

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

Policy BE8

Representations: Total received 22

Number in Support: 8

Modification Proposed:

Only the minor modifications noted in the responses below and any needed to remain consistent with the Core Strategy and the NPPF are proposed. It will be renumbered to Policy BE7 due to the deletion of the former BE7 (drainage).

Individual Representations and Steering Group Responses

Code Number	Full Name	Organisation represented (where applicable)	Policy BE8	Neighbourhood Plan Steering Group Response
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Statutory Consultees' Comments				
1001	Stratford District Council	Statutory Consultee	The approach to density within Policy BE8 requires clarification, perhaps incorporating the statement in the accompanying explanation that higher densities will be supported on sites with a high level of accessibility. Such an approach would result in the efficient use of land. It would also be appropriate to provide further clarity as to what the Neighbourhood Plan considers to be locations with a high level of accessibility. A recognised standard is 400m/5min	

		<p>walk from public transport. Is the reference to “public transport stations” in the accompanying explanation meant to include bus stops?</p> <p>Criterion (b) is not entirely consistent with the NPPF (see paras. 17 and 111) although recent Government statements have emphasised the use of brownfield land.</p> <p>Criterion (d) is not entirely consistent with the NPPF (see para. 112). The final paragraph is more of a design issue and might be better placed in Policy BE1.</p> <p>Has consideration been given to retaining/providing public space; new landscaping; quality of the public realm and integration of all land uses?</p>	<p>Will be amended to ‘Higher density near public transport’</p> <p>To be revised in line with the NPPF</p> <p><i>No harm in leaving it.</i></p> <p>Yes – Policy CLW4, 5, and 6.</p>
1005	Natural England	<p>Policy BE8 – Effective and Efficient Use of Land, section d) Making only exceptional use of the best and most versatile agricultural land, is also an important point. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. For guidance on how adverse impacts on soils can be minimised please refer to Defra’s Good practice guide for handling soils and Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.</p>	<p>Noted.</p> <p>To be revised in line with the NPPF</p>

Agents and Developers' Comments				
507	JLL re: Gateway One	Developer's Agent	This policy is welcomed, as it gives priority to the reuse of brown field land (such as The Gateway opportunity site).	Supportive
508	Pegasus Group re: Gallagher Estates	Policy BE8	<ul style="list-style-type: none"> • Current wording of the policy should be revised in line with para 112 of the NPPF. As written the policy is overly restrictive as it precludes development coming forward on BMV agricultural land. The word exception should be removed from the policy • There should also be a mechanism in the policy to allow for development to take place on BMV agricultural land if it is demonstrated to be necessary 	<ul style="list-style-type: none"> • Para 112 of the NPPF does not establish this test. That is not to say that the NDP cannot set a higher test. The thrust of para 112 is encompassed in the policy which is to say that the BMV agricultural land should be treated sequentially favouring the poorer quality land over the higher quality land. The policy allows flexibility so that if 'exceptional' circumstances exist then the BMV land will be considered • There is no requirement for such the policy to be expressly written with as such clause. The DM process allows the decision maker to weigh all benefits against harm so if a particular case was presented in such a way it would be for the decision

				maker to judge the merits of the scheme against the NDP as a whole and other material considerations
512	RPS re Taylor Wimpey and Miller Homes		The only comment here relates to the word 'exceptional' in reference to development on agricultural land of the best and most versatile quality. The NPPF makes reference to this land in the context of the economic benefit of such land and promoting sites of lesser quality, however the need to test for exceptional circumstances is not noted. For consistency with the NPPF, the policy should be amended to remove this phrase.	Noted. Para 112 of the NPPF does not establish this test. That is not to say that the NDP cannot set a higher test. The thrust of para 112 is encompassed in the policy which is to say that the BMV agricultural land should be treated sequentially favouring the poorer quality land over the higher quality land. The policy allows flexibility so that if 'exceptional' circumstances exist then the BMV land will be considered.
513	Stansgate planning re Mr C Swan		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.	The uncontrolled release of greenfield land around the town is not supported by the Core Strategy or this plan. The protection of greenfield land is therefore a valid position and will help to assist in the delivery of brownfield sites within the town and villages.
514	Stansgate Planning re Town Trust		Part b) that gives priority to reusing previously developed land over greenfield land should be deleted for reasons set out in representation to NO Policy H4. Furthermore, paragraph 111 of the NPPF 'encourages' effective use of land by reusing previously developed land, it does give any priority	See above comments.

			over greenfield.	
516	Framptons re ROSCONN Group		Criterion (d) is not justified by an evidence base. Greenfield land around the periphery of Stratford on Avon, Tiddington and Alveston is generally of best and most versatile agricultural value. There is no reasonable justification for criterion (d) having regard to national planning policy.	See above comments.
519	Daniel O'Donnell		Land around Stratford upon Avon, Tiddington and Alveston is generally best and most versatile agricultural land.	See above comments.
520	Charles Vickery		All land around Stratford upon Avon, Tiddington and Alveston is generally best and most versatile agricultural land.	See above comments.

Residents' Comments				
025	Jane Dodge		I agree	Supportive
056	Martyn Luscombe	Stratford Voice	Support	Supportive
057	Trevor Honychurch		Strongly agree	Supportive
095	Eric Ward		d) Too weak; . . . no use of productive agricultural land. See my comment on H4	This policy is compliant with the National Planning Policy Framework
139	Renny Wodynska		Green belt land and agricultural land , woods, forests etc. should NEVER ever be developed on - we have sufficiently damaged what is around us already. Many of us want harmony and quiet .	This policy is compliant with the National Planning Policy Framework
140	Alan George		Green belt land, agricultural land, woods, forests etc.	This policy is compliant with the

			should NEVER be developed on.	National Planning Policy Framework
168	Mrs Anna Louise Gregg		All very sensible. I particularly like the idea of controlling the density of housing so the town emerges from the countryside.	Supportive
182	David White		Vital if development is not to get out of control. I sympathise with those trying to work within the imposition of ever changing increases in demands for more housing by a Government hell bent on building more houses to meet their misguided doomsday scenario and unelected bureaucrats slavishly putting that policy into effect.	Supportive
201	Graham John Nicholson	The Inland Waterways Assoc. (Warks branch)	Agree	Supportive
228	John Campton		Support	Supportive
253	Daniel O'Donnell		Land around Stratford upon Avon, Tiddington and Alveston is generally best and most versatile agricultural land.	Not sure this statement is strictly true, but in any case there is scope for exceptional use for development.
296	Kate Rolfe		Developments at the edges of our town - we should encourage a feathering approach to design of houses i.e. no 3 storey developments on the outside edge.	Noted