

Response from Stansgate Planning for Mr C Swan

Please fill in your contact details below

Full Name:
Mr C Swan
Organisation represented (where applicable)
C/o Stansgate Planning
Capacity in which commenting on Plan (eg Resident, Business/Work in Area, Residents' Association Rep, Statutory Consultee)
On behalf of a resident of Alveston
Address:
9 The Courtyard (ADM/RJB/K/7405) Timothy's Bridge Road, Stratford-upon-Avon
Post Code:
CV37 9NP
Email Address:
Rachel@stansgate.co.uk

YourName: Mrs Rachel Best

Are you content with the Neighbourhood Development Plan as a whole?

YES	<input type="checkbox"/>
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NO	<input checked="" type="checkbox"/>
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If NO, please give your comments for any modifications you would like to see to the Policies or Proposals, or the reasons why you oppose them.

Policy/ Proposal No	Comments or Reasons
General	Please see comment below

Policy H1	Please see comment below
Policy H3	Please see comment below
Policy H4	Please see comment below
Policy BE 6	Please see comment below
Policy BE11	Please see comment below
Policy BE12	Please see comment below
Policy BE14	Please see comment below

**Stratford upon Avon Neighbourhood Development Plan 2015-2031
Pre-Submission Consultation May 2015**

Note abbreviation - Neighbourhood Plan (NP)

General Comments

Timing – The Neighbourhood Plan (NP) is premature. Its purpose is to support the strategic development needs set out in the Local Plan and plan positively to support local development as outlined in Paragraph 16 of the National Planning Policy Framework. It should therefore be prepared alongside the District Council’s Core Strategy to ensure it is consistent with the need to identify sufficient land to meet development requirements.

Presently, the Core Strategy Inspector’s report has identified a shortfall in the amount of new housing identified and an increase in the housing requirement will mean more sites need to be found.

Section 2 of the NP recognises that changes will be needed to the Core Strategy that will impact on the NP and Section 3 deals with Future Development Issues stating a figure for new houses that is out of date.

It is inappropriate to designate land throughout the NP until the matter of strategic development need is settled in the Core Strategy. The NP should not progress further and once the strategic development needs are settled further consultation on the NP should take place.

Evidence Base – there does not appear to be any readily available, published evidence base to support the policies and designations proposed in the NP. Planning Practice Guidance sets out that evidence is needed to support a NP and states '*proportionate, robust evidence should support the choices made and approach taken.*' It states policies should be '*clear and unambiguous* and '*It should be concise, precise and supported by appropriate evidence*' (Paragraphs 040/041 Ref ID 40/41-040-20140306).

Policy H1 - Built up Area Boundaries

Our client objects to the built up area boundary at Alveston. It is not in conformity with the Core Strategy and it is premature to define the boundary in advance of the housing requirement being settled.

Policy H1 where it relates to Alveston is not in conformity with the emerging Core Strategy as it does not account for the fact that the village is identified in the Core Strategy hierarchy as a sustainable settlement where housing development will take place. Policy CS15 identifies Alveston as a Category 4 Local Service Village (LSV) and Policy CS16 as proposed to be modified, provides for approximately 400 homes in total of which *'no more than around 8% should be provided in an individual settlement.'* Therefore, to acknowledge its sustainable nature and ensure delivery of strategic policies, the NP should draw a built up area boundary at Alveston having found sites to accommodate around 32 homes in the settlement.

Policy CS15 in respect of LSV's states development will take place on sites identified in the Site Allocations Document; Neighbourhood Plan; and through small-scale schemes on unidentified sites within Built-Up Area Boundaries. The Site Allocations Document is not yet prepared and in Alveston no sites allocations are identified in the Neighbourhood Plan. In other words, no suitable sites for around 32 houses within the Built up Area Boundary of Alveston are identified. Within the boundary, much of the village is Conservation Area and any proposals will need to be considered having regard to this.

It is premature to define the boundary at Alveston in advance of the housing requirement being settled. The boundary is identified based on a Core Strategy housing requirement that is no longer relevant, as the Core Strategy Inspector has found a need for additional housing in the district. The amount of additional housing needed is not yet established and some of the additional housing may be located on sites in the Neighbourhood Plan area. Furthermore, the distribution of the quantity of housing between LSV's in Policy CS16 has not yet been confirmed and may change.

There is no flexibility in this policy to allow for additional housing and until such time as an assessment of suitable locations on the edge of the settlements of Stratford, Tiddington and Alveston has been completed, it is not possible to define the Built up Area Boundary. This issue needs to be settled before the NP can progress.

Policy H3 - Local Service Village Allocations

There is no acknowledgement in the policy that Alveston should deliver around 32 houses in the plan period to conform with Policy CS16 of the Core Strategy as currently drafted. Windfall development within the boundary is unlikely to deliver this.

The approach to development at Alveston in the NP is to allow for windfall development only within the built up area boundary. This is inconsistent with Tiddington where an allocation of around 90 houses is stated and no justification is given why Alveston should be treated differently. The fact that Alveston is largely Conservation Area should not provide exemption from meeting the needs of the Core Strategy and there is a need to have flexibility to allow small scale proposals on suitable sites in or on the edge of the settlement. Therefore to allow only windfall within the built up area boundary of Alveston is unlikely to deliver the housing needed. There is a danger that the strategy of the Core Strategy will not be met and it will fall short on housing delivery.

Furthermore, the restrictive nature of other policies of the NP in respect of a presumption against development of greenfield land (Policy H4), the resistance towards use of garden land (Policy H5) and the importance of heritage assets (Policies BE11 and 12) means few sites may come forward within the settlement as they may conflict with other policies of the NP.

Policy H4 - Prioritising the Use of Brownfield Land

The policy states there is a general presumption against the development of greenfield land. This is at odds with the aims and objectives of the NPPF that there is a presumption in favour of sustainable development. Sustainable development can be on greenfield land as well as previously developed (brownfield) land. Whilst the Core Planning Principles encourage effective use of land as stated in the NP, they also encourage use of land of lesser environmental value; to actively manage patterns of growth to make fullest use of public transport, walking and cycling; and to focus significant development in sustainable locations. Some greenfield locations may meet this criteria equally as well or be more sustainable than previously developed sites. It follows that the emphasis in the NP should be for sustainable sites rather than previously developed.

Furthermore, there is not enough previously developed land available in Alveston to meet needs.

Notwithstanding this objection, use of the term 'exceptional circumstances' should be deleted and a criteria based approach used.

Policy BE6 - Design Quality Standards

Reference to Code for Sustainable Homes needs deleting and other standards such as Lifetime Homes and Building for Life are to be advisory rather than a requirement which is the way this policy is written. This is as a result of the Deregulation Act 2015 which came into force March of this year and aims to simplify the local planning burden by removing regulations duplicated in other legislation. It means Code for Sustainable Homes is no longer to be included in Local Plans; rather carbon reduction measures are to be applied through Building Regulations. Furthermore, reference to the Code has been deleted from Core Strategy Policy CS.3 Sustainable Energy so to include it in the NP is not in line with the Core Strategy.

In addition, the government's continued commitment to zero carbon homes by 2016 applies to sites of 10 or more dwellings, not to all new housing developments as stated in BE6.

Policy BE8 - Effective and Efficient Use of Land

Part b) that gives priority to reusing previously developed land over greenfield land should be deleted for reasons set out in representations to NP Policy H4. Furthermore, paragraph 111 of the NPPF 'encourages' effective use of land by reusing previously developed land, it does not give any priority over greenfield.

Policy BE11 - Listed Building and Scheduled Ancient Monuments

This policy is at odds with the National Planning Policy Framework paragraphs 129-134 where significance of the asset and level of harm is assessed and weighed against the public benefits of the proposal. As written, any harm would preclude any proposals for development.

Policy BE12 - Conservation Areas

This policy is at odds with the National Planning Policy Framework paragraphs 129-134 where significance of the asset and level of harm is assessed and weighed against the public benefits of the proposal. As written, any harm would preclude development.

Policy BE14 - Replacement Dwellings

Delete reference to Level 5 Code for Sustainable Homes having regard to Deregulation Act 2015 as explained in representations to NP PolicyBE6.

Stansgate Planning July 2015