

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

Policy BE3

Representations: Total received 18

Number in Support: 8

Modification Proposed:

Title will be changed to Master Planning otherwise the substance of this policy will remain relatively unchanged, with only the minor modifications noted in the Responses below proposed.

Individual Representations and Steering Group Responses

Code Number	Full Name	Organisation represented (where applicable)	Policy BE3	Neighbourhood Plan Steering Group Response
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Statutory Consultees' Comments				
1001	Stratford District Council	Statutory Consultee	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	Policy to be retained with a changed title.

		<p>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 "take account of recent and future development in the area" 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?</p> <p>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?</p> <p>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?</p> <p>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</p>	<p>The reference to 'recent development' relates to the need to take into account committed development adjacent or near to a development site and not compromise future development opportunities.</p> <p>This is the case.</p>
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		<p>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 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</p>	<p>Title will be changed to reflect Para 59 of NPPF</p> <p>They should show how a development responds to the existing environment and include committed development. They</p>
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			<p>existing or future known community.</p> <p>Policy CS.25 of the Core Strategy covers the need for a Transport Assessment where appropriate.</p> <p>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>	<p>should show how they do not prejudice future development aspirations.</p> <p>Cross-reference to Core Strategy and a footnote to be added.</p> <p>Not suggesting all sites should have facilities but consideration should be given.</p>
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Agents and Developers' Comments				
512	RPS re Taylor Wimpey and Miller Homes		<p>The Plan makes reference in a number of places to large scale developments referring to sites of 10 or more. This policy requires that all large scale developments be accompanied by a masterplan (outline) or contextual plan for detailed applications.</p> <p>Under current arrangements significant schemes often include concept plans or illustrative masterplans to outline the key components of schemes, submitted alongside Design and Access Statements. What is not included in these masterplans is an analysis of the recent and potential future development as required by policy BE3. This view of cumulative development is often used to consider issues such as highways impact, however, it has never been the preserve of design. It may be difficult to predict when future schemes will come forward and as such, the legitimacy of this</p>	<p>It is straightforward enough for a masterplan or contextual plan to have regard to committed development but it is accepted that future developments are unknown. The rationale behind this policy is to ensure that a development does not compromise the wider potential of the area to be developed. An example would be for a development on land adjacent to the former Harris builders' yard which is now a car park.</p>

			clause is debatable. On this basis, the requirements for cumulative assessments should be removed.	Development adjacent to this car park should not prejudice development coming forward on the car park at a future date.
516	Framptons re ROSCONN Group		This policy defines 'large-scale development' as 'development of 10 or more dwellings'. This definition is absurd in the context of the scale of development – and inconsistent with the approach taken in national planning policy. The absurdity of this policy is highlighted by the provision of Policy BE3 which requires the use of 'design codes and master planning' for schemes of 11 dwellings or more. The application of design codes and master planning imposes considerable extra costs upon applicants. Such provision for design codes and master planning on proposals for 11 dwellings or more imposes an excessive burden upon applicants. Such arrangements should be restricted to schemes of much greater scale, for example proposals in excess of 100 dwellings.	<p>The use of masterplans and design codes should be commensurate with the scale and nature of the developments proposed. There is no reason why this should result in an onerous financial burden on the applicant.</p> <p>Major development is defined in the GDMO 2015 as being 10 or more dwellings or 1,000sqm or more of floorspace. Where we have referenced large scale development we will change it to major development and reference the GDMO 2015.</p>
519	Daniel O'Donnell		Requiring a design code and master plan for all developments over 10 dwellings is excessive and unjustified given the scale of these proposals.	See above comments on proportionality.
520	Charles Vickery		The requirement of a design code and master plan for all developments over 10 dwellings is excessive and unjustified for such relatively modest schemes.	See above comments on proportionality.

Residents' Comments				
025	Jane Dodge		I agree	Supportive
028	Gordon Harrington		This should stress the need to consider more seriously the implications of large new housing developments on local services, particularly educational and medical. It is not responsible for the RDC to say, in response to recent objections to the 800 house Shottery development proposals because of insufficient secondary education facilities, that this is a matter for Warwickshire County Council (when space and funding are not available).	It may not be possible to impose policy wording that is outside the responsibility of the NDP
056	Martyn Luscombe	Stratford Voice	Support. Master plans should explain how features designed to ameliorate adverse impacts (e.g. traffic congestion, noise, flooding risks) address not just present circumstances but also expected future changes (traffic growth, climate change etc.)	Supportive
057	Trevor Honychurch		Agreed	Supportive
059	Maureen Dartnall	N/a	Will consideration be given to some sort of Public Transport to both Birmingham & London (Heathrow) Airports? It's ludicrous that no easy link is available for tourist to visit the town. GP services are stretched to breaking pointsomething needs to be done NOW ...not be " thought about"	This requirement is outside the scope of the NDP
086	Jenny Fradgley		Strongly support, design codes to include orientation to take advantage of solar gain, design for safety, and to highest environmental standards. Master plans should include community centres, space for teenage exercise as well as playgrounds for toddlers	Supportive
095	Eric Ward		Agree	Supportive
139	Renny Wodynska		As above - what about the impact on wildlife and nature which gives so many of us our health and	Section 9 – Natural environment focuses on these issues

			well-being. This needs to be dominant for me.	
140	Alan George		Impact on wildlife and nature should be primary. This is so important to support and help people with their health and well-being - refer to Bourneville as an example.	Section 9 – Natural environment focuses on these issues
212	David Tucker		A Master Plan is vital to avoid the historic ad-hoc development, which has taken place in the Town in recent years. This has particularly affected the Birmingham Road as successful development Appeals thwart Planning Policy and especially create and compound traffic bottle necks.	Supportive
228	John Campton		Yes	Supportive
253	Daniel O'Donnell		Requiring a design code and master plan for all developments over 10 dwellings is excessive and unjustified given the scale of these proposals.	The use of masterplans and design codes should be commensurate with the scale and nature of the developments proposed and does not need to be excessive.
278	Joan Graham		All very good principles and should help the town keep its unique market character.	Supportive