

Responses to Representations made on the Pre-submission Draft Stratford Neighbourhood Development Plan

Section 5 – Housing – General Comments

Representations: Total received 5

Number in Support: 1

Summary of Representations:

The prominent comment is one of Repetition, or inclusion of standards which have become out-of-date. There are comments about the content contained in individual Policies which are better dealt with under those specific Policies.

Summary of Response:

It is acknowledged that repetition should be avoided where possible, and that the Submission Version would be brought up-to-date with changes to National Guidance and with the Core Strategy.

Modification Proposed:

It is proposed to re-configure the Introduction and Explanatory Texts within Policies to reduce repetition and to make the Plan more readable

Individual Representations and Steering Group Responses

Code Number	Full Name	Organisation represented (where applicable)	Section 5 – Housing - General Comments	Neighbourhood Plan Steering Group Response
Statutory Consultees' Representations				
1001	Stratford District Council	Statutory Consultee	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	The plan is not just about housing, but Policy H1 for example does start with “All new housing development...” so it is quite clear what it is

		<p>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. -</p> <p>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.</p> <p>The Lifetime Homes standard has been superseded by the Housing Standards Review.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).</p> <p>- 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). -</p> <p>Page 17 - 4th para Publication date of Neighbourhood Plan is May 2015. The Core Strategy Inspector’s Interim Report</p>	<p>intending to achieve. However, it may be a good idea to have a Development Strategy section with an overarching housing policy within it. Reference to the CS allocations is simply a repeat of the CS and this will be reviewed.</p> <p>Noted. It is intended to review Policies H6 to H9, integrating and amending as necessary.</p> <p>Noted and References will be amended.</p> <p>While this could be an additional policy, it is probably not needed because schemes that come forward within the Town Boundary would be acceptable under H1 and be subject to design policies in the plan.</p> <p>This will be reviewed against the latest iteration of the CS and the Inspectors reports where available.</p>
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			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 “there is no current indication that the housing allocation for Stratford-upon-Avon Main Town will increase” 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.	
1004	WCC - Public Health Warwickshire	Statutory Consultee	<ul style="list-style-type: none"> • Mix should align with CS. Clarity needed on the % intended to be built. Recommends 40% be included • AH should be designed to integrate into market housing to support integration and social inclusion • Developments of 10 or more should be designed to Lifetime Homes Standard • Homes for older people should be located in areas with easy access to public transport and shopping • BfL should be used to inform development 	<ul style="list-style-type: none"> • The NDP needs to be aligned to the CS which requires 35% AH • Agreed – all housing should be tenure blind • This is the current intention but replaced by HSR • This will largely depend on market forces but it is agreed that access to these services is important • BfL is referred to in policy BE6

Agents and Developers' Representations

512	RPS re Taylor Wimpey and Miller Homes		The opening statement to this section, from page 17 onwards outlines the Town Council’s wishes to plan carefully for development in and around the town, which can accommodate necessary infrastructure and ensure housing	Noted - Supportive
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			opportunities for younger residents. This approach is firmly supported by RPS, whose clients are committed to delivery of a scheme capable of delivering a range of house types to support future housing need in Stratford Town.	
516	Framptons re ROSCONN Group		<p>Section 5</p> <p>The criticism that the demand for housing has ‘put pressure on greenfield sites on the periphery of the town creating urban sprawl and development uncoordinated with the necessary infrastructure particularly the town’s road network’ is an unsubstantiated assertion. Growth of the town has largely taken place in accordance with the provisions of the Stratford upon Avon Local District Plan Review 2006. Where sites have come forward for housing outside of the Local Plan process – primarily on the basis that the LPA has failed to maintain a sufficient supply of housing land – planning permission has then been granted by the Local Planning Authority or the Secretary of State with appropriate provision being made for new infrastructure and the delivery of high quality design.</p> <p>While it is noted that ‘There is no current indication that the Housing Allocation for Stratford upon Avon Main Town will increase’, there is similarly no cogent evidence to suggest that the main urban area will not be required to meet further housing needs to achieve the delivery of the OAHN.</p> <p>The emphasis on the re-use of brownfield land is acknowledged within national planning policy. The NP should be transparent and identify suitable brownfield land for new housing. If, as it is submitted, suitable brownfield land for housing cannot be identified, then the NP should explain to the community that it will be necessary to use greenfield land to accommodate necessary development. An objection is submitted to Policy H1 in the definition of Built-Up Area Boundaries. Figure 14 should be amended to allow for up to 100 new homes to be constructed on land off</p>	<p>This is not an unsubstantiated assertion. It is a fact that there have been several planning applications for large scale housing on green field sites around the town. The steering group are aware of the reasons but pressure on greenfield sites around the town will remain until the CS is in place or SDC can demonstrate a 5 YHLS. The NDP is in a difficult position of having to plan for development in and around the town in accordance with the latest position in the CS. Should this position change and any housing requirement increase, then this will be reviewed by the SG at that time.</p> <p>The NPD has identified brownfield land within the plan in the form of SSB1 – the Canal Regeneration Zone. Site allocations in the NDP, together with committed developments are sufficient to accommodate the envisaged</p>

			Knights Lane Tiddington. The suggested Built-Up Area Boundary is shown on the plan attached as APPENDIX 1 .	levels of housing in the emerging CS. Land off Knights Lane is not currently in the NDP as a site allocation. The SG is aware that there is a current appeal on this site.
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Residents' Representations				
295	Cllr Charles Bates		Page 17 repeats much of what's stated on page 14, with this type of repetition continuing throughout the Development Plan.	Noted. This is a drafting matter that will be corrected in the final submission version.