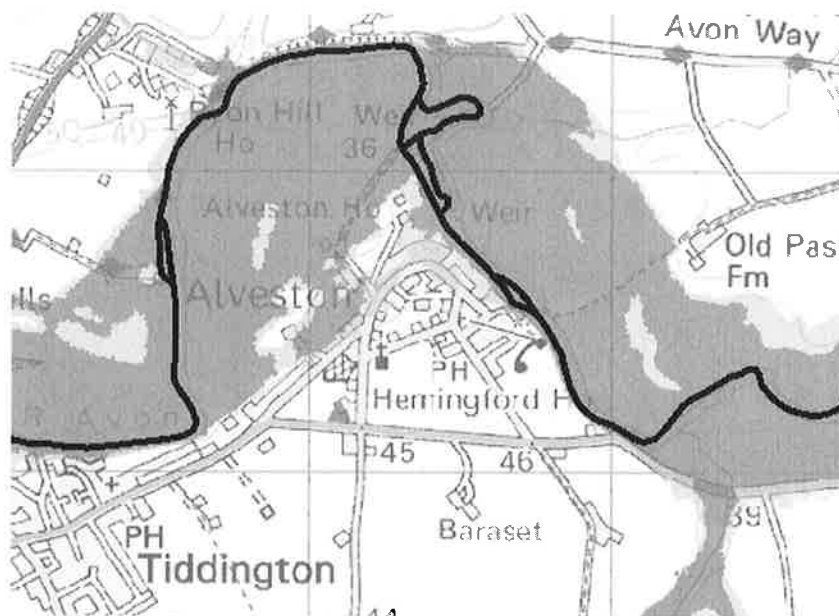


Figure 2: Extract from Environment Agency Flood Map.

Having regard to the constraint on development presented by the Conservation Area designation, the presence of Listed Buildings, and the flood zone, it is unclear exactly how residential development of the scale anticipated by the Neighbourhood Plan (up to 32 dwellings) could be accommodated within the proposed built up area boundary.

The Stratford-upon-Avon Core Strategy has yet to be formally adopted. Following examination earlier in the year, the Council resolved, in June 2015 to adopt only a number of the draft policies on an interim basis to help inform decisions about planning applications. The policies that have been adopted are those that are not subject to significant representations or unresolved concerns. It should be noted however that the housing related policies CS.15 to CS.19 inclusive and the Area Strategies are all potentially affected by decisions yet to be made concerning the overall housing requirement and its distribution. As such the proposed allocation of housing for Category 4 villages such as Alveston is unknown at the present time.

In this context it is noted that the Inspector's 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"*

In a letter to the Inspector on 2nd April the Council advised that this work, together with work in response other concerns raised by the Inspector, would be ongoing through the summer and allowing for consultation the Council anticipates that it would be in a position to resume the examination by 23 October 2015. With this in mind there is concern that, in the event that the housing targets for the District are increased, the Neighbourhood Plan, based on lower delivery targets, will not be compatible with the development requirements of the Core Strategy.

Having regard to the constraints on development within the village described above and the concern raised regarding the ability to provide development within the built up area boundary it is considered the Neighbourhood Plan will be undeliverable in its own right, in so far as development in Alveston is concerned, and prejudice the delivery of the objectives of the Core Strategy and be contrary to the provisions of the NPPF. Furthermore, the Neighbourhood Plan fails to provide any flexibility to accommodate additional housing development in the event that this is required following identification of the District Council's own OAN.

The direction of new housing development towards sustainable locations is a fundamental objective of the NPPF, and the detailed policies contained in the Draft Core Strategy. Isolated new development in the countryside is resisted and development will generally be required to respect the existing patterns of development, through established development management policies. As such it is considered that the definition of an arbitrary boundary for development is both unnecessary and unreasonably prescriptive. However, if a limit to the built up area is to be prescribed around Alveston, it is considered that the area should be extended to provide a greater degree of flexibility for development to avoid the flood zone and respect the important heritage assets of the village. The inclusion of the land edged red on the attached plan, which falls outside the Flood Zone, would provide such flexibility and allow for a limited and sympathetic development to meet identified housing needs.

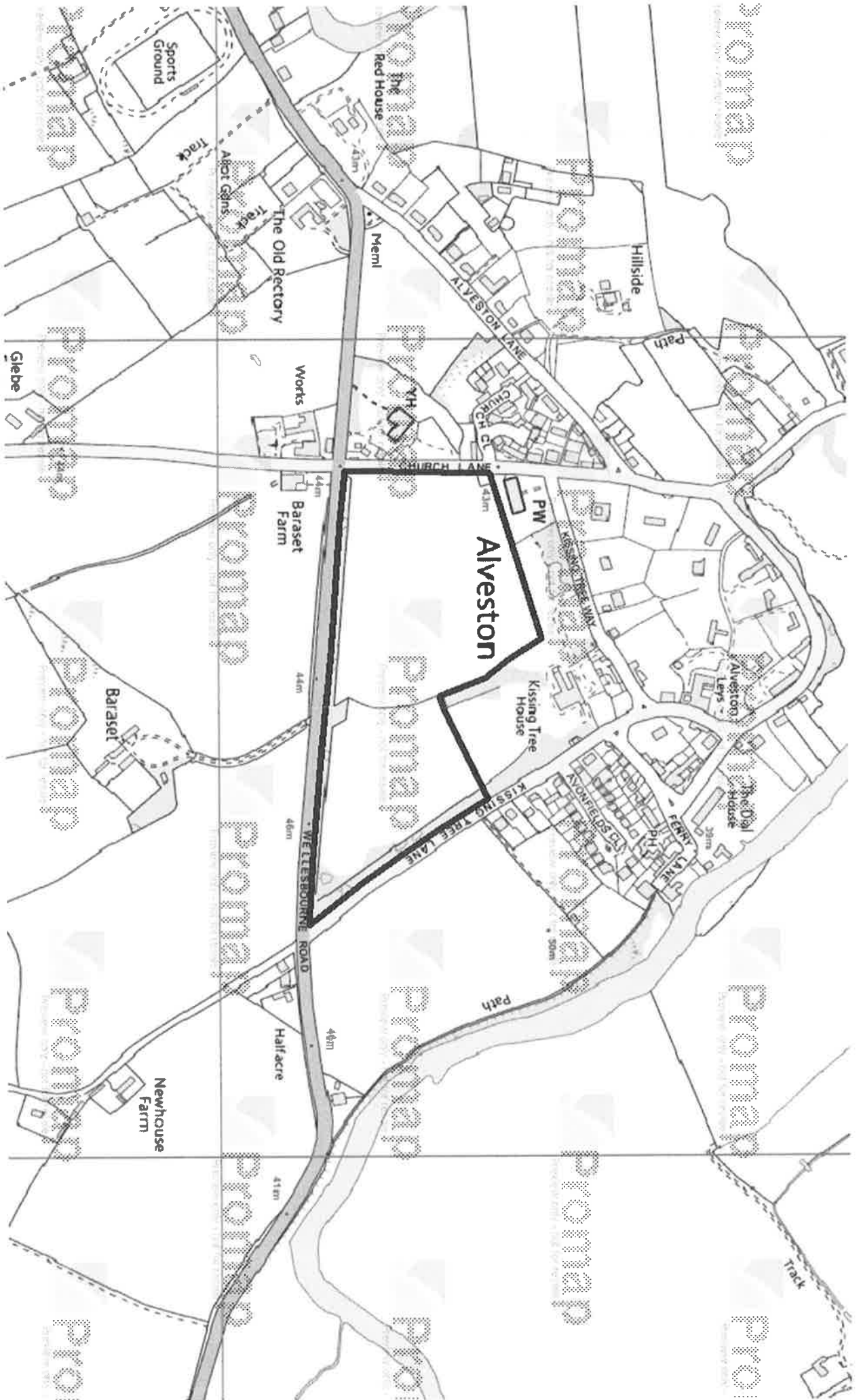
For the reasons set out in the above letter it is considered that the proposed Neighbourhood Plan is not compatible with the objectives of the Core Strategy and contrary to the provisions of the NPPF. Amendments are required to ensure that housing delivery can be secured in accordance with the Core Strategy and to allow flexibility for development options in the service villages, particularly the sustainable settlement of Alveston.

Yours Faithfully



Alex Hales
Associate

Enc: Site Location Plan
CC: Graham Jones – Savills



Land Adjacent to Kissingtree Lane, Wellesbourne Road and Church Lane, Alveston (not to scale)

