

## **EXAMINATION OF THE STRATFORD-ON-AVON CORE STRATEGY INSPECTOR'S INTERIM CONCLUSIONS**

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### **Abbreviations Used in this Report**

AML	Aston Martin Lagonda
CS	Stratford-on-Avon Core Strategy, Proposed Submission Version, June 2014
GBS	Greater Birmingham and Solihull
CW	Coventry & Warwickshire
DtC	Duty to Co-operate
dpa	dwelling per annum
EPB	Economic Prosperity Board
ELS	Employment Land Study
GLH	Gaydon Lighthorne Heath
HMA	Housing Market Area
JLR	Jaguar Land Rover
LVIA	Landscape and Visual Impact Assessment
LEP	Local Economic Partnership
LPA	Local Planning Authority
OAN	Objective Assessment of Housing Need
ONS	Office for National Statistics
PAS	Planning Advisory Service
SA	Sustainability Appraisal
SEP	Strategic Economic Plan
SELS	Strategic Employment Land Study
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SNHP	Sub-National Household Projections
SNPP	Sub-National Population Projections
the Act	The Planning and Compulsory Purchase Act 2004 (as amended)
the Council	Stratford-on-Avon District Council
the Framework	National Planning Policy Framework
the Guidance	the Planning Practice Guidance
the 2004 Regulations	The Environmental Assessment of Plans and Programmes Regulations 2004
the 2012 Regulations	The Town & Country Planning (Local Planning) (England) Regulations 2012
UPC	Unattributable Population Change

## **Executive Summary**

1. My interim conclusions are that whilst I am satisfied that the Duty to Co-operate [DtC] has been complied with, for the reasons set out in detail in what follows, the following elements of further work are required:
  - i. Stratford-on-Avon District Council [the Council] need 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;
  - ii. The Council needs to do further Sustainability Appraisal [SA] work to address identified defects in the SA process and as part of that exercise other strategic sites that have emerged at a late stage need to be considered and robust reasons given for selecting the preferred option and rejecting the alternative options;
  - iii. As I find Proposal SUA3 is not justified the Council might wish to consider an allocation at Atherstone Airfield and do further SA to examine it in combination with SUA1 and SUA2; and,
  - iv. The housing supply trajectory is tight and in view of the likely need to increase the OAN it needs to provide more headroom.

The Council is invited to draw up a timetable for completion of this work, agree it with me, provide regular updates on progress against the timetable and advise me, via the Programme Officer, in good time so that I can resume the examination promptly when that work is complete.

## **Introduction**

2. The Stratford-on-Avon Core Strategy, Proposed Submission Version, June 2014, [CS] was submitted for examination on 30 September 2014. Examination Hearings were held between 6 and 29 January 2015 and, in addition to making unaccompanied inspections, I undertook accompanied site inspections on 2 and 3 February 2015.
3. As I advised at the close of the Hearing sessions on 29 January 2015, I am writing to set out my Interim Conclusions on key matters. These include the DtC, OAN, SA and employment land supply. I established during the Hearing that Jaguar Land Rover [JLR] and Aston Martin Lagonda [AML] sought a clear steer on their respective allocations in the event that I was minded to issue interim conclusions and I undertook to do so. In the event I feel able to examine all of the proposed employment allocations because, unlike for housing, there is no need for that topic area to be reopened in substance pending consultation on the main modifications. For the reasons set out below the housing topic area needs to be revisited following further work on OAN and SA. In the circumstances I shall deliberately refrain from a detailed analysis of alternative housing allocations to enable the Council to review these in the first instance.

4. However I shall briefly comment on the overall housing strategy as that would not be prejudicial to the further work that is required and, in particular, consider where an increase in the housing requirement might be directed. This is without prejudice to the Council's findings. I shall also examine the housing land supply situation, acknowledging it too will need to be reviewed at a later stage in the examination.
5. As a matter of convention, in these interim conclusions numbers in [*square brackets*] refer to paragraphs earlier in the report. For the avoidance of doubt, these interim conclusions do not set out a final view on the soundness of the CS in respect of these or any other matters and they are issued without prejudice to the contents of my final report.

## **The Objective Assessment of Housing Need: *Background***

6. Paragraph 158 of the National Planning Policy Framework [the Framework] requires Local Planning Authorities [LPAs] to ensure that their Local Plan, which for this purpose would include the CS, is based on adequate, up-to-date and relevant evidence. Paragraph 159 of the Framework requires them to prepare a Strategic Housing Market Assessment [SHMA] to assess their full housing needs, working with neighbouring authorities where a Housing Market Area [HMA] crosses an administrative boundary. Paragraph 47 of the Framework states that to boost significantly the supply of housing, LPAs should use their evidence base to ensure that their Local Plan meets the full OAN for market and affordable housing in the HMA. Further guidance on undertaking an objective assessment is set out in the Planning Practice Guidance<sup>1</sup> [the Guidance].
7. The Coventry & Warwickshire [CW] Joint SHMA<sup>2</sup> takes the Office for National Statistics [ONS] Interim Sub-National Household Projections [SNHP], which cover the period from 2011-2021, as its starting point<sup>3</sup>. These take account of the size and structure of the population in the 2011 Census but are based on pre-Census estimates of population trends. The SHMA undertook a range of projections including PROJ1, linked to the 2010 and 2011 based SNPP, and PROJ1A, in which the projections were updated to take full account of the 2011 Census and revised ONS Mid-Year population estimates. It concludes that PROJ1A represents the main demographic projection and undertook sensitivity analysis on it based on differing assumptions with regard to headship rates. Although the SHMA is a useful starting point, and in many respects contains up-to-date evidence and analysis, it is not informed by the latest available information for the assessment of need up to 2031. For this reason only moderate weight can be given to its projections.
8. In May 2014 the ONS published new 2012-based Sub-National Household Projections [SNPP], which are the first set of population projections that take full account of the results of the 2011 Census. What has since been referred to as the SHMA Addendum<sup>4</sup> considers the implications of this additional information and was able to take account of the Guidance issued in March 2014. However it makes clear that the projections for individual authorities, rather than the whole HMA, should be regarded as only indicative. In the circumstances I attach significant weight to the SHMA Addendum because it was based on the most up-to-date population projections available at the time of convening the examination Hearings. However the SHMA Addendum makes clear, at paragraph 1.8, that it should be viewed alongside, and not replace, the main SHMA report.

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<sup>1</sup> See section 2a, starting at paragraph ID 2a-001-20140306.

<sup>2</sup> Document Ref. ED.4.3.3, which was published in November 2013.

<sup>3</sup> Table 32, Document Ref. ED.4.3.3.

<sup>4</sup> Document Ref. ED.4.3.1, which was published in September 2014.

9. Following the submission of the CS to the Secretary of State for examination, at the end of September 2014, the Council instructed ERM to undertake a '*Consolidated Review of Housing Need and Requirement in Stratford-on-Avon District*'<sup>5</sup>. The deadline for comments on this topic, Matter C, was adjusted to 19 December 2014 to enable participants to submit written comments on it and thereby avoid disrupting the Hearings programme. The Consolidated Review formed the basis of the substantive discussion at the Hearing because it underpins the Council's late change to its OAN, and hence the Council's housing requirement, from 10,800 to 11,320<sup>6</sup>. Whilst I acknowledge the concern that this was procedurally irregular, in the circumstances I consider it was an appropriate pragmatic response.
10. With the original SHMA, the SHMA Addendum, the ERM Consolidated Review, 5 different projections on behalf of the development industry and CPRE, there are 9 alternative approaches to assessing housing need before this examination. A composite table<sup>7</sup> helpfully sets out the assumptions and outcomes of most of these. The exception is that provided by CPRE, which was dismissed as being crude by ERM on behalf of the Council. It uses the actual household size figure of 2.2888, from 2011, to arrive at an estimate of 6,000 dwellings being required by 2031. Although CPRE provided a late addendum to this projection<sup>8</sup> that applied outcomes of the assumptions on household formation rates adopted by GL Hearn in the '*part return to trend*' projection, the dwelling requirement varies over the 20-year period. Whilst the purpose of that exercise appears to be to justify a request for the Council to do further work, the bottom line is that I do not regard the CPRE submissions to be a serious alternative to those which have been put forward by the other parties. I shall examine aspects of the alternative approaches to OAN below.

### ***What is the most relevant Housing Market Area?***

11. Section 3 of the SHMA gave reasons for concluding that Coventry and Warwickshire is the most relevant HMA for strategic planning purposes. There appears to be a high degree of consensus that whilst Stratford District straddles a number of HMAs, Coventry and Warwickshire is the most appropriate HMA. I acknowledge that my colleague has found that Stratford falls partly within the Birmingham HMA, which is consistent with DCLG research<sup>9</sup>. However the SHMA takes account of other indicators such as migration, travel to work flows and house prices in reaching the conclusion that it does. In the circumstances I have no sound basis to disagree with its conclusion.

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<sup>5</sup> Document Ref. ED.4.3.2a, issued on 2 December 2014, but the final version of which, incorporating an errata of corrections, is dated 10 December 2014.

<sup>6</sup> The Council has continued to refer to a figure of 11,300, but I am clear from an answer given to me by Mr Gilder, for ERM, that the correct figure is 11,320, or 566 dwellings per annum, and there is no case to round it down to 11,300.

<sup>7</sup> Document Ref. HD.16.

<sup>8</sup> Document Ref. HD.62.

<sup>9</sup> '*The Geography of Housing Market Areas*' [2010] as referred to in paragraph 3.8 and illustrated in Figure 2 of the SHMA.

## Demographic modelling

12. The Guidance advises that household projections published by DCLG should provide the starting point estimate of overall housing need and that, wherever possible, the latest available should be used<sup>10</sup>. The SHMA has the advantage of being a comprehensive piece of work that identifies a demographic housing need for Stratford of 10,758, or 538 dwellings per annum [dpa], but I have given a reason why it has been superseded. The SHMA Addendum only gives indicative figures for each District and there was a wide range of views as to the weight that should be given to them.
13. The focus on the HMA level in the SHMA Addendum appears to be because of the consistency between the SHMA and 2012-based figures at that level. Paragraph 2.8 offers 2 reasons for the quite marked differences at District level. The first is that the SHMA made an adjustment for Unattributable Population Change [UPC], which arises from a combination of errors in migration and population estimates, whereas the SHMA Addendum does not. The SHMA Addendum, at paragraph 2.19, finds '*...there is no clear, defensible basis for making a UPC adjustment to the new SNPP Projections*'. That might suggest that UPC was a distorting factor at the District level in the SHMA. The second is that the 2012-based SNPP draws on more up-to-date information about population change, but in the light of the Guidance I consider that is a positive.
14. Despite the reservations that are expressed in the SHMA Addendum I consider that the figures for each District are a good starting point for the assessment of objectively assessed need. Although it would appear that the data is less stable at the District level it is essential to identify a figure for each District. The indicative figures comprise the most up-to-date projections that are before the examination. On balance, despite the contradiction in the Council's stance, I attach the indicative figures in the SHMA Addendum substantial weight.
15. Assumptions are built into the demographic assessments of housing need and a key factor is Household Formation Rates [HFRs]. The SHMA Addendum assumes that HFRs will follow the trend assumed in the 2011-based household projections until 2021 and then revert to the rate of change projected in the 2008-based HFRs, rebased, from 2021 to 2031. This is known as the 'index' method. In contrast representatives of the development industry have taken a variety of approaches, described in the Composite Table of Assessments, which leads to a range of demographic need between 412 and 618 dpa<sup>11</sup>.
16. The SHMA Addendum acknowledges, at paragraph 2.25, that as the 2011-based projections are trend based, there is a degree to which they project worsening HFRs amongst key age groups, particularly

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<sup>10</sup> Paragraphs ID 2a-015-20140306 and 2a-016-20140306.

<sup>11</sup> See summary of methodology and outcomes in Document Ref. HD.16.

those in their 20s and 30s. Reflecting advice in the Guidance<sup>12</sup>, the SHMA Addendum has run sensitivity analysis around HFRs, which has resulted in a '*Part return to trend*' scenario. This scenario attempts to address the suppression of HFRs arising from economic factors and is characterised by the report's authors as a '*sophisticated approach*'<sup>13</sup>.

17. In my view this is a reasonable assumption and is more sophisticated than the index method. In any event Figure 13 of the SHMA Addendum shows that for the key age group of 25-34 that in Stratford District, by 2031, the '*Part return to trend*' projection largely returns to the 2008-based projection without a market signals uplift. The SHMA Addendum, in paragraph 4.13, gives reasons why there are a complex set of factors at play beyond supply side constraints. It concludes, at paragraph 5.25, that it is unlikely that there would be a full recovery in HFRs to the levels in the 2008 projections. In the circumstances I find no clear basis to assume a full return to trend when recent national figures show little sign of an improvement in average real incomes and thus housing affordability.
18. A second assumption is the vacancy rate of 3 %, which appears to be common to the SHMA, SHMA Addendum, Consolidated Review and representatives of the development industry, such as RPS. Others argue for a higher rate of up to 5.3 % based on Census or Council Tax data, taking account of second homes. ERM argue that second homes are within the 3 % figure. Noting the unchallenged claim, at paragraph 3.1.27 of the Consolidated Review, that 3 % is a widely used assumption which PBA used in the Greater Birmingham and Solihull Local Economic Partnership [GBSLEP] Stage 2 Report<sup>14</sup>, I consider that a vacancy rate of 3 % is a reasonable assumption.
19. A third key assumption is migration. The SHMA projection is based on the 2011-based SNPP and assumed average net in-migration of 1,056 pa. The SHMA Addendum adopts the net in-migration assumption from the 2012-based SNPP, which rises from 600 in 2013 to around 1,000, with an average net in-migration figure of 847 pa. The ERM Consolidated Review says, at paragraph 3.1.18, that this is substantially lower than the 2010-based SNPP. ERM propose a figure of 956 pa, based on a 10-year average from 2004-2013<sup>15</sup>. The representatives of the development industry have made different assumptions for net migration within the range of 728 to 1,033.
20. In this respect the ERM analysis is attractive. An assumption based on 10-year net migration should even out the peaks and troughs of the economy and better reflects the migration levels associated with the District's employment growth. My reservation is that paragraph 47 of the Framework requires the full OAN for the HMA to be met, whereas the Consolidated Review only looks at the District. However

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<sup>12</sup> Paragraph ID 2a-017-20140306.

<sup>13</sup> Paragraph 2.30, Document Ref. ED.4.3.1.

<sup>14</sup> Document Ref. RD.08.

<sup>15</sup> Table 3.2 and paragraph 3.1.17, Document Ref. ED.4.3.2a.

at some point it is necessary to focus on the District rather than the HMA and I note that recent case law<sup>16</sup> emphasises that the primary duty of the LPA is to assess the needs of the LPA's area. The SHMA Update, at paragraph 5.18, refers to the overall quantum of 4,000 dpa across the HMA '*as a minimum figure*' and, for the reasons outlined above, the assumptions underpinning that figure are justified. It appears to be a reasonable assessment of the OAN for the HMA. However the change in assumption with regard to migration at the District level points to the need to deliver more than 4,000 dpa and so I consider the additional 109 migrants, or around 58 dpa, should not count against the minimum figure in the HMA.

21. I have considered the argument that there is no support in the Framework for a plan to be based on figures for just a District. However the recent adoption of the North Warwickshire Core Strategy following my colleague's report<sup>17</sup>, would suggest otherwise. As I understand the position in Hart, to which reference was made, the Council agreed that it was part of a wider HMA with 2 other authorities but proceeded in the absence of a joint SHMA. That can be distinguished from the position here. The Consolidated Review has to be read alongside the SHMA Addendum and the Joint SHMA, rather than as a replacement for it.
22. To translate the migration figure of 109 pa into a number of dwellings the ERM Consolidated Review, at paragraph 3.1.34, refers to a ratio of 0.53 dwellings per migrant. The basis for this figure was tested at the Hearing, following which ERM provided a paper<sup>18</sup> that claimed the correct ratio was 0.44. When added to the figure from the SHMA Addendum for Stratford of 508 dpa<sup>19</sup>, this gives rise to a figure of 556 dpa. ERM says it is content to remain with the figure of 566 dpa because it '*effectively allows for a margin of error*'. Although the assessment might be simplistic there does appear to be headroom.
23. The position that I ultimately intend to take in this matter is coloured by the comparison of demographic housing need assessments that is set out in the composite table<sup>20</sup>. The overall figure for demographic need of 11,320, or 566 dpa, compares favourably with the equivalent figures in the SHMA and the SHMA Addendum, and demographic figures put forward by representatives of the development industry.
24. The output from the modelling of demographic housing need would appear to be about right. It is likely to be above the arithmetic mean of the various estimates made by the development industry. The

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<sup>16</sup> Paragraph 25 (i), *Satnam Millennium Limited v Warrington Borough Council* [2015] EWHC 370 (Admin).

<sup>17</sup> Document Ref. CD.04.

<sup>18</sup> Document Ref. HD.19.

<sup>19</sup> Figure 6, '*Part return to trend*' column for Stratford, Document ED.4.3.1.

<sup>20</sup> Document Ref. HD.16.



Statement of Common Ground<sup>21</sup> contains many criticisms but these do not relate to the calculation of the figure of demographic need. The Guidance says that the primary objective of identifying need is to identify the future quantity of housing need<sup>22</sup>. In terms of the demographic component the Council appears to have done that satisfactorily. This finding is not inconsistent with Table 426<sup>23</sup> of the 2012-based Household Projections for England, which projects an increase in the household population for Stratford from 119,183 in 2011 to 129,283 in 2031, i.e. an increase of just over 10,000. I return to the 2012 projections below [55].

### **Economic and employment growth: *Background***

25. Paragraph 158 of the Framework requires that the assessment of housing should take full account of relevant market and economic signals. As the Guidance makes clear<sup>24</sup>, employment trends should be taken into account.
26. At the Hearing I drew attention to Planning Advisory Service [PAS] guidance<sup>25</sup> that says: '*If both a job-led projection and a trend-led demographic projection have been prepared, the higher of the two resulting housing numbers is the objectively assessed need*'. No such advice is contained in the Guidance but the PAS guidance is material. In respect of Stratford-on-Avon District the original SHMA concluded, at paragraph 11.23, that there was a case for considering an uplift to housing numbers in order to support economic growth. It is material to note that the economic-driven projections in the SHMA indicated a need for between 754-776 dpa but these are based on employment growth of approximately 10,000 over the period at issue<sup>26</sup>.
27. Figures 11 and 12 of the SHMA Addendum set out economic-led projections for housing need linked to the Experian and Cambridge Econometrics jobs forecasts, respectively. At the HMA level Figure 11 suggests a modelled need for 3,636-3,747 dpa and Figure 12 gives rise to a range of 4,546-4,579 dpa, compared to the preferred estimate of circa 4,000 dpa. However, as paragraph 3.22 of the SHMA Addendum notes, the forecasts raise some geographical issues. For Stratford-on-Avon the economic-led projections are significantly higher than the figures derived from the demographic modelling, being in the range from 764-976 dpa compared to the indicative figure of 508 dpa arising from the demographic-led scenario. Taking account of the PAS guidance and the SHMA

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<sup>21</sup> Submitted by Gladman on behalf of themselves, Barton Willmore [BW], Nathaniel Lichfield, Pegasus and RPS, listed as HS-10 on the website.

<sup>22</sup> Paragraph ID 2a-002-20140306.

<sup>23</sup> Published since the close of the examination; see:

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

<sup>24</sup> Paragraph ID 2a-018-20140306.

<sup>25</sup> Paragraph 6.2 of publication '*Objectively Assessed Need and Housing Targets*', as referred to in the submission of Pegasus.

<sup>26</sup> See Tables 47 and 48 of the SHMA, Document Ref. ED.4.3.3.

conclusion this would appear to suggest that there remains a case for considering an uplift to housing numbers in order to support economic growth.

### ***The level of employment***

28. The Council agreed that at the point where the CS was submitted for examination that there was an imbalance between the housing and employment strategies. In short it was planning for housing on the basis of employment growth of 1,300 jobs, or 65 jobs pa<sup>27</sup>, whereas ERM now say that employment growth will be 12,100<sup>28</sup> over the life of the CS, i.e. over 600 jobs pa. It is surprising that this entirely new jobs growth figure was provided at such a late stage in the examination, post submission.
29. The basis for the figure of 12,100 jobs is not as clear as it might be. It appears to be derived taking account of the Experian forecast for the period 2025-2031 and ultimately compares favourably with some of those that have been put forward by the development industry. It has not been challenged that it represents a rate of 0.85 % pa. This compares to an average annual compound rate of change of 1.0 % over the longest timeframe for which ERM give figures<sup>29</sup>. However related Figure 4.2 shows a wide variation in the historic level of change over the period at issue. Although Regeneris have suggested, based on Oxford Economics forecasting, that past trends might give rise to 21,000 new jobs in the District up to 2031, this appears to be significantly above comparable forecasts<sup>30</sup>. ERM's projection of 12,100 appears to sit in the middle of the forecasts in the SHMA Addendum made by Cambridge Economics and Experian<sup>31</sup>. Another source<sup>32</sup> refers to a more recent Experian figure of 9,640. On balance the figure of 12,100 appears to be a reasonable estimate.
30. This figure does not include an allowance for the 100 ha allocation for JLR, who made it clear that they have no firm plans for the new site such that any job figure would be largely aspirational. Subject to ensuring that such a development gave rise to a review of the CS, there is a sound case for excluding this allocation from the jobs figure for this purpose because it is an unknown at this stage.
31. The CWLEP Strategic Economic Plan [SEP] anticipates that by 2030 the County's economy will employ an additional 94,500 people<sup>33</sup>. This is based on the Cambridge Econometrics forecast, although ERM advised the Hearing that it was extended by applying a higher growth

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<sup>27</sup> PROJ 1A rows in Tables 47 and 48, Document Ref. ED.4.3.3.

<sup>28</sup> Paragraph 4.1.125 of Document Ref. ED.4.3.2a.

<sup>29</sup> Source: Cambridge Econometrics/WIE, Table 4.1 of Document Ref. ED.4.3.2a.

<sup>30</sup> Summary in Document Ref. HD.16.

<sup>31</sup> Tables 7 and 8, respectively, in Document Ref. ED.4.3.1.

<sup>32</sup> See paragraph 4.4 of the '*Employment Land Demand Assessment*' at Appendix 1 to Turley's Matter D statement.

<sup>33</sup> See Executive Summary, page 9, Document Ref. ED.4.4.4.

rate<sup>34</sup>. The Council's unchallenged claim was that the CWLEP's figures were aspirational and might need to be reduced as the CWLEP was not successful in a recent bid for funding from Government. With the exception of Gaydon, the centres of Advanced Manufacturing and Engineering, which the CWLEP calls a key driver of economic growth, are located outside of the District<sup>35</sup>. Thus whilst there does not appear to be an agreed apportionment of the jobs by District the estimate of 12,100 jobs does not appear to be fundamentally at odds with what is inevitably an aspirational figure contained in the SEP.

### **Labour force adjustments**

32. In an attempt to show that there would be an adequate labour force supply to meet the projected growth in jobs of 12,100 in the District, ERM have made a series of labour force adjustments. These include an increase in economic activity rates. As already noted [28] the SHMA anticipated growth in the resident labour force of 1,300 but the ERM Consolidated Review argues that the provision of 11,320 dwellings, being 520 dwellings more than the submission version of the CS, would house *'...around 4,300 additional working population'*. It also relies on unpublished data to suggest that what it calls the working population would increase by 2,188 between 2011-2031<sup>36</sup>.
33. ERM's further paper<sup>37</sup> attempted to explain the derivation of these figures, which admitted that Table 5.1 in the ERM Consolidated Review was wrongly labelled. That Table is also said to be based on unpublished data, from GL Hearn. It is notable that agreement<sup>38</sup> has been reached that the 2012-based SNPP shows a decrease in the resident population aged 16-64 of 4,600 between 2012 and 2031; Regeneris say that would be 6,000 if the base year was 2011, which it needs to be. Given this significant contraction in what I shall call the conventional economically active population, those aged 16-64, it is difficult to understand the justification for the projected increase in the working population, or labour force supply.
34. It appears to rely on an ageing workforce and whilst I recognise the increase in the state pension age the employment yield from these age groups might be low due to lifestyle choices and other factors<sup>39</sup>. Of particular note is the claim that the state pension age for women would only increase from 62 to 65 by 2031 and, if correct, the ERM assumption of an increase of 1,400 working females in the 65-74 age groups does not appear to be credible. Moreover on its face the ERM

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<sup>34</sup> See, amongst other things, paragraph 4.1.65, Document Ref. ED.4.3.2a.

<sup>35</sup> See pages 56 and 57 of Document Ref. ED.4.4.4.

<sup>36</sup> See pages 55 and 56 of Document Ref. ED.4.3.2a; 2,188 taken from Table 5.2.

<sup>37</sup> Document Ref. HD.20 which, I would record, was handed to me 5 minutes before the start of the afternoon session on the first day of the Matter C Hearing.

<sup>38</sup> Document Ref. HD.11, which was discussed at the resumed Hearing.

<sup>39</sup> Paragraph 7.23, Development Economics report *'Housing and the Economy: Stratford-on-Avon District'*, appended to Gladman's statement for Matter D.

rebuttal only refers to an increase of 3,200 in the 65-74 age groups, including 1,800 working males, which appears to be materially less than the agreed reduction in those aged 16-64. The basis for these figures remains opaque and so I find that this particular adjustment has not been justified.

35. The second adjustment is for higher levels of in-commuting from outside of the District. Table 5.5 of the ERM Consolidated Review quantifies this as an increase of 4,800 to 7,435 by 2031 and it was conceded that the figure of 4,700 in paragraph 5.1.31 is incorrect. This flatly contradicts objective 12 of the CS, which says: '*There will have been a reduction in the level of net commuting through an improved balance between the number of homes and jobs in the District*'. The consequence of such an objective, given the change in the commuting ratio between 2001 and 2011, would logically be to increase the provision of housing.
36. Instead the Council has proposed to modify objective 12 so that it would read: '*A sustainable balance between employment growth and housing provision will be maintained...*'. However, given that the Council is assuming that net commuting will markedly increase<sup>40</sup> it is unclear how the new objective of maintenance could be achieved. It is planning for employment growth, but appears to be expressly relying on others to provide an adequate labour force supply, which cannot be construed as maintaining a sustainable balance.
37. ERM consider that the objective should not be tied to a level of commuting, but I consider the original objective reflects the advice in the Guidance to which I have referred [25]. The idea that it is appropriate to plan for more cross-boundary commuting seems inherently wrong and does not appear to be seeking to achieve sustainable development.
38. The ERM Consolidated Review, at paragraph 5.1.24, refers to the '*...excess of workers*' in Coventry, which it quantifies to be at least 20,000. This is within the HMA but it is questionable whether it represents short distance commuting as is being advocated by ERM. Moreover there are a number of factors that give rise to a risk to the Council's assertion that it would be able to draw on an expanding pool of labour within the HMA to meet its future employment needs. Amongst other things there is evidence<sup>41</sup> before the examination that there could be a shortage of 25,000 workers within the HMA by 2031.
39. The third adjustment is a reduction in out-commuting to take up local jobs. The ERM Consolidated Review, at paragraph 5.1.28, quantifies this to be '*...just over 2,000 by 2031*'. It says this represents a '*conservative estimate of only 0.05 %*' but that figure might not be

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<sup>40</sup> It is planning for a 182 % increase in net commuting [4800/2635 x 100].

<sup>41</sup> Paragraph 7.24, Development Economics report '*Housing and the Economy: Stratford-on-Avon District*', appended to Gladman's statement for Matter D.

correct<sup>42</sup>. The bottom line is that some 9 % of commuters are assumed to be recalled over the lifetime of the CS. This is risky as the PAS guidance<sup>43</sup> says. Whilst ERM assert, at paragraph 5.1.29, that it is a *'...realistic 'policy off' assessment'*, it is not evidence based and amounts to nothing more than aspiration. There is no evidence, such as a fit between the skills of the labour force and the needs of employers, to show that it is likely to happen.

40. Of the remainder paragraph 5.1.39 of the ERM Consolidated Review says that *'at least 3,000 are 'bounce back' jobs for which the labour force was already available in the district in 2011'*. However it would appear from paragraph xliii of the SHMA that this has already been taken into account and this assumption, at least in part, is conceded to be wrong on the basis that there is an element of double counting.
41. ERM concludes that if housing were provided above the demographic need level there is a *'strong likelihood'* that these would be taken by retired people or out-commuters<sup>44</sup>, but that claim appears to be based on a pessimistic view that the new jobs created will be low paid and/or part time. The same view is evident in paragraph 5.2.3 of the CS, which suggests that any additional housing would lead to further unbalancing of the population. In contrast Figure 1 of the Chelmer submission<sup>45</sup> provides a striking illustration of how, if one increases the number of dwellings to allow for significant growth in the resident labour force, that it is the younger working age groups, aged 25-44, that show the most marked increases. In contrast the over-65 age group remains broadly static in all 3 scenarios. This supports a finding that the ERM/Council assumption is ill-founded as, given its strong economy, there is no reason to find that the younger working age groups, aged 25-44, would commute out of the District.

### ***Economic and employment growth: Conclusions***

42. For the above reasons I have concerns about all of the labour market adjustments that have been advanced in an attempt to show there would be an adequate labour force supply to meet the projected growth in jobs of 12,100 in the District over the lifetime of the CS. This aspect of the ERM Consolidated Review has not been justified. On ERM's own evidence<sup>46</sup> there appears to be a huge disparity between the projected growth in the working age population in the District, 2,188, and recognised job growth forecasts of need which vary between 9,452 and 15,684. The significant potential economic

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<sup>42</sup>  $0.05\% \times 23,000$  [workers]  $\times 20$  [years] = 230; perhaps it should be 0.5 %?

<sup>43</sup> Paragraph 6.8, Ibid.

<sup>44</sup> Paragraph 5.1.40, Document Ref. ED.4.3.2a.

<sup>45</sup> Note the contrast between the scenarios in Figure 1 of *'Chelmer Demographic and Housing Review Paper'*, submitted with Pegasus Matter C statement.

<sup>46</sup> Table 5.4, Document Ref. ED.4.3.2a.

consequences of failing to provide an adequate labour force are documented<sup>47</sup>.

43. For these reasons the demographic-led projection is inadequate to meet future changes in the District's labour market: in short, it would appear that job growth within the District, even without the JLR allocation, is likely to exceed the labour supply. In the circumstances the housing figure is not aligned to the employment growth forecast and there are grounds for concern that the Council appears to be planning for a situation in which a key part of its labour force cannot live in the District.
44. A key objective, as per paragraph 158 of the Framework, is to ensure that an LPA's housing and employment strategies are integrated. This is not a matter that can be addressed by location, as per the Guidance [25], alone but needs a more fundamental response in terms of an uplift from the demographically derived housing need figure. No sound reasons have been given to depart from the view expressed in the conclusion of the SHMA that there is a case for such an uplift. To the contrary the marked divergence between the demographic and economic-driven projections strongly supports such a finding.

### ***Market signals and affordability***

45. Paragraph 17 of the Framework requires that plans should take account of relevant market signals. The Guidance says<sup>48</sup> the housing need number suggested by household projections is the starting point and should be adjusted to reflect market signals and indicators. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. Relevant signals include: land prices; house prices; rents; affordability; rate of development; and overcrowding. I shall examine each in turn noting that no party made a case in terms of land prices at the Hearing. The RPS evidence on this point is acknowledged to be for the period up to 2010 and as it does not disaggregate to local authority level it is of no assistance. The Guidance says<sup>49</sup> a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.
46. Dealing initially with house prices, this is considered in the SHMA: Figure 14 shows that average house prices are higher in Stratford than the rest of Warwickshire, the West Midlands and England. However the SHMA says that since 2007 in real terms, stripping out inflation, housing has fallen in value in all areas and this appears to be consistent with other evidence in the SHMA that suggests the

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<sup>47</sup> See for example paragraphs 7.6-7.10, Development Economics report '*Housing and the Economy: Stratford-on-Avon District*', appended to Gladman's statement for Matter D.

<sup>48</sup> Paragraph ID 2a-019-20140306.

<sup>49</sup> Paragraph ID 2a-020-20140306.

District has mirrored trends across the country. Figure 16 suggests that property prices are now broadly similar to those in Warwick and the SHMA states: '*Prices in Warwick and Stratford-on-Avon are notably higher than for other areas for all sizes of accommodation*'<sup>50</sup>.

47. However the increase over the pre-recession decade [1998-2007] at 156 %, albeit from a higher starting point, is below other areas of Warwickshire. Even over a longer timeframe, 1998-2013, median house prices have not increased at a faster rate at 151 %, compared to 155 % in Warwickshire and 182 % in England<sup>51</sup>. On balance whilst I accept there is a strong housing market in Stratford District I am not persuaded that there is clear evidence of longer term increases in prices relative to the national or local average that would give rise to a compelling case to adjust the housing need figure.
48. Turning to rents the SHMA finds that the variation in rents across the County largely follows the same pattern as seen for purchase prices. Figure 32 shows that entry level private rents are consistently below those in Warwick. The evidence is that median rents in Stratford have risen by 3 % over the period 2011-2013, as opposed to 11 % in Warwickshire and 3 % in England<sup>52</sup>, albeit from a higher starting point. Other evidence before the examination shows that median rents in Stratford have risen by 7.4 % over the period 2011-2014, as opposed to 13.3 % in Warwickshire and 4.39 % in England<sup>53</sup>. On balance I find that there is no clear evidence of rents having risen faster in Stratford District than the national or local average.
49. In terms of affordability it is material that paragraph 11.23 of the SHMA said that there was a case for considering an uplift to housing numbers in Stratford in order to improve housing affordability. However ERM have highlighted the improvement in the lower quartile house price: earnings ratio between 2007 and 2012<sup>54</sup> and there is no clear evidence that this has worsened over a longer timeframe in relative terms. The affordability ratio change in Stratford District appears to have been less than for the Birmingham HMA, Coventry HMA and England over both a 10 and 15-year period<sup>55</sup>.
50. RPS<sup>56</sup> refers to a ratio of 8.89 in 2013 but this would not appear to equate to a material worsening since 2007. I acknowledge that Table 23 of the SHMA shows it remains materially higher, at 8.79, than other Districts in the County and England, but there is no evidence of a worsening trend. I appreciate the SHMA found: '*This affordability analysis points to greater affordability pressures in Stratford-on-Avon*

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<sup>50</sup> Paragraph 8.11 of document ED.4.3.3.

<sup>51</sup> See for example Table/Figure 4.1 in NLP 'Housing Technical Paper'.

<sup>52</sup> Paragraph 4.12 in NLP 'Housing Technical Paper'.

<sup>53</sup> Appendix 4 to RPS OAN Report, at Appendix 1 to RPS Matter C statement.

<sup>54</sup> Paragraph 6.1.12, Document Ref. ED.4.3.2a.

<sup>55</sup> Table 5.4, BW Addendum to Matter C Hearing Statement.

<sup>56</sup> Paragraph 8.4.1 of RPS OAN Report, at Appendix 1 to RPS Matter C statement.

*District ...relative to other parts of the HMA*<sup>57</sup>. However there is not a clear case to uplift housing numbers to improve housing affordability.

51. Turning to rate of development, the Guidance<sup>58</sup> identifies that supply indicators include the flow of new permissions expressed as a number of units per year relative to the planned number and the flow of actual completions per year relative to the planned number. The moratorium meant that planned supply was intended to be low and so the existence of the moratorium per se is not a reason to conclude that this indicator is met. Supply is taking time to recover but there is no evidence to demonstrate this is because planning permissions have not been implemented. Evidence in respect of Meon Vale<sup>59</sup> indicates that sales have been high with completions for the current financial year running ahead of the Council's estimate. Given the timeframe of the CS there is no basis to increase supply to reflect the likelihood of under-delivery of the planned housing numbers.
52. Finally Table 11 of the SHMA shows that overcrowding in Stratford was the lowest, at 1.7 %, of any District in the HMA, where there was an average of 3.7 %, which compared to 4.8 % in England. Whilst Table 12 shows an increase between the Census in 2001 and 2011, the figures for Stratford, on any measure, have remained the lowest in the HMA. A similar picture emerges from the Census in 2001 and 2011 in respect of concealed households for all ages<sup>60</sup>. In terms of homelessness, the incidence in Stratford was relatively modest [0.126 %] compared with Warwickshire [0.2 %] and England [0.237 %]<sup>61</sup>. The Guidance<sup>62</sup> says the longer term increase in the number of such households may be a signal to increase housing numbers, but there is evidence to suggest there has been a reduction, albeit proportionally less than that for Warwickshire and England. In these circumstances I find this indicator does not suggest that an adjustment needs to be met.
53. Representatives of the development industry have argued that a further uplift for affordable housing need is justified. However the justification for this appears to be rather simplistic in relying on grossing up the annual affordable housing need to arrive at an estimate of OAN based on the policy requirement of 35 %. It is not a good basis upon which to justify such an uplift. I am satisfied that an objective assessment of affordable housing needs has been undertaken in the SHMA, but I see no basis on which that should be used to determine the overall OAN for the District. In any event my earlier findings might lead to an increase in the OAN, which would have the effect of increasing affordable provision. On balance I conclude, despite the SHMA's finding that there is a case for an uplift,

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<sup>57</sup> Paragraph 5.49 of Document Ref. ED.4.3.3.

<sup>58</sup> Paragraph ID 2a-019-20140306.

<sup>59</sup> Oral evidence given to Matter F session on Wednesday 14 January.

<sup>60</sup> Table 5.5, BW Addendum to Matter C Hearing Statement.

<sup>61</sup> Table 4.2 in NLP 'Housing Technical Paper'.

<sup>62</sup> Paragraph ID 2a-019-20140306.



that an upward adjustment in housing numbers has not been justified in terms of market signals in the District.

***Quantifying the scale of the required adjustment and the OAN***

54. For the identified reasons there is no alternative but to refer the matter back to the Council to enable it to revisit its estimate of OAN, moving on from the ERM Consolidated Review, to ensure it can maintain an adequate labour force supply [42]. As this is central to the plan it is not appropriate to leave it to a review mechanism as has been suggested. The Council needs to plan to meet its own projection of the growth in job numbers within its boundaries. In the event that ERM are instructed to undertake this work it might be better for a number of scenarios to be put forward showing varying assumptions. There is no purpose in suspending the examination only to be faced with a renewed attempt to justify making no allowance to meet the anticipated growth in the labour force. Any assumptions need to be evidence based rather than mere aspiration.
55. Pending the completion of additional work, it is difficult to arrive at a firm conclusion about the level of OAN. The difference in the estimates of OAN is significant. However I have given reasons for accepting the Council's demographic projection of 11,320. Based on that figure the SHMA's original higher end assessment of 600 dpa, to allow for a proportionate uplift to support the expected growth in the workforce, might need to be surpassed. The additional work required might need to take account of the 2012-based Household Projections for England, although the updated Guidance says the publication of new projections does not automatically render housing assessments to be out of date<sup>63</sup>.
56. Moreover the proposed change to objective 12 has not yet been agreed. The Council should aim to achieve a better balance between the number of homes and jobs in the District by broadly maintaining the commuting ratio at around 0.96: 1, which I understand to have been recorded in the 2011 census. Only with this approach would I consider endorsing the modified objective that has been put forward during the examination to replace objective 12.

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<sup>63</sup> Paragraph ID 2a-016-20140306, which was updated at the end of February.

## Assessment of the Duty to Co-operate [DtC]

57. Section 20(5)(c) of the Planning and Compulsory Purchase Act 2004 (as amended) [the Act] requires me to examine whether the Council has complied with the DtC imposed on them by section 33A of the Act in relation to the preparation of the CS. Section 33A requires an LPA to co-operate with other Councils and the bodies prescribed in Regulation 4 of the Town & Country Planning (Local Planning) (England) Regulations 2012 [the 2012 Regulations]. In particular it requires engagement on a constructive, active and on-going basis. The reference to preparation means that any failure to meet the DtC cannot be rectified after the CS has been submitted for examination.
58. The Council's '*Statement of Compliance with the Duty to Co-operate*'<sup>64</sup> describes the process of co-operation and identifies the strategic issues in which cross boundary issues arise. The statement contains a formal record of the DtC outcomes in the form of letters, position statements and Memoranda of Understandings. It has become clear that submissions to the effect that the DtC has not been met were exclusively concerned with housing, including OAN, rather than employment or other strategic matters.
59. It is significant that no Council or prescribed body has made any claim during this examination that the Council has failed to meet the DtC. To the contrary, a representative of Warwick District Council attended the Hearing session to support Stratford's approach and confirmed that the mechanism that has been established for joint working across Warwickshire can deal with any issues as they arise. Although there is no Memorandum of Understanding with Coventry City Council this appears to be precisely because of the joint working arrangements that are now in place within the County. Evidence of the scope of joint working can be seen from the Minutes of the Economic Prosperity Board [EPB]<sup>65</sup>, which includes representatives from the CWLEP.
60. Notwithstanding the above Coventry City Council did express a note of '*disappointment*' in its letter<sup>66</sup>, dated 17 July 2014, in response to the consultation on the submission CS. However the Council has responded positively to that concern by putting forward a new policy, 'CSxx', which commits the Council to review the CS in the event that the City Council is unable to meet its OAN within its own boundaries. This would appear to address the concern raised by the City Council.
61. The Council was not a commissioning authority for the Joint SHMA<sup>67</sup> across Coventry and Warwickshire. There were a number of factors that led to this decision but the Council has acknowledged that, with '*...hindsight and the passage of time the rationale behind this decision*

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<sup>64</sup> Document Ref. ED.3.3.

<sup>65</sup> Document Ref. CD.06.

<sup>66</sup> Consultation response Ref. 0848-1.

<sup>67</sup> Document Ref. ED.4.3.3.

*may certainly be questioned*<sup>68</sup>. However the Council did embrace the finding of the SHMA that Coventry and Warwickshire was the best fit in terms of the HMA. In the circumstances I find no basis to support the claim that the Council did not wish to be held accountable for the SHMA's findings. It was active in commissioning the SHMA Update<sup>69</sup> as well as a subsequent commission to review the Green Belt. Taken together this indicates that Coventry and the Warwickshire authorities are now working together much more closely and effectively than was the case in early 2013. Not only is there evidence that the DtC has been met within Warwickshire during plan preparation, but the joint working arrangements that have been put in place are now most unlikely to be undone in future.

62. A further issue that arose during the examination was the approach taken in the ERM Consolidated Review<sup>70</sup> which, amongst other things, includes a strategy of recalling commuters. Warwick District Council has indicated that any minor concerns arising from this work should be capable of resolution. This tends to support the Council's claim that it contains nothing of substance that would come as a surprise to the other Councils within Warwickshire. In the circumstances there is no clear basis to identify a failure to meet the DtC in the County. In any event, for the reasons already discussed, I have asked the Council to revisit this piece of work and review the assumptions at issue to ensure that the housing strategy complies with the Framework [39].
63. Co-operation has taken place with other LPAs and prescribed bodies as described in more detail in the Council's DtC statement. The submitted Memorandum of Understanding between the Council, Redditch Borough Council and Bromsgrove District Council, demonstrates that joint working arrangements are well established between the respective Councils. The CS makes specific provision to meet the employment needs of Redditch, as part of the Redditch Eastern Gateway, the northern part of which is proposed to come forward in association with an adjacent employment allocation within Bromsgrove District. This is clear evidence of a concrete action and outcome from the DtC as required by the Guidance<sup>71</sup>.
64. Some specific concerns with regard to Wychavon and Cherwell have been raised. In respect of the former, Wychavon has confirmed<sup>72</sup> that it considers the Council to have complied with the DtC. Turning to the latter the Council's DtC statement appends a Statement of Common Ground which confirms that communications between the respective Councils are well established and that the outcome of such discussions has informed the approach taken in the respective emerging plans.

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<sup>68</sup> Paragraph 2.7 of the Council's statement on Matter A.

<sup>69</sup> Document Ref. ED.4.3.1.

<sup>70</sup> Document Ref. ED.4.3.2a.

<sup>71</sup> Paragraph ID 9-011-20140306.

<sup>72</sup> Consultation response Ref. 2577-1.

65. A number of representors, particularly from the development sector, consider that the DtC has not been met in respect of the Birmingham Development Plan [BDP], because explicit provision for the unmet housing need from the City has not been made in the CS. My colleague who examined the North Warwickshire Core Strategy said that an early review of that plan would '*...be a sensible and pragmatic approach*'. Whilst the Inspector's Interim Findings<sup>73</sup> on the BDP were issued in the week that the matter was discussed at the Hearing, it remains true to say that Birmingham cannot confirm the scale of its OAN that it is unable to meet within its own administrative boundary.
66. The submitted Memorandum of Understanding between the Council and Birmingham City Council records agreement across all relevant areas, including the level and distribution of housing. The City Council has welcomed the commitment to a review of the CS should the housing shortfall that has been identified in the Birmingham HMA lead to an increase in housing provision within Stratford District. In my view the review mechanism represents an effective policy on this strategic cross boundary matter, again as required by the Guidance.
67. In any event, prior to closing the Hearing sessions, the Council put forward a reserve sites policy in order to address the reservations that were expressed at the Hearing that a review would not be capable of meeting the need at the point at which it was identified. Although various parties from the development sector argue that the unmet need arises now I cannot accept this claim when the respective Councils have yet to determine or agree the quantum of the shortfall to be met within Stratford. Nevertheless at the point where the scale of the need crystallizes the reserve sites policy would enable the Council to meet that need much earlier than a review. It would also be less resource intensive. Noting that the BDP is at a similar stage of preparation it would appear to be counterproductive to proceed to adopt this CS only to have to move straight on to a review once the BDP has been adopted. A reserve sites policy would better reflect paragraph 14 of the Framework, which says a plan should meet OAN with sufficient flexibility to adapt to rapid change.
68. Although the Council has said that the review process can be delivered by 2019 a reserve sites policy would be even more flexible. Whilst there can be no certainty as to what scale of reserve might be required I intend to consider this matter in my final report once the OAN has been agreed. However I note that the main modification proposes 10 % and that the Council's reservation in going further seems to be that, above this scale, a review would be appropriate<sup>74</sup>. I accept that there is a level above which a review would be sensible. For all of the reasons set out above, and taking all other matters into account, I am satisfied that the DtC has been met.

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<sup>73</sup> Document Ref. HD.07.

<sup>74</sup> Document Ref. HD.70.

**Legal compliance including the adequacy of the SA:  
Background to the SA**

69. The statutory requirements concerning SA of Local Plans are set out in European Directive 2001/42/EC [the Strategic Environmental Assessment Directive or '*the Directive*'], which was transposed into English law by the Act and the Environmental Assessment of Plans and Programmes Regulations 2004 [the 2004 Regulations]. Section 19(5) of the Act requires an appraisal of the sustainability of the proposals in a development plan document, such as this CS, to be carried out and for a report to be prepared. SA covered by this provision incorporate the corresponding requirements of the Directive and the 2004 Regulations. Regulation 12 of the 2004 Regulations provides that an SA report must identify, describe and evaluate the likely significant effects on the environment of: a) implementing the plan; and b) the reasonable alternatives taking into account the objectives and the geographical scope of the plan. The SA report has to include such of the information set out in Schedule 2 as is reasonably required.
70. Paragraph 165 of the Framework says SA should be an integral part of plan preparation. The Guidance explains that the role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>75</sup>. The SA needs to compare all reasonable alternatives including the preferred approach. It should predict and evaluate the effects of the preferred approach and reasonable alternatives, and clearly identify the positive and negative effects of each alternative. All reasonable alternatives should be assessed at the same level of detail as the preferred approach. The SA should outline the reasons why the alternatives were selected, the reasons why the rejected alternatives were not taken forward and the reasons for selecting the preferred approach in the light of the alternatives<sup>76</sup>.
71. The CS has had a long gestation period and this is reflected in the numerous SA that form part of the evidence base, which goes back to the original scoping report in 2007 that was updated in 2011. The more recent SA of note includes the Potential Development Options Report<sup>77</sup>, which examined the potential development options in the main settlements. There followed 2 reports on Potential Strategic Allocations and Alternative Strategic Options, the first of which looked at 14 strategic sites and the second at 5 strategic options, A-E<sup>78</sup>. The main SA Report<sup>79</sup> that brought the earlier work together to support the consultation on the Proposed Submission Version of

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<sup>75</sup> Paragraph 11-001-20140306.

<sup>76</sup> Paragraph 11-018-20140306.

<sup>77</sup> Document Ref. ED.3.8.

<sup>78</sup> Document Refs. ED.3.7a and ED3.7, dated June 2013 and January 2014, respectively.

<sup>79</sup> Document Ref. ED.3.6.

the CS is dated May 2014. Following criticism of the SA during the consultation process an SA Addendum was produced in September 2014<sup>80</sup>, which has not yet been the subject of consultation. I have taken all of the submissions<sup>81</sup> and evidence into account.

**Review of the criticisms of the SA:**

***(i) No SA undertaken at HMA level***

72. By reference to my colleague's report for Derby/South Derbyshire/ Amber Valley it is submitted that where one part of the HMA is capacity-capped, all reasonable alternatives for the distribution and apportionment of OAN must be tested through SA. It is claimed that the position in Derbyshire is analogous to Warwickshire where the capacity of Coventry is capped. It is said this is an important failing because there are previously-developed sites that are not just reasonable but preferable alternatives to the release of Green Belt.
73. The Council does not accept that it can be held not to have tested the reasonable alternatives in failing to commission an SA for the HMA, especially when the 6 constituent authorities are at different stages of plan preparation. It points out that the SHMA Addendum changed the OAN for Coventry markedly at the point where the CS was due to be submitted for examination. To the extent that Coventry might not be able to meet its own needs this is a DtC issue, which is capable of being addressed via a review policy, such as Policy CSxx. A similar approach has recently been endorsed by the Inspector in Lichfield<sup>82</sup>.
74. I have not been provided with my colleague's report for Derbyshire, but it would appear that was a joint plan or joint submission, which contrasts with the divergent status of plans in Warwickshire. I find no basis to conclude that there is a requirement for a joint plan at an HMA level, which is illustrated by my colleague's finding of soundness for North Warwickshire<sup>83</sup>. Accordingly I consider that the answer to this claim lies in Regulation 12 of the 2004 Regulations, which refers to reasonable alternatives in terms of the geographical scope of the plan. It must follow that there was no requirement on this Council to identify reasonable alternatives beyond the geographical sphere of the CS which was restricted to the Council's administrative boundary.

***(ii) Errors with regard to Long Marston Airfield***

75. ED.3.7, at paragraph 5.2.6, found that options B, C and D, namely Gaydon Lighthorne Heath [GLH], Long Marston Airfield and South East Stratford, performed at a similar level of sustainability and this is reiterated in ED.3.6, at paragraph 3.7.16. However Table 3.5 of ED.3.6 found in respect of Option C, Long Marston Airfield, that the

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<sup>80</sup> Document Ref. ED.3.6a.

<sup>81</sup> Document Refs. HD.02, HD.03, HD.04, HD.05, HD.06, HD.08, HD.38, HD.39, HD.40 and HD.52.

<sup>82</sup> Document Ref. HD.41.

<sup>83</sup> Document Ref. CD.04.

proposed route of the relief road would bisect Racecourse Meadow SSSI, a local wildlife site and a proposed local wildlife site and would therefore have significant adverse impacts on biodiversity.

Paragraph 3.7.17 is even more emphatic in saying '*...incorporating the position of the relief road would ensure a strong adverse effect against biodiversity. This additional information may mean that options B and D are now the most sustainable options*'. It is now

common ground that the relief road would not bisect the SSSI. Although the error was pointed out in representations made at consultation stage, in July 2014, it was repeated in Table A7 of the SA Addendum, ED.3.6a, in September 2014. It is submitted that, at the very least, the error was a determining factor that was material. It is said that this is the only explanation the Council has given as to why Option B was taken forward in favour of Long Marston Airfield.

76. The Council acknowledges the error but says it was not material. It says the map being assessed<sup>84</sup> did not give confidence that no part of the SSSI could be affected and so a precautionary approach was taken. It says an ecological consideration would include air quality in terms of proximity to a road<sup>85</sup> and that it was reasonable to conclude that there would be an adverse effect on biodiversity, flora and fauna because the road would cross a local wildlife site and a proposed local wildlife site and might potentially be within 200 m of the SSSI. As such the Council says the double negative score remains appropriate where there is '*potential harm to nationally designated habitats and/or leads to fragmentation of existing corridors and spaces*'.
77. In my view the admitted error was a material determining factor. It does comprise a major flaw because there can be nothing of greater significance than reasoning that distinguishes between 2 reasonable alternative strategic options. I find it impossible to conclude that Option C would have been rejected if that error had not existed because it is the sole reason given in ED.3.6 for discounting it. I cannot rule out the possibility that the original score would have been retained if the issue was merely one of air quality, albeit potentially on an SSSI, and/or impact on a local wildlife site and a potential local wildlife site. Because it is the only reason in the SA for discounting Option C it is fundamental. In the circumstances the admitted error needs to be corrected before a conclusion is drawn as to the preferred alternative. In order to maintain the integrity of the SA process, it is essential that those who undertake this additional SA work approach it with an open mind rather than seeking to justify the decision previously reached.
78. Dealing briefly with other points raised under this head, the first is the question as to whether the whole of the Long Marston Airfield is

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<sup>84</sup> Footnote 5 to HD.08 refers me to Figure 3 of the *Technical Statement: Ecology* "March 2014", but the document being referred to, at 1151-4, is Revision A, is dated July 2014 and cannot have been taken into account in ED.3.6, in May 2014.

<sup>85</sup> By reference to the '*Design Manual for Roads and Bridges*', in terms of nitrogen deposition within 200 m of a new road, Document CD.08.

previously-developed land. What constitutes curtilage is a judgment and based on my inspection, whilst the site is extensively developed with very considerable amounts of hardstanding present, there are peripheral fields that are not obviously within the definition of previously-developed land because they do not necessarily form one enclosure with it. This should not be taken to be a definitive judgment in the matter as ultimately it might come before the Secretary of State in another way<sup>86</sup>. In the circumstances the Council was not in legal error in asserting that the site was part greenfield and part brownfield. This sort of judgment is fact sensitive and so the reference to RAF Quedgeley, which would not appear to have been tested in the courts in any event, is of limited assistance.

79. The second is that the Council failed to take account of the *Technical Statement: Ecology*, dated July 2014, which appears to have been submitted during the consultation at that time. It stands to reason that the author of the SA, ED.3.6, could not have taken into account a document that was provided 2 months later. Thus whilst I have noted the case law referred to by both parties<sup>87</sup> I consider the claim falls at the first hurdle. As I have noted an earlier draft of that report would appear to have been taken into account in the SA. Moreover this is not equivalent to a section 78 appeal, which was the context for *Price Brothers*. The ecological issue was given consideration and this would appear to have been on an equal footing with other sites as part of the high level SA, which is broadly in line with the comments of Lord Malcolm in *Hallam Land*, albeit recognising that the point did not fall to be determined in that case. For these reasons I find no substance in the submission made on this point.

**(iii) Has the SA identified, described and evaluated proposals SUA1, SUA2 and SUA3 in combination?**

80. It is submitted that the SA of allocation SUA1 should include the 2 related greenfield sites, SUA2 and SUA3. It is asserted that it is the combined effect of these 3 interrelated allocations which need to be compared with reasonable alternatives but that this exercise has not been undertaken at any stage, even in the SA Addendum. It is pointed out that the Detailed Assessment Matrix [DAM] for SUA3 scores 4 negatives and so it cannot be said to show a null result. On this basis it is said the SA and SA Addendum do not adopt a lawful approach which complies with the Guidance.
81. The Council maintains that the Bishopton Lane site was considered within Option A which is a choice '*...enmeshed with issues of planning judgment*'<sup>88</sup>. Indeed in the alternative reference is also made to Option D. It says that the DAMs for SUA2 and SUA3 only show an

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<sup>86</sup> For example via an application for a Lawful Development Certificate [LDC].

<sup>87</sup> *Price Brothers (Rode Heath) Ltd v DoE* [1979] 38 P&CR 579 and *Hallam Land Management v City of Edinburgh Council* [2011] JPL 1470.

<sup>88</sup> As per Sales J in *Ashdown Forest Economic Development LLP v SSCLG and others* [2014] EWHC 406 (Admin) at ED.3.22.



adverse residual effect under one heading after mitigation and so the only adverse in combination effect relates to the loss of agricultural land. It points to section 5.8 and Table 5.1 of the SA, which it says undertakes the in combination assessment of policies including SUA3.

82. I consider that the substantive complaint that allocations SUA1, SUA2 and SUA3 were not considered in combination has been made out. SUA3 does not appear in Table 5.1, but I note that SUA2 is cited as having a negative effect in respect of SA Objective 7 even though the DAM shows the effect can be mitigated. It follows that it is the overall effect that is significant, which in SUA2's case includes a negative for Objective 7. As the DAM for SUA3 includes 4 negatives this would suggest there would be an adverse effect in combination with SUA2.
83. The SA Addendum, at paragraph 1.1.1.12, unambiguously says that: '*Given the character and nature of the Canal Regeneration Zone proposal, it was considered that there were no comparable sites that could be included a [sic] reasonable alternative within or on the edge of Stratford-upon-Avon*'. If allocations SUA1, SUA2 and SUA3 had been considered in combination such a conclusion would have been difficult to conceive as a greenfield housing site might be comparable to the effect of SUA3 and the 'replacement' allocation for SUA2. On its face it is clear that no reasonable alternatives were considered to SUA1 and I consider the reason given is unjustified.
84. The Council refers to the findings of my colleague in respect of the Lichfield Plan and, in particular, paragraph 75 where he found no obligation on a Council to assess every site in detail, especially where they are within the scope of a more general option. That must be right, but it does not excuse the situation here where no reasonable alternatives were considered. It is no answer to say in generic terms the Bishopton Lane site might be said to have been considered under Options A or D. Rather, in line with *Heard v Broadland DC* [2012] EWHC 344<sup>89</sup>, there is a need for an equal examination of the alternatives which it is reasonable to select. That has not occurred here because, in the case of allocations SUA1, SUA2 and SUA3, no alternatives were even identified. Nevertheless the Council submits, and I agree, the flaw is capable of being cured in accordance with *Cogent Land LLP v Rochford District Council and Bellway Homes Ltd* [2012] EWHC 2542 (Admin)<sup>90</sup>.

**(iv) Treatment of strategic sites that have emerged at a late stage**

85. Two strategic sites have emerged at a relatively late stage in the process and have been promoted via the examination: (i) the Dallas Burton Polo Club [Stoneythorpe Site]; and (ii) Wellesbourne Airfield. Both appear to have emerged at a similar time in early 2014 and so the analysis that follows would appear to apply to both of these sites.

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<sup>89</sup> Document Ref. HD.02c.

<sup>90</sup> Document Ref. ED.3.23.

A third, in the Green Belt at Lower Clopton, is referred to in the SA Addendum but that does not appear to have been seriously pursued.

86. The so-called omission sites are dealt with in paragraphs 29-34 of the SA Addendum, ED.3.6a. The test applied, in paragraph 33, is whether either site is '*so demonstrably better than anything else previously considered that it would be unreasonable to ignore it*'. It is submitted that in this respect the report has asked the wrong question and applied the wrong test. Rather the correct test is that formulated by Ouseley J in *Heard*, which is the phrase '*obvious non-starters*'. This was quoted with approval by Beatson LJ when giving the leading judgment in *Chalfont St Peter Parish Council v Chiltern District Council* [2014] EWCA Civ 1393<sup>91</sup>.
87. The Council has belatedly conceded that the test it applied in the SA Addendum finds no place in the case law. However it asserts that this does not demonstrate an error of law for a number of reasons, including those set out in paragraphs 31 and 32 of the SA Addendum, which relate to timeframe. The SA work that gave rise to the report in May 2014 was undertaken in furtherance of earlier work and the SA Addendum, as set out in paragraph 3, drew on information from previous documentation rather than introducing new arguments.
88. Nevertheless by the last session of the Hearing the Council confirmed its view, pursuant to the suggestion made on behalf of Dallas Burton, that the main modifications that were otherwise being advanced as a result of the examination require further SA work. It is submitted that this presents a clear procedural opportunity to address the flaw in the SA Addendum. The Council confirmed that it regarded it to be prudent to address Stoneythorpe within such a window of opportunity and I agree. However I do not regard that concession to be limited to that site as there is no basis in logic to proceed in such a manner.
89. With reference to Wellesbourne Airfield the proposed modification to the vision for Wellesbourne, together with associated changes to CS Policy CS25, should not be used as a bar to its consideration in the further SA work that is required. The Council agrees that the first sentence of paragraph 6.9.19 of the CS should be deleted. It also conceded that the note of meeting<sup>92</sup> had not been circulated and was not therefore an agreed note. Although the legal opinion<sup>93</sup> suggests the site is an '*obvious non-starter*' as I have already noted that is not what the SA Addendum said. Given that this legal opinion appears to be made on the basis of an incorrect assumption regarding the status of the note it would be wise to revisit it in the further SA work, particularly in view of the claim made on behalf of Gladman regarding the imminent termination of the head lease in 2016 and 2017<sup>94</sup>.

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<sup>91</sup> Document Ref. HD.02e.

<sup>92</sup> Document Ref. CD.09.

<sup>93</sup> Document Ref. HD.08, at paragraph 47.

<sup>94</sup> Mr Barrett told the Hearing on 27 January 2015 that the tenants only had a right to occupy the airfield until 2016 with the exception of the market until 2017.

**(v) Reasoning for selection of Option B, GLH**

90. By way of introduction the sequence of events is that as part of representations made during the consultation period in July 2014, FORSE provided a legal opinion<sup>95</sup>, which commented on the SA. Among other things it drew upon a review of the SA<sup>96</sup>. This appears to have prompted the Council to seek legal advice<sup>97</sup>, which was only produced during the Hearings. This legal advice anticipated the SA Addendum, including Table A7 that identifies the reasons behind the progression of GLH as the preferred option. That is then the focus of the submission made on behalf of FORSE in relation to Matter B<sup>98</sup>.
91. I deal initially with some of the complaints made by Mr Dove. First it is asserted that the scoring system is neither impartial, complete nor even handed, but I disagree. It is clear that the assessment of options was carried out by an independent and impartial consultancy. I am satisfied that the SA assesses a range of alternative sites in an equal manner and on a like for like basis against a clear set of SA Objectives. There is no reference to the 1995 Local Plan Inspector's Report in the SA. However having been provided with the relevant excerpt it was established at the Hearing that the housing is now focussed on a different area of land. Although one parcel to the south-west of the B4100 is proposed it would not encroach into the Local Wildlife Site<sup>99</sup>. As such it appears to be a different proposition from that previously rejected<sup>100</sup> and so I fail to see why the absence of reference to it in the SA is significant.
92. The further submission on behalf of FORSE<sup>101</sup> is labelled '*Summary of Expert Witness submission 06/01/2015*'. It does not appear to be a skeleton legal argument and my records confirm that FORSE made no prior request to make such a submission. It contains a rebuttal to the reasons given by the Council in Table A7 of ED.3.6a but, as the Council's legal advice confirms<sup>102</sup>, it is for the Council to discount, or in this case progress, the alternatives rather than the SA itself, given that it found that options performed at similar levels of sustainability.
93. This is confirmed by advice<sup>103</sup>, which says: '*It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental*

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<sup>95</sup> From Ian Dove QC, as he then was; see representation No 5965-1.

<sup>96</sup> See representation No 5965-3.

<sup>97</sup> From David Manley QC at ED.3.25.

<sup>98</sup> Document Ref. HD.06.

<sup>99</sup> Compare maps at HD.22b-c with the map on page 48 of the draft SPD and the Phase 1 Habitat Plan, Document Refs. ED.4.1.8 and RD.06, respectively.

<sup>100</sup> Document Ref. HD.22.

<sup>101</sup> Document Ref. HD.06.

<sup>102</sup> Document Ref. HD.08, at paragraph 28.

<sup>103</sup> Paragraph 5.B.7 of the extant ODPM advice '*A Practical Guide to the Strategic Environmental Assessment Directive*', September 2005.

*performance of alternatives, and can make the decision-making process more transparent'*. In my view the points raised in this submission go to the soundness of the proposal rather than the SA. The evidence that it draws upon is disputed and was the subject of discussion on the 'GLH' day of the Hearing. At this stage I do not propose to examine the allocation's soundness.

94. Nevertheless it seems that the thrust of the submission is that the explanation given in Table A7 is inadequate to justify the rationale for selecting the preferred option in sufficient detail. Thus FORSE say the fourth bullet-point makes no sense and rhetorically asks what the '*various influences*' are? Another party<sup>104</sup> has made this point and suggested that a clear and full statement of the reasoning for rejection of the alternative options should be set out within a single document. The ODPM advice affirms that: '*Justifications for these choices will need to be robust, as they can affect decisions on major developments*'<sup>105</sup>. In view of my conclusions elsewhere it would be wise to revisit the reasons given to ensure they are robust.

**(vi) Alleged errors in scoring**

95. Submissions have been made<sup>106</sup> to the effect that the scores against SA Objectives for individual sites represent a factual error. However, as I made clear at the start of the Matter B session, I cannot agree. In my view the scoring represents a judgment that has been reached rather than a factual error and in framing the matters and issues for the Hearing session I was concerned with factual errors that underpin the scoring, which might suggest the score was not fairly attributed because it was based on wrong information. Put simply, as external examiner, I am not best placed to review the individual scores.

**(vii) Consideration of alternatives and the legality of the SA Addendum**

96. Submissions have been made<sup>107</sup> that the SA, ED.3.6, has failed to give reasons for discounting sustainable sites, such as Meon Vale. That much is common ground and that is why the SA Addendum, ED.3.6a, was produced. It must also be common ground that the SA Addendum has not yet been the subject of consultation, but that appears to be capable of being remedied during this examination.
97. I have been referred to Regulation 13 of the 2004 Regulations but that does not, in terms, refer to '*early and effective*' public consultation as has been claimed, although I acknowledge the terms of the Directive. Neither does Regulation 8 refer to '*submission*', but rather to adoption. It is clear that there is a need for a further period of consultation. I accept the point did not fall to be determined by

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<sup>104</sup> Frampton's statement for Matter B; see in particular paragraphs 6 and 7.

<sup>105</sup> Paragraph 5.B.6, Ibid.

<sup>106</sup> Including, but not restricted to, Document Ref. HD.03.

<sup>107</sup> Document Ref. HD.03.

Sales J in *Ashdown Forest Economic Development LLP v SSCLG and others* [2014] EWHC 406 (Admin)<sup>108</sup>. However *Cogent Land* is authority for curing an earlier defect during the examination process and, in line with the factual matrix in that case, the main purpose of the SA Addendum, ED.3.6a, was to: '*...outline the rationale for selecting the preferred options...[and]...the reasons why rejected options were not taken forward*'<sup>109</sup>. For these reasons I reject the claim that the Council has not complied with the requisite statutory procedure and that the CS, which relies on it, is unlawful.

98. Finally I deal with my colleague's interim conclusions in respect of East Staffordshire, which have been referred to in these submissions. At the Hearing I put the 6 bases<sup>110</sup> on which the SA was found to be deficient in that case to the Council who discounted their applicability and no party took issue with that answer during or subsequent to the Hearing. As such I reject the view that it is directly comparable here.

### **(viii) Miscellaneous points**

99. It is claimed<sup>111</sup> that Table A3 of the SA Addendum, ED.3.6a, is '*factually inaccurate and a misrepresentation*' of correspondence with the Council. I accept that the letter does indeed refer to a second option for 1,350 dwellings, which is not dealt with in the SA. However it is now conceded that there was a subsequent email<sup>112</sup> that said '*...please only consider Option 1 (the additional 550 dwellings) as part of your assessment work*'. I acknowledge that there might be reasons that underpin that decision<sup>113</sup>, but the statement in Table A3 is not untrue.
100. The same representation claims, in short, that the rationale in Table A6 is inadequate and that there is no conclusion or recommendation. I express no view on this claim but it might be said to reinforce my earlier indication that the reasoning for rejection of the alternative options should be revisited in order to ensure that it is more robust.
101. It is asserted<sup>114</sup> that the defects in the SA are not capable of being addressed during the examination process. The Council's submission might have this point in mind when it says robust oral submissions were made in the Hearing but no legal submissions in writing were provided<sup>115</sup>. A number of leading Counsel addressed the Hearing and have submitted legal opinions but I do not understand any other party to suggest that any problems with the SA cannot be addressed during the examination process. The reasoning given, in paragraphs

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<sup>108</sup> Document Ref. HD.03a.

<sup>109</sup> Taken from the '*Summary*' at the start of the SA Addendum, ED.3.6a.

<sup>110</sup> Paragraph 8 of the interim report appended to BW statement for Matter B.

<sup>111</sup> Paragraph 2.10 of its matter B statement.

<sup>112</sup> Document Ref. HD.53.

<sup>113</sup> As set out in the covering email to Document Ref. HD.53.

<sup>114</sup> Paragraph 2.1.24 of Gladman's Matter B statement

<sup>115</sup> Document Ref. HD.08, paragraph 46.

2.1.25 and 2.1.26 of Gladman's statement, refers to the Directive, the Guidance and the lack of consultation, rather than case law. In the absence of more I am not persuaded that the problems that I have identified with the SA cannot be cured during the examination.

### **Rectifying the defects in the SA and the way forward**

102. Following the judgment in the *Cogent Land* case, it is clear that, in principle, the identified defects in the SA process may be cured by a later document. Since closing the Hearing sessions I have been provided with a copy of the judgment in *No Adastral New Town Limited v Suffolk Coastal DC and SSCLG* [2015] EWCA Civ 88<sup>116</sup>, in which the Court of Appeal has confirmed the approach in *Cogent Land*. I have identified 2 crucial defects in the SA process:

- i. The admitted error as to the route of the road associated with Long Marston Airfield was a material determining factor that appears to have been instrumental in that strategic site being discounted as a sustainable option [77]; and,
- ii. Allocations SUA1, SUA2 and SUA3 were not considered in combination and no reasonable alternatives were even identified, let alone considered [82].

103. In order to rectify these defects further SA work will need to be undertaken. As part of that exercise I have given reasons why other strategic sites that have emerged at a late stage need to be considered [88]. I have also found that it would be wise for the Council to revisit the reasons given for selecting the preferred option and rejecting the alternative options to ensure that there is a robust justification [94].

104. Once the further SA work is complete it should form the basis of an SA report that meets all the relevant requirements of the Directive and the 2004 Regulations. The SA report will need to be published for public consultation and, depending on its outcome, further SA work may indicate the need for modifications to the CS. Any such modifications would need to be the subject of public consultation. The Council will need to agree the timetable with me for carrying out the necessary work, including any necessary consultation.

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<sup>116</sup> Document Ref. RD.14.

## Other aspects of legal compliance

105. Contrary to the '*Statement of Consultation*'<sup>117</sup>, Chesterton & Kingston Parish Meeting claims that it has not been communicated with, has not received newsletters from the Council and has not been involved in any discussions. At the Hearing it was said that it had retained the same email address, ending '*gmail.com*', since 2006. This address is as stated on the Warwickshire Association of Local Councils [WALC] website, which the Council subsequently referred to<sup>118</sup>. I notice the WALC website invites its members to report any changes or errors and so whilst I have noted the response of the Parish Meeting, which suggests use of '*...personal email addresses until further notice*'<sup>119</sup>, I am unclear why any known problem was not addressed at source. In any event, based on the Parish Meeting's own evidence to the Hearing, the email address that the Council has used throughout the prolonged gestation period of the CS appears to have been correct.
106. The Council has provided a copy of its email to Chesterton & Kingston Parish Meeting dated 30 July 2013, to which a copy of Issue 6 of the Council newsletter was attached. Among other things this highlights the period of public consultation on the proposed new settlement at GLH. A further email dated 1 August 2013 was sent to the same email address regarding the formal consultation. The Council has confirmed that subsequent consultations were sent to the same email address. In these circumstances I am not persuaded that the mere assertion that these were not received is made out. They might not have been received at personal email addresses but that is not the relevant test. I am satisfied the Parish Meeting has been consulted.
107. Other concerns have been addressed in the Council's statement as well as in its '*Assessment of Representations*' made at consultation stage<sup>120</sup>. Viewed in that light the consultation appears to have been in line with the '*Statement of Consultation*' and its Statement of Community Involvement<sup>121</sup>. For these reasons, having regard to all other matters raised, I find no basis to conclude that there has been a failure to meet Regulations 17, 18 and 35 of the Town & Country Planning (Local Planning) (England) Regulations 2012 [the 2012 Regulations].

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<sup>117</sup> Document Ref. ED.3.4.

<sup>118</sup> Document Ref. HD.45.

<sup>119</sup> Document Ref. HD.45a.

<sup>120</sup> Document Ref. ED2.7.

<sup>121</sup> Document Ref. ED3.2.

### **Employment: *Introduction***

108. Relevant paragraph 158 of the Framework is under a title '*Using a proportionate evidence base*'. It requires LPAs to ensure that their Plan is based on adequate, up-to-date and relevant evidence about the economic characteristics and prospects of the area. Paragraph 160 of the Framework says LPAs should have a clear understanding of business needs in their area and work with, amongst others, LEPs to prepare and maintain a robust evidence base. Paragraph 161 of the Framework states that LPAs should use this evidence base to assess the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period. Further guidance on assessing economic development needs is set out in the Guidance<sup>122</sup>.
109. The District's Employment Land Study [ELS]<sup>123</sup> was undertaken in August 2011, approximately 3 years before submission of the CS for examination and prior to the publication of the Framework in March 2012. However the CWLEP Strategic Employment Land Study [SELS]<sup>124</sup> was added to the evidence base post submission although I understand that the Council had sight of a draft at an earlier stage. The *Introduction* to the SELS confirms that the purpose of the study was to provide a robust evidence base to, amongst other things, inform the preparation of each constituent Council's Local Plan.
110. The CS contains a clear vision for the future economy of the District, albeit one that is inextricably linked with the quantitative analysis that I review below. No substantive modifications have been put forward during the examination in relation to the economic vision. As already noted [36] a change has been put forward in relation to Strategic Objective 12, which concerns the economy. However both the original and proposed wording refers to 35 hectares and it is the basis for that figure that I shall examine in this part of my report. A proposed modification to the CS would identify a projected figure for jobs growth and so I consider it does not need to be in this Objective.

### **Employment land supply: *Quantitative analysis***

111. The ELS, at paragraph 11.23, found that '*it would be appropriate to plan for provision of 25-30 hectares (net) of employment land provision over the plan period*'. The CWLEP SELS does not provide a breakdown of employment land required in each local authority area under the recommended higher growth scenario<sup>125</sup>. The Council's Matter D statement, at paragraph 2.3, therefore explains that the same percentage for the base scenario, which does include a figure for the District, has been applied to the higher growth scenario,

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<sup>122</sup> See section 2a, starting at paragraph ID 2a-030-20140306.

<sup>123</sup> Document Ref. ED.4.4.2.

<sup>124</sup> Document Ref. ED.4.4.1.

<sup>125</sup> Scenario 2 (baseline+) is recommended as the minimum estimation of quantitative need at paragraph 7.5 of Document Ref. ED.4.4.1.



which gives a figure of 31 hectares. The Council confirmed at the Hearing that this approach has been taken to the EPB and LEP.

112. As the SELS recommends this as a minimum the figure has been rounded up to 35 hectares, which a proposed modification says will be expressed as a minimum and which, based on the up to date employment land position, is calculated to be 37.4 hectares<sup>126</sup>. Although the ELS range is expressed as net figures<sup>127</sup> I am told that the SELS figures are gross<sup>128</sup>. The effect of rounding up would address any concerns that I have on this point noting, for reasons that I examine in due course, that the main allocations are relatively unconstrained and so the net developable area is likely to be high.
113. In these circumstances I reject the claim that the evidence base is out of date and I regard the assumption underpinning the derivation of the figure of 31 hectares from the SELS to be reasonable. In reaching this view I have noted the submitted evidence that shows the available premises in Stratford-upon-Avon has changed markedly between 2011, the date of the ELS, and 2014<sup>129</sup>. However we are now 3 years into the timespan of the CS and there appear to have been no significant releases in the town during that time<sup>130</sup>. In the circumstances, post-recession, it is inevitable that there has been a tightening of employment land supply. That does not persuade me that the forecast led projections are out of date or inadequate.
114. I have been referred to Table 4-18 of the SELS, which says that, based on past completions, 63 hectares of employment land would be required over the period 2011-2031. However that was not the basis on which the report recommended that future employment land requirements be calculated. The view that land take-up will be more moderate than indicated by the past completions scenario is evident in the ELS and it is acknowledged that past development rates are subject to volatility and *'...cannot be relied upon in isolation...'*<sup>131</sup>. Nevertheless past completion rates were a factor in the SELS finding that the higher growth scenario be expressed as a minimum and in that sense I am satisfied this factor has been taken into account.
115. The only alternative analysis before me is Turley's *'Employment Land Demand Assessment'*, which estimates a need for 56 hectares over the lifetime of the CS<sup>132</sup>. Table 7.1 identifies an available supply of 39.5 hectares but at the Hearing it was agreed that this excludes the

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<sup>126</sup> Set out in the Council's Matter D statement, which was agreed at the Hearing.

<sup>127</sup> See quote at [111], although I note paragraph 11.21 of the ELS says standard plot ratios are used to calculate the final employment land requirements in Figure 11.2 and so there appears to be a tension between this and the final range.

<sup>128</sup> Document Ref. HD.31a.

<sup>129</sup> See, in particular, enclosure No 2 to JLL's Matter D statement.

<sup>130</sup> Schedule of employment land at Appendix 1 to Council's Matter D statement.

<sup>131</sup> Paragraph 6.14 of the *'Employment Land Demand Assessment'* at Appendix 1 to Turley's Matter D statement.

<sup>132</sup> Table 6.4, *Ibid*, based on the Experian Baseline Scenario.

2 hectares on land to the west of Banbury Road, Southam<sup>133</sup>. This analysis would therefore suggest a deficit of 14.5 hectares. However it was acknowledged at the Hearing that the calculation includes growth in the automobile sector. Figure 4.1 of the study found that the manufacture of transport equipment was the main source of forecast change in the period 2011-2031. Although I record that my estimate of roughly a third of jobs<sup>134</sup> coming from this sector was described at the Hearing as very crude, which I accept, since there is no disaggregation I am not persuaded that this is a sound basis on which to increase the requirement. Among other things the proposed modification in respect of AML alone is 4.5 hectares even without JLR.

116. It is also material to note from Turley's study that the higher growth scenario in the SELS was found to provide a margin of choice which, with the Southam allocation and AML, would be considerably greater than the 2.5 hectares recorded in Table 7.2. The study says this flexibility factor is an allowance equivalent to 20 % of the total requirement and *'...that this additional 'buffer' would ensure a reasonable choice of sites for businesses and developers and to allow for delays in sites coming forward or premises being developed'*<sup>135</sup>. This confirms my view that the evidence base is robust and that the provision of at least 35 hectares, as proposed, has been justified.
117. At the Hearing it was suggested by one party that given that the District is already a net-importer of labour that the CS should be looking to reign in the number of jobs rather than create potentially more imbalance between the labour force supply and more demand for housing. However such an approach would be the antithesis of that set out in the Framework. Paragraph 14 says for plan-making LPAs should positively seek opportunities to meet the development needs of their area. The third core planning principle at paragraph 17 of the Framework says planning should proactively drive and support sustainable economic development to deliver the business and industrial units the country needs. In this context the negative approach that was advocated would be at odds with the Framework.

### **Breakdown in terms of use class**

118. The ELS makes clear that the need for employment land is focussed on B1a and B1b floor space<sup>136</sup> rather than B1c, B2 and B8, where the ELS identified a potential surplus<sup>137</sup>. The Council says the breakdown by use class reflects Figure 8.12 of the ELS, which consistently finds a negative requirement for industrial floor space in all scenarios. The

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<sup>133</sup> See paragraph 7.7, Ibid. The 2 hectare figure derives from the Council's response to *Inspector's Further Comments and Queries*, 7 November 2014, but this would need to be changed in the vision for Southam, on page 18 of the CS.

<sup>134</sup>  $3,080/9,640 = 32\%$  although I readily acknowledge that the latter figure is a net figure after reductions in some sectors; all taken from Figure 4.1, Ibid.

<sup>135</sup> Paragraph 7.18, Ibid.

<sup>136</sup> See, in particular, paragraphs 10.20 and 11.24 of Document Ref. ED.4.4.2.

<sup>137</sup> See, in particular, paragraphs 10.22 and 11.27 of Document Ref. ED.4.4.2.

SELS is consistent with the ELS in that Table 4-10, for Stratford, identifies no need for B2 floor space over the lifetime of the CS. It does however identify a land requirement for B8 floor space, which is not inconsistent with Figure 8.12 of the ELS. Nevertheless the ELS recommends some provision for B2 and B8 at Alcester and that has been carried through into the CS in the proposed allocation at ALC3.

119. In the face of this consistent evidence base Turley's study identifies the majority of the expected change in B-class floor space over the lifetime of the CS to be in B1c/B2 and B8. The former might well be a reflection of the anticipated growth in the car industry and, given the objections under this heading are focussed on Stratford-upon-Avon, I note that proposal SUA2 says there might be scope for B1c. Whilst I note the claim that the ELS, specifically paragraph 0.58 ix, is rooted in the past I cannot accept this given its consistency with the SELS. There appear to be significant planning permissions for around 15 hectares of land at Loxley Road, Wellesbourne, which includes both B2 and B8<sup>138</sup>. Taken with the ALC3 allocation adjacent to Arden Forest Industrial Estate, which the ELS confirms to be '*...the largest employment site in the north-west of the District*'<sup>139</sup>, there appears to be significant provision for B2. On balance I find no basis to include B2 uses within other allocations, specifically that for Proposal SUA2.
120. The position in respect of B8 is less clear because of the identified need for B8 in the ELS and SELS. I note the ELS says of land at Loxley Road, Wellesbourne that it could be '*rationalised down*'<sup>140</sup> but this might not be realistic. Amongst other things the Hearing was told that AML is currently building a storage facility at Wellesbourne. Taken with the ALC3 allocation there also appears to be significant provision for B8 both to the east and west of Stratford. Both appear to be reasonably well related to the strategic road network<sup>141</sup> that is best placed to serve such storage and distribution facilities within use class B8. Although I have reviewed the BNP Paribas evidence<sup>142</sup> the warehouse and distribution enquiries appear to be across a wide area rather than specific to Stratford. On balance I am not persuaded that there is a clear rationale to include B8 uses within Proposal SUA2.

### **Spatial distribution: Introduction**

121. I propose to deal, in turn, with each of the specific employment allocations in the CS. However I would record that the allocation at Southam was unopposed at the Hearing, which was told the relevant planning permission has been issued. In a similar vein the 3 hectare employment component of SUA1 is uncontroversial because the land is already in employment use. Indeed during the course of the examination the Council has revised its position and is now seeking

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<sup>138</sup> Schedule of employment land at Appendix 1 to Council's Matter D statement.

<sup>139</sup> Paragraph 11.30, Document Ref. ED.4.4.2.

<sup>140</sup> Paragraph 11.48, Document Ref. ED.4.4.2.

<sup>141</sup> Alcester via A435/A46 and Wellesbourne via A429 to Junction 15 of the M40.

<sup>142</sup> Enclosure No 3 to JLL's Matter D statement.

to reduce the area of SUA1, retain 2 identified areas in their current form and envisages the provision of 9,000 m<sup>2</sup> of Class B1 throughout the proposed Canal Quarter. In the circumstances I do not propose to address these proposals further at this stage of the examination.

122. By way of introduction I would also observe that whilst I propose to examine the proposed allocations, at SUA2 and SUA3, for relocation from the Canal Quarter, this is without prejudice to my eventual view on whether the housing allocation, as part of SUA1, is acceptable.

**(i) JLR**

123. The 100 hectare allocation between the existing JLR site at Gaydon Proving Ground and Junction 12 of the M40 has now been identified on a plan as the southern end of the GLH allocation<sup>143</sup>. As the Council observed in its statement specific objections to the JLR component of the allocation are not obvious. Although I accept that the allocation is locally controversial, considerations such as the loss of countryside and agricultural land yield to the national significance of what is being proposed. To underline the point, JLR told the Hearing that the allocation being sought in the CS is '*...about keeping JLR in the UK*'.

124. I have no reason to doubt that the firm's existing facility at Gaydon is the largest facility of its type in the UK, where the firm's cars are designed and tested at a unique research and development facility. Strategic Policy AS11, for the existing site, is essentially agreed and I shall comment on the detail in my final report, but the proposed allocation is envisaged to replicate that facility. Gaydon is said to have a pivotal role in JLR's business and it is claimed to be the only facility where product development and innovation can take place. In that context there are limited options for where such a large scale facility could be accommodated. Although Gaydon Proving Ground comprises an extensive area of land its form and function would rule it out as a practical option for a plant of the scale being proposed. In view of the new link road to Junction 12 of the M40, which is already under construction, the proposed site is the only realistic option.

125. Although, given that the CS looks ahead to 2031, precise details of what is proposed are inevitably not available, I consider that the allocation is fully in line with the Government's emphasis on building a strong, competitive economy. Paragraph 18 of the Framework says the Government is committed to securing economic growth in order to create jobs and prosperity. Paragraph 19 continues by stressing that the planning system should do everything it can to support and encourage sustainable economic growth, rather than to act as an impediment. It requires significant weight to be placed on the need to support economic growth through the planning system. Paragraph 20 says LPAs should plan proactively to meet the development needs of business. That is precisely what the Council has done here.

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<sup>143</sup> See hatched area on plan appended to the Council's Matter D statement.

126. For various reasons Warwickshire Wildlife Trust was unable to attend the Hearing sessions and, in view of their previous representations, I sought clarification of the position that it took with regard to the JLR allocation. Its position has now been clarified<sup>144</sup>. In claiming there is a lack of ecological evidence it is unclear whether Warwickshire Wildlife Trust has taken account of the '*Ecological Appraisal*' that has been submitted<sup>145</sup>. This records large parts of the prospective JLR allocation to be arable, species poor semi-improved grassland and improved grassland. Whilst there are features of interest, including an area of broadleaved woodland adjacent to the site and a species-rich hedgerow within it, I consider that a detailed scheme would be able to respect such features. As JLR and the Council indicated that a scheme would need to provide necessary mitigation, Warwickshire Wildlife Trust's concerns appear to be capable of resolution.
127. It is clear from the Statement of Common Ground and the Joint Statement of Intent<sup>146</sup>, to which the Highway Authority and the Highways Agency are signatories, that the transport consequences of the JLR allocation are capable of being addressed. It is agreed the Strategic Transport Assessment<sup>147</sup> examined a worst case scenario based on trip assumptions provided on behalf of JLR. The transport interventions are set out in Table 2 of the proposed modifications<sup>148</sup>. On this basis I am satisfied that this is not a fundamental constraint.
128. For these reasons I am happy to give the clear indication requested by JLR, to enable future investment decisions to be made, that the 100 hectare allocation is appropriate. I do not, at this stage, propose to express a view on whether it might be necessary for the allocation to be identified separately from any housing allocation. I merely record that it is conceivable that it could come forward on that basis.

**(ii) AML**

129. AML and the Council have agreed a Statement of Common Ground<sup>149</sup> that invites me to recommend a main modification to the CS to identify an area of approximately 4.5 hectares to meet the company's operational requirements. The area, identified on a plan appended to the Statement of Common Ground, lies to the west of the main car park on the AML site and is less than half the area that was originally sought by AML. At present it comprises a field that runs down to a small stream that demarcates the field's northern boundary. There is a public footpath that runs broadly east-west along the northern boundary of a field on the opposite side of the small valley, which facilitates views towards the area proposed to be allocated.

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<sup>144</sup> Document Ref. HD.67.

<sup>145</sup> Document Ref. RD.07.

<sup>146</sup> Document Refs. HD.43 and HD.43a, respectively.

<sup>147</sup> Document Ref. ED.4.7.1.

<sup>148</sup> Document Ref. ED.1.1d.

<sup>149</sup> Document Ref. HD.33.

130. The Statement of Common Ground records that the existing AML site comprises the business's global headquarters and in that context my earlier analysis of the Framework equally applies [125]. At the time of my inspection the recently permitted extension to the main factory had just been completed although it was yet to be fully kitted out and utilised. With this extension it was evident to me, given the extent of the current ownership<sup>150</sup>, that the AML site is very constrained. To the north-east is the village of Lighthorne Heath, to the south and east are the JLR premises and to the west is Heath Farm. AML have given reasons why areas of the existing site are unsuitable and I find no reason to disagree with that analysis<sup>151</sup>. Thus the identified area to the north-west of the site appears to be the only real option.
131. The Statement of Common Ground records that the proposed site would only be acceptable with the provision within that land parcel of strategic landscaping to protect the setting of the village of Lighthorne and the wider area of open countryside to the north; I agree. Despite the topography, the bunds around the existing car park give an indication of the sort of structural landscaping that would be necessary to effectively screen the proposed site in views from the public footpath. Whilst it is possible that a built form might project above such a bund and soft landscaping would take some time to mature to become effective, there would appear to be a number of development options available within the enlarged site. Amongst other things the existing car park has existing built development on 3 sides, which could mitigate any new building; alternatively it could be sited away from the northern boundary. Although it is not necessary for me to express a view on these detailed considerations at this stage it is evident that the allocation provides a number of options to extend the company's operation.
132. I recognise that because of the late emergence of this particular proposal, during the course of the examination Hearings, that there has been no consultation exercise with regard to this proposal. My initial findings must therefore come with the clear caveat that local residents and other interested parties have not had an opportunity to express views in writing and it is conceivable that something might arise during that process which might lead to an alternative view. However, based on the information currently before the examination, including the submitted 'Ecological Appraisal'<sup>152</sup>, I am able to give an initial indication, as requested by AML, that the proposed allocation is likely to be acceptable.

**(iii) ALC3**

133. This is one of only 2 specific sites that the ELS recommended should be allocated and whilst it suggested a 5 hectare extension it went on, at paragraph 11.31, to say: '*A larger allocation might be justifiable*

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<sup>150</sup> See plan appended to Stansgate's Matter D statement, on behalf of AML.

<sup>151</sup> See paragraph 20 of Stansgate's Matter D statement, on behalf of AML.

<sup>152</sup> Document Ref. RD.07.

*depending on the scale of housing development in the town'. The town is one of only 3 existing settlements where the CS has identified housing allocations. Amongst Main Rural Centres it is second, only to Southam, in terms of the number of dwellings in the most up-to-date Housing Trajectory<sup>153</sup>. Moreover I note the ELS says, at paragraph 9.37, it is one of the larger employment sites in the District with limited vacancy and no identifiable development sites. It continues, at paragraph 9.38, by recommending that the Council: '*...takes a longer-term view regarding the possibility of further employment development of the remaining 6.9 hectares of land to the north of the existing estate'*. It is clear this is the additional area now proposed.*

134. Inset Map 2.1 to the adopted Local Plan identifies an area to the north of Arden Forest Industrial Estate that is not within the Green Belt. This is effectively '*safeguarded land*' as referred to in paragraph 85 of the Framework, in the context of Green Belts. However my site inspection confirmed that this area is effectively landlocked and could not be accessed without demolition of existing industrial buildings or encroachment into an area designated as Green Belt. Demolition is not a practical option and might only increase the need for an even larger release. The most obvious access would be the primary access proposed off Arden Road, which appears to have been designed for this purpose as the existing cul-de-sac is over-engineered for the few units it presently serves. Without a larger Green Belt release what one might conceivably end up with is an isolated access through a field, which is clearly not a sensible proposition on any level.
135. Evidence from a local Commercial Property Agent<sup>154</sup> strongly supports the allocation. It cites the example of Arc International Tableware, who makes brands such as Pyrex, which has been forced to move to Pershore because of the absence of suitable premises in the town. The unchallenged evidence is that 2 other major employers, Dawcom and Calgavin, will have to relocate outside of Alcester if more land is not brought forward to meet their needs. In respect of the former, a high tech communication company, this would have a knock-on effect because 85 % of their component parts are said to be manufactured on the estate. Calgavin Ltd made their own representations, which stress the need for the land to be brought forward immediately<sup>155</sup>, which underlines the need to address this allocation now. Together with other examples cited in that report, including the proposed Innovation Centre, I find this evidence to be convincing. I regard it to be significant that it says the estate is geared to warehousing, manufacturing and design rather than offices, which have never been particularly successful. This supports the proposed mix, including B2, which allows for relocation from existing premises within the town.

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<sup>153</sup> See Figure 2c, Document Ref. HD.09.

<sup>154</sup> The report from Westbridge & Co is appended to Stansgate's Matter D statement, on behalf of Alcester Estates Ltd.

<sup>155</sup> Representation No 0116-1.

136. Evidence before the Examination<sup>156</sup> deals with a range of topic areas of which the following are of note. The National Trust has confirmed that the setting of Coughton Court would be protected if a 20 m wide landscape buffer outside, but adjacent to, the northern boundary of the allocation was delivered. It says that suitable controls over tree retention, building heights and materials would ensure the impact on the setting of the listed building would be no greater than that arising from the existing estate. I have been given no reason to doubt this assessment and so I am satisfied that the proposal would preserve its setting. The Council confirmed at the Hearing that it envisaged the landscape buffer being outside the allocation and so whilst there is a need for an 8 m wide corridor adjacent to the stream, along the southern boundary of the allocation, it is in prospect that the net developable area would be a high proportion of the 11 hectare site<sup>157</sup>.
137. The Council has set out<sup>158</sup> the exceptional circumstances that it says justifies the release of 7 hectares from the Green Belt in this location. No party has taken issue with this rationale. Inset Map 2.1 to the adopted Local Plan shows Alcester is surrounded by Green Belt and whilst there is some land outside the Green Belt, between the town and the A435, most of this is now allocated for housing or is constrained by flooding. Taking account of my earlier reasoning, including the urgent need for land releases and the access issue, I am satisfied that there are exceptional circumstances that justify a revision to the Green Belt boundary in the manner being proposed. In reaching this view I consider that there is no obligation to carry out a general review of the Green Belt in order to demonstrate that exceptional circumstances exist. This is underlined here because the circumstances include site specific considerations such that the need can only be met in this location, adjacent to the industrial estate.
138. Representations have been made that seek to justify an even larger release<sup>159</sup>, but they are not persuasive. It would be better for the landscaped buffer to be within the Green Belt as the existing hedgerow is a recognisable physical feature and planting beyond it would ensure that it would become a long-term defensible boundary, which is likely to be permanent<sup>160</sup>. The area to the west appears to encompass the line of the footpath as well as low lying land near the River Arrow. It is appropriate for ALC3 to seek extensive landscaping along the western boundary. No good case has been made for an extension to the allocated area in this direction, which is required to provide a buffer to users of the right of way as well as to maintain a wildlife corridor along the river. My earlier rationale applies as to why it too should be in the Green Belt.

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<sup>156</sup> Stansgate's Matter D statement, on behalf of Alcester Estates Ltd.

<sup>157</sup> The safeguarded land plus the 7 hectare Green Belt release being sought.

<sup>158</sup> Point 2 at paragraph 4.1.6, on page 67, of the CS.

<sup>159</sup> Drawing No 6895-100 Rev A, appended to Stansgate's Matter D statement.

<sup>160</sup> As required by the last-bullet point of paragraph 85 of the Framework.



139. The extension to the east is based on the provision of a secondary access via the route of Tything Road which, in turn, is based on paragraph 5.18.1 of the Warwickshire Guide. I am far from convinced that this rationale gives rise to exceptional circumstances. On its face<sup>161</sup> the Warwickshire Guide says it was adopted in 2001 as Supplementary Guidance to the Warwickshire Local Transport Plan 2000. However that is no longer the extant version of the Local Transport Plan<sup>162</sup>. Since the 'parent' policy document is no longer extant the weight, if any, to be attached to the Warwickshire Guide is very limited. Whilst there has been reference to national publications, such as Manual for Streets, there appears to be no equivalent advice. In those circumstances the case for a secondary access, still less a case for taking that land out of the Green Belt, is not compelling. At best a second access would be preferable rather than essential. Despite this I note that the Council has put forward a modification that envisages the possibility of a case being made but stops short of taking the land out of the Green Belt. That appears to be fair.
140. In summary, for the reasons set out above, I consider that allocation ALC3 is appropriate because there are exceptional circumstances that justify a revision to the Green Belt boundary in this location.

**(iv) SUA2**

141. This is the second allocation that the ELS recommended should be made, albeit not specific to the allocated site. At paragraph 11.40 it merely said: '*We would recommend that an additional 5-10 ha of land is allocated at Stratford-on-Avon for B1 uses...*'. Paragraph 11.43 continued: '*The best location for new employment development would be close to the A46 and the proposed Stratford Parkway Station. If a site with prominence from the A46 could be achieved or depending on the scale of housing provision, an allocation of over 5 ha might be justified*'. Leaving aside, for this purpose, the area proposed for relocation from the Canal Quarter, it is evident the allocation is at the top of the recommended range.
142. In these circumstances the ELS provides credible evidence Stratford town needs a new business park and grounds to reject the claim that a more significant allocation would be justified. I acknowledge the 10 hectare allocation is less than the 11 hectares that is proposed for Alcester, but I have given reasons why the respective figures derive from the evidence base. I accept Stratford-upon-Avon is identified as a Key Urban Centre in the SEP<sup>163</sup>, but the quantum of the allocations are broadly similar and Stratford remains the focus for other forms of economic activity and jobs in the District, such as tourism and retail.
143. The Proposals Map, together with Inset Map 1.1, of the adopted Local Plan confirms that the A46 demarcates the boundary of the Green

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<sup>161</sup> See page 4 of the Warwickshire Guide, Document HD.17a.

<sup>162</sup> It has now been replaced by the 2011 version; see Document Ref. ED.4.7.9.

<sup>163</sup> Page 25, Document Ref. ED.4.4.4.

Belt to the north-west of Stratford-upon-Avon. The proposed site appears to be one of the only non-Green Belt sites that meet the identified criteria. Although a site in Bishopton Lane has been put forward by one objector as a possible alternative I am satisfied that it is not available for employment purposes<sup>164</sup>. There was a reference to a site at Ryon Hill but this appears to be poorly related to the A46 and the town and in any event the site appeared to be put forward on the basis that it was evidence that Stratford did not need another business park. First the Council's unchallenged claim was that Ryon Hill is fully occupied. Second any such claim flies in the face of the evidence, including the views expressed at the Hearing. To this extent the allocation at Proposal SUA2 is justified.

144. A Landscape and Visual Impact Assessment [LVIA] has been submitted on behalf of the landowners of SUA2<sup>165</sup>. It found a visual connection between the site and the urban edge of Stratford and that the connection would be increased following the implementation of the extant planning permission<sup>166</sup>. It also found that the visibility of the site is limited to short and medium distance views due to intervening vegetation, existing built forms and the topography. It considered that appropriate mitigation planting along the site boundaries could reduce these views and any long distance glimpsed views, which could be mitigated further through internal planting and sensitive roof design. The 2012 planning permission is a significant and material change in circumstances that post-dates the Council's landscape study<sup>167</sup> and enables me to make a distinction with its findings. The perimeter landscaping, taken with other existing characteristics of the allocated site<sup>168</sup>, would ensure that the net developable area would represent a high proportion of the site.
145. It has also been submitted that SUA2 would be unsustainable but I cannot agree. The proposed allocation would be well located in relation to Stratford-upon-Avon, which the ELS describes as the main employment centre in the District, providing around 17,500 jobs<sup>169</sup>, although I recognise that many of these jobs are in the tourism and retail sectors. In my view the proposed allocation is well located in relation to existing and proposed housing, with some scope for travel to work by public transport, bicycle or on foot. It is close to Stratford Parkway Station, which might be an option for some workers. Taking account of my finding on landscape impact I regard the claim that SUA2 would be unsustainable to be unsupported by the evidence.

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<sup>164</sup> See review of alternative sites at Appendix 2 to Document Ref. ED.2.7.

<sup>165</sup> Appended to Turley's Matter D statement, on behalf of The Philip Baker Trust.

<sup>166</sup> The west of Shottery scheme for up to 800 dwellings, including a local centre and primary school, was permitted by the Secretary of State in a decision letter dated 24 October 2012 [Appeal Ref. APP/J3720/A/11/2163206].

<sup>167</sup> Document Ref. ED.4.11.3, which is dated July 2011, specifically page B325.

<sup>168</sup> As described in HD.31a.

<sup>169</sup> Paragraph 0.14 of the Executive Summary, Document Ref. ED.4.4.2.

146. Focussing specifically on the 10 hectare allocation for relocation from the Canal Quarter, my starting point is that paragraph 8.1.8 of the PBA study<sup>170</sup> found that SUA2 '*is sufficient to accommodate relocating businesses*'. The Study found that SUA2 was preferable to a Green Belt release and no argument has been made to the contrary. Whilst it was claimed that imposing the restriction on relocating businesses would be contrary to the Framework no specific reasons are given.
147. Reference has been made to my colleague's report on the West Northamptonshire Joint Core Strategy which, it is said, took issue with a restriction in terms of locally based companies. However I have few details to understand whether the situation is comparable. It is one thing to seek to restrict a fresh employment allocation in that way, but that is not what is proposed here. The bottom line is the additional 10 hectares is not justified by the ELS and so without a link back to the Canal Quarter there would be no basis for its release.
148. Concerns have been expressed that in the event that a company did relocate from the Canal Quarter but went into administration within a short period that the land might be sterilised. In response to this concern the Council has put forward a proposed modification that, in short, requires a 3-month period of marketing that would be applied for a period of 2-years from when the plot was implemented. In my view this might be an acceptable compromise that would allow for focussed marketing to companies still to relocate from the Canal Quarter, but only for a relatively short period after first relocation.
149. In summary I consider that the core allocation of 10 hectares at SUA2 is fully justified on the basis of the ELS. In the event that the Canal Quarter comes forward for redevelopment, I further accept that the additional 10 hectares for relocation of existing businesses is justified on the basis of the evidence base, including the PBA report. However my initial finding on this second component of SUA2 comes with the clear caveat that I express no view at this stage on whether the housing component of SUA1 would be acceptable because that is related to a matter on which the Council need to do further work.

**(v) REDD1 and REDD2**

150. Allocations REDD1 and REDD2 have been agreed via the DtC in order to meet the needs of Redditch due to capacity constraints within the Borough. They form part of a larger strategic employment site, which includes land in Bromsgrove District, called the Redditch Eastern Gateway. It is evident that the release of employment land in this area was endorsed in the West Midlands Regional Spatial Strategy Phase 2 Review Panel Report in September 2009. It is said that the Redditch Eastern Gateway is a '*Game Changer*' site, which is being promoted by Worcestershire LEP, Worcestershire County Council and GBSLEP, and is included in the Worcestershire SEP.

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<sup>170</sup> Document Ref. ED.4.2.2.

151. In quantum terms the only document that I have been referred to is the Redditch Employment Land Review [ELR] update 2013<sup>171</sup>. It found, at paragraph 5.3, that *'...land capable of meeting Redditch's employment needs beyond the Borough boundary in neighbouring districts must be identified to meet the shortfall of around 26 Ha'*. The table on page 36 confirms the deficit to be 26.5 hectares. The CS, at paragraph 6.13.5, refers to a figure of 27.5 hectares, which is referenced elsewhere to an earlier version of the ELR<sup>172</sup>. However, on the limited information before me, the shortfall is 26.5 not 27.5 hectares and the figure in the supporting text should be reviewed<sup>173</sup>.
152. Proposal REDD1 extends to approximately 12 hectares and Proposal REDD2 extends to approximately 7 hectares, which together total approximately 19 hectares, gross. With the proposed release of a site known as Ravensbank ADR, in Bromsgrove District, the Redditch Eastern Gateway would extend to approximately 29 hectares, which is in excess of the 26.5 hectare shortfall that is identified. However, at least in respect of the identified sites REDD1 and REDD2 that are within Stratford District, the allocations follow physical boundaries and/or the District boundary, and so there is no obvious way to reduce their size. Indeed, the Council has proposed to increase the size of the Green Belt release in response to a representation received<sup>174</sup>, which would take the Green Belt boundary back to the A435. I shall consider the case for this modification in due course.
153. An Economic Impact Study of the Redditch Eastern Gateway<sup>175</sup> found it was the best employment site in an assessment of 33 sites. It said that the site has the greatest potential to attract significant inward investment providing a major employment site opportunity, which is both highly accessible and in an attractive environment. In my view it is the site's access to the strategic road network, via the A435 to Junction 3 of the M42, which distinguishes it as a game changer for the town. A high level assessment of comparator sites has identified Redditch Eastern Gateway as the best option to meet the shortfall in employment land within Redditch. Redditch Borough Council has also undertaken SA, which found Redditch Eastern Gateway performed well<sup>176</sup>. Although there was some speculation as to alternative sites at the Hearing, notably land south of Feckenham that is unrelated to the strategic highway network and physically separate from the urban area, there has been no serious challenge to this evidence.
154. The Economic Impact Study found a new roundabout junction on the A4023 would be required to enable the comprehensive development

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<sup>171</sup> Document Ref. HD.24.

<sup>172</sup> Document Ref. ED.4.1.6 says the ELR 2012 Update identifies a shortfall of 27.5 hectares, but I have not been provided with that document and in any event it would be appropriate to work to the most recent version which is before me.

<sup>173</sup> Including at paragraphs 4.1.6 and 6.13.5.

<sup>174</sup> Representation No 2612-1.

<sup>175</sup> Document Ref. ED.4.1.6.

<sup>176</sup> Document Ref. HD.27.

of the Redditch Eastern Gateway. Amongst other things it said area REDD1 could not be developed for commercial uses without the new roundabout due to highway capacity and environmental reasons. However, as paragraph 6.13.8 of the CS records, the cost of constructing such a roundabout would not be viable unless both parcels, REDD1 and REDD2, are made available for development.

155. In this broad context I focus initially on Proposal REDD1, which is also known as Winyates Green Triangle. This site is bounded on 2 sides by dual-carriageways, the A435 running north-south and the A4023 into Redditch. The third side comprises the District boundary, which follows a small stream, but is characterised by a residential neighbourhood along Far Moor Lane, within Redditch. On this basis it has been claimed that the site would be better suited to housing in order to meet the housing requirement within Stratford. As such there appears to be no dispute that it would be appropriate for the site to be released for development in the CS; I agree. The only issue is whether it should be allocated for housing or employment uses. In view of all that I have outlined above I consider there is a clear case that employment represents the site's optimum use.
156. Turning to REDD2, which is also known as Gorcott, the Council has set out<sup>177</sup> the exceptional circumstances that it says justifies the release of 7 hectares from the Green Belt in this location. The key factor is the need for the Redditch Eastern Gateway to be delivered as a package in order to meet the employment needs of Redditch. The Economic Impact Study outlines the site's economic importance to the town, which is underlined by its high level promoters [150]. Another significant material consideration is that the roundabout is only viable with the release of the whole 29 hectares. The latest draft plan<sup>178</sup> shows the point of access from the adopted highway entering land within Stratford, which is allocated within REDD2, with the indicative highway running parallel to the District boundary to serve Ravensbank ADR as well as Gorcott. Taking account of all of the above I am satisfied that there are exceptional circumstances that justify a revision to the Green Belt boundary to release REDD2. These include site specific considerations which mean the need could only be met by release of this particular site on the edge of Redditch.
157. Gorcott Hall, which lies within a parcel of approximately 2 hectares to the north-east of allocation REDD2, is a Grade II\* listed building. The submitted '*Built Heritage Assessment*'<sup>179</sup> concludes that development of the site would give rise to less than substantial harm to the wider setting and significance of the listed building. The report identifies, at paragraph 7.2, that the site does not form part of the immediate setting of Gorcott Hall. Paragraph 4.3.9 says the mature planting surrounding the Hall forms a visual boundary between it and the site, which is emphasised by the topography, with land falling away from

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<sup>177</sup> Point 3 at paragraph 4.1.6, on page 67, of the CS.

<sup>178</sup> Document Ref. HD.14.

<sup>179</sup> Document Ref. ED.4.1.7.

the Hall providing separation ensuring the Hall and its curtilage are seen as distinct elements away from the site; I agree. Although the Hall is experienced from the public footpath views of it are limited.

158. Paragraph 7.5 of the report concludes that the *'very minimal extent' of the harm '...is balanced, if not out-weighted by the provision of much-needed industrial infrastructure'*. The public benefits, which the Economic Impact Study says could include up to 1,336 net additional jobs and £74.3 million net additional GVA [Gross Value Added] per annum, would outweigh the less than substantial harm to the setting of the listed building. In any event the policy framework would ensure any proposals would protect the character and setting of Gorcott Hall. As the Heritage Assessment anticipates, this might include factors such as design, planting, noise attenuation and street lighting. In these circumstances I am satisfied that the allocation would preserve the setting of the listed building.
159. Under this heading I turn finally to the proposition that Gorcott Hall and its associated land, totalling around 2 hectares, should be taken out of the Green Belt. The Council's position in this matter appears to be confused. In Document ED.1.1b it has provided a plan that shows a proposed amendment to the boundary that would take this whole 2 hectare area out of the Green Belt. The rationale appears to be by reference to the sixth bullet-point of paragraph 85 of the Framework, which says that boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent. I accept that the A435 would fall into this category.
160. However paragraph 10.15 of the Council's Matter D statement says: *'The boundary that has been proposed for REDD2 does not fully utilise physical features. Therefore, the attached plan suggests an amended boundary, following the existing, well established tree/hedge planting which defines the curtilage of Gorcott Hall...'* [*my emphasis*]. The plan thereby appended contains a very minor change to the REDD2 allocation but, crucially, excludes the whole of Gorcott Hall and its associated landholding. Having regard to the photographs in the *'Built Heritage Assessment'*<sup>180</sup>, the boundary does appear to be a readily recognisable feature. In these circumstances, having taken account of the relevant representation, I am unable to conclude that exceptional circumstances exist. On the Council's own evidence there is a clear boundary on the ground that can form the basis of the Green Belt boundary and the rationale that underpins the wider release cannot be held to apply to the additional 2 hectares.
161. I am satisfied that the tree/hedgerow boundary is a permanent feature that would not need to be altered at the end of the plan period, in line with the penultimate bullet-point of paragraph 85 of the Framework. The existing hedgerow marks the boundary of the listed curtilage and planting around the employment release, which is

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<sup>180</sup> Including Plate Nos 10, 11, 12, 39, 51, 53, 54, 55, 56 and 57, Document Ref. ED.4.1.7, which I have used in the absence of public access to Gorcott Hall.

required for a number of reasons, including having regard to the site's elevation<sup>181</sup>, would reinforce this boundary. The topography might suggest the net area might be rather less than the gross and this supports an allocation in excess of the identified shortfall.

162. Amongst other things, on the limited information before me, I am unclear whether the land on the other side of the District boundary, within Bromsgrove, is within the Green Belt or not. If it is then the District boundary which, along with the A435, would be the other Green Belt boundary if the further release was endorsed, might not comply with the advice in paragraph 85. This is not an issue along the remainder of the north-west REDD2 boundary because it adjoins the proposed Ravensbank ADR allocation. This factor tends to support my finding that no exceptional circumstances exist.

163. In summary I consider that allocations REDD1 and REDD2 have been justified and are therefore appropriate. Both are required to meet the employment needs of Redditch. I have also given reasons as to why there are exceptional circumstances that justify a revision to the Green Belt boundary in this location, but only to release REDD2.

**(vi) SUA 3**

164. The Council has set out<sup>182</sup> the exceptional circumstances that it says justifies the release of 15 hectares from the Green Belt to the north of Stratford. Proposal SUA3 says that employment and commercial uses relocating from the Canal Quarter are to be delivered on a minimum of 9 hectares, together with uses that will help to facilitate the relocation process. In this context my earlier caveats apply.

165. Paragraph 8.1.9 of the PBA study<sup>183</sup>, which in this respect forms the key element of the Council's evidence base, found that as SUA3 *'...is within greenbelt it is considered that this is the site that should be dropped and not be identified in the Core Strategy as there [is] insufficient evidence to support a greenbelt release'*.

166. The only document in the evidence base that sought to justify the allocation in the face of this external study is a brief supplementary report<sup>184</sup>. As I suggested at the Hearing this document is really not up to the task. On the basis of a desktop exercise it asserts, without showing any working, that the best available estimate of the land requirement for relocation is about 20 hectares, including Western Road, or about 16 hectares, without it. Given that the PBA study recommends a 10 hectare site at SUA2, this might suggest between 6 and 10 hectares need to be identified elsewhere. The Council says this does not include DCS, which could need up to 10 hectares, but it is clear this figure does not solely arise from the Canal Quarter.

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<sup>181</sup> See, amongst other things, Figure 6 of Document Ref. ED.4.1.7.

<sup>182</sup> Point 2 at paragraph 4.1.6, on page 67, of the CS.

<sup>183</sup> Document Ref. ED.4.2.2.

<sup>184</sup> Document Ref. ED.4.2.3.

167. In sharp contrast to this crude analysis one party<sup>185</sup> has provided an analysis of all of the buildings and occupiers in the Canal Quarter based on the Valuation Office Agency [VOA] Database. In respect of the land to the west of the railway line, which is the only area on which the PBA study anticipates housing to be delivered within the lifetime of the plan<sup>186</sup>, it identifies a floor space of 62,908 m<sup>2</sup>. Listers confirmed at the Hearing that their unit, No 13, does not need to be replaced *'within Stratford upon Avon or the District [because Listers] ...can be flexible in its approach to finding an alternative site'*<sup>187</sup>. This unit is 10,004 m<sup>2</sup>, which means the revised floor space is 52,904 m<sup>2</sup>.
168. The SELS<sup>188</sup> and Turley's study<sup>189</sup> provide a sound basis to assume the plot ratio would vary between 40 %, for B1c and B2, and 50 %, for B1a/b and B8. So whilst it is difficult to be precise because some of the data is expressed, by way of example, as B2/B8 uses, I said at the Hearing that this might provide a basis for a land requirement of between 10.6 and 13.2 hectares<sup>190</sup>. Although I acknowledge the Council has subsequently revisited the employment allocation in SUA1, at the date of the Matter D Hearing 3 hectares was proposed in SUA1, plus the 10 hectares in SUA2, which led me to suggest there was effectively no need to make any provision for employment land beyond these sites for the relocation of any existing businesses. Whilst I recognise that DCS wish to combine its operation on a single site, this suggests to me that it could be viewed as a hybrid case, i.e. it could legitimately take part of the fresh allocation on SUA2 because its other site would be recycled for employment uses.
169. Following my criticism the Council revisited its supplementary report and produced a revised report with table<sup>191</sup>. At face value this does not progress matters very far. Excluding Listers, as per my earlier reasoning, this identifies that the current occupiers of Areas 1 and 2, to the west of the railway, occupy 10.63 hectares, which is just 0.63 hectares more than the SUA2 allocation for this purpose. Indeed even if Areas 3 and 4 are included, the current area is approximately 18 hectares, less the 3 hectares<sup>192</sup> within SUA1 and 10 hectares within SUA2, gives rise to a figure of 5 hectares. However that includes areas which the PBA study does not anticipate coming

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<sup>185</sup> Appended to the Matter D statement of JLL.

<sup>186</sup> For a summary see Table 6.8, Document ED.4.2.2.

<sup>187</sup> Quotes taken from Matter I statement on behalf of Listers.

<sup>188</sup> Table 4-1, Document Ref. ED.4.4.1, said to be based on ODPM guidance.

<sup>189</sup> Table 6.1, Ibid, which is also said to draw on industry proxies.

<sup>190</sup> 52,904 m<sup>2</sup> x 50 % plot ratio = 10.6 ha and 52,904 m<sup>2</sup> x 40 % plot ratio = 13.2 ha. This assumes the quoted floor space figures comprise its footprint, which might not be true in the case of some of the properties that are listed, such as the 5-storey office block at 20 Timothy's Bridge Road.

<sup>191</sup> Document Ref. HD.30.

<sup>192</sup> For this purpose the 3 hectares are relevant because the alternative is that some of the identified sites within areas 3 and 4, which the Council have otherwise listed, would not be redeveloped.



forward for housing within the lifetime of the CS. This exercise does not therefore justify a 15 hectare release in the Green Belt either.

170. The Council has, albeit at a very late stage<sup>193</sup>, undertaken an analysis of alternative sites around Stratford in an attempt to show there are none available. The sites can reasonably be described as essentially contiguous with the urban area. I have no reason to criticise the reasons given for rejection of the sites that have been considered. However I regard the omission of Atherstone Airfield as significant. As I suggested at the Hearing Atherstone Airfield is a similar distance from the town centre as SUA3, indeed in travel time it might be less. It is in one ownership and it is available. It is not in the Green Belt. At the very least it merits proper consideration as an alternative site.
171. In what is in effect a footnote to the alternative sites analysis the Council says: '*Businesses generally find locations south of the river unattractive due to poorer accessibility to the strategic road network. This is evident from the lack of take-up of plots on the Stratford Business and Technology Park on Banbury Road. It should be noted that this argument was made by the owner in support of developing the remainder of the site for housing, which was accepted by the District Planning Authority*'. However this is inconsistent with the submission on behalf of Atherstone Airfield, which refers to a choice of routes to the strategic highways network. It also refers, amongst other things, to a recent approach for a new 25,000 sq ft [2,323 m<sup>2</sup>] unit from a company based between Stratford and Shipston.
172. Crucially my site inspection revealed a unit under construction and this shows up on Appendix 1 to the Council's statement as a B2/B8 unit of 2,810 m<sup>2</sup>. On this basis it is clear the Council also regard it to be an acceptable location for a new industrial unit. My inspection broadly confirmed the submissions made on behalf of the landowner that the site is, in many ways, well suited to such uses. The runways have been planted as woodland and provide an effective screen. The mass of the existing buildings strongly suggests that a further large unit, or units, could be accommodated within the identified site<sup>194</sup> without detracting from the character and appearance of the area.
173. The key issue that does not work in its favour is that the site is within the Vale of Evesham Control Zone, as proposed under Policy CS14. However the plan of this area<sup>195</sup> reveals this site to be an anomaly because it is outside the network of main roads that otherwise form its boundary. This view is consistent with the comments attributed to the Highway Authority on a recent planning application<sup>196</sup>, which says that the A3400 and A429 are designated lorry routes. I regard it to be inevitable that lorries going to and from Atherstone Airfield would use the A3400 to link to other main roads when travelling to and

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<sup>193</sup> See Appendix 2 to Document Ref. ED.2.7, undertaken after consultation.

<sup>194</sup> Edged red on the plan within enclosure 1 to the JLL Matter D statement.

<sup>195</sup> Figure X to the SPG, Document Ref. ED.5.11.

<sup>196</sup> See quote at paragraph 54 of the JLL statement in respect of Matter D.

from the site; it is most unlikely they would enter the control zone. In these circumstances it is difficult to understand why Atherstone Airfield is within the Vale of Evesham Control Zone as it serves no purpose.

174. The Highway Authority did not provide a statement to explain the rationale for the site being in the control zone and whilst it did attend the Hearing I am not persuaded that a sound reason was given for its inclusion. I appreciate that at the Transport Assessment stage the airfield would need to be in the zone to apply the policy, but if the main roads are designated lorry routes then there is most unlikely to be any impact on settlements in the zone because HGVs will traverse around it. That simple and inescapable logic undermines the rationale for Policy CS14 to be applied to the site and leads me to find that a revision to the boundary, so that it would run along the A3400, would be appropriate. For these reasons I am in no doubt that Atherstone Airfield is a viable alternative to SUA3 for the relocation of B2 and B8 uses. In any event the Highway Authority did not see the policy as a fundamental constraint to further development at Atherstone Airfield.
175. Listers said in its statement that Area 4 in the Canal Quarter is *'...not deliverable within this plan period or viable'* so that *'...it may not be appropriate or necessary for allocation SUA3'*<sup>197</sup>. I accept that view informed the approach taken in the PBA study<sup>198</sup>. However at the Stratford-upon-Avon Matter I session Listers indicated that if a good relocation opportunity arose that redevelopment plans could move forward before 2031. It was said Western Road is an unconventional place to sell cars and that as the company is actively engaged in site assembly in that area this would be a benefit as there would be less people to deal with. Investment decisions in new car showrooms could be put back if more suitable larger sites could be identified.
176. I accept that SUA3 has a main road frontage, co-location near the existing Mini dealer would have advantages and that there is expert evidence<sup>199</sup> to support the preference of car dealerships for SUA3. Bearing in mind that the PBA study does not anticipate the Western Road area coming forward within the lifetime of the CS, this does not, even in combination with the revised position taken by Listers at the Hearing, amount to exceptional circumstances in my view. Although the Council has suggested that the northern part of SUA2 is reserved for new companies<sup>200</sup>, this is not reflected in the policy. In these circumstances I am far from persuaded that SUA2 would be an unacceptable location for the relocation of car dealerships. It remains in prospect that they could enjoy a prominent frontage, potentially visible from the trunk road, and there might be a synergistic effect.

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<sup>197</sup> Quotes taken from Matter I statement on behalf of Listers.

<sup>198</sup> See for example Table 4.1, Document Ref. ED.4.2.2.

<sup>199</sup> Appendix 1 to Matter I statement of Framptons.

<sup>200</sup> Document Ref. HD.31a.

177. Amongst other things I note that the Hearing was told that the JLR franchise had agreed that if SUA3 became available that it would move straight away and would look for a site of 2.3 hectares. The Council appeared to regard this as something that would fall within the second limb of the policy, namely uses that will help to facilitate the relocation process. However as the JLR franchise occupies a main road frontage on the Birmingham Road that is wholly unrelated to the Canal Quarter I fail to understand its eligibility. The proposition appears to be that it would free up its site to a car dealership within Western Road, but the link is tenuous and the site could equally go for an alternative end use, such as housing. It reinforces my view that exceptional circumstances do not exist for this scale of release.
178. The Hearing was further advised that discussions were underway with Jewsons and Buildbase with a view to reaching agreement with them to move from Area 3 within the Canal Quarter to SUA3. I note from the PBA study<sup>201</sup> that Jewsons had previously indicated that it might '*...consider relocation to an appropriate site south of the river*'. Whilst it is unclear whether it had a specific site in mind the evidence given at the Hearing does not justify the release of SUA3 for this purpose.
179. Exceptional circumstances need to be shown on the basis of robust evidence and that is conspicuous by its absence in respect of SUA3. As was observed at the Hearing the evidence seemed to change over the course of just over a week. Accordingly I reject the claim that without SUA3 there will be no regeneration of the Canal Quarter. The PBA study does not anticipate the area that Jewsons occupy coming forward for redevelopment within the lifetime of the CS.
180. The PBA study, at paragraph 6.3.2, says it was understood that the '*...Council has a preference not to use compulsory purchase powers*'. At the Stratford-upon-Avon Matter I session, again for the first time, the Council said that PBA had been wrong in that assumption and that it was not opposed to using CPO powers. I accept that it was qualified to be a last resort but I still find it surprising that the Council's own consultants would have got such a basic assumption wrong. However this too does not alter my view regarding SUA3.
181. For the above reasons, and taking all other matters into account, I find no exceptional circumstances exist that would justify a revision to the Green Belt boundary to release SUA3. My reasoning is further reinforced by the somewhat arbitrary extent of the land shown on the relevant plan in Document ED.1.1b. I ask rhetorically why one would exclude the Mini dealership but include the open field behind those commercial premises? A significant part of the eastern boundary of the proposed allocation does not even appear to follow an existing field boundary on the ground. In this respect the proposed allocation appears to be the antithesis of paragraph 85 of the Framework.

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<sup>201</sup> Table 4.1, Document Ref. ED.4.2.2.

182. Without prejudice to any future finding in terms of the housing component of SUA1, what the Council might wish to investigate is whether there might be scope to make an alternative allocation at Atherstone Airfield. In particular there might be merit in considering whether DCS could relocate to the airfield in order to maximise the effectiveness of the SUA2 allocation. I have given reasons why the Council's report gives a basis to identify a need for 5 hectares [169] and I note DCS currently occupies a site of 4.87 hectares within the Canal Quarter. In terms of traffic generation and the relationship with Stratford it is material that the Hearing was told that the second DCS factory is at Long Marston, which is within the Vale of Evesham Control Zone. If it were acceptable for DCS to move to Atherstone Airfield on a 10 hectare site this has the potential to free up the remaining SUA2 site to accommodate, on a like for like basis, the current floor space of all other occupiers within the Canal Quarter.
183. Alternatively there might be scope for other B2/B8 uses within the Canal Quarter to relocate to Atherstone Airfield and so a generic allocation could be considered. To this limited extent I invite the Council to undertake further work, which would need to be subject to SA, including in combination with Proposals SUA1 and SUA2. However I do so against a clear finding that the PBA study<sup>202</sup>, being the Council's main evidence in this respect, saw no need for release of a second site in addition to SUA2 [146, 165]. For this reason I can be certain that deletion of SUA3 would not in itself prejudice delivery of the Canal Quarter regeneration scheme within the life of the CS.

### **Employment: *Conclusions***

184. I consider the CS is based on a clear economic vision and strategy, at least in terms of quantum [110].
185. I have given reasons for finding that the CS is based on adequate, up-to-date and relevant evidence that has properly assessed the quantitative needs of economic activity in the District [112, 116] and which justifies the mix of proposed employment releases [118-120].
186. I have given reasons for finding that the employment allocations in the CS are, in the main, justified by the evidence [128, 132, 140, 149 and 163]. However I have found that there are no exceptional circumstances to justify the release of 15 hectares of Green Belt land at SUA3 [181] or 2 hectares at Gorcott Hall and its associated curtilage [160] from the Green Belt. In total, out of the 31 hectares of Green Belt land that are proposed for release in the CS, I have found exceptional circumstances exist to release just 14 hectares.
187. Finally I have found there is no justification for Atherstone Airfield to be included within the Vale of Evesham Control Zone [173] and that the Council might wish to explore the opportunity that the site offers for the relocation of B2 and B8 uses from the Canal Quarter [182].

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<sup>202</sup> Document Ref. ED.4.2.2.

## **Housing Strategy and Housing Supply: *Background***

188. The Council's '*Topic Paper 1: Development Strategy*' summarises the long gestation of the CS and the different scenarios and options that have been considered at each stage. The Council state that from an early stage, in 2009, there was '*...a strong body of support for a new settlement*'<sup>203</sup>. The consultation in 2010 gave rise to concerns about the impact of large-scale development in Stratford-upon-Avon. The consultation in 2012 gave rise to what is said to be a '*...significant level of support...for the principle of a wider dispersal approach*'<sup>204</sup>.
189. The Topic Paper records the population of the District to be 120,500 with around 27,000 residents in Stratford-upon-Avon<sup>205</sup> the largest town, which represents around 22 % of the population of the District. Below this are 8 smaller towns, which the adopted Local Plan calls Main Rural Centres [MRCs], namely: Alcester, Bidford-on-Avon, Kineton, Henley-in-Arden, Shipston-on-Stour, Southam, Studley and Wellesbourne. The combined population<sup>206</sup> of these towns is around 40,000 residents, which represents over 33 % of the population of the District. The remaining 45 % of the District's residents live in the rural area, which covers approximately half of Warwickshire. It is notable that the Hearing was told the District is one of the top ten largest Districts in England. It is self-evidently a large rural District.
190. The figures discussed in this section of the report are taken from the latest version of the main modifications, but I regard it as inevitable that they are going to have to be revisited in the light of my earlier analysis, specifically with regard to OAN [54]. This does not detract from the sentiments that are expressed below which, in the main, should be read as generic proportions rather than specific figures.

## ***CS housing strategy***

191. The latest version of the housing trajectory is included in the main modifications that formed the basis of the discussion on the final afternoon of the Hearing. Essentially it is that found at Figure 2c of the *Housing Implementation Strategy*<sup>207</sup>, except the figure for Local Service Villages [LSVs] has increased to 2,000 and, hence, the total for the CS has increased to 11,405. When the breakdown of this revised distribution is analysed it gives rise to the following<sup>208</sup>:
- Stratford: 2,684 dwellings or 23.5 % of what is proposed;

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<sup>203</sup> Paragraph 6.4.3, Document Ref. ED.5.5, but it is evident from the associated tables, which show over half of respondents consistently supported this option.

<sup>204</sup> Paragraph 6.6.4, Document Ref. ED.5.5.

<sup>205</sup> Paragraph 6.1.2 of the CS says 26,000 residents, but this is still around 22 %.

<sup>206</sup> Source: paragraph 1.17, Council's statement for Matter E, but adding together the figures in paragraphs 6.2.2, 6.3.2, 6.4.3, 6.5.4, 6.6.3, 6.7.2, 6.8.2 and 6.9.4 of the CS suggests the figure is approximately 41,000 residents, or 34 %. The difference might be due to Parish boundaries and hence it is not significant.

<sup>207</sup> Document Ref. HD.09.

<sup>208</sup> Note: these figures update those that formed the basis of the discussion at the Hearing, which were calculated against the original housing figure of 10,800.

- MRCs: 2,910 dwellings or 25.5 % of what is proposed;
- LSVs: 2,000 dwellings or 17.5 % of what is proposed;
- New town: 2,500 dwellings or 22 % of what is proposed; and,
- Rural locations: 1,311 dwellings or 11.5% of what is proposed.

I accept that there is little justification for attaching significant weight to these percentages, but I consider that they are a useful guide for the assessment of what is proposed in the context of what exists.

### ***Stratford and the main towns***

192. There appears to be a broad measure of support for a distribution that identifies Stratford-upon-Avon and the 8 MRCs as sustainable locations. This terminology, sustainable locations, is now put forward as a main modification in preference to 'hierarchy' and since I think it is fair to say that at no stage did the Council propose a 'town first' ranking system or, as the case may be, to prioritise LSVs over Large Rural Brownfield Sites [LRBS], the revised wording would be more appropriate. Whilst the proposed distribution would see around 49 % of new dwellings directed to these 9 towns, which is slightly below the 55 % of the District's existing population that they accommodate, the housing strategy essentially perpetuates the existing balance. There is no obvious reason why the existing pattern should be called into question and so I consider that it is appropriate to focus at least 49 % of the housing requirement into these 9 existing settlements.

193. Stratford-upon-Avon supports an extensive range of shops and services and is the focus for public transport serving both the District and various towns and cities beyond. As I have already noted it is the focus for economic activity and jobs in the District [142]. I find no clear basis on which to disagree with the Council's claim that the sum of the 8 MRCs, in terms of the level and range of services and facilities, does not match that of Stratford-upon-Avon. This might be said to support a case for focussing additional housing into the town.

194. However, in percentage terms, Stratford-upon-Avon is scheduled to take slightly above its share of new housing when compared to its population relative to that of the District [189, 191]. Given the preference that has been expressed during consultation [188] I find no reason to criticise the apportionment currently proposed in the CS. It would still be the largest urban centre in the District and so I reject the claim that this approach contradicts the priorities of the SEP<sup>209</sup>. Nevertheless there might be scope to increase the allocation because there can be no doubt that the town is a highly sustainable location for further housing. Although a matter for the Council to consider in the first instance the town might be able to accommodate a higher level of growth without harming its character or causing traffic problems. The Strategic Housing Land Availability Assessment [SHLAA]<sup>210</sup> confirms that there are a number of unconstrained sites, many of which were promoted at the Hearing.

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<sup>209</sup> Reference has been made to page 25 of the SEP, Document Ref. ED.4.4.4.

<sup>210</sup> See in particular the summary maps in Document Ref. ED.4.1.2.

195. I consider that it would be an unnecessary complication to formally distinguish between different types of MRCs, such as primary and secondary. In practice the housing trajectory shows that the distribution between the MRCs is uneven in any event. Around 45 % of those dwellings that have been allocated and/or granted planning permission within MRCs since 2011 have been directed to Alcester and Southam<sup>211</sup>. This appears to be consistent with the employment allocations that are proposed for these towns, particularly the former. The distribution to MRCs might be said to be about right, but there remains scope to increase the amount. In my view it is material that they presently house more than 33 % of the resident population and generically the 8 MRCs appear to be a highly sustainable location. The SHLAA<sup>212</sup> confirms there are a number of potential sites, many of which are not subject to footnote 9 [of the Framework] constraints.
196. The latest housing trajectory identifies 537 dwellings in what is effectively a 'to be' allocated column within the '*MRC Unspecified*' row, net of windfalls. Given that planning permissions that are continuing to come forward<sup>213</sup> would be set against the total in this row, I reject the claim it is necessary to allocate these in the CS. It is fair to anticipate that the residual figure will come forward via the Site Allocations Plan or Neighbourhood Plans. I acknowledge that the Hearing was told that 7 out of the 8 MRCs are proposing to bring forward Neighbourhood Plans, but a proposed main modification says the figure in the supporting text for each MRC would be modified to reflect the latest situation. There remains scope for this figure to give a clear steer to those preparing Neighbourhood Plans so there would be no ambiguity about the scale of provision needed in each MRC. Alternatively the Council suggested the Site Allocations Plan could effectively override a Neighbourhood Plan that failed to make the required level of provision. The first option might be preferable.

### **Local Service Villages**

197. There has been some criticism of the level of housing proposed for LSVs, but in the context of a large rural District some level of housing in villages would be appropriate. The housing strategy in the adopted Local Plan, and its predecessors, appears to have been successful in directing new housing to the main towns<sup>214</sup>. There is evidence before the examination that this pattern has continued to be quite marked since 2001<sup>215</sup>. Amongst other things the growth in the number of

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<sup>211</sup> 482 [Alcester] plus 528 [Southam] expressed as a percentage of 2223 [which is the total allocation to MRCs of 2,910 less the 687 'MRC Unspecified', which are proposed to be allocated at a later stage].

<sup>212</sup> See in particular the summary maps in Document Ref. ED.4.1.2.

<sup>213</sup> One of the most recent of which is Appeal Ref: APP/J3720/A/13/2194850 on land north of Campden Road, Shipston-on-Stour for up to 54 dwellings, as well as a retail store, community use and a large 'extra care' retirement development.

<sup>214</sup> See for example paragraph 1.2.12 of the CS.

<sup>215</sup> See for example research by Rural Solutions for Gladman referred to as part of its statement for Matter I, LSV, session.

households in the urban part of the District is said to be nearly ten times higher in percentage terms than in the rural area and this is said to have given rise to a disproportionate ageing demographic within the rural area. In the context of a District in which 45 % of the existing population lives outside the main towns, the level of housing that is proposed to be directed to the main villages would help to address these problems and sustain their long-term future. I have no reason to doubt the Council's claim that there are another 100 villages below category 4, which underlines that the housing is being directed to the largest, most sustainable, rural settlements.

198. Inevitably such an approach is subject to the complaint that this would lead to a less sustainable pattern of development, in terms of, among other things, transport patterns and access to retail facilities. However the LSV methodology has expressly taken account of the existence of public transport and village shops, as well as settlement size and whether there is a primary school, in categorising villages. It might have been better if the methodology had taken account of employment, but I am not convinced that the end result is unfit for purpose. In my view the list of villages, as proposed to be modified, is a reasonable basis on which to direct the 2,000 dwellings currently proposed, in order to achieve a sustainable outcome. This level of housing would help to sustain the existing services and facilities in these villages, including public transport, primary schools and shops. At a minimum it would maintain the vitality of rural communities and therefore comply with the policy in paragraph 55 of the Framework, which seeks to promote sustainable development in rural areas.
199. I acknowledge that the rationale for the current figure of 2,000 dwellings appears to be rather arbitrary. The Council's explanation is that the overall quantum has been derived using a bottom-up approach taking the approximate mid-point of the ranges deemed appropriate for each category of LSV. However the chosen ranges necessarily involve a value judgment and so it is hard to escape the view they were established in order to achieve the residual number of dwellings specified in the CS. Nevertheless, for the reasons discussed, I am not convinced that the end result is inappropriate.
200. As I suggested at the Hearing there is a problem with the approach to LSVs in the CS insofar as the methodology fails to take account of Green Belt. In my view the original range of dwelling numbers for each category was unsatisfactory when viewed in this light because, without any evidence of the capacity for each village to accommodate a minimum number of dwellings, this could have required Green Belt releases. With no attempt to demonstrate exceptional circumstances I am unclear how I could have found such an approach to be sound. However the Council has recognised the shortcomings of this aspect of its approach and has put forward a revised form of words as a main modification, which in my view gives rise to greater flexibility. It would ensure there would be no conflict with Green Belt policy.



201. Noting that the number of dwellings allocated to LSVs has increased from 1,950, in the CS, to 1,970, e.g. in the *Housing Implementation Strategy*, and now to 2,000, as proposed to be modified, I consider that the Council would need to robustly justify any further increase. I note that the SA process<sup>216</sup> looked at increasing the LSV allocation from 1,800 to 2,150 and gave reasons for discounting this option, but the CS is already over half way towards the higher figure. In this respect Topic Paper 1 says<sup>217</sup>: '*...an over-reliance on dispersing development to smaller villages would not be appropriate due to the impact this would have on their character and the need to travel longer distances, most likely by car, to shops, services, jobs, schools, etc'*. Although it is unclear whether the Council subscribes to this view, it might suggest that there are limits to the dispersal option.
202. Evidence before the examination suggests there are a number of footnote 9 [of the Framework] constraints that might restrict a number of the identified LSVs from delivering<sup>218</sup>. I have reviewed this evidence by going back to the quoted source documents<sup>219</sup> and the points appear to be well founded. Given that roughly half the number of houses in LSVs already have planning permission<sup>220</sup> I have no reason to find that the existing allocation is undeliverable. However it would need to be shown why any further increase in the numbers allocated to LSVs would be a sustainable option when, taking account of Green Belt, other villages in some categories might already need to take, in relative terms, a large number of dwellings.

### ***Other components of the housing strategy***

203. The other components of the rural housing strategy are LRBS and Other Rural Locations. During the examination the Council has put forward various changes to its vision and a new strategic objective that provides a renewed emphasis on previously-developed land. Despite this the Council does not find it to be appropriate to allocate further housing beyond the 700 units, or 6 %, that already have planning permission on LRBS. The Council does not appear to be short of options within this category and in the event that the OAN is increased there would appear to be scope to revisit this conclusion. However, in the context of the required SA work, that is a matter for the Council to consider in the first instance.
204. Within the Other Rural Locations category are dwellings elsewhere in the rural area. Within the 611 units, or 5.5 %, that are allocated to this category the vast majority already have planning permission. The balance comprises a windfall allowance which, together with a similar allowance for Stratford-upon-Avon and the MRCs, works out at 27 dpa over the last 15 years of the plan period. The basis for this

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<sup>216</sup> Table A6, Document Ref. ED.3.6a.

<sup>217</sup> Paragraph 6.8.8, Document Ref. ED.5.5.

<sup>218</sup> See BW analysis in the table in its statement for Matter I, LSV, session.

<sup>219</sup> The summary maps, Document Ref. ED.4.1.2.

<sup>220</sup> LSV row in Figure 2c, Housing Trajectory, Document Ref. HD.09.

figure is data over the last 3 years because the moratorium skewed the position before that, although historic data<sup>221</sup> would still appear to support a figure of 27 dpa. I hope it is fair to say that there was a consensus at the relevant, Matter F, Hearing session that this was a realistic figure. I consider there is compelling evidence<sup>222</sup> to support this windfall allowance, including within the Other Rural Locations. In the context of a continuation of the restrictive approach to dwellings in the countryside, however, there appears to be no scope to meet any increase in the housing requirement in the Other Rural Locations.

205. The other major component within the housing strategy is the new town and I have already noted some support for this approach, albeit unrelated to the spatial outcome [188]. In view of the scope of the required SA work I do not intend to say a great deal under this head. In the event that this additional work confirms GLH, the proposed trajectory, which has been the subject of sustained criticism from a number of parties, appears to be tight. Taken with the acknowledged lack of 'headroom' in the housing trajectory, which has not materially changed despite the increase in the OAN from 10,800 to 11,320, this factor strongly suggests that greater flexibility needs to be built into the CS to give a margin of appreciation above the eventual housing requirement agreed. This is irrespective of the reserve sites policy.
206. If GLH is retained as the new settlement option it would not appear to have any scope to deliver more than 2,500 houses within the plan period to 2031. Accordingly it appears that, for the reasons I have identified, any increase in the OAN would need to be directed to, in no particular order, Stratford-upon-Avon, the 8 MRCs or LRBS. There appears to be limited scope within the LSVs [201, 202] and no scope elsewhere in the Other Rural Locations [204]. This broad observation might assist the Council in the further SA work it needs to undertake. However, depending on the scale of the housing requirement, there might be other options, possibly including a second new settlement. This analysis is equally applicable to any future consideration of reserve sites.

### ***More detailed aspects of housing land supply***

207. Paragraph 47 of the Framework says: *'To boost significantly the supply of housing, local planning authorities should: ... • identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer to 5 % (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20 % (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to*

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<sup>221</sup> See Figure 1, Document Ref. ED.4.1.2.

<sup>222</sup> Figure H5, Authority Monitoring Report 2012-2014, Document Ref. ED.5.3.a; even if the focus is restricted to small windfalls the average is more than 27.

*ensure choice and competition in the market for land [and] • identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15'.*

208. Allied to this the Guidance says<sup>223</sup>: *'The approach to identifying a record of persistent under delivery of housing involves questions of judgment for the decision maker in order to determine whether or not a particular degree of under delivery of housing triggers the requirement to bring forward an additional supply of housing.... The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle'.*
209. The Council conceded at the relevant, Matter F, Hearing that it would be appropriate to apply a 20 % buffer at the moment. There have been a number of recent appeals that have confirmed this approach and I find no reason to disagree. I consider the most relevant table for this purpose is Figure H1a<sup>224</sup>, which shows completions against the Local Plan target, albeit this should be adjusted post 2011 for the current OAN, 566, which will itself need to be reviewed. It is clear that the housing target has only been met twice in the last 10-years and that over the 13-years for which figures are given the average<sup>225</sup> is materially below the adopted Local Plan target. On any measure I consider this is a record of persistent under delivery of housing.
210. The most recent housing trajectory<sup>226</sup> shows front loaded provision in the early years of the plan period going forward from 2015. This is graphically illustrated on the Housing Trajectory Graph<sup>227</sup>, which shows well over 1,200 dpa are anticipated to be delivered in the 3 financial years 2016/17, 2017/18 and 2018/19. This appears to be a consequence of the release of sites following the moratorium, although there has clearly been a time-lag between the grant of planning permissions for larger strategic sites and implementation. It is a necessary and required correction to persistent under delivery.
211. At the relevant, Matter F, Hearing the Council ran through the assumptions that underpin its calculation of the 5-year housing land supply and, in particular, the figure for commitments within 5-years. I note a 10 % deduction has been applied for non-implementation. It would be fair to say that there was little substantive criticism of the Council's assumptions in terms of build-out rates on major sites. In my view the presentation of this material could be better in order to facilitate a more open interrogation of those assumptions. However, on the information before the examination<sup>228</sup>, the Council was able

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<sup>223</sup> Paragraph reference 3-035-20140306.

<sup>224</sup> Document Ref. ED.5.3a.

<sup>225</sup> An average of 391 dpa as opposed to a Local Plan target of 475 dpa for the first 10-years of that period and 566 dpa during the last 3-years.

<sup>226</sup> For the purpose of this section I intend to focus on Document Ref. HD.09.

<sup>227</sup> Figure 2a, Document Ref. HD.09.

<sup>228</sup> Figure 5, Document Ref. HD.09.

to show a 5-year supply even with the required 20 % buffer, albeit against a housing requirement that does need to be re-evaluated.

212. I have given reasons [204] why the evidence underpinning the level of windfalls is compelling, but it should be noted that in this respect the latest trajectory contrasts sharply with that in the submission version of the CS, which referred to a total of 1,390 windfalls. The Council has reallocated the majority of these to an allocated column within the '*MRC Unspecified*' row on which I have commented. The balance of the LSV figure is identified to come forward as 500 units in each of the last 5-year phases of the CS. These broad locations for growth appear to have a reasonable prospect, as per footnote 12 of the Framework, of coming forward within this anticipated timescale.
213. Notwithstanding the above the housing land supply situation is fluid. I have given reasons elsewhere [54] as to why the OAN needs to be revisited. This is plainly fundamental to the calculation of housing land supply. For this reason it is likely to be necessary to return to this issue at a later stage in the examination, noting that I have deliberately not focussed on the realism of the trajectory at GLH pending the further SA work required [103]. That, in itself, could have a bearing on the anticipated trajectory. However, in respect of the Canal Quarter the trajectory<sup>229</sup> for the purpose of the 5-year land supply appears to be realistic because Warwick House is a discrete site and Listers have confirmed the availability of its Masons Road site within Area 1a. To this extent the modest amount of housing, 20 units, which are projected to come forward in 2018/19 would appear to be realistic. I make no further observations at this stage, beyond recording that the trajectory anticipates the delivery of 300 units at GLH within the 5-year period up to and including 2018-19.
214. Noting that there will inevitably come a point where it will only be necessary to apply a 5 % buffer, the Council purports to show that a 5-year supply of specific deliverable sites can be maintained until the final, 5-year, phase of the CS<sup>230</sup>. However as this is intimately tied in with delivery of the key allocations in the Canal Quarter and GLH I do not propose to reach a view on this at this stage of the examination. Even if I were to express a without prejudice view on the allocations up to 2031, I would not be able to comment on the bigger picture in the absence of clarity in respect of the housing requirement.
215. That said the overall supply position over the whole plan period is tight [205] and does not appear to be a robust position on which to take the plan forward. There is no realistic flexibility in the housing supply to respond to changing circumstances. It is important to ensure that any delay in assumed delivery from sites contributing to the supply does not result in a deficiency in the 5-year assessment. Although I recognise the reserve sites policy provides some comfort I consider that greater headroom should be built into the trajectory.

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<sup>229</sup> Figure 2b, Document Ref. HD.09.

<sup>230</sup> Figure 6, Document Ref. HD.09.

**Housing Strategy and Housing Supply:  
Conclusion**

216. For the above reasons [192, 198, 203, 204], and having regard to all other matters raised, I find that the overall strategy in the CS, to direct roughly half of the growth to the main towns, with 17.5 % directed to sustainable villages and smaller proportions to LRBS and Other Rural Locations, to be justified. However there is still a clear need for a further strategic allocation in addition to these categories and a new town has been identified through the consultation process as the preferred option. For the reasons given [206], if GLH is confirmed as the strategic option, there would appear to be a need to focus any increase in the housing requirement towards the LRBS and/or the main towns of Stratford-upon-Avon and/or the 8 MRCs.
217. There is compelling evidence to underpin the level of windfalls [204]. The housing land supply situation is fluid, but as at January 2015, being the date of the *Housing Implementation Strategy*, which underpinned the discussions at the Hearing, the Council was able to show a 5-year supply even with the required 20 % buffer [211]. However this is based on a requirement of 11,320, which needs to be reviewed, and on assumptions regarding delivery, in particular at GLH, which cannot be confirmed in these interim conclusions. Unfortunately this means I am unable to give the assurance I would have wished to provide in respect of the housing land supply situation in the interim. Moreover I have given reasons why the housing supply position over the whole plan period is tight and why there is a need to provide more headroom in the trajectory over the lifetime of the plan [215].

## **Interim Conclusions**

218. It is apparent that, for the reasons set out above, further work is required in order to demonstrate a robust and objective assessment of housing needs and ensure that the SA process is carried out in full accordance with statutory requirements and relevant guidance. Unfortunately, it would not be appropriate to proceed with the examination until this work has been carried out. This work should include the appropriate involvement of relevant stakeholders and public consultation in respect of any material changes that may be proposed to the CS as a result. I suggest that the Council considers the contents of these interim conclusions and prepares a timetable that sets out how it intends to progress matters. As I remain anxious to ensure that the examination progresses quickly I shall proceed to look at other, less controversial, areas of the CS in the interim including, for example, individual policies where a measure of agreement has been reached as to the appropriate way forward.
219. I recognise that these interim conclusions will be a disappointment for both the Council and a number of parties but, for the reasons I have given, I consider that the CS is not sound as it stands. In the circumstances it would not be appropriate to let the CS progress to adoption at the present time. So whilst I recognise the benefit of a plan-led system it needs to be based on a sound plan. In any event I have tried to give some certainty for investment decisions by giving a clear indication of my views on the proposed employment allocations and, without prejudicing the Council's position, commenting on housing strategy and supply, to the extent that I feel able to do so.

*Pete Drew*

Inspector

18 March 2015



**Stratford-on-Avon District  
Core Strategy**

**Final Schedule of Main Modifications**

**June 2016**





## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

This schedule sets out the Main Modifications that are required to be made to the submitted version of the Core Strategy (September 2014) in order for it be 'sound' and able to be adopted by the District Council as a Development Plan Document.

It should be noted that in certain cases, consequential changes to numbering of paragraphs, etc. have not been shown.

New policy text is underlined to reflect the identified convention. Deletions to text are ~~struck through~~.

Main Mod. Reference	Submission Page no.	Core Strategy Section/Policy	Proposed Modification New text is <u>underlined</u> / deleted text is <del>struck through</del>
MM01	3-6	1.1	<p>Amend text as follows:</p> <p>1.1.7 The Council wishes to meet in full its objectively assessed needs for market and affordable housing and will do so within its own boundaries. In general it wishes to maintain the current role both of Stratford-upon-Avon itself and of the other defined main rural centres. Stratford-upon-Avon is the main town in the District and will continue to grow, but without significant infrastructure investment its historic character and international significance would be compromised as a result of the pressures created by further peripheral housing expansion. <del>It is therefore considered that, during the plan period, the only housing development that should be brought forward beyond that already committed should be focused within the proposed regeneration zone.</del> <u>The exception to this is the opportunity to develop land at Bishopton to the north of the town. This and the initial phases of development within the proposed regeneration zone constitute the two strategic options that will be brought forward during the plan period.</u></p> <p>1.1.8 Elsewhere, the main rural centres continue to perform an important role as service hubs for their rural hinterland and in each centre there are commitments that will see housing development come forward during this plan period. The amount of committed development varies in each settlement, but this in part reflects the specific constraints and opportunities that apply and the importance of retaining their individual character and distinctiveness. Consistent with the emerging strategy, additional housing development is now committed in the market towns of Alcester and Southam <u>and a further strategic development opportunity has been identified at Southam.</u> The Council believes it is appropriate to focus the provision of public services and commercial facilities in these larger rural settlements, as it is important to ensure that a wide range of provision, relatively close at hand and therefore accessible to a majority of residents, is maintained in these centres.</p> <p>1.1.10 Having taken into account the desire to maintain the role of <del>the existing settlements</del> <u>hierarchy</u> through the careful management of a dispersed pattern of development, it is considered very unlikely that <del>they existing settlements</del> could accommodate the full and objectively assessed</p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p>need for housing in the District over the plan period without damage to their role, character and distinctiveness. <u>The Council will consider opportunities to accommodate additional development on large rural brownfield sites, ensuring that previously used land is brought back into use where proposals are accepted as representing a sustainable approach.</u> However, in addition, the feedback from previous periods of consultation has revealed that, under this scenario, there is support for the option of a new settlement being developed to help address the housing need and that this is an option that should be pursued in preference to further substantial expansion at Stratford-upon-Avon. <del>After careful consideration, including further consultation, on the reasonable alternatives, it is apparent that an expanded settlement located on land close to Lighthorne Heath would be the most appropriate choice having regard to the operation of the local housing markets.</del> <u>After careful consideration, including appropriate consultation and examination of the reasonable alternatives, it is apparent that two new settlements should be brought forward during the plan period. At Long Marston Airfield there is an opportunity to create a sustainable new settlement on a mixed brownfield/greenfield site. At Lighthorne Heath there is an opportunity to create a second sustainable new settlement that will integrate with the existing village. These new settlements are appropriate choices having regard to the operation of the local housing markets.</u> The case for proposing <del>a these</del> <u>these</u> new settlements is bolstered by the concerns held by residents of many existing communities across the District that further significant development could not be accommodated in them in a satisfactory and sensitive manner.</p>
MM02	11-13	1.3	<p>Amend text as follows:</p> <p>1.3.7 A Joint Strategic Housing Market Assessment for Coventry and Warwickshire was published in November 2013 <u>and updated in September 2015.</u> Based on an assessment of migration and commuting flows and house prices, the JSHMA identifies strong functional links between Coventry and the different parts of Warwickshire which point towards the existence of a Coventry-focused housing market area (HMA). For Stratford-on-Avon, there are identified functional links from the higher priced southern parts of the District into the Cotswolds; from the west of the District towards Redditch and Wychavon; and from the east of the District towards Cherwell. The JSHMA also identifies links from parts of the HMA into Solihull and Birmingham, albeit concluding that there are stronger functional links within the HMA. Based on the grouping of local authority boundaries, the SHMA identifies Coventry and Warwickshire as the defined housing market area for strategic planning purposes. However, it is also evident that the functional relationships with the Greater Birmingham HMA support the conclusion that the more western part of the District can properly be</p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p><u>identified as being subject to an overlap between the two HMAs.</u></p> <p>1.3.8 The Council wishes to meet in full its objectively assessed needs for market and affordable housing and will do so within its own boundaries. Active and ongoing discussions with neighbouring authorities, principally within Coventry and Warwickshire and <u>Greater Birmingham</u> but also within the other housing market areas that influence the District, indicate that they too plan to meet in full the identified housing needs within their own areas. <del>The known exception is the city of Birmingham, where the emerging evidence indicates that identified housing needs over the period 2011-2031 will exceed capacity within the city. However, evidence being prepared across the wider Greater Birmingham and Solihull LEP area is not yet sufficiently advanced to understand to what extent, if any, there are implications for other Districts beyond the LEP area, including Stratford-on-Avon District. It is further acknowledged that the extent to which objectively assessed need for the city of Coventry will be met within the city itself is unknown. The Council will continue to work with its immediate and wider neighbours in accordance with the duty to co-operate and will therefore keep under ongoing review the need and scope to respond to new evidence. In the event of the evidence identifying that further housing provision is justified in Stratford-on-Avon, a review of the Core Strategy will be brought forward to address this.</del> <u>The known exceptions are the cities of Birmingham and Coventry, where evidence shows that identified housing needs over the period 2011-2031 will exceed capacity within each city. In each case the authorities within the respective housing market areas are working cooperatively to ensure that housing needs will be met across the HMA as a whole. The Council acknowledges that, given the overlap between the HMAs, Stratford-on-Avon District has a role to play in meeting the needs arising from the two areas. Within Coventry and Warwickshire, a redistribution designed to meet the overall requirements of the HMA has been provisionally agreed. For Greater Birmingham, the situation is not fully resolved although the quantum of unmet need is known. The Council will continue to work with the authorities in each HMA in accordance with the duty to cooperate and will therefore keep under ongoing review the need to respond to new evidence using the mechanisms set out in the Plan to address the need once it is known.</u></p>
MM03	14-15	Vision	<p>Amend as follows:</p> <p>In 2031 the outstanding built and natural character and heritage of Stratford-on-Avon District, its settlements and landscape, will have been maintained and enhanced. Biodiversity will have been</p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p>strengthened in rural and urban areas, including through the provision of improved networks of green infrastructure. New and existing buildings will be more water and energy efficient and contribute to a reduction in flood risk, all helping the District to mitigate and adapt to the effects of climate change.</p> <p>To meet future development needs, <del>40,800</del> <u>at least 14,600</u> additional homes will have been provided across the District. New homes will have been sensitively developed in ways that protect and enhance the setting, character and identity of each settlement, and effectively meet the needs of the District's existing and future population. <del>Up to</del> <u>At least</u> an additional 35 hectares of employment land will have been provided to meet the District's requirements, together with 19 hectares to meet the needs of Redditch. <del>Derelict and Vacant</del> <u>or underutilised</u> brownfield sites will have been brought back into suitable use while preserving their important features.</p> <p>A settlement <del>hierarchy</del> <u>pattern</u> comprising the main town of Stratford-upon-Avon, eight Main Rural Centres and a wide range of Local Service Villages will have been reinforced by development of a scale and nature that has retained the individual character and function of each settlement.</p> <p>This will have been supplemented with <u>development on brownfield sites in sustainable locations</u> <del>plus</del> an expanded community at Lighthorne Heath <u>and a new settlement at Long Marston Airfield,</u> <del>that provides each providing</del> its residents and the residents of surrounding villages with a range of additional services, facilities and opportunities.</p> <p>Small-scale housing development in villages not identified in the settlement hierarchy will have been provided to meet local needs and will reflect their rural character. The role of the countryside in the rural economy will have been strengthened, with additional business opportunities of a suitable nature and scale provided.</p> <p>Overall, the strategy will have strengthened town and village communities whilst maintaining their characteristics, protected the countryside from inappropriate development and activities and ensured a <u>safe</u> high quality of life for residents throughout the District.</p> <p><b>Stratford-upon-Avon</b> will have enhanced its role as a town of international standing that satisfies the expectations of residents, businesses and visitors. More tourists will visit the town and stay longer, in part achieved through an expansion of its cultural offer. The town's role as the main shopping and</p>

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			<p>services centre in the District will have been strengthened. <del>As</del> Significant progress will have been made on the regeneration of an extensive area of mostly outworn and underused land adjacent to the canal. New and existing companies will have located on high quality employment land on the periphery of the town, with excellent access to the strategic road network. <u>A new link to the strategic network from the south of the River Avon will have been provided via a western/south western relief road.</u> Traffic in the town centre will be managed more effectively to reduce its impact on the environment.</p> <p><b>Southam</b> will continue to prosper as a centre and focal point for shops, services and jobs for a sizeable rural catchment. <del>Development to both the north and south of the town will have provided about 350 homes, a range of new sports facilities, and about 3 hectares of additional employment land.</del> Development will have taken place to the north, east and south of the town to provide about 900 homes, a range of new sports facilities and other community infrastructure, and about 3 hectares of <u>additional employment land.</u> The built environment and setting of Southam will have been enhanced, including by restraining development in the Stowe Valley to the west of the town.</p> <p><b>Wellesbourne</b> will have enhanced its role as a rural centre through the provision of commercial uses that are sensitive to the character and setting of the village. The river corridor will have been enhanced for leisure activities and wildlife. <u>The aviation related functions at Wellesbourne Airfield will have been retained and enhanced.</u> There will be improved community facilities and the business park will have been regenerated.</p> <p><b>Lighthorne Heath</b> will have been expanded providing about <del>2,500</del> <u>2,300</u> additional homes by 2031. The local community will support a wide range of new facilities and services, including education, health and leisure. It will benefit from extensive areas of open space and natural features. Jaguar Land Rover's operations at Gaydon will have expanded and diversified to ensure the company's pre-eminent contribution to the national, regional and local economy. Highway improvements will have been implemented, including to Junction 12 of the M40, and high quality express bus services will link the new settlement with nearby town centres and railway stations.</p> <p><u><b>Long Marston Airfield</b> will have been developed to provide about 2,100 homes by 2031, along with a range of new facilities and services including education, health and leisure. It will benefit from extensive areas of open space and sustainable transport links to Stratford-upon-Avon.</u></p>

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MM04	16	Key Diagram	<p>Add Long Marston Airfield new settlement</p> <p>Add Halford Local Service Village</p>
MM05	17-18	Strategic Objectives	<p>Amend as follows:</p> <p><del>(4) To help mitigate and adapt to climate change, all residential development will have achieved as a minimum water and energy efficiency Code for Sustainable Homes Level 4. From 2019, all non-residential development will have achieved water and energy efficiency BREEAM 'Good' standard.</del></p> <p><u>(4) To help mitigate and adapt to climate change, all residential development will have incorporated enhanced water efficiency measures as set out in the Building Regulations. All non-residential development will as a minimum have achieved the water and energy efficiency BREEAM 'Good' standard.</u></p> <p><del>(6) The flood plain will have been maintained and, where opportunities arise, restored. The risk of flooding will be managed effectively by taking a whole catchment approach to implement sustainable flood management schemes. from flooding will not have increased.</del> Water bodies will have reached a good status or potential in accordance with the Water Framework Directive.</p> <p>(8) Community facilities and open space will have been improved across the District. Through collaborative working between District, Town and Parish Councils and key partners in education, public <u>safety</u>, health and other services, opportunities to improve the health and wellbeing of the District's communities will have been realised as a result of the development process.</p> <p><u>(NEW) Previously developed sites in sustainable locations will have been re-used for purposes that are of an appropriate type and scale, while retaining their important natural, historic and other features.</u></p> <p><del>(12) There will have been a reduction in the level of net commuting through an improved balance</del></p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p><del>between the number of homes and jobs in the District. To contribute to this, an additional 35 hectares of land for business uses will have been delivered in the District. A sustainable balance between employment growth and housing provision will be maintained as a result of the implementation of at least 35 hectares of additional land for general business uses, thereby helping to meet the needs of new and existing businesses wishing to locate or expand in the District.</del></p> <p>(14) <u>At least an additional 14,600 homes (an average of 540 730 per annum) will have been built across the District on brownfield and greenfield sites, reflecting the dispersed settlement pattern of the provided across the District. Where justified by the available evidence, the District Council will have worked with neighbouring councils to help meet any unmet housing needs arising outside the District. These dwellings will be built by a range of developers, housing associations and other providers.</u> In addition, the needs of Gypsies and Travellers will have been met through the provision of <del>41 52</del> additional pitches by <del>2016 2019</del> and an <del>average of 2 pitches per annum thereafter</del> <u>additional 30 pitches thereafter, a total of 71 pitches by 2031.</u></p> <p>(15) <u>A mix of sizes, types and tenures of housing will have been built by a range of developers, housing associations and other providers.</u> To improve the affordability of housing across the District, <u>35% of dwellings on eligible sites will have been provided as affordable homes.</u></p>
MM06	21-22	2.1 Sustainability Framework	<p>Amend final bullet point in paragraph 2.1.8:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal of the Proposed Submission Version of the Core Strategy (<del>April</del> <u>May 2014</u>)</li> </ul> <p>Insert additional bullet points at end:</p> <ul style="list-style-type: none"> <li>• <u>Sustainability Appraisal Addendum (Sept 2014) – an addendum to the May 2014 Sustainability Appraisal.</u></li> <li>• <u>Sustainability Appraisal of the Stratford-on-Avon Core Strategy: Post Inspectors Interim Conclusions (July 2015) – an assessment of the potential strategic development sites.</u></li> <li>• <u>Sustainability Appraisal of the Stratford-on-Avon Core Strategy: Proposed Modifications (Aug 2015) – an assessment of the policies and proposals of the Proposed Modifications to the Stratford-on-Avon Core Strategy.</u></li> </ul>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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MM07	23-24	CS.1 Explanation	<p>Amend final bullet point in paragraph 2.2.2:</p> <p>Planning for places (an environmental role) – use the planning system to both protect and enhance our natural, built and historic environment, to use natural resources prudently, <u>ensuring the effective use of land through reusing previously developed land and promoting mixed use developments</u>, and to mitigate and adapt to climate change, including moving to a low-carbon economy.</p>
MM08	27-28	CS.2	<p>Amend Part B by replacing bullet points with numbers and amending wording of first one:</p> <ol style="list-style-type: none"> <li>1. reduce energy demand, <del>in particular by the use of sustainable design and construction through energy efficiency measures</del>;</li> <li>2. supply energy efficiently and give priority to decentralized energy supply; and</li> <li>3. provide energy from renewable or low carbon energy sources.</li> </ol> <p>Delete from part B:</p> <p><b>Residential Development</b>  <del>New homes will achieve Level 4 of the Code for Sustainable Homes, until such time as these are superseded.</del></p> <p>Amend second paragraph under title 'Non-Residential Development' in Part B:</p> <p>To demonstrate that the required <del>Code for Sustainable Homes</del> and BREEAM standards will be met, proposals for new development should be accompanied by a pre-assessment certification under the relevant scheme and approved by a registered assessor.</p> <p>Amend final heading to read:</p> <p><b>Extensions and <del>Major Refurbishments</del> <u>the Re-Use of Buildings</u></b></p> <p>Delete 2<sup>nd</sup> paragraph of final section:  <del>The Council will support and, if feasible, establish a Community Energy Fund to enable the delivery of Allowable Solutions in line with the 2016 Building Regulations.</del></p>



## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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MM09	28-30	CS.2 Explanation	<p>Insert at end of paragraph 3.1.4:</p> <p><u>Subject to the introduction via the Building Regulations of higher energy targets aimed at achieving the Government's Zero Carbon Homes Policy, new homes will have to incorporate renewable and low carbon energy technologies and the Council's SPD requirement for 10% renewable energy onsite will no longer be applied.</u></p> <p>Delete from paragraph 3.1.7:</p> <p><del>The Council will develop Stratford-on-Avon specific allowable solutions, to be in place by 2016, which will be published in a future planning policy document.</del></p> <p>Delete paragraph 3.1.8:</p> <p><del>The changes to Building Regulations for 2013-19 have not yet been defined. In the interim, the Council will use the alternative standards provided by the Code for Sustainable Homes and BREEAM, to demonstrate the energy and water performance of development. The Council considers it would not be compatible with its Allowable Solutions policy to require standards beyond Code for Sustainable Homes Level 4.</del></p> <p>Amend paragraph 3.1.9:</p> <p>Checking compliance with Building Regulations is a separate process to getting planning approval; however both processes must be complied with. <del>In the context of sustainable design, applicants are encouraged to consider both together at the design stage as this will help to avoid problems, delays and increased costs as proposals are progressed through the application stages.</del> <u>The Government has introduced national standards for energy and water efficiency for new homes within Building Regulations. For non-residential development, the Council will use the alternative standards provided by BREEAM to demonstrate the energy and water performance.</u></p> <p>Delete from paragraph 3.1.11:</p> <p><del>The Water Cycle Study Update (2012) provides evidence that water efficiency measures for</del></p>

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			<p><del>development proposals should achieve a Code for Sustainable Homes Level 3-4 as a minimum within this District.</del></p> <p>Delete from paragraph 3.1.12:</p> <p><del>For residential development, post construction Code for Sustainable Homes assessments will be required which must be undertaken by an accredited assessor. Replacements for the BREEAM standards are being developed and this policy will apply the equivalent replacement standards. The policy will also apply to any future replacements to the Code for Sustainable Homes.</del></p> <p>Delete paragraph 3.1.13:</p> <p><del>In cases where the Council requires large developments to supply decentralised energy to the site, large developments are defined as over 100 residential dwellings or non-residential developments over 10,000m<sup>2</sup>.</del></p> <p>Delete DMC(2), renumber DMC(3) as (2)  <del>Conditions will be imposed to ensure the development is built to energy efficiency measures applicable at the time of construction, in line with the progressive tightening of the Building Control Regulations to reach zero carbon standards.</del></p> <p>Delete first monitoring indicator :  <del>Number of new homes achieving a four star or above of the Code for Sustainable Homes.</del></p>
MM10	31-33	CS.3	<p>Delete last sentence of 2<sup>nd</sup> paragraph of Part A and insert new text:</p> <p><del>Large developments should supply decentralised energy to the site, or provide for future connection to a decentralised scheme where it is viable to do so.</del></p> <p><u>The Council is commissioning a study to identify “district heating priority areas”.</u></p> <p><u>All new developments in district heating priority areas will be required to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable.</u></p>

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			<p><u>All new developments in other areas will be encouraged to incorporate infrastructure for district heating, and will be expected to connect to any existing suitable systems (including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable.</u></p> <p><u>Detailed advice on District Heating will be provided in a Development Requirements Supplementary Planning Document.</u></p>
MM11	33-34	CS.3 Explanation	<p>Insert additional paragraph at end:</p> <p><u>3.2.10 District Heating Schemes deliver heating and hot water to multiple buildings from a local plant. A heat network of insulated pipes buried underground is required to distribute the heat generated; these can often be installed at the same time as other services when a site is being developed and can also be retrofitted to existing buildings. District heating can be combined with electricity production in combined heat and power (CHP) or in combined cooling, heat and power (CCHP). This is an efficient form of decentralised energy supply providing heat and electricity at the same time. Currently the overall fuel efficiency of CHP is around 70-90% of the fuel input, depending on heat load; much better than most power stations which are only around 40-50% efficient. It is possible to vary the energy source to fuel district heating depending on cost and availability so the energy source can be changed over time; potential fuel sources include conventional fuels, biomass, and waste and other renewables. District Heating (including CHP/ CCHP) is currently one of the most low cost ways of meeting zero carbon, particularly on brownfield sites where the efficiency or appropriateness of other technologies may be constrained. The Council will produce a district heat map and energy master plan, and district heat network priority areas will be identified, based on the outcome of this evidence. It is anticipated that the future district heat network priority areas are likely to be identified in urban areas or large strategic sites where there is an appropriate mix and density of uses which would render such schemes viable. Elsewhere in the district there may be the opportunities for small scale schemes to serve local communities.</u></p> <p>Delete first monitoring indicator :  <del>Number of new homes achieving a four star or above of the Code for Sustainable Homes.</del></p>

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MM12	36-38	CS.4	<p>Amend Part A:</p> <p>All development proposals should be located in Flood Risk Zone 1 (Low Probability Flood Risk).</p> <p><del>There is a presumption against development in flood risk areas as shown on the Policies Map and identified in the most up to date Strategic Flood Risk Assessment.</del></p> <p>Development within the Environment Agency’s flood risk zones 2, <del>3a and 3b</del> <u>2 and 3a</u> will only be acceptable when the sequential test and, where applicable, the exception test have been satisfied, as set out in the National Planning Policy Framework. <u>Land use in High Probability Flood Zone 3b should be restricted to water compatible or, with the exception test, essential infrastructure.</u></p> <p>The flood plain will be maintained and, where opportunities arise, restored in order to maximise natural storage of flood water, reduce flooding problems and increase landscape, <u>ecological</u> and conservation value. <u>Rural and urban land use practices to restore more sustainable natural floodplains and to reduce runoff will be encouraged. Developers will be encouraged to reduce the reliance on hard engineered solutions through their site by contributing to upstream flood storage, giving consideration to a whole catchment approach.</u></p> <p>Amend 1st paragraph in Part B:</p> <p>In all development, there should be no flooding, from all sources, <del>on</del> <u>to</u> properties up to the 100 year flood event, including an allowance for climate change.</p> <p>Amend 9<sup>th</sup> paragraph in Part B:</p> <p>All development proposals should seek to control and discharge 100% of surface water runoff generated on site <u>during the 1 in 100 year plus climate change rainfall event</u> using above ground sustainable drainage systems, such as swales, ponds and other water based ecological features. Where it can be demonstrated that it is not practicable, development proposals should maximise opportunities to use SUDS measures which require no additional land take, such as green roofs, permeable surfaces and water butts. <u>There is a presumption against the underground storage of water.</u></p> <p>Amend heading of Part C:</p>

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			<p><del>Enhancing and Protecting</del> <u>Protection of the Water Environment</u></p> <p>Replace 1<sup>st</sup> paragraph in Part C:</p> <p><del>Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, reinstated.</del> <u>Development proposals that lie adjacent to a canal, river or tributary should ensure that the natural features and functions of the watercourses and its wider corridor are retained, or where possible reinstated and that appropriate habitats buffers are established.</u></p> <p>Replace 4<sup>th</sup> paragraph in Part C:</p> <p><del>Physical and visual access to the riverside should be improved for the benefit of all people, maintaining the balance between formalising access, maintaining a natural character to the river and safeguarding sensitive sections of the river.</del> <u>Physical and visual access to watercourses will be promoted where it respects the natural function of the watercourse and sensitive nature of the river corridor as a whole.</u></p> <p>Insert text at end of 5<sup>th</sup> paragraph in Part C:</p> <p><u>Where a development site contains areas identified as flood plain, the development layout design should ensure that no surface water attenuation features are located in Flood Zone 3. There should be an 8 metre easement to allow maintenance &amp; access to all main rivers and to ensure that the river corridor is sensitively managed to support environmental infrastructure (including wildlife corridors) and to protect/improve habitat for BAP species and/or ecological networks.</u></p> <p>Amend 6<sup>th</sup> paragraph in Part C:</p> <p><del>All development proposals should demonstrate high levels of water efficiency. All new housing developments must be water efficient and, as a minimum, reach Code for Sustainable Homes Level 4 or achieve equivalent sustainability standards for buildings as directed by national policy.</del> <u>All residential development should incorporate water efficiency measures to achieve the enhanced technical standard for water usage under the building regulations. Non-residential development should demonstrate water efficiency of the relevant BREEAM 'Good' standard as a minimum. Grey water recycling and rainwater</u></p>

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			<p>harvesting schemes should be used unless it can be demonstrated that it is not appropriate for a specific location.</p> <p>Insert new paragraph 7 in Part C:</p> <p><u>Development proposals will take full account of the biodiversity value of watercourses and river corridors and their role in supporting local ecological networks. Impacts from lighting, noise and visual disturbances should be avoided or mitigated and opportunities to create, enhance and restore adjacent habitats for biodiversity will be encouraged.</u></p> <p>Insert new paragraph 3 in Part D:</p> <p><u>In respect of the proposal for land at Gaydon/Lighthorne Heath (Policy GLH) and the growth of existing employment at Gaydon (Policy AS.11), Severn Trent Water has identified the need for improvements to be made to the local wastewater infrastructure, including temporary works to ensure that adequate capacity is secured prior to occupation of early phases of development. Such improvements are necessary to support the delivery of the overall strategy for the District and will be supported accordingly.</u></p>
MM13	38-40	CS.4 Explanation	<p>Amend paragraph 3.3.6:</p> <p>The NPPF also states that development plan policies should seek to minimise the need to consume new resources over the lifetime of the development, by making more efficient use or reuse of existing resources, rather than making new demands on the environment. Consequently, local authorities should promote the sustainable use of water resources and the use of sustainable drainage systems in the management and treatment of surface water run-off. The Council therefore intends to use its planning policies to require more sustainable use of water consumption and BREEAM standards. <del>For residential development post construction Code for Sustainable Homes assessments will be required which must be undertaken by an accredited assessor. Replacements for the BREEAM standards are being developed and this policy will apply the equivalent replacement standards. The policy will also apply to any future replacements to the Code for Sustainable Homes.</del> There are several key drivers for</p>

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			<p><u>ensuring that water use in the development plan period is minimised as far as possible. The evidence provided by the 2015 update to the Water Cycle Study suggests that the Council should promote an approach that will contribute to achieving a 'water neutral' position after growth across the District. The area is one showing moderate water stress and the envisaged growth involving an increase in population will further exacerbate this issue. In order to ensure surplus raw water supply for growth in the area, STWs water resource plan over the next 25 years is reliant on more efficient use of existing resources and demand reduction from customers. The proposals and opportunities for new resources are limited, in the main due to the limitation on available new resources locally, which means that looking beyond the next 25 years further new resources would likely need to be transferred into the area to cater for further increases in population and hence water demand. This creates a very strong driver for new homes in the next 25 years to be made as efficient as economically possible. The Council is promoting sustainable development within the District and considers that higher levels of efficiency are justified, thereby reducing demand from new property as far as possible.</u></p> <p>Insert at end of paragraph 3.3.11:</p> <p><u>The greatest benefits are gained when sustainable urban drainage systems are designed as a multifunctional resource, capable of delivering a wide range of environmental and quality of life benefits (ecosystems) for future occupants. Flood storage areas, wetland habitats and above ground SUDs can form a functioning ecosystem in their own right for many species, and can increase biodiversity by increasing habitat area, increasing populations of some protected species and increasing species movement.</u></p>
MM14	41	CS.4 DMCs	<p>Amend DMC(3):</p> <p>Flooding in green field developments can be avoided by effective master planning of the development site, and <del>may need</del> <u>needs</u> to include an allowance for managing exceedance flows, if surface water drainage infrastructure is exceeded. In brownfield development, it may be not possible to achieve this level of protection depending on the nature of the existing risk, but there will be a presumption against building in areas of high risk.</p> <p>Insert text at end of DMC(7):</p> <p><u>The Environment Agency promotes flood risk measures that include wetland habitat creation, including</u></p>

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			<p><del>through the use of woody debris upstream, to ensure that flood management solutions are consistent with biodiversity needs.</del></p> <p>Delete DMC(8):</p> <p><del>A suitable maintenance access (usually 8 metres wide) will be required alongside all watercourse channels.</del></p>
MM15	42-43	CS.5	<p>Amend policy as follows:</p> <p>The landscape character and quality of the District will be maintained by ensuring that development takes place in a manner that minimises and mitigates its impact and, where possible, incorporates measures to enhance the landscape. <u>The cumulative impact of development proposals on the quality of the landscape will be taken into account.</u></p> <p><u>Development will be permitted where:</u></p> <p><b>A. Landscape Character and Enhancement</b></p> <ol style="list-style-type: none"> <li><del>1. Development should have</del> <u>Proposals have</u> regard to the local distinctiveness and historic character of the District's diverse landscapes.</li> <li><del>2. Development should</del> <u>Proposals</u> protect landscape character and avoids detrimental effects on features which make a significant contribution to the character, history and setting of a settlement or area.</li> <li><del>3. Measures should be</del> <u>are</u> incorporated into development schemes to enhance and restore the landscape character of the locality.</li> </ol> <p><b>B. Visual Impacts</b></p> <ol style="list-style-type: none"> <li><del>1. Proposals for development should</del> include, dependent on their scale, use and location, an assessment of the likely visual impacts on the local landscape or townscape, and the site's immediate and wider setting. Applications for major developments <del>must be accompanied by</del> <u>may require</u> a full Landscape and Visual Impact Assessment.</li> <li><del>2. Where harmful visual impacts are predicted, a</del> <u>New landscaping proposals must be</u> <u>are</u></li> </ol>



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			<p>incorporated to reduce <del>predicted harmful visual</del> the impacts and enhance the existing landscape. Provision must be made for its long term management and maintenance.</p> <p><b>C. Trees, Woodland and Hedges</b></p> <p>1. <del>Due to</del> <u>Proposals do not lead to any loss or damage but rather protect</u> the quality of ancient semi-natural woodland and aged/veteran trees, particularly in the Forest of Arden, <del>and but also (due to their relative scarcity)</del>, elsewhere in the District., <del>no development will be permitted that would lead to their loss or damage.</del></p> <p>2. Proposals that will have an impact on woodlands, hedges and trees <del>should</del> incorporate measures to protect their contribution to landscape character, public amenity and biodiversity. The loss of those trees which are of high public amenity value will be resisted and such trees will be protected by the use of Tree Preservation Orders.</p> <p>3. The design and layout of development schemes and other projects in rural and urban areas <del>will be expected to</del> <u>incorporates</u> trees in a manner that is appropriate to the nature of the site, including the use of native species. However, given the continued threat to native trees and plant species from pests and diseases, the incorporation of non-native species into schemes will be considered and accepted where appropriate.</p> <p>4. Development schemes and other opportunities <del>will be</del> <u>are</u> used to:</p> <ul style="list-style-type: none"> <li>• <u>enable</u> the expansion of native woodlands, <del>and</del></li> <li>• <del>to</del> buffer, extend and connect fragmented ancient woodlands,</li> <li>• <del>to develop</del> <u>flood risk reduction measures through the planting of woodlands, trees and undergrowth</u> for their intrinsic value and to help climate change adaptation.</li> </ul> <p>Policy CS.12 sets out additional factors to be taken into account when considering development proposals in those parts of the District designated as Special Landscape Areas.</p>
MM16	44	CS.5 DMCs	<p>Amend DMC(1) as follows:</p> <p><del>Assessment of development proposals will have regard to cumulative impact.</del> On an individual basis some proposals may seem innocuous but <u>cumulatively</u> they could form part of a general <del>trend towards</del> decline in the quality of the landscape <del>which needs to be considered.</del></p>

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			<p>Amend 2<sup>nd</sup> sentence in DMC(2) as follows:</p> <p>For major applications, a full Landscape and Visual Impact Assessment <del>must</del> <u>will be expected to be</u> submitted, which has been undertaken in accordance with national guidelines for such assessments.</p> <p>Replace DMC(4):</p> <p><del>Natural England's publication 'Standing Advice for Ancient Woodland' states that: "Development close to, though not directly involving destruction of an ancient woodland can nevertheless be damaging to the site... Whilst development should be kept as far as possible from ancient woodland, a minimum buffer of at least 15 metres in width should be maintained between the ancient woodland and development boundary." Whilst the Standing Advice currently only applies in the south and east of England, it still provides a useful reference document for other Local Planning Authorities. All development proposals in the proximity of ancient woodland shall have regard to the 'Standing Advice for Ancient Woodland and Veteran Trees' published by Natural England. As a starting principle, development must be kept as far away as possible from ancient woodland. The necessary width of any buffer zone will depend upon local circumstances and the type of development. Buffer zones should be retained in perpetuity and allowed to develop into semi-natural habitats. Section 6 of the Standing Advice includes guidance on mitigation measures, including buffers.</del></p>
MM17	46-47	CS.6	<p>Amend Part A as follows:</p> <p>Proposals will be expected to <u>minimise impacts on biodiversity and, where possible, secure a net gain in biodiversity by:</u></p> <p>1. Safeguarding <u>and, where possible, enhancing</u> existing habitats, including:</p> <p>(a) Sites of Special Scientific Interest, which will be subject to a high degree of protection. <del>Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national networks of SSSIs. Development proposals should seek to avoid adverse effects on SSSIs. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national networks of SSSIs.</del></p>

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			<p>(c) Those subject to local designations such as Local Wildlife Sites and Local Nature Reserves. Development adversely affecting a Local Site will only be permitted either where it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site, <del>or where there is good reason to permit development and it is possible to secure the creation and long-term maintenance of equivalent habitat elsewhere.</del></p> <p>Replace final paragraph in Part A:</p> <p><del>Where a development will impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area.</del></p> <p><u>Where a development will have a negative impact on a biodiversity asset, mitigation will be sought in line with the mitigation hierarchy. Impacts should be avoided and, if this is not possible, mitigated.</u></p> <p><u>Where there would be a residual impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area. Where an impact cannot be fully mitigated or, as a last resort, compensated for, then planning permission will be refused.</u></p>
MM18	47-48	CS.6 Explanation	<p>Insert additional text at end of paragraph 3.5.10:</p> <p><u>They should also recognise and respond to the opportunity to secure biodiversity enhancement through the built environment, by incorporating features such as bat boxes, swift bricks and green roofs. The Town and Country Planning Association publication ‘Biodiversity by Design’ is a useful guide.</u></p> <p>Amend paragraph 3.5.11 as follows:</p> <p><del>Good developments incorporate biodiversity considerations but can still result in some biodiversity loss when there are impacts that cannot be avoided through design and locations, or mitigated by other measures. The NPPF requires, as a last resort, compensation for this loss to be made.</del></p> <p><u>Good developments will deliver biodiversity enhancement. However, where biodiversity losses cannot be avoided or mitigated the NPPF requires, as a last resort, compensation for this loss to be made.</u></p>

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MM19	50-51	CS.7	<p>Delete final paragraph in Part A:</p> <p><del>Where the impact of development on the biodiversity aspects of Green Infrastructure cannot be mitigated effectively on site, the principle of biodiversity offsetting in accordance with Policy CS.6 Natural Environment will apply.</del></p> <p>Insert in first paragraph under list, 1-5 in Part B:</p> <p>Access to Green Infrastructure features within settlements and the countryside will be provided through, <u>for example</u>, local nature reserves...</p>
MM20	51-53	CS.7 Explanation	<p>Insert at end of paragraph 3.6.1:</p> <p><u>Further information about the District's Green Infrastructure assets will be provided in the Council's Site Allocations Plan. The Environment Agency also offers a free advice service, which identifies constraints, including green infrastructure assets on development sites. In addition, Warwickshire County Council has mapped information on green infrastructure connectivity.</u></p>
MM21	54-55	CS.8	<p>Replace Part B:</p> <p><del>Where proposals will affect a heritage asset, including involving its harm or loss, they will only be permitted in exceptional circumstances. Applicants will be required to undertake and provide an assessment of the significance of the asset using a proportionate level of detail relating to the likely impact the proposal will have on the asset's historic interest. In assessing whether exceptional circumstances exist, the following factors will be considered:</del></p> <p><del>(1) Whether it is practical to continue the current or previous use of the heritage asset and whether there are any other viable alternative uses.</del></p> <p><del>(2) The impact of the harm or loss of the heritage asset on the structure or setting of any other heritage asset, including the character and appearance of a Conservation Area.</del></p> <p><del>(3) Whether the relocation and reconstruction of the heritage asset is appropriate and can practicably</del></p>

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			<p><del>be achieved, either onsite or elsewhere.</del></p> <p><del>(4) That a suitable programme has been arranged and agreed to record those features of historic interest that would be lost in the implementation of the proposal.</del></p> <p><u>Where proposals will affect a heritage asset, applicants will be required to undertake and provide an assessment of the significance of the asset using a proportionate level of detail relating to the likely impact the proposal will have on the asset's historic interest.</u></p> <p><u>Proposals which would lead to substantial harm to, or total loss of significance of, designated heritage assets will only be permitted where substantial public benefits outweigh that harm or loss and it is demonstrated that all reasonable efforts have been made to sustain the existing use or find reasonable alternative uses.</u></p> <p><u>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm must be justified and weighed against the public benefits of the proposal, including securing its optimum viable use.</u></p> <p><u>For non-designated heritage assets, proposals will be assessed having regard to the scale of any harm or loss and the significance of the heritage asset.</u></p> <p><u>Where harm or loss of a heritage asset can be fully justified, as part of the implementation of the proposal the District Council will require archaeological excavation and/or historic building recording as appropriate, followed by analysis and publication of the results.</u></p> <p>Delete text from 1<sup>st</sup> paragraph of Part C:</p> <p>Proposals will be high quality, sensitively designed and integrated with the historic context. The design and layout of development proposals will be informed by an understanding of the significance of the historic asset and environment. <del>Both designated and non-designated historic features should be retained in situ.</del> Creative and innovative design and architecture that helps to secure the conservation of heritage assets and integrates new development into the historic environment will be encouraged where it is sympathetic to the character of the local area.</p>
MM22	55-56	CS.8 DMCs	Insert additional text in DMC(2):

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			<p>There will be a presumption in favour of the physical in situ preservation of <del>historic</del> <u>heritage</u> assets, whether designated or non-designated. <u>This approach is based on the view that historic heritage remains should be seen as an opportunity rather than a constraint and should be used to inform the proposed design and contextual analysis. In particular, this can include incorporating such features into the proposed design to provide a historical narrative to the site. If proposing.....</u></p> <p>Insert new DMC (3):</p> <p><u>A non-designated heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Non-designated heritage assets are included in the Warwickshire Historic Environment Record available at <a href="http://heritage.warwickshire.gov.uk/">http://heritage.warwickshire.gov.uk/</a>. In addition, the Council will compile a local list of non-designated heritage assets which will be publicly available on the Council's website at <a href="http://www.stratford.gov.uk/heritage">www.stratford.gov.uk/heritage</a>. It should be noted, however, that in a district like Stratford-on-Avon with such a rich heritage, the list will never be definitive and will require updating as and when new heritage assets are identified, including through the consideration of development proposals. Neighbourhood Plans may also identify non-designated heritage assets.</u></p> <p>Insert new DMC (4):</p> <p><u>In considering whether to grant planning permission in accordance with Policy CS.8(B) the Council will also have regard to the desirability of preserving the heritage asset, its setting or any features of special architectural or historic interest which it possesses, in accordance with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</u></p>
MM23	58-59	CS.9	<p>Replace 1<sup>st</sup> paragraph in Part B:</p> <p><del>Proposals should be compatible with national design guidance in 'Building for Life 12' and 'Secured by Design'. The design approach will ensure that development is:</del>  <u>High quality design will be achieved by ensuring that all development is:</u></p>

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			<p>Insert additional text after 1<sup>st</sup> sentence in Part B (7):</p> <p><u>Schemes linked to the evening and night-time economy will incorporate measures to help manage anti-social behaviour and to avoid unacceptable impact on neighbouring uses, residents and the surrounding area.</u></p> <p>Insert extra examples into paragraph 3.8.2:</p> <p><u>... 'Secured By Design (ACPO), Biodiversity by Design (TCPA, 2004), Climate Change Adaption by Design (TCPA, 2007), 'By Design'...</u></p>
MM24	60-61	CS.9 DMCs	<p>Insert new DMC(1):</p> <p><u>The District Council supports the implementation of Building for Life 12. It provides applicants with a useful checklist for ensuring high quality design and meeting the requirements of the criteria set out in Part B.</u></p>
MM25	65	CS.10	<p>Amend Policy as follows:</p> <p>The purposes of the Green Belt will be upheld by resisting inappropriate development within it, except in cases where very special circumstances are justified, in accordance with the provisions of national <del>planning</del> policy.</p> <p>The following forms of development in the Green Belt are <del>appropriate</del> <u>not inappropriate</u> in principle:</p> <p>(a) A small-scale development which meets a housing, employment or other need identified by a local community, in accordance with Policy AS.10 Countryside and Villages, subject to it not being harmful to the openness <del>and character</del> of the area <u>Green Belt</u>.</p> <p>(b) A small-scale extension <del>to</del> <u>or alteration of a building</u>, or the replacement of an existing building for the same use, as long as the <del>extended or new replacement building, and the activities involved, do not have a materially greater impact on the openness and character of the area</del> <u>is not materially larger than the one it replaces.</u></p> <p>(c) The limited infilling, <del>or the partial or complete redevelopment, or change of use</del> of a previously developed ('brownfield') site, <del>whether redundant or in continuing use (excluding temporary buildings),</del></p>

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			<p>subject to it not having a materially greater impact on the openness and character of the area than the existing or previous development or activity on the site of the Green Belt and the purpose of including land within it than the existing development. <del>The proposed location and type of development should be consistent with the overall development strategy for the District and the provisions of other policies in the Core Strategy where applicable.</del></p> <p>(d) The construction of new buildings and the carrying out of activities as defined in national planning policy.</p> <p>(e) <u>Limited infilling in Local Service Villages identified in accordance with Policy CS.16.</u></p> <p><u>The provisions of other policies in the Core Strategy will be taken into account in order to assess the impact of a development proposal on the character of the area and other features in order to assess whether there would be any other harm.</u></p> <p>It is proposed to remove the following areas of land from the Green Belt:</p> <ol style="list-style-type: none"> <li>1. <del>15 hectares east of Birmingham Road (north of A46), Bishopton, Stratford-upon-Avon (see Proposal SUA.3)</del></li> <li>2. 7 hectares north of Arden Road, Alcester (see Proposal ALC.3)</li> <li>3. <u>79.8</u> hectares at Gorcott Hill, north of Mappleborough Green (see Proposal REDD.2)</li> </ol> <p><del>The boundary of the Green Belt is shown on the Policies Map. The preparation of the Site Allocations Development Plan Document will include consideration of the need to identify Built-Up Area Boundaries for those Local Service Villages where it is agreed that site allocations should be made.</del></p>
MM26	65-68	CS.10 Explanation	<p>Amend the text that follows paragraph 4.1.6:</p> <p><b><u>1. East of Birmingham Road (north of A46), Bishopton, Stratford-upon-Avon</u></b>  Amount of land affected: 15 hectares (see Policies Map)  Exceptional Circumstances:  A key component of the development strategy for Stratford-upon-Avon is the Regeneration Zone which involves the redevelopment of a substantial area of existing business and commercial uses. To facilitate this will require the relocation of a number of established companies, including various car dealerships based on Western Road. They are seeking a high profile, visible road frontage location</p>



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			<p><del>which this land provides. The release of this site from the Green Belt is based solely on providing scope for implementing the Regeneration Zone proposal.</del></p> <p><del>Assessment against the five purposes of the Green Belt:</del></p> <p><del>(i) Restricting the sprawl of large built-up areas relates to the main conurbations in the West Midlands.</del></p> <p><del>(ii) The scale of the site involved will have no perceived impact on the merging of neighbouring towns.</del></p> <p><del>(iii) While the development of this site would cause some encroachment into the countryside, it is well screened from the wider landscape. It also provides the opportunity to utilise land and buildings that are currently used for a range of generally unattractive activities, including commercial uses and a caravan site.</del></p> <p><del>(iv) Development of this site would not have a significant impact on the setting or character of the town as the Birmingham Road approach is already affected by the traffic island and recent development.</del></p> <p><del>(v) The modest area of land involved will have no discernable impact on the prospects of urban regeneration elsewhere. In this case, removing land from the Green Belt to accommodate development is intended to directly facilitate urban regeneration.</del></p> <p><del>More information is set out in the Area Strategy for Stratford-upon-Avon (see Proposal SUA.3).</del></p> <p><b>3. Gorcott Hill, north of Mappleborough Green</b></p> <p>Amount of land affected: <u>79.8</u> hectares (see Policies Map)</p> <p><del>4.1.7 Further specific alterations to the boundaries of the Green Belt will be considered through the process of preparing the Site Allocations Development Plan Document. This will include the definition of Built-Up Area Boundaries for those Local Service Villages that lie within the Green Belt, in order to provide for small-scale housing schemes in accordance with the provisions of the overall development strategy. <u>Built-Up Area Boundaries will be defined either in the Site Allocations Development Plan Document or via a Neighbourhood Development Plan for those Local Service Villages that lie within the Green Belt in order to identify where limited infilling might be appropriate.</u></del></p>
MM27	69	CS10 DMCs	<p>Delete DMC(1):</p> <p><del>(1) Until Built-Up Area Boundaries are defined for Local Service Villages to inset, i.e. to exclude them, from the Green Belt, the designation will continue to wash over them and development proposals otherwise consistent with the provisions of part (b) in Policy AS.10 Countryside and Villages will not</del></p>

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			<p><del>be supported.</del></p> <p>Revise first bullet-point under re-numbered DMC (3) as follows:</p> <p>“An extension to <del>or replacement of</del> a building must not result in a building <del>be</del> disproportionately <del>or</del> <del>materially</del> larger compared with the <u>original building</u>, and a replacement building must not be <u>materially larger than the one it replaces, existing situation</u>, taking into account any buildings that are to be removed”.</p>
MM28	72	CS.12	<p>Insert at end of 1<sup>st</sup> paragraph in Policy:</p> <p><u>The cumulative impact of development proposals on the quality of the landscape will be taken into account.</u></p>
MM29	73	CS.12 DMCs	<p>Amend DMC(2) as follows:</p> <p><del>Assessment of development proposals will have regard to cumulative impact.</del> On an individual basis some proposals may seem innocuous but <u>cumulatively</u> they could form part of a general <del>trend towards</del> decline in the quality of the landscape.</p>
MM30	81-83	CS.15	<p>Amend policy as follows:</p> <p><b>Distribution of Development</b></p> <p>The distribution of development in Stratford-on-Avon District during the plan period 2011 - 2031 will be based on a pattern of balanced dispersal, in accordance with the distinctive character and function of the wide range of <u>sustainable locations</u> <del>settlements</del> across the District, <del>as reflected in the following hierarchy:</del></p> <p><b>A. Main Town: Stratford-upon-Avon</b></p>

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			<p>The town is the principal settlement in the District <u>and as such is a main focus for housing and business development</u>. Services and infrastructure will be improved to reflect the scale of development that takes place. The role of the town centre as a focus of shopping, services and tourism will be maintained.</p> <p>The specific strategy for the town is set out in its Area Strategy and Policy AS.1 Stratford-upon-Avon. Development will take place:</p> <ul style="list-style-type: none"> <li>• on allocated sites identified in the Area Strategy and shown on the Policies Map;</li> <li>• on sites identified in the Neighbourhood Plan; and</li> <li>• through the redevelopment and re-use of suitable land and property within the Built-Up Area Boundary defined on the Policies Map.</li> </ul> <p><b>B. Main Rural Centres</b></p> <p>The following rural market towns and large villages are identified as suitable locations for housing and business development and the provision of local services:</p> <p>Alcester, Bidford-on-Avon, Henley-in-Arden, Kineton, Shipston-on-Stour, Southam, Studley and Wellesbourne</p> <p>The strategies for these settlements are set out in their individual Area Strategies and Policies AS.2 to AS.9.</p> <p>Development will take place:</p> <ul style="list-style-type: none"> <li>• on allocated sites identified in the Area Strategies and shown on the Policies Map;</li> <li>• on sites identified in a Neighbourhood Plan; and</li> <li>• through the redevelopment and re-use of suitable land and property within their Built-Up Area Boundaries as defined on the Policies Map.</li> </ul> <p><b>C. New Settlements</b></p> <p>The following two locations are identified as sustainable growth points for the creation of new communities, <u>providing for a range of uses and making a significant contribution to meeting the housing needs of Stratford-on-Avon District:</u></p> <ul style="list-style-type: none"> <li>• Land in the vicinity of Gaydon and Lighthorne Heath to the west of the M40 <del>is identified as a major new growth point in the District</del> - the detailed provisions of this development are set out in Proposal</li> </ul>

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			<p><u>GLH and the extent of the site is shown on the Policies Map.</u></p> <ul style="list-style-type: none"> <li>• <u>Land at Long Marston Airfield - the detailed provisions of this development are set out in Proposal LMA and the extent of the site is shown on the Policies Map.</u></li> </ul> <p><del>The detailed provisions of this development are set out in Proposal GLH and the extent of the site is shown on the Policies Map.</del></p> <p><b>D. Local Service Villages</b></p> <p>A wide range of villages fall into this category, in accordance with the level of local services available. The status of an individual settlement could alter if the availability of services changes.</p> <p>The scale of housing development that is appropriate in each village is specified in Policy CS.16 Housing Development.</p> <p>Development will take place:</p> <ul style="list-style-type: none"> <li>• <del>On sites to be identified in the Site Allocations Development Plan Document;</del></li> <li>• on sites identified in a Neighbourhood Plan; and</li> <li>• through small-scale schemes on unidentified but suitable sites within their Built-Up Area Boundaries (where defined) or otherwise within their physical confines.</li> </ul> <p><b>E. <u>Large Rural Brownfield Sites</u></b></p> <p><u>To encourage the effective use of previously developed land, development will take place on Large Rural Brownfield Sites in accordance with Policy AS.11.</u></p> <p><b>F. All other settlements</b></p> <p>Development is restricted to small-scale community-led schemes which meet a need identified by the local community.</p> <p><b>G. Local Needs Schemes</b></p> <p><del>In</del> <u>Within and adjacent to all settlements in this hierarchy</u>, development may include small-scale community-led schemes brought forward to meet a need identified by that community. Dwellings provided through such schemes will contribute to the overall housing requirement for the District.</p> <p><b>7 Requirements</b></p>

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			<p>All development at existing settlements is expected to protect and enhance the character of the settlement involved and its setting. To achieve this, each individual proposal will be assessed against the following principles:</p> <ul style="list-style-type: none"> <li>(a) in relation to residential development, the number of homes proposed is consistent with the overall scale of development identified for the settlement in Policy CS.16 Housing Development;</li> <li>(b) the scale of the development is appropriate to its immediate surroundings and to the overall size and character of the settlement;</li> <li>(c) the design of the development is well-related to, and can be readily integrated with, the existing form of the settlement;</li> <li>(d) the location and extent of the development does not have an unreasonably harmful impact on the surrounding landscape and setting of the settlement;</li> <li>(e) the location and extent of the development would not result in the identity and/or integrity of the settlement being undermined as a result of the reduction in the gap with an adjacent settlement; and</li> <li>(f) the scheme incorporates or provides for appropriate improvements to the infrastructure and services of the community.</li> </ul> <p>For development proposals that are clearly larger than would be consistent with the principles set out above, a detailed Masterplan accompanying an application will be required to show:</p> <ul style="list-style-type: none"> <li>• what specific and additional opportunities would be secured for the benefit of the local community;</li> <li>• how any impacts on the character of the existing settlement and community would be overcome effectively;</li> <li>• what arrangements would be made to phase the implementation of the development; and</li> <li>• how the necessary infrastructure and services to support the development would be provided.</li> </ul> <p>It is expected that promoters of development schemes will engage with the local community, including through the neighbourhood planning process <u>where such a plan is under active preparation</u>, prior to the submission of a planning application.</p>

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MM31	83-85	CS.15 Explanation	<p>Amend text as follows:</p> <p>5.1.10 Based on this methodology, the following grouping of villages has been identified:            Category 1: Bishop’s Itchington, Harbury, Long Itchington, Quinton, Tiddington            Category 2: Brailes, Fenny Compton, Lighthorne Heath, Napton-on-the-Hill, Salford Priors, <u>Stockton</u>, Tysoe, Welford-on-Avon, Wilmcote, Wootton Wawen            Category 3: Claverdon, Earlswood, Ettington, Great Alne, Ilmington, Long Compton, Newbold-on-Stour, Snitterfield, <del>Stockton</del>, Temple Herdewycke, Tredington            Category 4: Alderminster, Alveston, Aston Cantlow, Bearley, Clifford Chambers, Gaydon, <u>Halford</u>, Hampton Lucy, Ladbrooke, Lighthorne, Long Marston, Loxley, Mappleborough Green, Moreton Morrell, Northend, Oxhill, Pillerton Priors, Priors Marston, Tanworth-in-Arden, Wood End</p> <p>5.1.11 The scope for individual villages to accommodate development, and the assessment of specific sites for their suitability for development, will take into account the presence of environmental designations, such as <del>Green Belt</del>, <u>the Cotswolds AONB</u>, Special Landscape Areas and Conservation Areas. <u>Within the Green Belt development will reflect the provisions of Policy CS.10, the National Planning Policy Framework and the Planning Practice Guidance.</u></p> <p><del>5.1.12 The process of allocating sites for development in the LSVs will be carried out through the preparation by the Council of a separate Site Allocations Development Plan Document. It would also be appropriate for neighbourhood plans to identify such sites, subject to this being consistent with the provisions of the Core Strategy.</del></p> <p>5.1.15 For this reason, the Council has consistently made it clear that it might need to consider the role that a different form of development would have in meeting part of the overall amount of future growth in the area. This need has intensified as a result of the increased housing requirement to <del>40,800</del> <u>14,600</u> dwellings.</p> <p>5.1.16 Following a rigorous technical assessment of a wide range of options, including large-scale extensions to existing settlements, the Council has concluded that making provision for a <u>two</u> new settlements <del>in the vicinity of Gaydon/Lighthorne Heath</del> is the most appropriate means of contributing to the District’s housing requirement during the plan period. <del>This location is adjacent to a major employment site occupied by Jaguar Land Rover and Aston Martin which supports a substantial</del></p>

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>
			<p><del>number of jobs. It has convenient access to the M40 at Junction 12 and express bus services can readily be provided to link it with nearby towns, railway stations and other attractions. The site does not have any overriding physical constraints, the necessary infrastructure can be provided effectively and the development can be implemented without delay.</del></p> <p>5.1.17 <u>The location of the new community at Gaydon/Lighthorne Heath is adjacent to a major employment site occupied by Jaguar Land Rover and Aston Martin Lagonda which supports a substantial number of jobs. It has convenient access to the M40 at Junction 12 and express bus services can readily be provided to link it with nearby towns, railway stations and other attractions. The site does not have any overriding physical constraints, the necessary infrastructure can be provided effectively and the development can be implemented without delay. The new settlement is expected to deliver 3,000 homes, of which around 2,500 2,300 will be built during the plan period up to 2031. In the longer term, once completed, the new settlement will become the second largest community in the District after Stratford-upon-Avon.</u> The site is very well contained, making it unlikely that the settlement would grow to any appreciable extent beyond the scale now envisaged. The Council believes that this is the right place in which to create a new community, as it will benefit from and enhance existing networks, relationships and patterns of movement. This location for creating a new community also has the added benefit of having a close relationship with Jaguar Land Rover's intentions to expand its activities and create a substantial number and range of new jobs on adjacent land.</p> <p>5.1.18 <u>The location of the new community at Long Marston Airfield is west of the B4632 on a part-greenfield/part-brownfield site. A new community can be created predominantly on an area of previously developed land. This site will deliver new housing well-related to Stratford-upon-Avon, but is of sufficient size to support a wide range of local facilities on the site. Its relationship to the town offers the prospect of different options for sustainable travel. However, the transport benefits would include a south-western relief road to Stratford-upon-Avon in addition to new public transport links. The new settlement is expected to deliver 3,500 homes, of which around 2,100 will be built during the plan period up to 2031.</u></p> <p>5.1.189 <u>In terms of the settlement hierarchy pattern across the District, the new settlements will become the equivalents of a Main Rural Centre and complement their role.</u></p>
MM32	86	CS.15 DMCs	Amend DMC(1) as follows:

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>
			(1) Local Needs Schemes are defined as small-scale community-led schemes to meet a need identified by that community. They include but are not limited to housing schemes. Local Needs Schemes will be supported in principle <del>where they are in or adjacent to</del> <u>in any</u> settlement across the District, in accordance with Part <del>7G</del> of the policy, whether Stratford-upon-Avon, Main Rural Centre, Local Service Village or other village or hamlet.
MM33	87-88	CS.16	<p>Insert additional Strategic Objective:</p> <p><u>(NEW) Previously developed sites in sustainable locations will have been re-used for purposes that are of an appropriate type and scale, while retaining their important natural, historic and other features.</u></p> <p>Amend policy as follows:</p> <p><b>Housing Development</b></p> <p><b>A. Housing Requirement</b></p> <p>Stratford-on-Avon District will meet its objectively assessed housing needs for the period 2011 to 2031. Provision will be made for <del>around at least 10,800</del> <u>14,600</u> additional homes, distributed as follows based on the <u>sustainable locations identified</u> <del>settlement hierarchy set out</del> in Policy CS.15:</p> <ul style="list-style-type: none"> <li>• Stratford-upon-Avon: approximately <del>2,500</del> <u>3,500</u> homes</li> <li>• Main Rural Centres: approximately <del>2,830</del> <u>3,800</u> homes</li> <li>• New Settlement at Lighthorne Heath: approximately <del>3,000</del> <u>2,300</u> homes <del>of which 2,500 will be built within the plan period</del></li> <li>• <u>New settlement at Long Marston Airfield: approximately 2,100 homes</u></li> <li>• Local Service Villages: approximately <del>1,950</del> <u>2,000</u> homes</li> <li>• Large Rural Brownfield Sites: approximately <del>500</del> <u>1,245</u> homes</li> <li>• Other Rural Locations: approximately <del>500</del> <u>750</u> homes</li> </ul>



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			<p><b>B. Strategic Allocations</b></p> <p>To deliver the housing requirement, the Core Strategy identifies the following strategic allocations for housing and housing-led mixed-use development during the plan period. The detailed provisions for each site allocation are set out in Section 6 Area Strategies.</p> <ul style="list-style-type: none"> <li>• 650 homes <u>within the plan period from a total of approximately 1,010 homes</u> on the Canal Quarter Regeneration Zone, Stratford-upon-Avon (SUA.1)</li> <li>• <u>65 homes South of Alcester Road, Stratford-upon-Avon (SUA.2)</u></li> <li>• <u>500 homes North of Bishopton Lane, Stratford-upon-Avon (SUA.4)</u></li> <li>• 190 homes North of Allimore Lane (southern part), Alcester (ALC.1)</li> <li>• 160 homes North of Allimore Lane (northern part), Alcester (ALC.2)</li> <li>• 200 homes West of Banbury Road, Southam (SOU.1)</li> <li>• 165 homes West of Coventry Road, Southam (SOU.2)</li> <li>• <u>530 homes South of Daventry Road, Southam (SOU.3)</u></li> <li>• <del>2,500</del> <u>2,300</u> homes <u>within the plan period from a total of approximately 3,000 homes</u> at Gaydon/Lighthorne Heath New Settlement (GLH)</li> <li>• <u>2,100</u> homes <u>within the plan period from a total of approximately 3,500 homes</u> at Long Marston Airfield New Settlement (LMA)</li> </ul> <p>A further strategic allocation of approximately <del>4,950</del> <u>2,000</u> homes is identified for the Local Service Villages. Policy CS.15 identifies four categories of Local Service Village, to which the following housing requirements apply:</p> <ul style="list-style-type: none"> <li>• Category 1 - approximately <del>76 to 100</del> <u>450</u> homes in <del>each</del> <u>total</u>, of which no more than around <u>25%</u> should be provided in an individual settlement.</li> <li>• Category 2 - approximately <del>54 to 75</del> <u>700</u> homes in <del>each</del> <u>total</u>, of which no more than around <u>12%</u> should be provided in an individual settlement.</li> </ul>

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			<ul style="list-style-type: none"> <li>• Category 3 - approximately <del>26 to 50</del> <u>450</u> homes in each <del>total</del>, of which no more than around 13% should be provided in an individual settlement.</li> <li>• Category 4 - approximately <del>40 to 25</del> <u>400</u> homes in each <del>total</del>, of which no more than around 8% should be provided in an individual settlement.</li> </ul> <p><u>Within the Green Belt Local Service Villages, housing development will take place wholly in accordance with the provisions of Policy CS.10.</u></p> <p><b>C. Site Allocations <u>Neighbourhood Planning</u></b></p> <p>The Council is committed to giving local people the opportunity to influence where homes are built in their communities and encourages Parish Councils to prepare Neighbourhood Plans that identify sites to meet or exceed the housing requirements set out above. <del>However, to ensure that the housing requirement for the Local Service Villages is delivered, the Council will prepare a Site Allocations Plan by 2016. Based on monitoring of housing supply and progress on Neighbourhood Plans, the Site Allocations Plan will identify and allocate sites to meet the housing requirement in the Local Service Villages.</del></p> <p><b>D. Phasing and Delivery</b></p> <p>The accompanying Housing Trajectory Table shows how the housing requirement will be delivered. The provision of new homes will be monitored <u>at least annually</u> to ensure <u>the trajectory is being met and to assess the housing land supply</u>. <del>continuous delivery across the plan period, to avoid either over- or under-provision of housing against the overall District requirement. Allocated sites will only come forward ahead of their phasing timescale if monitoring shows a significant shortfall in housing delivery across the previous phases and there appears to be no reasonable prospect of earlier phased sites being developed within the plan period. The calculation of 5 year housing land supply as set out in the latest Authority Monitoring Report (AMR) will provide the mechanism for managing housing delivery and updating the Housing Trajectory to bring forward additional sites if required.</del></p> <p><del>As a contingency, the Site Allocations Plan will also consider any need to identify further housing sites in Stratford upon Avon and the Main Rural Centres. Such sites will only be identified and released during the plan period if monitoring shows there is a significant shortfall in the amount of housing being delivered.</del></p> <p>The Site Allocations Plan will identify Reserve Housing Sites providing flexibility to ensure that the</p>

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			<p><u>District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031.</u></p> <p><u>Reserve sites will be released in the following circumstances:</u></p> <ul style="list-style-type: none"> <li>• <u>To rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in Stratford-on-Avon District;</u></li> <li>• <u>To contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath;</u></li> <li>• <u>To contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities;</u></li> <li>• <u>To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District.</u></li> </ul> <p><u>In accordance with Policy CS.xx, the Council will bring forward a review of the Core Strategy if it is evident that the required scale of additional housing site provision is beyond that which can properly be addressed within the context of the Site Allocations Plan process.</u></p>
MM34	88-92	CS.16 Explanation	<p>Amend text as follows:</p> <p>5.2.1 Stratford-on-Avon District Council is required to boost significantly the supply of housing. The housing requirement of <del>40,800</del> <u>14,600</u> for the 20 year period 2011 to 2031 (<del>or an average of 540 homes per annum</del>) is <del>based on</del> <u>derived from</u> an objective assessment of housing needs based on up- to-date technical evidence as required by the National Planning Policy Framework (NPPF). <u>The OAN for the District is 14,600 homes (or 730 homes per annum).</u></p>

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			<p>5.2.2 The starting point for objectively assessing housing need is to use trend-based demographic forecasts that make assumptions about likely household formation rates, rates of fertility and mortality, and levels of in-migration into the District from other parts of the UK. These projections then need to be tailored to local circumstances, <u>taking account of employment forecasts, housing market signals and indicators of housing affordability.</u> <del>Whilst there is a broad relationship between the number of homes and the number of jobs, the relationship is affected by patterns of commuting and economic activity rates.</del></p> <p>5.2.3 In Stratford-on-Avon District, of the <del>40,800</del> <u>14,600</u> new homes required, only some <del>4,700</del> <u>2,258</u> are needed to house the increase expected from the existing population: the vast majority of new homes being to house in-migrants to the District. <u>Based on the latest demographic assumptions as set out in the 2012 Sub-National Population Projections, the housing required to meet identified need is 9,236 (462 homes per annum), rising to 11,534 (577 homes per annum) to take account of migration rates over a 10 year period. However, once adjusted to take into account the factors outlined above, the calculation of OAN rises by 153 homes per annum to 14,600. This is the level of development required to balance the number of homes with the expected number of jobs in the District to 2031, whilst maintaining the 2011 commuting ratio of 0.96:1. The high probability is that the in-migrants will include a disproportionate number of retired people and those intending to commute to jobs outside the District. Provision of further additional housing above the 40,800 <del>11,300</del>, therefore, is considered likely to lead to a further unbalancing of the population.</u></p> <p><u>5.2.4 The housing requirement to be planned for in the Core Strategy is based on three different annual rates of delivery: 566 homes per annum in Phase 1 of the plan period, 894 homes per annum in Phase 2 and 730 homes per annum in Phases 3 and 4. This 'step-change' in delivery is considered appropriate firstly because of the fact that the Core Strategy period is at the end of Phase 1 and it would be perverse to retrospectively apply a significantly higher housing target to past years, and secondly because the Council recognises the importance of meeting the OAN and acknowledges the need to plan on the basis of an identified element of contingency or 'headroom' (see below).</u></p> <p>(Note: the Figure 1 Housing Trajectory Table and Graph are updated to reflect this approach and can be found at the end of the schedule.)</p> <p>5.2.45 <u>The Fig.1 Housing Trajectory - Table and Graph show how the housing requirement is being met through expected rates of delivery across the plan period.</u> <del>Although the Core Strategy will be adopted in 2015, it covers the 20 year period from 2011 to 2031 and follows on from the end of</del></p>

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			<p>the Local Plan Review 2006 <u>in 2011</u>. <u>More information on the housing trajectory can be found in the Housing Implementation Strategy that accompanies the Core Strategy</u>. The graph also shows the annual housing target of 540 <del>565</del> (horizontal orange line) and the managed delivery target (dashed purple line). By taking into account the number of homes built, the managed delivery target shows the number of homes still needing to be built to achieve the housing requirement. The slight rise between 2011/12 and 2016/17 above the annualised average rate reflects the shortfall in provision during the early years of the plan period whilst the tailing off reflects the overprovision between 2016/17 and 2020/21. The ‘negative’ end to the target corresponds to the slight over-provision in overall delivery that is anticipated by 2031.</p> <p><del>5.2.5 The Council acknowledges that the anticipated high-level annual delivery between 2016/17 and 2018/19 (reaching a peak of approximately 1,319 homes in 2017/18) is ambitious and exceeds by some margin the previous highest rate of annual supply of 806 homes in 2004/05. However, this reflects the need to correct the previous undersupply of housing in the short-term, as required by the NPPF. In doing so, it also requires commitment by developers and homebuilders to deliver new homes for which they have been granted planning permission. The stepped decrease in housing provision over the plan period reflects anticipated oversupply in phase 2, enabling the Council to demonstrate a continuous 5-year supply of housing as required by the NPPF. The Core Strategy will need to be reviewed prior to 2031 to identify the housing requirement post 2031, enabling continuous supply of housing beyond the plan period.</del></p> <p><u>5.2.6 As can be seen from the Trajectory Table, sufficient provision is made for at least 15,842 homes to be delivered by 2031, exceeding the requirement of 14,600 by approximately 9%. The step-change in annual supply and the Council’s commitment to meeting the housing needs of the District is also evident when contrasting the delivery of 132 homes in 2011/12 with the projected delivery of (at the peak point) some 1,979 homes in 2019/20. The highest levels of delivery are expected in Phase 2 reflecting the need to remedy the undersupply in previous years.</u></p> <p><u>5.2.7 Annual completions (actual, expected in current year and estimated in future years) are shown by the columns in the Trajectory Graph. The Council acknowledges that the anticipated high-level annual delivery between 2016/17 and 2020/21 is ambitious and exceeds by some margin the previous highest rate of annual supply of 806 homes in 2004/05. However, this reflects the need to correct the previous undersupply of housing in the short-term, as required by the NPPF. In doing so, it also requires commitment by developers and homebuilders to deliver new homes for which they have been granted planning permission. The stepped decrease in housing provision over the plan period reflects</u></p>

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			<p><u>anticipated oversupply in phase 2, enabling the Council to demonstrate a continuous 5 year supply of housing as required by the NPPF. The Core Strategy will need to be reviewed prior to 2031 to identify the housing requirement post 2031, enabling a continuous supply of housing beyond the plan period.</u></p> <p><u>5.2.8 The graph also shows the annualised OAN target of 730 (horizontal dashed line) and the annual plan target (horizontal solid line), with the step-change between 2015/16 and 2016/17. The managed delivery target (dotted line) shows the number of homes still needing to be built to achieve the housing requirement. The slight rise between 2011/12 and 2016/17 above the annualised average rate reflects the shortfall in provision during the early years of the plan period whilst the tailing off reflects the overprovision between 2016/17 and 2020/21. The 'negative' end to the target corresponds to the over-provision in overall delivery that is anticipated by 2031.</u></p> <p><del>5.2.69</del> <u>The housing trajectory comprises homes already built (known as completions), homes with planning permission and homes on allocated sites (known as commitments). The trajectory shows the number of homes already built and the number of homes with planning permission and expected to be built. These are known as completions and commitments, respectively, and count towards meeting the housing requirement of 10,800. Commitments include 800 homes at 'Land West of Shottery, Stratford-upon-Avon', a further 465 homes at Meon Vale (ie. The Large Rural Brownfield Site of the former Engineers Depot, Long Marston), as well as three of the sites identified as strategic allocations in this Core Strategy that, which were granted permission in early 2014/15: 350 homes North of Allimore Lane, Alcester (sites ALC.1 and ALC.2); and 236 homes West of Banbury Road, Southam (SOU.1); 165 homes West of Coventry Road, Southam (SOU.2); and 82 homes at Warwick House, part of the Canal Quarter Regeneration Zone, Stratford-upon-Avon. The remainder of the housing requirement is being delivered through the remaining strategic allocations as set out in Policy CS.15, with an allowance made for 'windfall' sites.</u></p> <p><u>5.2.10 The figure for the Large Rural Brownfield Sites refers to those listed in Policy AS.11 and represents the number of homes with planning permission from these sites. Whilst further homes may come forward from this source in accordance with Policy AS.11, the District Council is not relying on this supply to meet its housing requirement. Any additional homes would therefore comprise an additional source of windfall supply. The remainder of the housing requirement is being delivered through the remaining strategic allocations as set out in Policy CS.16; on identified Strategic Housing Land Availability Assessment (SHLAA) sites, and with a small allowance made for 'windfall' sites. Notwithstanding the above, it should be noted that whilst the Council considers the housing requirement to be appropriate for the District, local communities may wish to make additional provision through the auspices of Neighbourhood Planning.</u></p>

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			<p><u>5.2.11 The Council has also committed to preparing a Site Allocations Plan to allocate reserve sites in accordance with Policy CS.16 to meet any shortfall in housing within the District and help meet housing needs arising from outside the District. The Site Allocations Plan therefore builds additional robustness into the housing trajectory and makes doubly sure that the housing needs of the District will be met.</u></p> <p>5.2.7<del>12</del> 'Windfalls' are those homes that get permission and are built on unidentified sites such as small infill schemes and conversions or where a larger site unexpectedly comes forward for development, such as a former factory. Given the nature of the District, with its numerous settlements each comprising a mix of older and newer built areas and the past high rate of windfall development it is appropriate to continue to include an allowance for windfall development in <del>p</del>Phases 2, 3 and 4 of the plan period. This allowance is based on an analysis of the rate of windfalls on small sites (i.e. less than 5 homes) excluding residential garden land. In reality, the level of windfall development may be much higher, particularly since a number of larger rural exception affordable housing schemes may also come forward for development. As such, the windfall allowance should not be seen as a ceiling, although the Council will monitor the cumulative supply of windfalls to ensure that there is not a significant overprovision of housing across the District.</p> <p><del>5.2.8 The Core Strategy also includes a further allowance for large windfalls (i.e. sites of between 5 and 99 homes) in Phases 2 and 3 of 160 homes in Stratford-upon-Avon and 660 homes across the Main Rural Centres. Whilst the Council acknowledges that this is potentially a large number of homes that have not been allocated in the Core Strategy itself, the Council has committed itself to preparing a Site Allocations Plan to accompany the Core Strategy by the end of 2015/16. The Council anticipates many of these homes will have obtained planning permission and be under construction by 2015/16. Thus, the Site Allocations Plan will identify and allocate land to meet any residual shortfall in supply, taking account of the overall supply of windfalls across the District. This pragmatic and flexible approach is consistent with the Planning Practice Guidance which allows for Core Strategies to be found sound where they do not identify specific sites in years 11-15. The Site Allocations Plan will also allocate sites to meet any shortfall of housing in each Local Service Village as appropriate, and will assess the need for further contingent housing sites to be identified in Stratford-upon-Avon and the Main Rural Centres. These contingent sites would only be released during the plan period if monitoring shows there is a significant shortfall in the amount of housing already delivered.</del></p> <p>The following paragraphs remain as originally submitted but are renumbered as follows:</p>

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			<p>5.2.9 and 5.2.10 are amalgamated and become 5.2.<u>13</u></p> <p>5.2.11 becomes 5.2.<u>14</u></p> <p>5.2.12 becomes 5.2.<u>15</u></p> <p>5.2.13 becomes 5.2.<u>16</u></p> <p><u>5.2.17 As identified at paragraph 1.3.9, the planned long-term expansion by Jaguar Land Rover at Gaydon involves a development that is likely to be of more than local significance. The precise nature and timing of this development is currently unknown. In the event that development creating a substantial number of new jobs is brought forward in the earlier part of the plan period, this could have implications for the scale of housing growth that should be planned for beyond 2021. The Council will keep this matter under active review, in co-operation with other authorities in the housing market area.</u></p> <p><u>5.2.18 The Council is required to demonstrate the equivalent of 5 years' worth of housing land supply (5YHLS) on adoption and throughout the plan period. This is known as the 5YHLS calculation. It is a comparison of the anticipated supply of new homes against the number of new homes that are required to be built (the housing requirement). It is expressed as the number of years' worth of supply. So as to avoid being skewed by annual fluctuations in housing supply, it is calculated over a 5 year period. It should therefore exceed 5. Any 5YHLS is a snapshot in time. The 5 year period is a 'forward look' produced on at least an annual basis and standard practice is for the starting point to be 1 April each year.</u></p> <p><u>5.2.19 As of 31 March 2016, based on the housing trajectory set out in Figure 1, the Council can demonstrate a 5-year supply with a 20% buffer applied, which is necessary at the date of adoption because there has been a record of persistent under delivery of housing in the District for a number of years, albeit, as a result of the moratorium, for reasons outside of the Council's control. The calculation seeks to deal with the shortfall from previous years fully within the 5 year period, applies a conservative 5% deduction for non-implementation and excludes an additional allowance for windfalls within the 5 year period above those homes already committed. The calculation should also be seen in the context of the Core Strategy including a contingency of some 9%.</u></p> <p>(Note: ahead of adoption, Figure 2 will be updated to reflect the position as at April 2016 for the 5 year period 2016-2021.)</p>



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MM35	n/a	n/a	<p>Insert an additional policy:</p> <p><b><u>Policy CS.xx</u></b></p> <p><b><u>Accommodating Housing Need Arising from Outside Stratford-on-Avon District</u></b></p> <p><u>The existence of unmet housing need arising outside Stratford-on-Avon District will not render this Plan out of date. However, the Plan will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review. To establish this, the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to:</u></p> <ol style="list-style-type: none"> <li>a. <u>prepare and maintain a joint evidence base including housing need and housing land availability;</u></li> <li>b. <u>take part in a process to agree the strategic approach to address any shortfall of land availability to deliver in full the Housing Market Area’s Objectively Assessed Housing Need or other evidenced housing need arising outside the District; and</u></li> <li>c. <u>where the evidence and the duty to co-operate process clearly indicates that there is a housing need that cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need could most appropriately be met within Stratford-on-Avon District, the Council will seek to identify the most appropriate sites to meet this need and will review the Local Plan to do this, should it be required.</u></li> </ol> <p><u>Explanation</u></p> <p><u>The six local planning authorities within the Coventry and Warwickshire Housing Market Area (HMA) have agreed to cooperate together to ensure the HMA’s housing need of at least 4,277 dwellings per annum is met in full. It is recognised that this is important in supporting the growth ambitions of Coventry and Warwickshire as well as ensuring local plans and core strategies within the sub-region comply with national policy and guidance.</u></p> <p><u>However, it is recognised that there may be physical or policy constraints which make it difficult for one or more of the local planning authorities within the sub-region to meet their local objectively assessed housing need in full. In these circumstances it will be necessary for the six authorities to work closely together to address this potential shortfall and to ensure the HMA’s overall housing need is met in full.</u></p>

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			<p><u>The process for doing this has been set out and agreed by the Coventry and Warwickshire Shadow Joint Committee. The starting point of this process is a shared evidence base relating to strategic issues. It is recognised that the following assessments/ studies are likely to be the key elements of this shared evidence base:</u></p> <ul style="list-style-type: none"> <li>• <u>A Joint Strategic Housing Market Assessment: it is important to ensure that the objectively assessed housing need of the HMA and each of the Councils within the HMA is understood and that the evidence to support this is kept up to date.</u></li> <li>• <u>A Joint Approach to Strategic Housing Land Availability Assessments: it is important that housing land availability is assessed consistently across the HMA so that the overall and local supply of potential housing sites is understood.</u></li> <li>• <u>Joint Employment Land Assessment: it is important to ensure that employment land requirements and supply are understood, and planned for, alongside housing. A shared evidence base will help to understand the sub-regional and local employment land requirements as well as the availability of sub-regional and local sites to meet these requirements.</u></li> <li>• <u>A Green Belt Study: the West Midlands Green Belt covers significant parts of the Coventry and Warwickshire HMA. The Green Belt study needs to be up to date to inform a sub-regional approach.</u></li> </ul> <p><u>In the event that there is a shortfall arising from one or more District within the HMA, and in the context of a shared evidence base, the six local planning authorities have agreed to work together to develop and maintain a strategy to meet the HMA’s housing requirement. This process will seek to identify the most suitable available sites to meet any shortfall. Stratford-on-Avon District Council will participate actively in the process on an on-going basis.</u></p> <p><u>Should this strategy identify that sites within Stratford-on-Avon District are required to meet some or all of a housing need arising from outside the District, the Council will undertake work to establish the most appropriate sites to do this and if this indicates that significant modifications are required to the Local Plan, the Council is committed to undertaking an early review of the Plan to address this.</u></p> <p><u>A further issue that may need to be addressed through this process is the potential for a shortfall in housing land arising from outside the Coventry and Warwickshire HMA, in particular from the Greater Birmingham area. In the event that such a shortfall may need to be partially addressed within the Coventry and Warwickshire HMA, the six local planning authorities have agreed to work together using the process described above.</u></p>

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MM36	93-94	CS.17	<p>Amend policy as follows:</p> <p><b>A. Requirement and Thresholds</b></p> <p>All new residential development <u>that incorporates or comprises use as a dwelling house within Use Class C3, including that proposed to meet specialised needs, on sites of 0.2 hectares or more and/or comprising 5 or more self-contained homes,</u> will be required to contribute to the provision of affordable housing <u>in accordance with the following thresholds:</u></p> <ul style="list-style-type: none"> <li>• <u>In the parishes of Alcester and Kinwarton, Bidford-on-Avon, Henley-in-Arden and Beaudesert, Kineton, Shipston-on-Stour, Southam, Stratford-upon-Avon, Studley and Mappleborough Green, Tanworth-in-Arden, and Wellesbourne; development providing:</u> <ul style="list-style-type: none"> <li>○ <u>11 or more dwellings; or</u></li> <li>○ <u>6 or more dwellings with a combined gross floorspace of more than 1,000sqm</u></li> </ul> </li> <li>• <u>In all other parishes; development providing 6 or more dwellings.</u></li> </ul> <p><u>The Council will have regard to the nature of a scheme, including the relevant planning unit, in order to determine whether it comes within Use Class C3 and is subject to the provisions of this policy. The affordable housing will comprise a minimum of 35% of the homes, unless credible site specific evidence of viability indicates otherwise. Schemes proposing more than 35% affordable housing provision, including rural exceptions, will also be supported where it meets an identified need. The Council will also support Use Class C2 and C2a schemes that contribute to the provision of affordable housing.</u></p> <p><b><del>B. Site Size Thresholds</del> <u>On-site Provision</u></b></p> <p><del>On all schemes proposing between 5 and 9</del> <u>fewer than 11</u> homes a contribution to off-site affordable housing provision in the District will be provided where on-site provision (in whole or part) is not proposed. <del>On schemes proposing 40</del><u>11</u> or more homes, affordable housing will be provided on-site.</p> <p>The application of the minimum affordable housing requirement may result in a fractional level of provision. Given the distributional strategy of this Plan and the preference for smaller sites, fractional provision assumes greater importance for reasons of equitability. <del>On sites of between 5 and 9</del> <u>fewer than 11</u> homes, the fractional requirement will be provided as an off-site contribution. For sites <del>proposing between 40</del> <u>11</u> and 20 homes the requirement for on-site provision will be rounded down to</p>

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			<p>the nearest whole unit (unless the applicant proposes rounding up), with the balance to be provided as an off-site contribution. For sites proposing 21 homes or more, affordable housing will be provided on-site to the nearest whole unit.</p> <p><u>Full or partial off-site provision of general needs affordable housing on sites proposing 11 or more homes will only be permitted where exceptional circumstances have been demonstrated to the Council's satisfaction. Schemes providing specialised accommodation may provide affordable housing off-site where such provision has been justified to the Council's satisfaction. In both circumstances the alternative form of provision will be equivalent or better in all respects to the affordable housing were this to have been provided on-site in accordance with Part A of the Policy.</u></p> <p><b>C. Affordability and Tenure</b></p> <p>Affordable housing is defined as social rented, affordable rented, and intermediate housing provided to eligible households whose needs are not met by the market. Such housing will:</p> <ol style="list-style-type: none"> <li>(1) Ensure the development of cohesive and stable communities, through the provision of appropriate stock and tenure profiles and management arrangements on each site.</li> <li>(2) Effectively meet the needs of households, including through its availability at a cost low enough for them to afford, determined with regard to local house price and market rent levels.</li> <li>(3) Include provision for homes to remain at an affordable cost for future eligible households or, exceptionally if relevant restrictions are lifted, for the subsidy involved in their development to be fully recycled for alternative affordable housing provision.</li> </ol> <p>On each site to which this policy applies, an appropriate tenure profile will be determined based on the principle that total affordable housing costs (rents and sale prices together with any applicable service charges) must be set at levels which will ensure that the accommodation is genuinely affordable to all households on low incomes, including those in work and/or with special needs. <del>The expectation is that the following tenure mix will apply, as updated by the Development Requirements Supplementary Planning Document in accordance with the housing type, size and mix set out in Policy CS.18, unless evidence relating to specific local circumstances indicates otherwise:</del> <u>In accordance with the housing size and mix required by Policy CS.18, the following preferred tenure mix will also apply. The final mix achieved on any site will be informed by the up-to-date position set out in the Development Requirements SPD, which shall take into account any change to the definition of affordable housing established via national guidance, any relevant site specific issues and evidence of local</u></p>

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			<p><del>circumstances.</del></p> <ul style="list-style-type: none"> <li>• Maximum 20% Affordable Rented Housing</li> <li>• Maximum 20% Intermediate Housing</li> <li>• Minimum 60% Social Rented Housing</li> </ul> <p><b>D. On-site Provision and Integration</b></p> <p><del>To contribute to the achievement and maintenance of sustainable communities, affordable housing will be provided on-site in accordance with Part B of this policy. To ensure community cohesion and good design, affordable homes will be fully integrated in the design of the overall scheme, being physically and visually indistinguishable from the market units and ‘pepper-potted’ dispersed across the site in clusters appropriate to the size and scale of the development.</del></p> <p><del>Full or partial off-site provision will only be permitted where exceptional circumstances have been demonstrated to the Council’s satisfaction. In such cases, the alternative form of provision will be equivalent or better in all respects to the affordable housing, were this to have been provided on-site in accordance with Part A of the policy.</del></p> <p><b>E. Delivery</b></p> <p><del>The provision of affordable housing will be required irrespective of the availability of public subsidy. Schemes must have effective mechanisms in place to ensure their timely delivery, proper allocation and management, and retention in perpetuity. Schemes will remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. All homes will reflect the Council’s</del> <u>The Council will identify quality benchmark standards in respect of affordable housing allocation, monitoring and management arrangements as set out in the in its Development Requirements SPD.</u></p>
MM37	94-96	CS.17 Explanation	<p>Insert at end of paragraph 5.3.1:</p> <p><u>Applications for low cost market housing would be determined on the same basis as open-market housing. However, low cost market housing could also be brought forward as Local Needs Schemes in accordance with Policy CS.15.</u></p>

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			<p>Insert at end of paragraph 5.3.5:</p> <p><u>The SHMA evidence has been supplemented by the Updated Assessment of Housing Need (September 2015) which identifies an increased need of at least 233 affordable homes per annum. The impact of any change to the definition of affordable housing arising from national planning guidance, such as the provision of Starter Homes, should be considered at housing market area level. The outcome should be reflected in the Council’s Development Requirements SPD or, if required, via a review of this policy.</u></p> <p>Insert text at end of paragraph 5.3.6:</p> <p><u>The viability evidence also found that development of the Canal Quarter Regeneration Zone was less viable with 35% affordable housing provision. Given the housing mix expected to be provided, and the potential for a higher quantum of flatted homes, it is recommended that a lower affordable housing requirement is set for this particular site. This is included in Proposal SUA.1.</u></p> <p>In paragraph 5.3.7, insert <u>fewer than 11 dwellings</u> after the word “for”</p> <p>Insert additional paragraph:</p> <p><u>5.3.8 It is considered appropriate that there should be a lower threshold for the provision of affordable housing on sites within rural parishes. The majority of parishes in Stratford-on-Avon District were designated as rural under Statutory Instrument 2004 No.2681. The parishes of Mappleborough Green, Lighthorne Heath and Wilmcote were not listed in the Order because at the time they were part of the parishes of Studley, Lighthorne and Aston Cantlow, respectively. Thus, the designation that applies to these parishes applies to the three new parishes accordingly. In accordance with the settlement hierarchy in Policy CS.15, which identifies 8 Main Rural Centres, the Council has chosen not to apply the lower threshold to the parishes of Alcester and Kinwarton, Bidford-on-Avon, Henley-in-Arden and Beaudesert, Kineton, Shipston-on-Stour, Southam, Studley and Mappleborough Green, and Wellesbourne. The upper threshold also applies to the parish of Tanworth-in-Arden (which has a population of just over 3,000) and the town of Stratford-upon-Avon.</u></p>
MM38	96-97	CS.17 DMCs	Insert two additional DMCs:

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			<p>(1) <u>The majority of the District is designated as a rural area wherein the Council will seek the lower affordable housing threshold of 5 dwellings or fewer. In non-rural designated areas, for the higher threshold of 10 homes or fewer to apply the combined gross floorspace must not exceed 1,000sqm. For schemes in non-designated rural areas where the combined gross floorspace exceeds 1,000sqm, the Council will seek affordable housing on schemes of 6 or more homes. It should be noted that the floorspace threshold does not apply to the lower threshold. For the avoidance of doubt, the following table sets out examples of how Policy CS.17 would apply:</u></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 10%; text-align: center;"><u>Number of Homes</u></th> <th colspan="2" style="text-align: center;"><u>Alcester and Kinwarton, Bidford-on-Avon, Henley-in-Arden and Beaudesert, Kineton, Shipston-on-Stour, Southam, Stratford-upon-Avon, Studley and Mappleborough Green, Tanworth-in-Arden, and Wellesbourne</u></th> <th style="text-align: center;"><u>All Other Parishes</u></th> </tr> <tr> <th style="text-align: center;"><u>10 homes or fewer and maximum combined gross floorspace of more than 1,000sqm</u></th> <th style="text-align: center;"><u>10 homes or fewer and maximum combined gross floorspace of less than 1,000sqm</u></th> <th></th> </tr> </thead> <tbody> <tr><td style="text-align: center;"><u>1</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td></tr> <tr><td style="text-align: center;"><u>2</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td></tr> <tr><td style="text-align: center;"><u>3</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td></tr> <tr><td style="text-align: center;"><u>4</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td></tr> <tr><td style="text-align: center;"><u>5</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>No provision</u></td></tr> <tr><td style="text-align: center;"><u>6</u></td><td style="text-align: center;"><u>Off-site provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>Off-site provision</u></td></tr> <tr><td style="text-align: center;"><u>7</u></td><td style="text-align: center;"><u>Off-site provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>Off-site provision</u></td></tr> <tr><td style="text-align: center;"><u>8</u></td><td style="text-align: center;"><u>Off-site provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>Off-site provision</u></td></tr> <tr><td style="text-align: center;"><u>9</u></td><td style="text-align: center;"><u>Off-site provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>Off-site provision</u></td></tr> <tr><td style="text-align: center;"><u>10</u></td><td style="text-align: center;"><u>Off-site provision</u></td><td style="text-align: center;"><u>No provision</u></td><td style="text-align: center;"><u>Off-site provision</u></td></tr> <tr><td style="text-align: center;"><u>11</u></td><td style="text-align: center;"><u>On-site</u></td><td style="text-align: center;"><u>On-site</u></td><td style="text-align: center;"><u>On-site</u></td></tr> </tbody> </table>			<u>Number of Homes</u>	<u>Alcester and Kinwarton, Bidford-on-Avon, Henley-in-Arden and Beaudesert, Kineton, Shipston-on-Stour, Southam, Stratford-upon-Avon, Studley and Mappleborough Green, Tanworth-in-Arden, and Wellesbourne</u>		<u>All Other Parishes</u>	<u>10 homes or fewer and maximum combined gross floorspace of more than 1,000sqm</u>	<u>10 homes or fewer and maximum combined gross floorspace of less than 1,000sqm</u>		<u>1</u>	<u>No provision</u>	<u>No provision</u>	<u>No provision</u>	<u>2</u>	<u>No provision</u>	<u>No provision</u>	<u>No provision</u>	<u>3</u>	<u>No provision</u>	<u>No provision</u>	<u>No provision</u>	<u>4</u>	<u>No provision</u>	<u>No provision</u>	<u>No provision</u>	<u>5</u>	<u>No provision</u>	<u>No provision</u>	<u>No provision</u>	<u>6</u>	<u>Off-site provision</u>	<u>No provision</u>	<u>Off-site provision</u>	<u>7</u>	<u>Off-site provision</u>	<u>No provision</u>	<u>Off-site provision</u>	<u>8</u>	<u>Off-site provision</u>	<u>No provision</u>	<u>Off-site provision</u>	<u>9</u>	<u>Off-site provision</u>	<u>No provision</u>	<u>Off-site provision</u>	<u>10</u>	<u>Off-site provision</u>	<u>No provision</u>	<u>Off-site provision</u>	<u>11</u>	<u>On-site</u>	<u>On-site</u>	<u>On-site</u>
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			<u>12</u>	<u>On-site</u>	<u>On-site</u>	<u>On-site</u>
			<p>(2) <u>Gross floorspace is defined as the area of the dwelling measured externally at each floor level. It includes perimeter wall thickness and external projections, areas occupied by internal walls and partitions, integral garages and conservatories. It excludes attached garages, parking areas and canopies etc, and greenhouses and stores.</u></p> <p>Insert three additional bullet points at end of previous DMC(1), now DMC(3):</p> <ul style="list-style-type: none"> <li>• <u>Self-build housing</u></li> <li>• <u>Residential extensions; and,</u></li> <li>• <u>Extra-care housing.</u></li> </ul> <p>Amend 1<sup>st</sup> sentence in previous DMC(7), now DMC(9):</p> <p>Full or partial off-site provision of schemes of <del>40</del> <u>11</u> or more homes will only be permitted where exceptional circumstances have been demonstrated to the District Council's satisfaction.</p> <p>Delete 1<sup>st</sup> sentence from beginning of previous DMC(10), now DMC(12):</p> <p><del>The stated 35% proportion represents the minimum expected level of provision.</del></p>			
MM39	98-99	CS.18	<p>Amend Policy as follows:</p> <p><b>B. General Needs Housing Mix</b></p> <p><del>The expectation is that the following type and size mix will apply, as updated by the Development Requirements Supplementary Planning Document, and in accordance with the tenure mix set out in Policy CS.17 Affordable Housing, unless evidence relating to specific local circumstances indicates otherwise.</del></p> <p><u>The following table sets out the preferred type and mix of homes that will apply, in accordance with the tenure mix set out in Policy CS.17 Affordable Housing, but the final mix achieved on any site will be informed by the up-to-date position set out in the Development Requirements SPD, taking account</u></p>			



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			<p><u>of any relevant site specific issues and evidence of local market circumstances.</u></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th style="width: 25%;">Dwelling type</th> <th style="width: 25%;">Market housing</th> <th style="width: 25%;">Social rented or Affordable rented Housing</th> <th style="width: 25%;">Intermediate affordable housing</th> </tr> </thead> <tbody> <tr> <td>1 bed (2 person)</td> <td style="text-align: center;">5% <u>5-10%</u></td> <td style="text-align: center;">40% <u>15-20%</u></td> <td style="text-align: center;">0%</td> </tr> <tr> <td>2 bed (3 or 4 person)</td> <td style="text-align: center;">40% <u>35-40%</u></td> <td style="text-align: center;">40% 35-40%</td> <td style="text-align: center;">50%</td> </tr> <tr> <td>3 bed (5 or 6 person)</td> <td style="text-align: center;">40% <u>40-45%</u></td> <td style="text-align: center;">30% <u>35-40%</u></td> <td style="text-align: center;">40%</td> </tr> <tr> <td>4+ bed (6, 7 or 8+ persons)</td> <td style="text-align: center;">15% <u>15-20%</u></td> <td style="text-align: center;">20% <u>5-10%</u></td> <td style="text-align: center;">10%</td> </tr> </tbody> </table> <p>To maximise flexibility of <u>in</u> the housing stock, 1 and 2 bed affordable homes <del>will</del> <u>should</u> be provided through an appropriate mix of bungalows, flats, apartments, maisonettes and houses, whilst 3 and 4 bed affordable homes <del>will</del> <u>should</u> be provided as houses. <del>Affordable homes, irrespective of tenure, will not be provided as flats or apartments.</del> Intermediate affordable housing should not be provided as <u>1-bed homes unless an exceptional justification is advanced as part of a planning application. All 1 and 2 bed affordable houses will</u> <u>homes should</u> be built with bedrooms capable of satisfactorily accommodating 2 occupiers in each bedroom (i.e. double or twin bedrooms) <u>unless an exceptional justification is advanced as part of a planning application.</u></p> <p>Replace 1<sup>st</sup> paragraph in Part C:</p> <p><del>Schemes proposing housing that meets the needs of vulnerable people whilst promoting independent living, including extra care accommodation, will be supported in accordance with Policy CS.16 Housing Development provided all of the following criteria are met:</del></p> <p><u>Specialised accommodation is housing that meets the needs of vulnerable people of whatever age and includes the broad range of accommodation for older people such as, for example, 'extra care' housing accommodation for elderly people. Schemes that provide specialised accommodation whilst promoting independent living will be supported in accordance with Policy CS.16 Housing Development provided all of the following criteria are met:</u></p>	Dwelling type	Market housing	Social rented or Affordable rented Housing	Intermediate affordable housing	1 bed (2 person)	5% <u>5-10%</u>	40% <u>15-20%</u>	0%	2 bed (3 or 4 person)	40% <u>35-40%</u>	40% 35-40%	50%	3 bed (5 or 6 person)	40% <u>40-45%</u>	30% <u>35-40%</u>	40%	4+ bed (6, 7 or 8+ persons)	15% <u>15-20%</u>	20% <u>5-10%</u>	10%
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			In Part D, delete the sentences: <del>All homes will be built to the optional higher level of accessibility as set out in Building Regulations (Part M). Proposals for affordable housing will meet the national space standard for new homes.</del>
MM40	99-100	CS.18 Explanation	<p>Amend text as follows:</p> <p><u>5.4.1 Meeting housing needs is not just about delivering additional housing; it is about ensuring the right type of additional housing is delivered. The Strategic Housing Market Assessment (SHMA) for the Coventry and Warwickshire sub-region provides guidance on the appropriate mix of housing in Stratford-on-Avon District. The majority of need and demand is for 2 and 3 bed homes. The size and type mix has been informed by the Coventry and Warwickshire Strategic Housing Market Assessment (SHMA),</u> Regard has also been had to the deliverability of affordable housing by the Council's partner housing associations.</p> <p><u>Insert 3 new paragraphs:</u></p> <p><u>5.4.2 The Core Strategy covers the period to 2031. This is a long period of time during which there will be changes to market conditions and Government policies. The nature of these changes is unknown but will inevitably affect both housing needs and demand. Change can take place with short lead-in times and can also relate to matters not directly related to housing and planning – for example, changes to eligibility for social care or support – but which nevertheless impacts on housing requirements. Thus a measure of flexibility is needed to ensure that the mix of both affordable and market housing that is delivered is capable of timely adjustment to ensure that the housing needs of different types of households are effectively met.</u></p> <p><u>5.4.3 Stratford-on-Avon is a large rural District and affordable housing is widely, but unevenly, dispersed across the District. According to the 2011 Census, 13% of the housing stock is affordable housing. Demand for affordable housing is high and the turnover of the stock is generally low. Changes to policy and legislation can have a disproportionate impact on the ability of people requiring affordable housing to access housing appropriate to their needs. This makes it important to plan for a range and mix of housing which is sufficiently flexible to cater for changing household needs.</u></p> <p><u>5.4.4 The majority of need and demand is for 2 and 3 bed market and affordable homes. Some provision for 4 bedroom affordable houses is sought, particularly to reflect the circumstances of smaller villages, which have lost stock of this size under Right to Buy legislation. Experience has</u></p>

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			<p><u>also shown that there is very little demand for 1-bed shared ownership affordable homes in particular.</u></p> <p><u>Delete paragraph 5.4.5 and renumber subsequent paragraphs.</u></p>
MM41	100-101	CS.18 DMCs	<p>Amend DMC(2) as follows:</p> <p>Part B of this policy does not apply to <u>schemes providing specialised accommodation in accordance with Part C</u>. Schemes that do not meet the requirements of Part C will be treated as general needs housing and subject to the provisions of this policy.</p> <p>Insert an additional DMC:</p> <p>(3) <u>In respect of Part B, in line with providing an appropriate mix of affordable homes, such onsite provision should reflect the broad range of market homes. For example, a scheme for 3 and 4 bed market homes should not normally provide all affordable homes as 1 and 2 bed homes.</u></p> <p>Delete DMC (4):  <del>Specialised accommodation, including Extra Care schemes, that provide self-contained units of accommodation (irrespective of level of care provided or Use Class) will provide affordable housing in accordance with Policy CS.17 and count as supply against the District housing requirement.</del></p> <p>Amend DMC(5):  Schemes, including Extra Care, should meet the <del>internal space standards and</del> care support arrangements specified in the latest relevant Warwickshire County Council guidance contained in Market Position Statements. The first suite of these statements includes ‘Services for People with Disabilities’ and ‘Services for Older People’. They are available to view at <a href="http://www.warwickshire.gov.uk">www.warwickshire.gov.uk</a>. Extra Care schemes should be provided in accordance with Warwickshire County Council's ‘Extra Care Housing Strategy for Older People in Warwickshire’. This document sets out the justification for the Council's approach. Additional information in respect of arrangements to ensure the delivery of appropriate care and support packages will be set out in the Development Requirements SPD.</p> <p>Insert an additional DMC:</p>

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			(6) <u>Specialised accommodation is housing for any age group that is purpose designed and designated in a planning obligation for a specific client group. The delivery of support or care will not result in the categorisation of housing as specialised accommodation if the housing is not purpose designed and designated.</u>
MM42	102-103	CS.19	Amend 2 <sup>nd</sup> paragraph in Part A:  The subdivision or conversion of existing buildings into dwellings or existing houses into flats or Homes in Multiple Occupation (HMO) will be supported where the residential use is acceptable in principle and the conversion provides a satisfactory <u>safe</u> living environment and amenity for the intended occupiers and there would be no significant adverse impact on the amenities of neighbouring properties by virtue of the intensification of use.
MM43	105-106	CS.20	Amend Policy as follows:  Proposals for the provision of permanent, temporary and transit Gypsy and Traveller pitches and Travelling Showpeople plots will be <del>supported where all of the following criteria are met</del> <u>considered against the following criteria:</u>  (d) <del>the site will not be at high risk of flooding in accordance with Environment Agency requirements;</del> <u>the site should avoid areas prone to fluvial, pluvial or surface water flooding, and exclude areas with a 1 in 100 or greater annual probability of flooding;</u>  (g) the site will be in a sustainable location in reasonable proximity to local services and facilities, including health <u>and emergency</u> services, making them accessible by modes of transport more sustainable than the private car;  (i) the development and use of the site makes best use of previously developed, untidy or derelict land <u>where available and suitable</u> and will not have unacceptable adverse impacts on the landscape, biodiversity or the built environment;
MM44	106	CS.20 Explanation	Amend text as follows:

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			5.6.1 The National Planning Policy Framework (NPPF) requires the Council to identify sites to meet the accommodation needs of the gypsy and traveller community. Even though government policy requires the identification of sites for permanent and temporary pitches, <del>the Council's Gypsy and Traveller Needs Assessment (2011) indicates that at present there is no need for Travelling Showpeople sites</del> <u>the Council's Gypsy and Traveller Needs Assessment 2014 Update indicates that there is no</u> <del>There is also no demonstrated</del> need for transit site provision in the District. The County Council is seeking to bring forward Emergency Stopping Places in the County and the District Council and its neighbours will be key partners in this process. Temporary planning permission was granted in November 2013 for a facility in Stratford-on-Avon District for up to 12 caravans and towing vehicles near Southam. The permission runs to November 2016, enabling the effects of the use to be gauged over a temporary period.
MM45	106	CS.20 DMCs	Delete DMC (2): <del>Site development must accord with the national guidance on site design and facility provision set out in the 'Designing Gypsy and Traveller Sites: Good Practice Guide' (May 2008, as amended).</del>
MM46	108-109	CS.21	Amend 2 <sup>nd</sup> paragraph in Policy as follows:  Provision will be made for <del>an additional</del> <u>at least</u> 35 hectares of employment land over the plan period 2011-2031.  Amend 4th paragraph of Policy as follows:  In addition, approximately 100 hectares of land are identified at Gaydon/Lighthorne Heath to enable the expansion of Jaguar Land Rover's activities <u>and a further 4.5 hectares to enable the expansion of Aston Martin Lagonda.</u> (See Proposal GLH)
MM47	109-111	CS.21 Explanation	Amend text as follows:

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			<p><del>5.7.7 Stratford-on-Avon District has experienced a higher increase of in-commuting than other parts of Warwickshire, rising from about 20% in 1981 to nearly 36% in 2001. There has also been an increase in out-commuting during the same period, from about 32% to nearly 40%, again the highest in the county. Overall, there was a daily net outflow of commuters to surrounding areas of around 3,600 people according to the 2001 Census. Between 2001 and 2011, the District moved from experiencing a net outflow to a net inflow of commuters. At the time of the 2011 Census there were 2,635 more people travelling into the District to work than residents finding employment outside the District. There were nearly 23,300 people living and working in the District, which is 38% of its residents in employment, and a further 10,500 residents who mainly work at or from home. Generally, those commuting out of the District to work are more highly skilled than those commuting into the area. This is more likely to reflect the high levels of skills in the resident population than a deficit in highly skilled jobs within the District. High levels of commuting are also a reflection of the high cost of housing in the District for people on low wages.</del></p> <p>Insert additional paragraph:</p> <p><u>5.7.20 The proposals for employment provision set out in the Core Strategy reflect the wider anticipated performance of the local economy. There is a projected net growth of 12,100 jobs over the plan period to meet the local needs of the District. This increase reflects a fairly buoyant economy, although a significant proportion of these jobs are likely to be relatively low paid and part-time. Further jobs are expected to be created by the strategically significant investments proposed by Jaguar Land Rover and Aston Martin Lagonda, but the scale and trajectory of this additional job provision is uncertain.</u></p>
MM48	113-114	CS.22	<p>Amend 1<sup>st</sup> paragraph:</p> <p>Retail development and other commercial uses <del>will should be</del> provided in a manner that helps to strengthen the function and character of the District's town and rural centres for the benefit of residents, businesses and visitors.</p> <p>Amend 3<sup>rd</sup> paragraph:</p> <p>Large-scale retail development, defined as <u>comparison retailing schemes</u> exceeding 1,000 square</p>

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			<p>metres (gross) <u>and convenience retailing schemes exceeding 2,500 square metres (gross)</u>, should be located within or on the edge of Stratford-upon-Avon town centre, or the commercial core of a Main Rural Centre identified in Policy CS.15 Distribution of Development, or to serve the needs of the proposed new settlements at Gaydon/Lighthorne Heath <u>and Long Marston Airfield</u>.</p> <p>Amend 7<sup>th</sup> paragraph:</p> <p>The cumulative impact of large-scale retail schemes outside Stratford-upon-Avon town centre and the commercial core of Main Rural Centres, including those in other local authority areas, on the vitality and viability of these centres will be taken into account. Retail proposals <del>of less than 1,000 square metres (gross) other than large-scale retail development, as defined above,</del> are appropriate in principle outside Stratford-upon-Avon town centre and in any of the Main Rural Centres. <u>However, evidence regarding impact will be sought in relation to such schemes where there is concern about their potential effect on existing centres.</u></p>
MM49	114-115	CS.22 Explanation	<p>Amend text as follows:</p> <p>5.8.10 The Convenience Goods Retail Study commissioned by the Council specifically covered the towns of Stratford-upon-Avon, Alcester, Shipston-on-Stour and Southam. <del>The Council is applying the scenario whereby no further large foodstore should be provided in any of the main rural settlements.</del> Given the lack of suitable sites within or on the edge of the commercial <del>core</del> <u>centres</u> of these <u>and other main settlements centres in the District</u>, the Council is concerned about the impact a large foodstore on the edge of <del>a main rural</del> <u>such a settlement</u> would have on the role of the existing centre. <del>Although</del> it is acknowledged that such stores would widen choice for local residents and help to reduce the need to travel, <del>t</del> <u>However,</u> the extensive geographical nature of the District means that communities <u>also</u> tend to look to those shopping centres which are the most convenient <u>and</u> relatively close to them. The provisions of the policy provide scope for the impact of a proposed store to be assessed in detail on a case by case basis.</p> <p>Amend text as follows:</p> <p>5.8.12 The policy makes specific allowance for the provision of retail floorspace associated with the</p>

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			proposed new settlements at Gaydon/Lighthorne Heath <u>and Long Marston Airfield</u> . The scale of these overall developments will make <del>it</del> <u>them</u> the second and <u>third</u> largest settlements in the District, equivalent to the size of Alcester. As such, it will be important to provide sufficient shops and services to meet the needs of the new communities. A village centre incorporating a range of facilities is an integral part of Proposal GLH <u>and Proposal LMA</u> . However, the scale of retail provision should be directly related to the function of the new settlements <del>in itself</del> <u>themselves</u> and within their local area.
MM50	116	CS.22 DMCs	<p>Delete final sentence from DMC(1):</p> <p>The NPPF provides a local authority with the scope to set its own threshold for when a Retail Impact Assessment should be required (para. 26). This should be based on local circumstances and the view is taken that the modest size of even the larger settlements in the District justifies a lower threshold than the default threshold of 2,500 sq.m specified in the NPPF <u>for comparison retailing schemes</u>. The policy therefore specifies that a Retail Impact Assessment will be required for <u>comparison retail proposals over 1,000 sq.m and convenience retail proposals over 2,500 sq. m</u> for sites outside Stratford-upon-Avon town centre. Applicants will be expected to provide a RIA as part of a planning application and to pay the District Council to get it independently verified. <del>Evidence regarding impact will be sought in relation to smaller schemes where there is concern about their potential effect on existing centres.</del></p>
MM51	117-118	CS.23	<p>Amend 3<sup>rd</sup> paragraph as follows:</p> <p>Elsewhere in the District, <u>unless established through other provisions of the Plan such as Policy AS.11 Large Rural Brownfield Sites</u>, large-scale proposals for new and major extensions to existing tourism-related development, including accommodation, will need to be justified taking into account:</p> <p>Amend 7<sup>th</sup> paragraph as follows:</p> <p>Increased access to and use of canals and navigable waterways in the District will be encouraged, including the provision of moorings and marinas <u>where it respects and works with the natural features and function of the watercourse</u>. Any proposed extension to or creation of new navigable waterways <u>must ensure there are no overall detrimental impacts on the natural environment</u>. Additional</p>



## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p>permanent moorings and marinas will only be supported where there is adequate access, availability of existing facilities such as transport links or shops, <del>and where they will not</del> <u>adequate water resources and foul waste infrastructure and it can be demonstrated that the Water Framework Directive status of navigable rivers will not deteriorate.</u> Such schemes should <del>not</del> compromise the use or operation of existing navigable waterway features such as junctions or locks.</p>
MM52	123-126	6.1	<p>Insert at end of paragraph 6.1.25:</p> <p><u>These are specifically provided on land south of Alcester Road and at Atherstone Airfield.</u></p> <p>Amend paragraph 6.1.30:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>23,500</del> <u>homes are to be provided in the town over the plan period. Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM53	126-127	AS.1	<p>Insert additional sentence after the 1<sup>st</sup> sentence of the policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Amend 12<sup>th</sup> bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• Provide additional <u>access to</u> natural accessible greenspace, <del>specifically in the Tiddington area,</del> given the shortfall against the standard set out in Policy CS.24 Healthy Communities.</li> </ul> <p>Amend 6<sup>th</sup> bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• Support the provision of <u>emergency services and the enhancement of</u> <del>enhanced</del> health and</li> </ul>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

Main Mod. Reference	Submission Page no.	Core Strategy Section/Policy	Proposed Modification New text is <u>underlined</u> / deleted text is <del>struck through</del>						
			<p>medical facilities at Stratford Hospital.</p> <p>Replace all bullet points with roman numerals.</p>						
MM54	128	SUA.1	<p>Amend parts of proposal as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">What is to be delivered:</td> <td style="padding: 5px;"> <ul style="list-style-type: none"> <li>• <u>Housing – approx. 650 dwellings by 2031 of which up to 25% will be provided as a mix of affordable homes</u></li> <li>• <del>Class B1 uses on a minimum of 3 hectares</del></li> <li>• <u>9,000 sq m of Class B1 distributed throughout the Canal Quarter</u></li> <li>• Linear park alongside canal</li> <li>• Multi-purpose community facility (if required)</li> </ul> </td> </tr> <tr> <td style="padding: 5px;">When it is to be delivered</td> <td style="padding: 5px;"> <p><del>Phases 1 – 4 (2011/12 - 2030/31) and post 2031</del>  <u>Phase 2 (2016/17 - 2020/21) approx. 80 homes</u>  <u>Phase 3 (2021/22 - 2025/26) approx. 270 homes</u>  <u>Phase 4 (2026/27 - 2030/31) approx. 300 homes</u>  <u>Post 2031 approx. 350 homes</u></p> </td> </tr> <tr> <td style="padding: 5px;">Specific requirements</td> <td style="padding: 5px;"> <p><del>Production of a Masterplan Supplementary Planning Document to establish a comprehensive approach to the whole area, to include, inter alia:</del></p> <ul style="list-style-type: none"> <li>• <del>environmental, ecological and recreational enhancement of the canal corridor</del></li> <li>• <del>pedestrian and cycle links through the area and with adjacent parts of the town and a vehicular crossing over the canal linking development off Masons Road and Timothy's Bridge Road</del></li> <li>• <del>traffic management measures</del></li> </ul> </td> </tr> </table>	What is to be delivered:	<ul style="list-style-type: none"> <li>• <u>Housing – approx. 650 dwellings by 2031 of which up to 25% will be provided as a mix of affordable homes</u></li> <li>• <del>Class B1 uses on a minimum of 3 hectares</del></li> <li>• <u>9,000 sq m of Class B1 distributed throughout the Canal Quarter</u></li> <li>• Linear park alongside canal</li> <li>• Multi-purpose community facility (if required)</li> </ul>	When it is to be delivered	<p><del>Phases 1 – 4 (2011/12 - 2030/31) and post 2031</del>  <u>Phase 2 (2016/17 - 2020/21) approx. 80 homes</u>  <u>Phase 3 (2021/22 - 2025/26) approx. 270 homes</u>  <u>Phase 4 (2026/27 - 2030/31) approx. 300 homes</u>  <u>Post 2031 approx. 350 homes</u></p>	Specific requirements	<p><del>Production of a Masterplan Supplementary Planning Document to establish a comprehensive approach to the whole area, to include, inter alia:</del></p> <ul style="list-style-type: none"> <li>• <del>environmental, ecological and recreational enhancement of the canal corridor</del></li> <li>• <del>pedestrian and cycle links through the area and with adjacent parts of the town and a vehicular crossing over the canal linking development off Masons Road and Timothy's Bridge Road</del></li> <li>• <del>traffic management measures</del></li> </ul>
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## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

Main Mod. Reference	Submission Page no.	Core Strategy Section/Policy	Proposed Modification New text is <u>underlined</u> / deleted text is <del>struck through</del>
			<ul style="list-style-type: none"> <li>• <del>improve links to Stratford railway station</del></li> <li>• <del>ensure implementation of the Steam Railway Centre is not prejudiced</del></li> <li>• <del>appropriate treatment of any contamination</del></li> <li>• <del>scope to de-culvert watercourses</del></li> </ul> <p>The Masterplan will also incorporate Design Codes and a Delivery Strategy, in conjunction with Proposal SUA.2 and Proposal SUA.3.</p> <p><u>Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community in the Canal Quarter. The SPD will set out broad principles to show how the policy requirements, together with other policy requirements in this Core Strategy, should be delivered on the site. The SPD will also incorporate a Delivery Strategy in conjunction with Proposal SUA.2 and ProposalSUA.5.</u></p> <p><u>The development will:</u></p> <ul style="list-style-type: none"> <li>• <u>secure environmental, ecological and recreational enhancement of the canal corridor</u></li> <li>• <u>provide pedestrian and cycle links through the area and with adjacent parts of the town and a vehicular crossing over the canal linking development off Masons Road and Timothy's Bridge Road</u></li> <li>• <u>deliver traffic management measures</u></li> <li>• <u>improve links to Stratford railway station</u></li> <li>• <u>ensure implementation of the Steam Railway Centre is not prejudiced</u></li> <li>• <u>secure appropriate treatment of any contamination de-culvert watercourses</u></li> </ul>

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>	
MM55	129	SUA.2	Amend parts of Proposal as follows:	
			Where it is to be delivered	<p>South of Alcester Road, <del>west of Wildmoor roundabout</del></p> <p>Approx. <del>20</del> <u>25</u> hectares (gross)</p>
			What is to be delivered	<p>Employment uses comprising:</p> <p>(i) Class B1(a) office and Class B1(b) research and development uses, although scope for B1(c) light industry will be considered</p> <p>(ii) Relocation of businesses from the Canal Quarter Regeneration Zone</p> <p>During the plan period up to 10 hectares will be released, plus additional land to correspond with the area taken up by businesses relocating from the Regeneration Zone.</p> <p><u>Housing – approx. 65 dwellings on land to east of Western Relief Road.</u></p>
			Specific requirements	<ul style="list-style-type: none"> <li>• vehicle access <u>to the employment development</u> directly off Wildmoor Roundabout or proposed Western Relief Road</li> <li>• extensive landscaping <del>within the site and on the southern and western boundaries</del> <u>of the employment development</u></li> </ul> <p><u>If a plot that has been developed on that part of the site allocated for the relocation of businesses from the Canal Quarter Regeneration Zone becomes available it should be marketed for a period of three months in order that another business in the Regeneration Zone has the opportunity to take it up. This provision will be applied for a period of two years from when that plot was originally implemented.</u></p>

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>													
MM56	129-130	SUA.3	Delete Proposal in its entirety.													
MM57	n/a	n/a	Insert new Proposal: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: left;"><b><u>Proposal SUA.4: North of Bishopton Lane</u></b></th> </tr> </thead> <tbody> <tr> <td style="width: 30%;"><u>Where it is to be delivered</u></td> <td><u>North of Bishopton Lane between the canal and The Ridgeway</u> <u>Approx. 25 hectares (gross)</u></td> </tr> <tr> <td><u>What is to be delivered</u></td> <td> <ul style="list-style-type: none"> <li>• <u>Housing – approx. 500 dwellings</u></li> <li>• <u>Primary school - land and financial contribution</u></li> <li>• <u>Public open space, including adjacent to canal and alongside A46 Northern Bypass</u></li> </ul> </td> </tr> <tr> <td><u>When it is to be delivered</u></td> <td><u>Phases 2 - 3 (2016/17 – 2025/26)</u></td> </tr> <tr> <td><u>How it is to be delivered</u></td> <td><u>Private sector</u></td> </tr> <tr> <td><u>Specific requirements</u></td> <td> <ul style="list-style-type: none"> <li>• <u>appropriate layout and design to mitigate noise impact from A46</u></li> <li>• <u>surface water attenuation measures</u></li> <li>• <u>provision of an appropriate form of crossing over the canal to cater for vehicles, pedestrians and cyclists</u></li> <li>• <u>improvements to the canal towpath and access to it</u></li> <li>• <u>contribution to community facilities (on and/or off-site)</u></li> </ul> </td> </tr> </tbody> </table>		<b><u>Proposal SUA.4: North of Bishopton Lane</u></b>		<u>Where it is to be delivered</u>	<u>North of Bishopton Lane between the canal and The Ridgeway</u> <u>Approx. 25 hectares (gross)</u>	<u>What is to be delivered</u>	<ul style="list-style-type: none"> <li>• <u>Housing – approx. 500 dwellings</u></li> <li>• <u>Primary school - land and financial contribution</u></li> <li>• <u>Public open space, including adjacent to canal and alongside A46 Northern Bypass</u></li> </ul>	<u>When it is to be delivered</u>	<u>Phases 2 - 3 (2016/17 – 2025/26)</u>	<u>How it is to be delivered</u>	<u>Private sector</u>	<u>Specific requirements</u>	<ul style="list-style-type: none"> <li>• <u>appropriate layout and design to mitigate noise impact from A46</u></li> <li>• <u>surface water attenuation measures</u></li> <li>• <u>provision of an appropriate form of crossing over the canal to cater for vehicles, pedestrians and cyclists</u></li> <li>• <u>improvements to the canal towpath and access to it</u></li> <li>• <u>contribution to community facilities (on and/or off-site)</u></li> </ul>
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MM58	n/a	n/a	<p>Insert new Proposal:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;"><b><u>Proposal SUA.5: Atherstone Airfield</u></b></td> </tr> <tr> <td style="width: 50%; vertical-align: top;"><u>Where it is to be delivered</u></td> <td style="vertical-align: top;"> <p><u>Atherstone Airfield, east of Shipston Road, Preston-on-Stour</u></p> <p><u>Approx. 10 hectares gross (5 hectares net), plus a ‘reserve ‘ of approx. 9 hectares gross (5 hectares net) should it be required, all to assist in the delivery of the Canal Quarter Regeneration Zone (see Proposal SUA.1)</u></p> </td> </tr> <tr> <td style="vertical-align: top;"><u>What is to be delivered</u></td> <td style="vertical-align: top;"> <p><u>Employment uses comprising:</u>  <u>(i) The relocation of businesses from the Canal Quarter Regeneration Zone falling within Use Classes B1c, B2 or B8; (ii) The relocation of businesses from elsewhere in the District falling within Use Classes B1c, B2 or B8 but only insofar as this would help to facilitate (i) above and not in respect of the ‘reserve’ of approx. 9 hectares gross unless an exceptional justification is advanced as part of a planning application.</u></p> </td> </tr> <tr> <td style="vertical-align: top;"><u>When it is to be delivered</u></td> <td style="vertical-align: top;"> <p><u>Phases 2 – 4 (2016/17 – 2030/31), subject to the reserve only being released at a point where it is demonstrated as part of a planning application that there is insufficient land at either SUA.2 or the first phase of SUA.5 to meet the needs of businesses relocating from the Canal Quarter Regeneration Zone.</u></p> </td> </tr> </table>	<b><u>Proposal SUA.5: Atherstone Airfield</u></b>		<u>Where it is to be delivered</u>	<p><u>Atherstone Airfield, east of Shipston Road, Preston-on-Stour</u></p> <p><u>Approx. 10 hectares gross (5 hectares net), plus a ‘reserve ‘ of approx. 9 hectares gross (5 hectares net) should it be required, all to assist in the delivery of the Canal Quarter Regeneration Zone (see Proposal SUA.1)</u></p>	<u>What is to be delivered</u>	<p><u>Employment uses comprising:</u>  <u>(i) The relocation of businesses from the Canal Quarter Regeneration Zone falling within Use Classes B1c, B2 or B8; (ii) The relocation of businesses from elsewhere in the District falling within Use Classes B1c, B2 or B8 but only insofar as this would help to facilitate (i) above and not in respect of the ‘reserve’ of approx. 9 hectares gross unless an exceptional justification is advanced as part of a planning application.</u></p>	<u>When it is to be delivered</u>	<p><u>Phases 2 – 4 (2016/17 – 2030/31), subject to the reserve only being released at a point where it is demonstrated as part of a planning application that there is insufficient land at either SUA.2 or the first phase of SUA.5 to meet the needs of businesses relocating from the Canal Quarter Regeneration Zone.</u></p>
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## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<u>How it is to be delivered</u>	<u>Private sector</u>
			<u>Specific requirements</u>	<ul style="list-style-type: none"> <li>• <u>improvements to the access off Shipston Road if required in order to achieve a satisfactory access</u></li> <li>• <u>mitigation to local road network where identified in a detailed transport assessment which should accompany a planning application</u></li> <li>• <u>structural landscaping around the boundaries of the site to consolidate and complement that which already exists</u></li> </ul>
MM59	131-133	6.2	Amend paragraph 6.2.22:  Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about 480 homes are to be provided in the town over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u>	
MM60	133-134	AS.2	Insert additional sentence after the 1 <sup>st</sup> sentence of policy:  <u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u>  Replace all bullet points with roman numerals.	

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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MM61	135	ALC.3	<p>Amend parts of Proposal as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;">Specific requirements</td> <td style="padding: 5px;"> <p>Amend 2<sup>nd</sup> bullet point:</p> <ul style="list-style-type: none"> <li>• protect <u>and enhance</u> the watercourse that runs along southern boundary</li> </ul> <p>Insert additional bullet point:</p> <ul style="list-style-type: none"> <li>• <u>the form of development should cause no harm to the setting of Coughton Court</u></li> </ul> <p>Insert at end:  <u>Outside the area allocated, and within the Green Belt, the provision of structural landscaping or a secondary/emergency access off Tything Road (if required) will be treated as 'very special circumstances' in accordance with paragraph 88 of the NPPF.</u></p> </td> </tr> </table>	Specific requirements	<p>Amend 2<sup>nd</sup> bullet point:</p> <ul style="list-style-type: none"> <li>• protect <u>and enhance</u> the watercourse that runs along southern boundary</li> </ul> <p>Insert additional bullet point:</p> <ul style="list-style-type: none"> <li>• <u>the form of development should cause no harm to the setting of Coughton Court</u></li> </ul> <p>Insert at end:  <u>Outside the area allocated, and within the Green Belt, the provision of structural landscaping or a secondary/emergency access off Tything Road (if required) will be treated as 'very special circumstances' in accordance with paragraph 88 of the NPPF.</u></p>
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MM62	136-137	6.3	<p>Amend first sentence of paragraph 6.3.11 to replace "<del>be limited given</del>" with "<u>reflect</u>".</p> <p>Amend paragraph 6.3.17:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>220-500</del> homes are to be provided in the village over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the village through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>		



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MM63	137-138	AS.3	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Replace all bullet points with roman numerals.</p>
MM64	139-140	6.4	<p>Amend paragraph 6.4.16:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>6575</del> homes are to be provided in the town over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM65	140-141	AS.4	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Insert additional bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• <u>Investigate the removal of weirs and/or the provision of fish passes on the River Alne through the town.</u></li> </ul> <p>Insert additional bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• <u>Provide additional allotments/community orchards given the shortfall against the standard set out in Policy CS.24 Healthy Communities.</u></li> </ul> <p>Replace all bullet points with roman numerals.</p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

Main Mod. Reference	Submission Page no.	Core Strategy Section/Policy	Proposed Modification New text is <u>underlined</u> / deleted text is <del>struck through</del>
MM66	142-143	6.5	<p>Amend paragraph 6.5.18:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>400</del><u>130</u> homes are to be provided in the village over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the village through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM67	144	AS.5	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Insert additional bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• <u>Investigate the removal of weirs and/or the provision of fish passes on the River Dene.</u></li> </ul> <p>Insert additional bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• <u>Support the replacement or major refurbishment of Kineton High School including the upgrading of the swimming pool to become a community facility to serve the eastern area of the District.</u></li> </ul> <p>Replace all bullet points with roman numerals.</p>
MM68	145-147	6.6	<p>Replace final sentence in paragraph 6.6.16:</p> <p><del>According to the Retail Study, a modest additional amount of convenience goods floorspace is justified to bolster the role of Shipston, and this should be located within or adjacent to the town</del></p>

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			<p><del>centre.</del> <u>According to the Convenience Goods Retail Study there is a quantitative case for providing additional floorspace in the town. Ideally this should be located within or adjacent to the town centre.</u></p> <p>Amend paragraph 6.6.21:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, <del>about 235</del> <u>a minimum of 500</u> homes are to be provided in the town over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM69	147-148	AS.6	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Amend 1<sup>st</sup> bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• Minimise the risk of flooding in the town from the River Stour and other sources <u>ensuring that land that may be required for flood alleviation measures is kept free from development.</u></li> </ul> <p>Amend 5<sup>th</sup> bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• Investigate and identify a suitable area to be designated as a Local Nature Reserve in the Shipston area, <u>possibly through the provision of a wetland area in association with measures aimed at managing flood risk upstream of the town.</u></li> </ul> <p>New 6<sup>th</sup> bullet-point:</p> <ul style="list-style-type: none"> <li>• <u>Investigate the scope to utilize land to the east of the town for alleviation and biodiversity purposes.</u></li> </ul>

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			<p>Replace 3<sup>rd</sup> bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• <del>Refurbish or replace the Townsend Hall to improve leisure facilities in the town.</del> <u>Improve leisure facilities in the town, both built and open spaces, including the refurbishment of Townsend Hall.</u></li> </ul> <p>Amend 5<sup>th</sup> bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• Improve the public rights of way network, in particular access to open countryside <del>to the west of the town.</del></li> </ul> <p>Delete 7<sup>th</sup> bullet point in B. Social:</p> <ul style="list-style-type: none"> <li>• <del>Provide additional parks, gardens and amenity greenspace given the shortfall against the standard set out in Policy CS.24 Healthy Communities.</del></li> </ul> <p>Replace all bullet points with roman numerals.</p>
MM70	149-150	6.7	<p>Amend paragraph 6.7.20:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>440</del><u>1,100</u> homes are to be provided in the town over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the town through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM71	151-152	AS.7	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Insert additional bullet points in A. Environmental:</p>

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			<ul style="list-style-type: none"> <li>• <u>Create flood storage upstream of Southam to alleviate flooding in the town.</u></li> <li>• <u>Investigate river restoration opportunities at the confluence of the River Stowe with the River Itchen to promote fish passage and improve migratory opportunities.</u></li> </ul> <p>Insert additional bullet-point at end of B. Social:</p> <ul style="list-style-type: none"> <li>• <u>Investigate the scope to designate additional land along the Stowe valley to the west of the town as public open space.</u></li> </ul> <p>Replace all bullet points with roman numerals.</p>						
MM72	n/a	n/a	<p>Insert new Proposal:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;"><b><u>Proposal SOU.3: South of Daventry Road</u></b></td> </tr> <tr> <td style="width: 30%;"><u>Where it is to be delivered</u></td> <td><u>South of Daventry Road and north of Welsh Road East</u>  <u>Approx. 25 hectares (gross)</u></td> </tr> <tr> <td><u>What is to be delivered</u></td> <td> <ul style="list-style-type: none"> <li>• <u>Housing – approx. 500 dwellings</u></li> <li>• <u>Financial contribution towards primary education in the town</u></li> <li>• <u>General store of approx. 280 sq.m. net – land and building</u></li> <li>• <u>Public open space, including approximately 1.6 hectares of sports pitches</u></li> <li>• <u>Multi-purpose community building of approximately 500 sq.m, to include a hall, kitchen facility, toilets, storage space and changing rooms for sports pitches, together with associated car parking and</u></li> </ul> </td> </tr> </table>	<b><u>Proposal SOU.3: South of Daventry Road</u></b>		<u>Where it is to be delivered</u>	<u>South of Daventry Road and north of Welsh Road East</u>  <u>Approx. 25 hectares (gross)</u>	<u>What is to be delivered</u>	<ul style="list-style-type: none"> <li>• <u>Housing – approx. 500 dwellings</u></li> <li>• <u>Financial contribution towards primary education in the town</u></li> <li>• <u>General store of approx. 280 sq.m. net – land and building</u></li> <li>• <u>Public open space, including approximately 1.6 hectares of sports pitches</u></li> <li>• <u>Multi-purpose community building of approximately 500 sq.m, to include a hall, kitchen facility, toilets, storage space and changing rooms for sports pitches, together with associated car parking and</u></li> </ul>
<b><u>Proposal SOU.3: South of Daventry Road</u></b>									
<u>Where it is to be delivered</u>	<u>South of Daventry Road and north of Welsh Road East</u>  <u>Approx. 25 hectares (gross)</u>								
<u>What is to be delivered</u>	<ul style="list-style-type: none"> <li>• <u>Housing – approx. 500 dwellings</u></li> <li>• <u>Financial contribution towards primary education in the town</u></li> <li>• <u>General store of approx. 280 sq.m. net – land and building</u></li> <li>• <u>Public open space, including approximately 1.6 hectares of sports pitches</u></li> <li>• <u>Multi-purpose community building of approximately 500 sq.m, to include a hall, kitchen facility, toilets, storage space and changing rooms for sports pitches, together with associated car parking and</u></li> </ul>								

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>	
				<u>secure cycle stands.</u>
			<u>When it is to be delivered</u>	<u>Phases 2 - 3 (2016/17 – 2025/26)</u>
			<u>How it is to be delivered</u>	<u>Private sector</u>
			<u>Specific requirements</u>	<ul style="list-style-type: none"> <li>• <u>extensive landscaping along eastern boundary of the site</u></li> <li>• <u>appropriate treatment and management of mature hedgerows along road frontages</u></li> <li>• <u>contribution to community facilities (on and/or off-site)</u></li> <li>• <u>enhancements to the appearance and environment of the existing underpass of the A423 Southam Bypass, including improvements to the lighting and drainage in the area as appropriate</u></li> <li>• <u>signalised pedestrian crossing at junction of A425 Daventry Road and A423 Southam Bypass</u></li> </ul>
MM73	154-155	6.8	<p>Amend paragraph 6.8.19:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <u>95100</u> homes are to be provided in the village over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the village through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>	
MM74	156	AS.8	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p>	

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			New text is <u>underlined</u> / deleted text is <del>struck through</del>
			<p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Insert additional bullet point in A. Environmental:</p> <ul style="list-style-type: none"> <li>• <u>Investigate river restoration opportunities to promote fish passage and improve migratory opportunities.</u></li> </ul> <p>Replace all bullet points with roman numerals.</p>
MM75	157-159	6.9	<p>Delete 1<sup>st</sup> sentence from paragraph 6.9.19:</p> <p><del>The Study also recommended that the established flying function of the airfield should be retained due to its importance to the local economy.</del></p> <p>Amend paragraph 6.9.21:</p> <p>Based on the strategy set out in Section 5 for distributing housing development in the District, and taking into account the number of dwellings built and granted planning permission since 2011, about <del>385830</del> homes are to be provided in the village over the plan period. <u>Policy CS.16 also indicates that Reserve Sites may need to be identified in the village through the Site Allocations Plan and/or the Neighbourhood Plan. As such, the above figure should be seen as a minimum to be provided for over the plan period.</u></p>
MM76	159-160	AS.9	<p>Insert additional sentence after the 1<sup>st</sup> sentence of policy:</p> <p><u>It will assess the extent to which each of these principles is applicable to an individual development proposal.</u></p> <p>Delete 4<sup>th</sup> bullet point in B. Social:</p>

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			<ul style="list-style-type: none"> <li>• <del>Provide additional parks, gardens and amenity greenspace given the shortfall against the standard set out in Policy CS.24 Healthy Communities.</del></li> </ul> <p>Amend 2<sup>nd</sup> bullet point in C. Economic:</p> <ul style="list-style-type: none"> <li>• Retain <u>and support the enhancement of the established flying functions and aviation related facilities at Wellesbourne Airfield.</u></li> </ul> <p>Replace all bullet points with roman numerals.</p>
MM77	161-164	6.10	<p><b>Gaydon/Lighthorne Heath</b></p> <p>Amend introductory text as follows:</p> <p>6.10.2 The proposal covers approximately 290 hectares. It comprises a new settlement of approximately 3,000 dwellings (with <del>2,500</del> <u>2,300</u> dwellings to be built by 2031) and associated services, facilities and necessary off-site infrastructure, together with provision for Jaguar Land Rover <u>and Aston Martin Lagonda</u> to expand <u>their</u> <del>its</del> operations.</p> <p>6.10.6 Jaguar Land Rover is a major international business which has a network of sites within the West Midlands and the North of England. The company is one of the nation’s most important businesses and, as an advanced manufacturing firm developing leading technologies including in low emissions vehicles, it is a key driver of economic recovery. <u>Aston Martin Lagonda is similarly well established at Gaydon, which is the global headquarters of the business. The Company is of international renown and invests considerable resources into research, development, testing and manufacture of vehicles. It is important within the local and regional economy, generating skilled and well paid jobs both directly and within the supply chain.</u></p> <p>6.10.10 One of the key elements of the proposal is to provide Jaguar Land Rover with the scope required to expand its well-established operations at the adjacent Gaydon Site. The company requires sufficient and appropriately located land to support its growth and future business needs in order to maintain its competitiveness and high skilled workforce. It requires this certainty in order to have confidence in its ability to invest, expand and broaden operations in the future as part of a long term plan which will be of benefit to the local, sub-regional and national economy. <u>In similar vein but</u></p>



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			<p><u>at a much reduced scale, Aston Martin Lagonda also requires expansion land that can be secured as part of the overall proposal.</u></p> <p>6.10.13 It is important that the overall vision is clearly established to help develop the community's own identity. To this end, the Council will facilitate the production of a <u>Framework Masterplan Supplementary Planning Document (SPD)</u> with input from the existing local communities alongside the promoters/developers of the new community and Jaguar Land Rover. <del>This will be approved before the Council grants any planning permissions for the new development, unless exceptional circumstances arise. Proposals will need to be in accordance with the detailed requirements of this SPD and the evolving business requirements of Jaguar Land Rover.</del> <u>The SPD will provide a guide as to how the policy requirements of the Core Strategy can be incorporated into the new community in order to attain environmental, social, design and economic objectives in relation to the development. The SPD will need to be approved before the Council grants any planning permissions for the new development, unless exceptional circumstances arise. Planning applications will need to generally accord with the broad objectives of the SPD. Planning applications will need to be accompanied by a detailed Masterplan or similar document clearly demonstrating how the SPD's objectives can be attained in an integrated way. As regards Jaguar Land Rover, the proposals will reflect the evolving business requirements of the company.</u></p> <p><b>Development Proposal</b></p> <p>6.10.14 To contribute to meeting the future needs of the District, the following site is allocated for development. The extent of the site is defined on the Policies Map.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;"><b>Proposal GLH: Gaydon/Lighthorne Heath</b></td> </tr> <tr> <td style="width: 50%; vertical-align: top;">Where it is to be Delivered</td> <td style="vertical-align: top;">Land largely bounded by M40, B4451 and B4100 and to north and east of Lighthorne Heath</td> </tr> <tr> <td></td> <td style="vertical-align: top;">Approx. 290 hectares (gross)</td> </tr> </table>	<b>Proposal GLH: Gaydon/Lighthorne Heath</b>		Where it is to be Delivered	Land largely bounded by M40, B4451 and B4100 and to north and east of Lighthorne Heath		Approx. 290 hectares (gross)
<b>Proposal GLH: Gaydon/Lighthorne Heath</b>									
Where it is to be Delivered	Land largely bounded by M40, B4451 and B4100 and to north and east of Lighthorne Heath								
	Approx. 290 hectares (gross)								

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			What is to be Delivered	<ul style="list-style-type: none"> <li>• Land comprising approximately 100 hectares <u>at the southern end of the allocation</u> to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include:                             <ul style="list-style-type: none"> <li>○ Research, design, testing and development of motor vehicles and ancillary related activities.</li> <li>○ Other advanced engineering technologies and products.</li> <li>○ Offices.</li> <li>○ Low volume manufacturing and assembly operations.</li> <li>○ Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure.</li> <li>○ Automotive education and training including ancillary accommodation.</li> </ul> </li> <li>• <u>Land comprising approximately 4.5 hectares to the west of Lighthorne Heath to enable the expansion of Aston Martin Lagonda (AML) to meet the business needs of the company for uses that can include:</u> <ul style="list-style-type: none"> <li>○ <u>Research, design, testing and development of motor vehicles and ancillary related activities.</u></li> <li>○ <u>Other advanced engineering technologies and products.</u></li> <li>○ <u>Low volume manufacturing and assembly operations.</u></li> <li>○ <u>Offices.</u></li> <li>○ <u>Automotive education, conference and training including ancillary accommodation.</u></li> <li>○ <u>Leisure, promotional and marketing uses related to existing uses on the site.</u></li> <li>○ <u>Ancillary new and replacement car parking.</u></li> <li>○ <u>Complementary and ancillary uses for staff and visitors.</u></li> <li>○ <u>Ancillary car storage.</u></li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>• Housing – approximately 3,000 dwellings (<del>2,500</del> <u>2,300</u> dwellings by 2031) <u>to include (alongside private sector housing):</u> <ul style="list-style-type: none"> <li>○ <u>Extra care for the elderly;</u></li> <li>○ <u>Private sector rental;</u></li> <li>○ <u>Opportunities for self-build residential accommodation, and</u></li> <li>○ <u>The delivery of 35% affordable housing in accordance with Policy CS.17.</u></li> </ul> </li>   <li>• One main village centre, <del>appropriately located to serve both the overall development and the existing resident and workforce communities, comprising a range of shops and services to support these existing and new communities and to include community, health &amp; leisure facilities and a primary school. to be delivered within the defined first phase of development. The main village centre shall be appropriately located to serve both the existing residents of Lighthorne Heath and the existing and proposed workforce communities. The main village centre shall incorporate:</del> <ul style="list-style-type: none"> <li>• <u>a range of shops and services to support the existing and new communities, and</u></li> <li>• <u>a community hub to include a meeting space, health, police office and leisure facilities, and</u></li> <li>• <u>a three form entry primary school,</u></li> </ul> <u>all as identified within the Infrastructure Delivery Plan.</u> </li>   <li>• A contribution to support off-site provision for secondary (including sixth form) schooling.</li>   <li>• A comprehensive green infrastructure strategy incorporating:</li> </ul>

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				<ul style="list-style-type: none"> <li>○ Structural landscaping and open space, both alongside the M40 and to establish and/or reinforce visual and functional buffers to maintain the separate identity and integrity of the existing villages of Lighthorne and Gaydon.</li> <li>○ A managed ecological reserve at Lighthorne Quarry, linking to managed networks within and adjacent to the development.</li> <li>○ A network of open spaces to include provision for children’s play, formal sports, allotments and community woodland. <u>The open space within the site will provide for ecological mitigation as part of the wider biodiversity strategy and the use of Sustainable Urban Drainage Systems (SUDS) and will relate to wider countryside accessibility.</u></li> <li>● <del>Highway improvements in the vicinity of the site and to the wider network that mitigate the impact of the development</del></li> <li>● <del>Walking and cycling links within the site and to integrate with the surrounding countryside.</del></li> <li>● <u>A comprehensive pedestrian and cycle network to provide links to the surrounding countryside, villages and employment areas.</u></li> <li>● <u>The phased delivery of utilities and infrastructure to include:</u> <ul style="list-style-type: none"> <li>○ <u>New primary substation</u></li> <li>○ <u>New mains gas pipeline</u></li> <li>○ <u>Upgrade work to the foul sewer infrastructure</u></li> <li>○ <u>Superfast fibre optic broadband</u></li> </ul> </li> </ul>

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				<ul style="list-style-type: none"> <li>The <u>phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan, but also to include any further specific schemes that may be identified as necessary to mitigate more local impacts.</u></li> <li>Frequent, express bus services to Warwick/Leamington and Banbury, including railway stations.</li> </ul>
			When it is to be Delivered	<del>Phases 2-4 (2016/17 to 2030/31) and post 2031</del> <u>JLR Development:</u> <u>Phases 2-4 (2016/17 to 2030/31) and post 2031</u> <u>AML Development:</u> <u>Phases 2-4 (2016/17 to 2030/31)</u> <u>Housing and related development:</u> <u>Phase 2 (2016/17 – 2020/21) approx. 425 homes</u> <u>Phase 3 (2021/22 – 2025/26) approx. 875 homes</u> <u>Phase 4 (2026/27 – 2030/31) approx. 1,000 homes</u> <u>Post 2031 approx. 500 homes</u>
			How it is to be Delivered	Private sector, public sector, infrastructure and service agencies
			Specific Requirements	Production of a <u>Framework Masterplan Supplementary Planning Document (SPD) to determine the key principles of land uses, layout, design, phasing, infrastructure and mitigation. The SPD will need to accord with the following specific requirements: guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community at Gaydon/Lighthorne Heath. The SPD will set</u>

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			<p><u>out broad principles to show how the above policy requirements, together with other policy requirements in this Core Strategy should be delivered on the site. It will need to accord with the following specific requirements:</u></p> <ul style="list-style-type: none"> <li>• All elements of the proposal, including both the new housing and related facilities and the expansion of the Jaguar Land Rover facility, will be considered comprehensively in order to promote an integrated approach to the overall development as far as this is practicable.</li> <li>• The proposed new housing and expansion of the Jaguar Land Rover facility will properly integrate with, complement and where appropriate deliver related enhancements to the existing employment land at the Gaydon Site and the existing urban fabric at Lighthorne Heath.</li> <li>• The expansion of the Jaguar Land Rover facility will be considered within the context of the wider long term aspirations for the existing Jaguar Land Rover operations on the Gaydon Site.</li> <li>• <u>Whilst respecting the operational requirements in both existing and proposed employment areas, land uses within the site and beyond should integrate both physically through the provision of public routes and visually through urban design principles.</u></li> <li>• <del>The first phase of residential development will be defined to include the initial phased delivery of the new primary school, community facilities and village centre.</del></li> </ul> <p><u>The Masterplan SPD will identify:</u></p>

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				<ul style="list-style-type: none"> <li>• <del>Mix, type and tenure of dwellings including the opportunity for specialist accommodation to include extra care for the elderly, private sector rental and self-build opportunity.</del></li> <li>• <del>Range and scale of community services and facilities to be provided.</del></li> <li>• <del>Provision and phased implementation of all necessary infrastructure.</del></li> <li>• <del>Clear guidance on how land uses within the site and beyond are integrated both physically through the provision of public routes and visually through urban design principles, whilst respecting the operational requirements of the business and security.</del></li> <li>• <del>Integrated open space, ecological mitigation, and biodiversity strategy for the site as a whole and how this relates to a wider countryside accessibility strategy.</del></li> </ul>
MM78	n/a	n/a	<p>Insert new Area Strategy (and Proposal):</p> <p><b><u>6.xx Long Marston Airfield</u></b></p> <p><b><u>All Strategic Objectives are relevant to this Area Strategy.</u></b></p> <p><b><u>Context</u></b></p> <p><u>The site is situated to the west of the B4632 Campden Road, approximately 5 kilometres (3 miles) south of Stratford-upon-Avon. The villages of Long Marston and Quinton are close by but physically separate from the proposed development. Also, to the south of the site is the former Long Marston Depot that is partly being redeveloped for housing, and now known as Meon Vale.</u></p>	

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p><u>The entire area involved extends to about 205 hectares. The airfield was an RAF training station between 1941 and 1954. It now comprises a range of uses including microlight flying, business, open storage and leisure, including major entertainment events.</u></p> <p><u>The main part of the site is flat and featureless, comprising runways and grassed areas between them, and a small number of remaining aircraft hangers. There are scattered areas of storage and other small-scale commercial activities. There is a long earth embankment along the western boundary of the airfield itself that was constructed as a noise bund for the drag racing activity. The western part of the site comprises an area of undeveloped land outside the curtilage of the historic airfield. It includes an area of woodland, hedgerows and a watercourse.</u></p> <p><u>About 3 kilometres to the south of the site is Meon Hill that lies within the Cotswolds Area of Outstanding Natural Beauty. Although views across the site are afforded from the top of Meon Hill, those from public vantage points on the rights of way around the hill are limited.</u></p> <p><b><u>Justification</u></b></p> <p><u>The Strategy set out in Section 5 of the Core Strategy for distributing housing development across the District is based on the need to protect Stratford-upon-Avon, the main rural centres and local service villages from excessive rates of development that would be harmful to their respective character, function and sustainability. Therefore, in order to meet the overall housing requirement for the District, a new settlement provides an appropriate and effective means of meeting those needs during the current plan period and beyond.</u></p> <p><u>Such an approach is acknowledged in the National Planning Policy Framework (NPPF), which states that ‘the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements...that follow the principles of Garden Cities.’ (para. 52)</u></p> <p><u>The site is well-located to provide a substantial amount of housing close to and well-related to Stratford-upon-Avon without the need for a further large-scale expansion of the urban area, over and above that already committed during the current plan period. The wide range of shops, services and jobs provided in the town are accessible by various existing and potential modes of transport. Conversely, the size of the new settlement as proposed means that it is large enough to provide and support various facilities on the site, including retail, education, health and leisure, so that its residents will not need to travel to meet their day to day requirements.</u></p> <p><u>A large part of the site is brownfield and much of that which is greenfield is not within the area proposed for built forms of development. The site is largely unaffected by national or local constraints</u></p>



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			<p><u>and designations. There is a flood zone running along the western part of the site but this lies within an area proposed as an extensive open space and wildlife corridor rather than for development.</u></p> <p><u>A key aspect of the proposal is the scope that it offers to provide a major component of a new route around Stratford-upon-Avon from the south to the A46(T) Alcester Road at Wildmoor. From here, M40 Junction 15 at Warwick is only 12 kilometres to the north-east.</u></p> <p><b><u>Vision</u></b></p> <p><u>The design and layout of the new settlement will seek to identify and establish a character that draws from that of the surrounding area and its proximity to Stratford-upon-Avon. It will be a mixed-use development which provides a range of accessible services, facilities and employment opportunities that are convenient and accessible to the community itself and the local area. At the heart of the community will be a large local centre, positioned to be visible upon arrival and within walking distance of most residents.</u></p> <p><u>A wide range of transport choices will be available in order for the residents to gain access to Stratford-upon-Avon and all it has to offer. Vehicle movements into the town will be regulated in an effective way through traffic management measures. There will also be a convenient walking and cycling route into the town using the established Greenway that runs along the western edge of the site. Public transport services could take a number of forms, including the potential for a facility running alongside the Greenway.</u></p> <p><u>There will be a network of landscape corridors on the edge of and within the developed area which incorporate attractive open spaces, wildlife habitats, allotments and other amenities. Key spaces will be focused on formal and informal parks of varying sizes that coincide with features such as streams and vistas.</u></p> <p><u>The provision of a relief road running between Shipston Road (A3400) and Evesham Road (B439) on the western edge of Stratford-upon-Avon is an integral part of the proposal. The design of this road will need to take fully into account a number of significant issues, including flood risk, ecological mitigation and management, and impact on the character of the landscape. Specifically, through the use of mitigation where appropriate, proposals should seek to avoid harm to Racecourse Meadow Site of Special Scientific Interest, consistent with Policy CS.6.</u></p> <p><u>It is important that the overall vision is clearly established to help develop the community's own identity. To this end, the Council will facilitate the production of a Framework Masterplan Supplementary Planning Document (SPD) with input from the existing local communities alongside the</u></p>

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			<p><u>promoters/developers of the new community, and the appropriate infrastructure and service agencies including bus operators. The SPD will provide a guide as to how the policy requirements of the Core Strategy can be incorporated into the new community in order to attain environmental, social, design and economic objectives in relation to the development. An essential component of the SPD will be a clear indication as to when key aspects of infrastructure and services are expected to be provided to support the new settlement and its residents. The SPD will need to be approved before the Council grants any planning permissions for substantial new development, unless exceptional circumstances arise. Planning applications will need to generally accord with the broad objectives of the SPD. Planning applications will need to be accompanied by a detailed Masterplan or similar document clearly demonstrating how the SPD's objectives can be attained in an integrated way.</u></p> <p><b><u>Development Proposal</u></b>  <u>To contribute to meeting the future needs of the District, the following site is allocated for development. The extent of the site is defined on the Policies Map.</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center;"><b><u>Proposal LMA: Long Marston Airfield</u></b></td> </tr> <tr> <td style="width: 50%;"><u>Where it is to be Delivered</u></td> <td><u>Land west of B4632 Campden Road</u>  <u>Approx. 210 hectares (gross)</u></td> </tr> <tr> <td><u>What is to be Delivered</u></td> <td> <ul style="list-style-type: none"> <li>• <u>Housing – approximately 3,500 dwellings (2,100 dwellings by 2031)</u></li> <li>• <u>A main village centre comprising a range of shops and services to include community and leisure facilities. A community hub, including a shop, police office and community facility, to be delivered within the defined first phase of development</u></li> <li>• <u>Two primary schools, and</u></li> <li>• <u>A secondary school</u></li> </ul> <p><u>all as identified within the Infrastructure Delivery Plan.</u></p> <ul style="list-style-type: none"> <li>• <u>A comprehensive Green Infrastructure strategy incorporating:</u></li> </ul> </td> </tr> </table>	<b><u>Proposal LMA: Long Marston Airfield</u></b>		<u>Where it is to be Delivered</u>	<u>Land west of B4632 Campden Road</u>  <u>Approx. 210 hectares (gross)</u>	<u>What is to be Delivered</u>	<ul style="list-style-type: none"> <li>• <u>Housing – approximately 3,500 dwellings (2,100 dwellings by 2031)</u></li> <li>• <u>A main village centre comprising a range of shops and services to include community and leisure facilities. A community hub, including a shop, police office and community facility, to be delivered within the defined first phase of development</u></li> <li>• <u>Two primary schools, and</u></li> <li>• <u>A secondary school</u></li> </ul> <p><u>all as identified within the Infrastructure Delivery Plan.</u></p> <ul style="list-style-type: none"> <li>• <u>A comprehensive Green Infrastructure strategy incorporating:</u></li> </ul>
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				<ul style="list-style-type: none"> <li>○ <u>Structural landscaping and open space</u></li> <li>○ <u>A network of open spaces to include provision for children’s play, formal sports, allotments and community woodland.</u></li> <li>• <u>Employment – approximately 13 hectares in total (with no more than 8 hectares by 2031), of which no less than 10% should be in the form of small business workshops.</u></li> <li>• <u>The phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan, to include:</u> <ul style="list-style-type: none"> <li>○ <u>a connection to the strategic highway network (A46) at Wildmoor through the construction of a south-western relief road between A3400 Shipston Road and B439 Evesham Road, together with a road between B439 and A46 Alcester Road to be provided by others</u></li> <li>○ <u>any specific schemes that may be identified as necessary to mitigate local traffic impacts, including in Stratford-upon-Avon and rural communities.</u></li> </ul> </li> <li>• <u>Walking and cycling network within the site, together with links to the surrounding countryside and to Long Marston village.</u></li> <li>• <u>Frequent public transport services to Stratford-upon-Avon, including the station, and Honeybourne Station, potentially using the route of the former railway line between Stratford and Honeybourne.</u></li> <li>• <u>Land safeguarded for the possible provision of a railway station adjacent to the former Stratford to Honeybourne line.</u></li> <li>• <u>The phased delivery of utilities infrastructure to include:</u> <ul style="list-style-type: none"> <li>○ <u>New primary substation</u></li> <li>○ <u>Upgrade work to the foul sewer infrastructure</u></li> <li>○ <u>Superfast fibre optic broadband</u></li> </ul> </li> </ul>
			<u>When it is to be Delivered</u>	<u>Phases 2-4 (2016/17 to 2030/31) and post 2031</u>
Stratford-on-Avon District Council - June 2016	83		<u>How it is to be Delivered</u>	<u>CS Final Schedule of Main Modifications Private sector, public sector, infrastructure and service agencies</u>

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MM79	165-166	AS.10	<p>Insert the following text at the beginning of the Policy:</p> <p><u>This policy applies to all parts of the District apart from those which lie within the Built-Up Areas Boundaries defined for Stratford-upon-Avon and the Main Rural Centres, the area covered by Proposal GLH, the area covered by Proposal LMA and land covered by Policy AS.11 Large Rural Brownfield Sites.</u></p> <p>Amend following two paragraphs as follows:</p> <p>In order to help maintain <del>balanced</del> <u>the vitality</u> of rural communities and a strong rural economy, provision will be made for a wide range of activities and development in rural parts of the District.</p> <p>All proposals will be <del>subject to a thorough assessment</del> <u>thoroughly assessed against the principles of sustainable development</u>, including the need to:</p> <p>Replace 6<sup>th</sup> bullet point:</p> <ul style="list-style-type: none"> <li><del>• Avoid development on best and most versatile agricultural land.</del></li> <li>• <u>Seek to avoid the loss of large areas of higher quality agricultural land.</u></li> </ul> <p>Insert at end of (b):</p> <p><u>and Policy CS.16 Housing Development.</u></p>
MM80	167-168	AS.10 Explanation	<p>Delete paragraph:</p> <p><del>6.11.1 This policy applies to all of the District apart from those areas which lie within the Built-Up Area Boundaries defined for specific settlements, land identified for development in the Core Strategy or Site Allocations Development Plan Document, and land covered by Policy AS.11 Large Rural Brownfield Sites.</del></p>
MM81	171-173	AS.11	Insert additional Strategic Objective:

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			<p><u>(NEW) Previously developed sites in sustainable locations will have been re-used for purposes that are of an appropriate type and scale, while retaining their important natural, historic and other features.</u></p> <p><b>1. Gaydon Site</b></p> <p>Add to the existing bullet points as follows:</p> <ul style="list-style-type: none"> <li>• <u>Automotive education, conference and training including ancillary accommodation;</u></li> <li>• <u>Leisure, promotional and marketing uses related to existing uses on the site;</u></li> <li>• <u>ancillary new and replacement car parking;</u></li> <li>• <u>complementary and ancillary uses for staff and visitors; and</u></li> <li>• <u>car storage.</u></li> </ul> <p>Amend criterion (c):</p> <p>(c) provide comprehensive structural landscaping around the perimeter and within the site <u>as appropriate;</u></p> <p>Amend criterion (d):</p> <p>(d) <u>retain and enhance</u> <del>minimise the impact of development on</del> ecological and archaeological features <del>within</del> <u>on</u> the site; <u>and</u></p> <p>Delete criterion (e):</p> <p><del>(e) assess the effects of the proposed development on the demand for housing and local services; and</del></p> <p>Amend criterion (f):</p> <p>(f) assess the impact of traffic arising from the proposed development on the local road network and the need for any off-site highway improvements <u>or other appropriate mitigation measures,</u> <del>including to Junction 12 on the M40.</del></p>

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			<p><b>2. Former Engineer Resources Depot, Long Marston</b></p> <p>Replace 2<sup>nd</sup> bullet point</p> <ul style="list-style-type: none"> <li><del>• storage and distribution (Class B8), subject to acceptable traffic impact;</del></li> <li>• <u>employment uses within Classes B1, B2 and B8;</u></li> </ul> <p>Replace 4<sup>th</sup> bullet point</p> <ul style="list-style-type: none"> <li><del>• residential development of a form and scale that meets local needs or is justified in relation to other uses on the site.</del></li> <li>• <u>residential development that is consistent with the approach set out in Policies CS.15 and CS.16.</u></li> </ul> <p>Replace (a):  <del>(a) take into account the Masterplan that has been produced for the site or justify any significant departure from its provisions;</del>  <u>provide a fresh Masterplan in advance of any future development proposals on the site that materially depart from the existing commitments and thereafter justify any significant departures from its provisions.</u></p> <p><b>3. Former Southam Cement Works, Long Itchington</b></p> <p>Replace 2nd bullet point</p> <ul style="list-style-type: none"> <li><del>• employment and residential development of a form and scale that meets local needs or is justified in relation to other uses on the site.</del></li> <li>• <u>residential and employment development that is consistent with the approach set out in Policies CS.15, CS.16 and CS.21.</u></li> </ul> <p>Insert at end of criterion (b):<u>and secure biodiversity enhancement;</u></p> <p><b>4. Former Harbury Cement Works, Bishop’s Itchington</b></p> <p>Replace 3<sup>rd</sup> bullet point</p>

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			<ul style="list-style-type: none"> <li>• <del>employment and residential development of a form and scale that meets local needs or is justified in relation to other uses on the site.</del></li> <li>• <u>Residential development that is consistent with the approach set out in Policies CS.15 and CS.16.</u></li> </ul> <p>Modify (a) as follows:</p> <p><del>Comply with the Masterplan for the site that has been adopted as a Supplementary Planning Document</del> <u>Take into account the Masterplan that has been produced for the site and</u> <del>or</del> justify any significant departure from its provisions.</p>
MM82	175-176	6.13 Redditch	<p>Amend paragraph 6.13.4:</p> <p>With regard to housing, land on the northern edge of Redditch in Bromsgrove District has been identified to accommodate 3,400 dwellings to meet the town’s housing requirements. There may be scope for some housing development on the eastern edge of the town within Redditch Borough itself. Adjacent land in Stratford-on-Avon District to the west of the A435 could have some very limited capacity <u>consistent with the scale of development identified in Policy CS.16</u>, but this is constrained by landscape issues and the importance of retaining the identity and character of Mappleborough Green. <del>This area will be assessed through the preparation of the Site Allocations Development Plan Document.</del></p>
MM83	176	REDD.1	<p>Insert two additional Specific requirements:</p> <ul style="list-style-type: none"> <li>• <u>de-culvert and enhance the existing watercourse feature</u></li> <li>• <u>protect priority habitats within the site</u></li> </ul>
MM84	176	REDD.2	<p>Insert two additional Specific requirements:</p> <ul style="list-style-type: none"> <li>• <u>protect and enhance the Pool and Blacksoils Brook</u></li> </ul>

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			<ul style="list-style-type: none"> <li>• <u>protect priority habitats within the site</u></li> </ul>
MM85	179-180	CS.24	<p>Amend penultimate paragraph in Part B:</p> <p>New open space provision will be designed to complement and enhance the existing open space provision in the area. <u>Where appropriate, improvements to the quality and/or accessibility of existing provision will be sought.</u> Where developments are of a suitable scale provision will be made on site.</p> <p>Delete DMC(4):</p> <p>(4) <del>Other principles, such as accessibility and quality of provision, are equally important as the standards set. Where it is justified, opportunities to enhance existing facilities should be sought.</del></p>
MM86	184-185	CS.25	<p>Amend Part A to read:</p> <p>Development proposals should be consistent with and contribute to the implementation of the transport strategies and priorities set out in the Warwickshire Local Transport Plan (LTP), including its area strategies. Stratford-on-Avon District Council, <del>and Warwickshire County Council</del> <u>and, where appropriate, Highways England</u> will work together to achieve the objectives and implement the proposals in the LTP, with particular emphasis on encouraging modal shift with greater use of more sustainable forms of transport and improving the safety of all road users.</p> <p>Insert additional text at end of 2<sup>nd</sup> paragraph in Part D:</p> <p><u>There is a presumption against development that would prejudice the implementation of any individual scheme that is safeguarded to the extent to which it is shown on the Policies Map</u></p> <p>Amend Part E to read:</p> <p>General aviation activity within the District will be <del>confined to supported at the existing airfields at of Long Marston, Snitterfield and Wellesbourne.</del> <u>Proposals for the expansion of development associated with aviation activity requiring planning permission will only be permitted where they are within the</u></p>



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			<p>established limits of an existing airfield <del>subject to them</del> and will not have <del>having</del> an unacceptable effect on the environment of adjacent areas and on local residents and businesses.</p> <p>Amend 2<sup>nd</sup> bullet point in Part F to read:</p> <ul style="list-style-type: none"> <li>• <del>a community led</del> <u>an existing</u> local access network; or</li> </ul> <p>Amend final paragraph in Part F to read:</p> <p>Major infrastructure development must provide ducting that is available for strategic fibre deployment <del>or community owned local access networks</del>. Developers are encouraged to have early discussions with strategic providers <del>or local broadband groups</del>.</p>
MM87	187-188	CS.25 DMCs	<p>Insert additional text in DMC(2):</p> <p>All developments which generate significant amounts of movement, <u>including all proposals where there is expected to be a material impact on the Strategic Road Network</u>, should have a Travel Plan detailing provision for sustainable transport movements (pedestrian and cycle provision and public/community transport); safe and secure layouts; incorporation of facilities for plug-in and other low emission vehicles where feasible; and that consideration has been given to the needs of disabled people by all modes of transport.</p> <p>In DMC(4) delete <del>Long Marston</del>;</p> <p>Insert additional DMC:</p> <p><u>(6) Any proposals for broadband infrastructure under Part F of the policy should be assessed to ensure that they are fit for purpose and capable of being upgraded and/or expanded in future as appropriate. Provision should ideally be provided on a wholesale basis to allow a range of ISPs to provide services. CSW Broadband Project and its successors will provide assistance in assessing Connectivity Statements and will provide information on local access points and the development of the strategic network.</u></p>

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MM88	193-194	8.1 Policies Map	<p>All Maps which have been added, deleted or modified since the Core Strategy was submitted in 2014 are shown in a separate document titled Policies Map. They include all the modifications listed below.</p> <p>Insert additional text after paragraph 8.1.3:</p> <p><b>A. <u>Green Belt</u></b></p> <p>The following boundaries of the Green Belt are proposed to be amended in accordance with Policy <u>CS.10</u>:</p> <ul style="list-style-type: none"> <li>• <u>Land north of Arden Road, Alcester</u></li> <li>• <u>Land at Gorcott Hill, Mappleborough Green</u></li> </ul> <p>In new Section B (SLAs), <u>land North of Arden Road, Alcester and land at Gorcott Hill, Mappleborough Green to be excluded from the Arden SLA</u> (consequent upon Proposals ALC.3 and REDD.2)</p> <p>In new Section C (AoR), <u>land at London Road, Shipston-on-Stour and south of Holywell Road/Mill Crescent, Southam to be excluded from the respective AoRs.</u></p> <p>Insert new Section D:</p> <p><b><u>D. Vale Of Evesham Control Zone</u></b></p> <p><u>The following boundary change is proposed (See Policy CS.14)</u></p> <ul style="list-style-type: none"> <li>• <u>Atherstone Airfield – removed from Vale of Evesham Control Zone</u></li> </ul> <p>Original Section C becomes new <u>Section E</u></p> <p><b>Proposed Site Allocations Maps</b> (now Section F):</p> <p>Update the list of proposed allocations as follows:</p> <p><del>Proposed Site Allocation: East of Birmingham Road, Stratford-upon-Avon (see Proposal SUA.3)</del>  <u>Proposed Site Allocation: North of Bishopton Lane, Stratford-upon-Avon (see Proposal SUA.4)</u>  <u>Proposed Site Allocation: Land at Atherstone Airfield (see Proposal SUA.5)</u></p>

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			<p><u>Proposed Site Allocation: South of Daventry Road, Southam (see Proposal SOU.3)</u>  <u>Proposed Site Allocation: New Settlement at Long Marston Airfield (see Proposal LMA)</u></p> <p>Add new Section G:  <b><u>G. Safeguarded Land</u></b></p> <p><u>The following land is proposed to be safeguarded (See Policy CS.25)</u></p> <ul style="list-style-type: none"> <li>• <u>Stratford-upon-Avon, South Western Relief Road</u></li> <li>• <u>Stratford-upon-Avon, West of Shottery Relief Road</u></li> <li>• <u>Former railway line southwards from Stratford railway station to Long Marston:</u> <ul style="list-style-type: none"> <li>○ <u>Land at Station Road, Long Marston</u></li> <li>○ <u>Land at Milcote Crossing</u></li> </ul> </li> </ul> <p>Replace 2<sup>nd</sup> sentence of 3<sup>rd</sup> bullet point in paragraph 8.1.4:</p> <p><del>Sites that are allocated for development in the Core Strategy will not be included within a BUAB until planning permission has been granted.</del> <u>Sites at Stratford-upon-Avon and the Main Rural Centres that are confirmed as allocations upon adoption of the Core Strategy will be included within the BUABs.</u></p>
MM89	227-237	Appendix 1	Replace written text with the revised text as shown in Appendix 1 to this schedule.
MM90	238-255	Schedule of Infrastructure Projects	Replace the tables with the new tables as shown in Appendix 2 to this schedule.
MM91	256-259	Appendix 2	In the table:

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			<p>Modify scores for Halford to read '1' in Public Transport column and '2' in Total column.</p> <p>Modify scores for Stockton to read '2' in Shop column, '3' in Public Transport column and '8' in Total column.</p> <p>In section 3: Insert Halford in Category 4. Reposition Stockton from Category 3 to Category 2.</p> <p>Amend penultimate paragraph: The following scale of housing has been identified for each category of LSV over the plan period, which is considered to be both appropriate and achievable subject to the satisfaction of policies in the Core Strategy that seek to regulate the amount, location and nature of development:</p> <p><u>Category 1: <del>76 to 100 dwellings</del> approximately 450 homes in total, of which no more than around 25% should be provided in an individual settlement.</u></p> <p><u>Category 2: <del>51-75 dwellings</del> approximately 700 homes in total, of which no more than around 12% should be provided in an individual settlement.</u></p> <p><u>Category 3: <del>26 to 50 dwellings</del> approximately 450 homes in total, of which no more than around 13% should be provided in an individual settlement.</u></p> <p><u>Category 4: <del>10 to 25 dwellings</del> approximately 400 homes in total, of which no more than around 8% should be provided in an individual settlement.</u></p> <p><u>Within the Green Belt Local Service Villages, housing development will take place wholly in accordance with the provisions of Policy CS.10.</u></p>
MM92	264-274	Glossary	<p><b>Affordable Housing:</b></p> <p>Insert the following text at end: <u>See also definitions for General Needs Housing, Low Cost Market Housing and Specialised</u></p>

## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

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			<p><u>Accommodation</u></p> <p>Insert the following:  <b><u>Community facilities:</u></b> <u>The term community facilities includes provision for health and social care, education, emergency services, meeting spaces and cultural facilities (including libraries, arts and places of worship), open space, sports venues and local shops and pubs.</u></p> <p><b>Extra-care Housing:</b></p> <p>Amend the definition:  <del>Housing designed with the needs of frail/older people in mind and offering varying levels of care and support on site. People who live in extra-care housing have their own self-contained homes, their own front doors and a legal right to occupy the property. It is also known as ‘very sheltered housing’. It comes in many forms, including blocks of flats, bungalow estates and retirement villages. It can often provide an alternative to a care home.</del></p> <p><u>Extra care’ housing developments comprise self-contained homes with design features and support and care services available to enable self-care and independent living. Each household has its own front door. It is for people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long term care (residential or nursing homes.</u></p> <p>Insert the following definitions:</p> <p><b><u>General Needs Housing:</u></b> <u>All housing of any tenure other than that which is specialised housing. See also definition of Specialised Accommodation.</u></p> <p><b><u>Low Cost Market Housing:</u></b> <u>Low cost market housing is sold at a price lower than the normal market value. By definition, although it is more ‘affordable’ to potential purchasers, low cost market housing does not fall within the planning definition of affordable housing as set out in the NPPF.</u></p> <p><b><u>Specialised Accommodation:</u></b> <u>Specialised accommodation is housing for any age group that is purpose designed and designated in a planning obligation for a specific client group. The delivery of support or care will not result in the categorisation of housing as specialised accommodation if the</u></p>

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			<u>housing is not purpose designed and designated.</u>

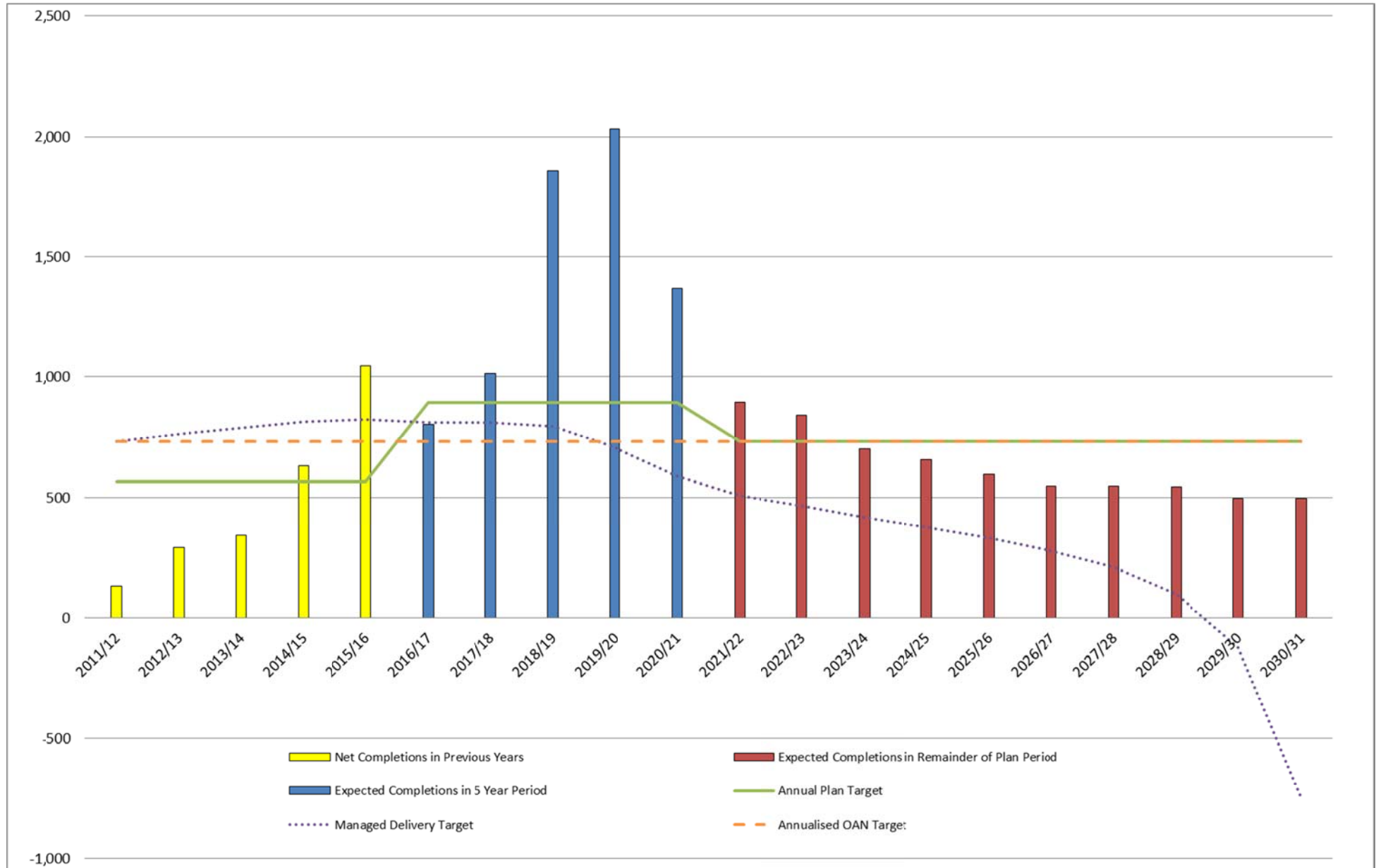
## Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

**Figure 1 – Trajectory Table**

For the plan period 1 April 2011 to 31 March 2031			Phase 1					Phase 2					Phase 3					Phase 4				
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Location	% of Total	Total (Net)	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
SUA.1 - Canal Quarter		652							41	41			30	60	60	60	60	60	60	60	60	60
SUA.2 - South of Alcester Road		68							28	40												
SUA.4 - North of Bishopston Lane		500							25	100	100	100	100	75								
West of Shottery		800							100	100	100	102	50	50	50	50	50	50	50	48		
Other Sites		1,423	52	149	164	93	201	202	117	101	171	51	50	50	20	2						
Windfall		50											5	5	5	5	5	5	5	5	5	5
<b>Stratford-upon-Avon</b>	<b>22.0%</b>	<b>3,493</b>	<b>52</b>	<b>149</b>	<b>164</b>	<b>93</b>	<b>201</b>	<b>202</b>	<b>311</b>	<b>382</b>	<b>371</b>	<b>253</b>	<b>235</b>	<b>240</b>	<b>135</b>	<b>115</b>	<b>117</b>	<b>115</b>	<b>115</b>	<b>113</b>	<b>65</b>	<b>65</b>
ALC.1 - North of Allimore Lane (South)		190							40	40	40	40	30									
ALC.2 - North of Allimore Lane (North)		160									40	40	40	40								
Other Sites		176			57	39	35	1	3	2	38	1										
<b>Alcester</b>	<b>3.3%</b>	<b>526</b>	<b>0</b>	<b>0</b>	<b>57</b>	<b>39</b>	<b>35</b>	<b>1</b>	<b>43</b>	<b>42</b>	<b>118</b>	<b>81</b>	<b>70</b>	<b>40</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Bidford-on-Avon</b>	<b>3.1%</b>	<b>493</b>	<b>2</b>	<b>0</b>	<b>-1</b>	<b>97</b>	<b>132</b>	<b>51</b>	<b>56</b>	<b>72</b>	<b>42</b>	<b>42</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Henley-in-Arden</b>	<b>0.5%</b>	<b>77</b>	<b>-1</b>	<b>39</b>	<b>10</b>	<b>9</b>	<b>6</b>	<b>1</b>	<b>4</b>	<b>8</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Kineton</b>	<b>0.8%</b>	<b>134</b>	<b>-3</b>	<b>11</b>	<b>0</b>	<b>0</b>	<b>60</b>	<b>38</b>	<b>18</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Shipston-on-Stour</b>	<b>3.1%</b>	<b>499</b>	<b>43</b>	<b>3</b>	<b>20</b>	<b>10</b>	<b>14</b>	<b>44</b>	<b>58</b>	<b>130</b>	<b>124</b>	<b>53</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
SOU.1 - West of Banbury Road		236				2		45	48	48	48	45										
SOU.2 - West of Coventry Road		165						30	40	40	40	15										
SOU.3 - South of Daventry Road		535								75	100	100	100	100	60							
Other Sites		146	6	2	4	1	3	1	21	60	45	1				2						
<b>Southam</b>	<b>6.8%</b>	<b>1,080</b>	<b>6</b>	<b>2</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>76</b>	<b>109</b>	<b>223</b>	<b>233</b>	<b>161</b>	<b>100</b>	<b>100</b>	<b>60</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Studley</b>	<b>0.6%</b>	<b>100</b>	<b>1</b>	<b>4</b>	<b>15</b>	<b>15</b>	<b>33</b>	<b>6</b>	<b>0</b>	<b>7</b>	<b>12</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Wellesbourne</b>	<b>5.2%</b>	<b>830</b>	<b>0</b>	<b>20</b>	<b>2</b>	<b>73</b>	<b>115</b>	<b>144</b>	<b>70</b>	<b>52</b>	<b>102</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
MRC Windfall		100											10	10	10	10	10	10	10	10	10	10
<b>Main Rural Centres</b>	<b>24.2%</b>	<b>3,839</b>	<b>48</b>	<b>79</b>	<b>107</b>	<b>244</b>	<b>398</b>	<b>361</b>	<b>358</b>	<b>543</b>	<b>633</b>	<b>394</b>	<b>230</b>	<b>200</b>	<b>120</b>	<b>60</b>	<b>14</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>
Category 1 LSV		764	13		17	40	103	22	86	213	188	82										
Category 2 LSV		551	5	8	6	22	72	41	58	162	126	41					10					
Category 3 LSV		429	4	5	10	24	33	18	11	87	128	74	32				3					
Category 4 LSV		237	2	9	6	7	24	18	28	31	91	20	1									
LSV Windfall		100											10	10	10	10	10	10	10	10	10	10
<b>Local Service Villages</b>	<b>13.1%</b>	<b>2,081</b>	<b>24</b>	<b>22</b>	<b>39</b>	<b>93</b>	<b>232</b>	<b>99</b>	<b>183</b>	<b>493</b>	<b>533</b>	<b>217</b>	<b>43</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>23</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>
<b>GLH - Gaydon Lighthorne Heath</b>	<b>14.5%</b>	<b>2,300</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>125</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>175</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>
<b>LMA - Long Marston Airfield</b>	<b>13.3%</b>	<b>2,100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>60</b>	<b>120</b>	<b>120</b>	<b>120</b>	<b>130</b>	<b>150</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>
Long Marston Depot (Meon Vale)		965			5	155	115	76	78	116	102	118	60	60	60	20						
Harbury Cement Works		280								20	40	40	40	40	40	20						
<b>Large Rural Brownfield Sites</b>	<b>7.9%</b>	<b>1,245</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>155</b>	<b>115</b>	<b>76</b>	<b>78</b>	<b>136</b>	<b>142</b>	<b>158</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>60</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Rural Elsewhere		519	7	29	24	38	75	46	66	96	69	58	5			-1	7					
Rural Villages		145	2	15	5	7	25	20	17	24	11	17					2					
Rural Windfall		120											12	12	12	12	12	12	12	12	12	12
<b>Other Rural Locations</b>	<b>4.9%</b>	<b>784</b>	<b>9</b>	<b>44</b>	<b>29</b>	<b>45</b>	<b>100</b>	<b>66</b>	<b>83</b>	<b>120</b>	<b>80</b>	<b>75</b>	<b>17</b>	<b>12</b>	<b>12</b>	<b>11</b>	<b>21</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>12</b>
<b>District Total</b>	<b>100.0%</b>	<b>15,842</b>	<b>133</b>	<b>294</b>	<b>344</b>	<b>630</b>	<b>1,046</b>	<b>804</b>	<b>1,013</b>	<b>1,859</b>	<b>2,029</b>	<b>1,367</b>	<b>895</b>	<b>842</b>	<b>702</b>	<b>656</b>	<b>595</b>	<b>547</b>	<b>547</b>	<b>545</b>	<b>497</b>	<b>497</b>

# Stratford-on-Avon District Core Strategy – Schedule of Main Modifications

Figure 1 – Graph





## Appendix 1 – Infrastructure Delivery Plan

### 1. Introduction

Stratford-on-Avon District Council's Core Strategy proposes 14,600 new homes over the plan period. Based on a 2.2 person per household calculation the estimated population derived from the housing growth will be 32,120.

Policy CS.15 illustrates the development distribution for the district concentrating on Stratford-upon-Avon, the Main Rural Centres, Gaydon Lighthorne Heath new settlement and Long Marston Airfield new settlement. The Local Service Villages will also provide an appropriate amount of housing growth.

This Infrastructure Delivery Plan (IDP) sets out the main infrastructure items necessary to facilitate the level and distribution of growth set out in the Core Strategy. It also identifies other items of infrastructure necessary to achieve the plan's wider objectives and those of its partners. It is a working document that will be kept up to date as infrastructure planning progresses.

A Schedule of Infrastructure Projects is provided at the end of the IDP. This comprises ~~three~~four Tables:

Table 1 – Main Schedule;

Table 2 – Infrastructure Trajectory for Gaydon/Lighthorne Heath New Settlement and JLR

Employment;

Table 3 – Infrastructure Trajectory for Long Marston Airfield New Settlement; and

Table 4 - Infrastructure Trajectory for Canal Quarter and Related Employment Site.

The main ~~schedule~~body of the document describes individual projects, where these are known, and broad descriptions of the type of infrastructure that might be needed where individual projects have not been identified. Where the infrastructure is essential to support the growth outlined in the Core Strategy, it is shown as 'critical' on the Schedule. All other infrastructure that is necessary to achieve the Core Strategy's wider objectives is considered desirable.

The main infrastructure schedule also shows when the proposed or committed infrastructure is required throughout the lifespan of the Core Strategy in order to support sustainable development and ensure that housing and infrastructure are delivered in a timely manner. There are separate infrastructure delivery schedules for the strategic sites for Gaydon Lighthorne Heath, Long Marston Airfield and the Canal Quarter. Both LMA and GLH are subject to planning applications and require phased infrastructure delivery, based on the amount of housing developed annually, to ensure the development is mitigated effectively.

Physical infrastructure that will be delivered on site as a normal part of a development, and that will be paid for by the developer as a normal part of development costs, is not generally included in this IDP. The infrastructure items shown will generally be financed through developer contributions (S106 and the Community Infrastructure Levy), as well as through the capital programmes of the District Council, County Council, their key partners and other agencies.

Similarly, small local projects that will be determined by Town and Parish Councils through the Neighbourhood Development Plan process are not identified in the IDP. They may, however, be

indirectly funded by the Community Infrastructure Levy (CIL), via the proportion of the levy that is passed to Town and Parish Councils.

Costs associated with infrastructure delivery are provided in the individual schedules where this is currently available. The development of the IDP is an iterative process and relies on a number of contributions from various infrastructure providers and practitioners. The process will remain live and can only be regarded current at any particular point in time during the development of the Core Strategy.

As background evidence for CIL, a further document will be produced setting out details of which items of infrastructure will be funded through S106 and which will be funded in whole or part through the levy (the 'Regulation 123' list).

## **2. Transport Infrastructure**

Work to identify the transport infrastructure required as part of the Core Strategy has been led by Warwickshire County Council as the Local Highways Authority. It draws upon:

- the Stratford on Avon District Strategic Transport Assessment completed by Warwickshire County Council (WCC) with assistance from Arup in October 2012;
- the Strategic Transport Assessment Phase 2 Modelling Report, WCC/Arup (June 2013);
- the Stratford (Canal Quarter) Regeneration Zone Scenario Analysis, WCC/Arup (November 2013);
- the Strategic Transport Assessment Options Analysis Report, WCC/Arup (April 2014);
- the Strategic Transport Assessment Cumulative Assessment, WCC/Arup (April 2014);
- the Strategic Transport Assessment Further Focused Options, WCC/Vectos (July 2015);
- the Local Transport Plan for Warwickshire (2011-2026) and other sources.

Infrastructure improvements identified include highways infrastructure, public transport and pedestrian and cycle routes. Some schemes are critical to enable the development of specific sites – these are generally to be provided by the developer either as part of the development using S278/S38, or as an associated planning obligation secured through S106 (for example as part of the proposed new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield or the Stratford Canal Quarter Regeneration Zone). Other projects, such as the various measures referred to as the Stratford Transport Package, will be wholly or partly CIL funded as they will deal with the cumulative impacts of development across a number of sites.

The transport infrastructure required to 2031 also includes some strategic schemes of regional or sub-regional significance such as the improvements to the A46(T), M40 and M42, led by the Highways Agency with support from Warwickshire County Council and neighbouring highway authorities. Some contribution may be sought from developers but these projects will be mostly delivered with external agency funding.

Other public transport projects will be determined as plans evolve during the Core Strategy period, especially the detail of a possible new Park & Ride and express bus services in conjunction with a new settlement at Gaydon/Lighthorne Heath. The latest STA 2015 Further Options Assessment identifies the importance of the Stratford Transport Package and South Western Relief Road in delivering the strategic allocations of the Canal Quarter and LMA effectively.

The IDP also includes enhanced pedestrian and cycle routes in Stratford at Birmingham Road/Guild Street and a number of minor cycle infrastructure improvements to help deliver the Cycle Strategy within the Local Transport Plan. As with highways infrastructure, the creation of new or enhanced

pedestrian and cycle links will generally be funded as part of the development package where they relate to specific sites, or with a contribution from CIL if they deal with the cumulative impact of a number of developments.

Community transport initiatives and other local projects may be identified in Neighbourhood and Parish Plans and may secure a share of CIL funding indirectly from Town and Parish Councils. These small local projects are not identified in the IDP.

Local pedestrian and cycle links, including off-road schemes that improve access to or the amenity value of open space, will generally either be negotiated as part of a S106 package in lieu of on-site open space contributions (if the need can be linked to a particular development), or they will be identified through the Neighbourhood Development Plan process.

SDC will continually work with the WCC through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

### **3. Education**

The relatively dispersed pattern of growth outlined in the Core Strategy may help ensure the continuing financial viability of many small village schools that currently have declining pupil numbers. Any proposals for new housing in the Main Rural Centres will present some challenges in terms of providing school places but in most cases these can be overcome with investment in existing schools.

It is more difficult to accommodate an increase in pupils within Stratford-upon-Avon where there is currently no forecast surplus capacity. In addition to the proposed development at Shottery, which will provide a new primary school and a contribution towards the cost of secondary provision, a significant amount of development is proposed in the Core Strategy at the Canal Quarter Regeneration Zone and at Bishopton Lane. This will require the provision of additional primary and secondary school places which will be delivered where possible through the expansion of existing schools. The two councils will keep under review the need to plan for the development of wholly new schools.

At primary age, WCC needs to consider how best to meet additional pressure in Stratford, Wellesbourne, Welford on Avon, Fenny Compton, Lighthorne Heath, Tanworth in Arden, Studley, Alcester, Napton, Southam, Ilmington, Shipston, Quinton, Henley in Arden, Harbury, Great Alne, Bidford on Avon, Ettington and Long Compton. This will not see expansions of all of the named schools but will require discussions with all local providers to ensure a sustainable solution. An indicative list of those schools more likely to be expanded is provided in the Schedule of Infrastructure Projects. Similarly, there will be a need for additional secondary school places across the District and discussions will be held with all schools to determine the most appropriate way of meeting the forecast additional demand. An indicative only list is provided in the Schedule.

A new settlement at Gaydon/Lighthorne Heath will include new primary provision and a financial contribution towards secondary provision, a new 3FE Primary School with nursery that will replace the existing primary school at Lighthorne Heath, which will be demolished through a phased programme. The new school site will be close to the village hub/centre of the new settlement and in close proximity to the provision of new flexible community accommodation that could cater for a children's centre service if required. A financial contribution to accommodate secondary school pupils generated from the development will be provided as part of the development offer. The existing school at Kineton currently has substandard accommodation so part of this provision will be removed, allowing for the creation of a new IT, technology and science block. Education provision sought through the development of GLH will also allow for Special Education Needs (SEN).

Currently WCC are revisiting access arrangements at Kineton High School which may change bus access and could have an impact on how the school is expanded. WCC will require developer contributions towards specific phases of the expansion at a set amount (yet to be established) rather than a per-pupil based figure.

A new settlement at Long Marston Airfield will include two new 2FE primary schools with nursery and SEN provision along with a new secondary school with 6th form and SEN provision.

An initial estimate of the overall costs of making the necessary provision for the district is ~~£60.5m~~ £75.9m. This represents ~~£18.5m~~ £23.2m for primary, £7.5m for special educational needs (SEN), and ~~£34.5m~~ £45.25m for secondary and post 16, although secondary has yet to be confirmed. This includes the requirements of the new settlements.

These costs do not include the provision of land for new schools or any element for pre-school provision which should be provided with any new primary provision.

Contribution calculations are based on pupil yield generated from development. These pupil yield calculations differentiate between rural and urban areas except for secondary provision at Kineton where this will be phased-scheme specific.

SDC will continually work with the WCC through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

#### **4. Primary and Acute & Community Health Care Infrastructure**

##### **4.1 Primary Care**

The District is served by 19 GP practices, 5 of which have branch surgeries, making a total of 24 premises. This section outlines the anticipated impact of the growth outlined in the Core Strategy in terms of the built physical capacity needed to ensure the delivery of primary health care, as assessed by the Arden, Herefordshire & Worcestershire Area Team of NHS England.

##### **NHS South Warwickshire Clinical Commissioning Group**

NHS South Warwickshire CCG's main role is commissioning a range of services including health needs assessment, identification of clinical outcomes, service specification, contract negotiation or procurement with continuous quality assessment.

As a membership organisation, the CCG engages with its 36 member GP practices to deliver its vision for the future of primary care. The CCG's 2016-2020 Strategic Plan identifies the transformation of out of hospital services, including primary care, as its key deliverable. Fundamental to the CCG's strategic direction is the drive to develop integrated, seamless out of hospital services, which ensure patient care is provided in the most appropriate setting, as close to home as possible and inappropriate hospital admissions are avoided. In this context, primary care is expected to remain the key service of care delivery in south Warwickshire.

WCC is currently in liaison with the CCG to confirm overall provision required in LSV's and MRC's.

##### **Primary Medical Care (GP) Provision**

The population growth arising from any new housing development in Stratford District will inevitably place increased demand upon healthcare services within the District, including primary medical care services provided by the District's 19 GP practices (which deliver services from 24 premises across the District).

The NHS Five Year Forward View has set a clear direction of travel for the NHS in England, which is not only consistent with, but also an enabler to the CCG's own Strategic Plan. In relation to primary medical care, the Plan:

- Advocates a radical upgrade in prevention. The CCG expects that in future General Practice will have a critical role to play as the co-ordinating point for preventative care
- Places strong emphasis on the need to expand and strengthen primary and wider out-of-hospital care.

Both of the above areas will clearly impact on future infrastructure requirements. It is likely that there will be a significant increase (above expected population increase terms) in both the number of appointments being delivered in General Practice and the length of time for each appointment, meaning that, correspondingly, significant additional clinical space will be required. Subject to consultation with local GP practices and the CCG's population, as well as the emerging plans of the federation of South Warwickshire GP practices (SWGP Ltd), GP practices may choose to consolidate over the period of the Core Strategy, with, for example, a number of large primary care centres emerging as hubs, alongside practices servicing smaller populations acting as spokes, in a hub and spoke model.

The CCG is undertaking an audit to confirm current primary care capacity in south Warwickshire. At a high level, the most up to date data available indicates an overall deficit in capacity across the District, which will be compounded by further development unless new premises are built or existing premises are extended or upgraded.

In relation to the key strategic sites identified in the District Council's Core Strategy:

- Gaydon/Lighthorne Heath Development - New premises or the extension/upgrade of existing premises in the locality of the development will be required.
- Long Marston (including Long Marston Airfield and Long Marston Depot) - New premises or the extension/upgrade of existing premises (Meon Medical Centre, Lower Quinton) will be required.

A transformed out of hospital system will need to be supported by efficient and effective transport infrastructure. The design and development of such infrastructure will, for example, need to take account of the centralised delivery of key services, the emergence of primary care hubs and the national direction of travel towards 7-day working.

### **Stratford-upon-Avon**

The future development of the Canal Quarter and other currently unidentified sites in the town will result in an estimated 900 houses which will generate a population increase of 1,980 residents using the Census 2011 average household size of 2.2 residents per dwelling. However, these proposals are part of the overall development of Stratford-upon-Avon which will in total comprise 2,590 additional homes with an increased population of around 5,700. There are four practices situated in the town whose total average list size per whole time equivalent (wte) GP is greater than the national average of 1,750. Therefore, these practices currently have no capacity to increase their list sizes. Three of the practices have some under-utilisation in their premises and a fourth has stated that they could undertake internal modifications to their premises to create additional clinical rooms. The requirement is therefore for two additional clinical rooms and associated infrastructure to accommodate additional clinical sessions and associated non-clinical staff. The cost of this is estimated at £60,690, excluding externals, furniture & equipment, telephones/data, fees and VAT.

The development of Stratford-upon-Avon during the plan period will result in a total of at least 3,590 new homes which will generate a population increase of approximately 7,898 residents using the Census 2011 average household size of 2.2 residents per dwelling. There are four practices situated in the town whose total average list size per whole time equivalent (wte) GP is greater than the

national average of 1,750. Therefore, these practices currently have no capacity to increase their list sizes.

One of these practices has some under-utilisation in their premises and has stated that they could increase their GP capacity by 6 sessions a week. The residual requirement is therefore for three additional consulting rooms and associated infrastructure to accommodate additional clinical sessions and associated non-clinical staff. The cost of this is estimated at £284,844, excluding externals, furniture & equipment, telephones/data, fees and VAT.

### **Main Rural Centres**

The development of the Main Rural Centres during the plan period will result in a total of at least 3,800 new homes which will generate a population increase of approximately 8,360 residents using the Census 2011 average household size of 2.2 residents per dwelling.

The proposals for additional development at Southam would generate an increased population of approximately 2,310 residents. There are 2 GP practices in the town, neither of which have capacity to accommodate these additional patients. The requirement is therefore for one additional consulting room and associated infrastructure for clinical and non-clinical staff at a cost of £94,948 excluding externals, furniture & equipment, telephones/data, fees and VAT.

The proposals for additional development at Shipston-on-Stour would generate an increased population of at least 1,100 residents. The existing GP practice does not have the capacity to accommodate these additional patients and there is insufficient room to expand on the current site. Consideration will therefore be given to a relocation of the GP practice, potentially to land off Campden Road that is likely to be made available as a result of a planning obligation related to development in that part of the town."

Hastings House Surgery in Wellesbourne currently has capacity for an additional 130 patients based on the average national list size of 1,750 patients per wte GP. This capacity will be utilised by residents moving into houses that already have planning permission so a capital contribution will be required from any further development. However, proposals for a new surgery have been granted planning permission and it is likely that the existing surgery will close and be redeveloped once the new surgery opens.

The practices in the other Main Rural Centres have sufficient capacity to accommodate the planned increases in population. This is either because new purpose built premises have recently been developed, current premises are under-utilised and/or individual practices' list sizes are currently sufficiently below the national average of 1,750 patients per wte GP.

### **Local Service Villages and Other Rural Locations**

Further analysis is required to establish any infrastructure requirements arising from these developments. In total 1,574 additional houses are planned which will result in an increased population of 3,463 residents. The maximum requirement would therefore be for two clinical rooms at a cost of £60,690, excluding externals, furniture & equipment, telephones/data, fees and VAT. The development of the Local Service Villages and Other Rural Locations through the Core Strategy will result in a total of at least 4,000 homes which will generate a population increase of approximately 8,800 residents using the Census 2011 average household size of 2.2 residents per dwelling. Further analysis is required to establish any infrastructure requirements arising from these developments however, the maximum requirement would be for two consulting rooms and associated infrastructure for clinical and non-clinical staff at a cost of £189,896, excluding externals, furniture & equipment, telephones/data, fees and VAT.

## **Gaydon/Lighthorne Heath**

This site is for 2,530 houses by 2031, ultimately rising to 3,000 houses. This will generate a population increase of 5,505,060 residents by 2031 using the ratio of 2.2 residents per dwelling, eventually rising to 6,600. There are three practices situated near this development whose total average list size per wte GP is greater than the national average of 1,750. Therefore, these practices currently have no capacity to increase their list sizes. One of the practices has stated that they could provide additional GP sessions by utilising available rooms in their existing premises and this will be sufficient to increase capacity to provide services to the additional population generated by other planned development in the area.

The requirement for this strategic site is therefore ultimately for new premises to accommodate the equivalent of a 4 GP surgery to provide services to its residents at a gross cost of £1.8m. The precise timing of the likely phased provision of this facility is to be determined.

## **Long Marston Airfield**

This site is expected to deliver 2,100 homes by 2031, eventually rising to 3,500 homes. This will generate a population increase of 4,620 residents by 2031 using the ratio of 2.2 residents per dwelling, eventually rising to 7,700 residents. The practice situated closest to this development is Meon Medical Centre in Lower Quinton. This practice's average list size per wte GP is greater than the national average of 1,750 and therefore has no capacity to increase its list size. A new facility would be required that will be able to accommodate 4 consulting rooms and associated infrastructure for clinical and non-clinical staff. The estimated cost and precise timing of the likely phased provision of this facility is to be determined.

## **4.2 Acute and Community Health Services**

South Warwickshire NHS Foundation Trust (the "Trust") is the major provider of acute and community health services to the population of South Warwickshire.

The Trust provides a range of planned and emergency services to patients from its sites across the District as well as from patients' homes. *Acute care* is delivered from a hospital setting and encompasses a range of clinical health-care functions, including emergency medicine, trauma care, pre-hospital emergency care, acute care surgery, critical care, urgent care and short-term inpatient stabilization. Community health-care services are responsible for delivering health services in the community - in people's homes, health centres and community-based clinics - and include district nurses, health visitors and therapists delivering out-of-hospital rehabilitation.

The Trust's acute services sites include:

Warwick Hospital – this site houses the majority of the Trust's Acute Services including; Accident and Emergency services, Diagnostic and Pathology departments, Maternity and SCBU (Special Care Baby Unit), Main and Day Surgery Theatres together with an Intensive Care Unit and Coronary Care Unit.

Stratford-upon-Avon Hospital - this is one of the Trust's community hospitals and it includes a minor injuries unit, outpatients department, radiology department and an intermediate care ward. The hospital has been granted planning permission for a redevelopment of its site which has been planned as a 3 phase development to meet the population growth from the Core Strategy as well as the existing ageing population. A secured loan has been secured by the Trust to fund the first phase of the redevelopment with the intention of paying this off through development contributions. The overall scheme costs which include building works is £23,910,000.

Currently these hospitals are ~~now~~ at full capacity. Over the past three years the Trust has made good progress in establishing out-of-hospital services and pathways to deliver care closer to patients' homes to avoid unnecessary hospital admissions and shorten stays in hospital. These changes have enabled the Trust to make better use of hospital capacity. However, there are now limited opportunities to further improve hospital capacity utilisation. This means that additional healthcare infrastructure will be needed to support future population growth.

It is not sensible to plan further infrastructure on a piecemeal basis as applications for each new development come forward. The cost and planning implications of so doing are impracticable. Instead, the Trust has considered the anticipated housing growth across the South Warwickshire area and looked at the overall impact of the proposed increased population to develop an infrastructure strategy to serve the future healthcare needs of the growing population. This strategy takes into account the trend for the increased delivery of healthcare out of hospital and into the community and the impact of an ageing population on the provision of acute healthcare.

The Trust has used Strategic Needs Population Projections ("SNPP") data to identify the population growth projected for Warwick and Stratford localities over a 20 year plan period. These SNPP projections identify a ~~39,818~~72,875 growth in population between 2011 and 2031 for Warwick and Stratford on Avon District Councils. This growth will be met by ~~20,972~~ the joint delivery of around 33,125 new homes. Stratford on Avon District Council's Core Strategy proposes ~~40,800~~14,600 new homes over the plan period, equivalent to a population of ~~45,960~~32,120.

Based on the above figures, the healthcare needs of the anticipated demographic profile of the new population will generate hospital demand equivalent to 15,000 admissions and 53,000 outpatient appointments per year by the end of the plan period. This will require about 160 acute hospital beds, 16 outpatient clinic suites, associated diagnostic and intervention facilities, maternity and support service infrastructure. This indicates the additional capacity the Trust will need to provide to meet the healthcare needs of the new population and excludes any additional healthcare capacity it will need to provide in future to meet the needs of the ageing resident population.

The Trust proposes to meet these infrastructure requirements through 3 development projects, including 2 new ward blocks at Warwick Hospital Site which will deliver circa 96 beds and a new Stratford Hospital which will provide circa 50 beds, 16 new outpatient clinic suites, associated diagnostic and intervention facilities and support service infrastructure.

The full costs of these developments are estimated at around ~~£6873~~ million and the Trust will seek a contribution for the ~~£35.740.7~~ million costs associated with the growth in housing once the CIL charging scheme is adopted. Until CIL is adopted, SWFT will seek a contribution towards Acute and Community Care from large sites through S106 agreements. The Trust expects to ~~borrow~~ have to secure a loan to raise the rest of the funding for the projects, and will request a CIL contribution from Stratford and Warwick District Councils to reflect the additional demands on healthcare arising from growth in housing. They also expect to raise charitable donations towards the projects.

### **4.3 Pharmacies**

Warwickshire Health and Wellbeing Board's Pharmaceutical Needs Assessment (PNA) is published every two years. The latest update was published in March 2015 and did not highlight any significant serious barriers to access in Stratford District. The summary highlighted that in this locality:

- Pharmaceutical services are relatively easy to access from 08.00 until 20.00 from Monday to Friday. A service can be accessed somewhere in the locality from 07.00 until at least 23.00.
- A service is accessible all day on Saturday and from 08.00 until 18.00 on Sunday.
- There are 22 contractors per 100,000 population which is considered adequate with reference to



local geography and size of locality.

- The pharmaceutical service provided by community pharmacies in the locality is supplemented by eleven dispensing GP practices serving the more rural areas.
- The range of services provided is comprehensive including advanced and enhanced services in addition to the contractually required essential services.
- The more rural services of this locality benefit from pharmaceutical service provided by dispensing doctors and the many collection and delivery services provided by community pharmacies and dispensing GPs.
- Cross-border availability of pharmaceutical services is significant in this locality.

#### **4.4 Coventry and Warwickshire Partnership Trust (CWPT)**

CWPT offer a range of age-independent mental health services for adults in both community and acute services.

##### **Mental Health Support Services**

Mental health services are offered across Warwickshire and include inpatient and community focused services. The services are organised into Integrated Practice Units (IPUs), which are teams of clinical staff working more closely with patients to meet their individual needs. It may be that there is cross-border use of mental health services. Located within the locality are:

Inpatient Services in Warwick, Community Mental Health teams in Leamington Spa, Warwick and Stratford upon Avon, Crisis Resolution and Home Treatment Teams in Stratford upon Avon and Rehabilitation and Recovery Services in St Michaels Hospital Warwick.

##### **Mental Health Services and Support for Young People**

Child and Adolescent Mental Health Services (CAMHS) offer services to children and young people up to their 17th birthday. Children and young people are referred to the service through professionals such as GPs and educational psychologists. Local Commissioners are exploring future options around commissioning community mental health services for children and young adults aged up to 25.

##### **South Warwickshire Foundation Trust (SWFT)**

SWFT offer home visits to families and offer support and expertise in improving family's needs, protection and well-being across South Warwickshire. Specialist services range from children nursing, physiotherapy, school health and paediatricians, speech and language therapy, looked after children and health visitation. SWFT also provide 2x centres in Stratford upon Avon, 1x service in Shipston on Stour, 1x service in Southam and 1x service in Fenny Compton.

#### **4.5 Dentists**

Dentist practise capacity is currently being reassessed. Stratford on Avon District support 18 surgeries which are distributed throughout the district in the following settlements:

- 2x Alcester, 1x Bidford on Avon, 3x Southam, 7x in Stratford upon Avon, 1x Shipston on Stour, 2x Henley in Arden, 1x Wellesbourne and 1x Studley.

SDC will continually work with WCC in identifying capacity and demand based on housing growth in the district and will update the infrastructure schedule accordingly.

## **5. Green Infrastructure, Open Space & Sports Provision**

### **5.1 Introduction**

The green infrastructure, open space and sports provision package put forward in the Schedule of Infrastructure Projects has a number of purposes:

- To enhance ecology and biodiversity;
- To address climate change;
- To improve the provision of and public access to open space;
- To foster health and wellbeing through participation in sports and recreation; and
- Related to this, to encourage active ageing.

### **5.2 Biodiversity**

The Warwickshire Coventry and Solihull Local Biodiversity Action Plan (LBAP) identifies the costs of achieving the LBAP habitat requirements to 2026. The costs of creating, restoring and enhancing habitats across the District to meet LBAP targets are estimated to be £792,000 per annum.

It is further estimated by Warwickshire County Council (Ecology) that around 90% of the £792,000 will be delivered through partners, including agri-environment schemes, Environment Agency schemes, biodiversity offsetting and public open space provision and enhancement delivered through S106.

This leaves a deficit of £79,200 per annum to deliver local green infrastructure needs. These will predominately be identified in Neighbourhood and Parish Plans and be funded by Town and Parish Councils' CIL receipts and other sources.

### **5.3 Open Space Strategy and Active Communities Strategy**

Open space and active communities infrastructure proposed in this IDP is underpinned by an assessment of open space and sports needs undertaken in September 2011 and updated in April 2014, undertaken by Arup on behalf of the Council. It is supported by the District Council's Open Space Strategy and Active Communities Strategy and is in line with guidance from Sport England, Fields in Trust, Natural England and CABI.

Future development and associated population growth will create a need for new and improved public open spaces including urban and village green infrastructure (e.g. street trees, pocket parks and other amenity green spaces), parks and gardens, play areas, allotments and improved access to the countryside. There will also be a need for new and improved indoor and outdoor sport and recreation facilities to support the health and wellbeing agenda of an increased population, including measures to improve levels of physical activity, mental wellbeing and social inclusion.

In addition the management of open spaces and recreational facilities will need to change to mitigate and adapt to climate change, including facilitating community food production (reducing air miles on food), planting drought and flood resistant species, planting to reduce surface water run-off and the

introduction of water efficiency measures and low carbon energy usage at leisure facilities across the District.

The Schedule of Infrastructure Projects presents an assessment of the types of open space and sports provision required to meet needs, by broad settlement or type of settlement, to reflect the level and distribution of growth set out in the Core Strategy. The open space will mostly be provided on-site and secured through S106 contributions although higher order facilities (such as the indoor sports provision) would generally be funded through CIL.

The Schedule also includes an indicative list of projects to further the aims and objectives of the Open Space and Active Communities Strategies and meet some of the requirements and/or shortfalls identified in the needs assessment. The more strategic projects listed could receive CIL funding. The smaller, more local projects could utilise S106 funding where this is paid in lieu of on-site provision (and subject to the limits on pooling S106 contributions). Developer contributions would be used to fund new or enhanced facilities to the extent that these are meeting the needs of the Core Strategy's additional population.

A further review of the Open Space, Sport and Recreation Assessment with either a separate or inclusive Sport Pitch Strategy will be required to further assess the impact of housing growth in the Core Strategy and the review will assist in the qualitative assessment of Sport Pitch Stratford-on-Avon provision which will need to account for cross boundary usage, governance of sport and league structure, consultation on service provision and adequacy of existing sites, displaced demand and future and current educational demand based on existing and future curriculum.

## **6. Emergency Services**

### **6.1 Police**

This section is based on a paper from Warwickshire Police in response to the Further Focused Consultation (March 2014). The Police response is the latest in a positive dialogue maintained throughout the preparation of the Core Strategy.

The direct and additional impacts of new development in the District on local policing will be manifested in demand and responses in the following areas:

- Additional calls and responses per year via the control centre;
- Attendance to additional emergency events within the locality each year;
- Additional non-emergency events to follow up with public contact each year;
- Additional recorded crimes in the locality;
- Additional need for custody facilities;
- Additional anti-social behaviour incidents each year;
- Demand for increased patrol cover;
- Additional vehicle use;
- Additional calls on the Airwaves system;
- Additional use of the Police National Database (PND) systems to process and store crime records and intelligence;
- Additional demand for deployment of Mobile CCTV technologies;
- Additional demand for local access to beat staff from local neighbourhood teams;
- Additional policing cover and interventions in all the areas described when considering staffing and functions above and for additional accommodation from which to deliver these.

Where there is a large concentration of new homes, as in the case of the new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield, Warwickshire Police estimate that they will require a new Safer Neighbourhood Team (SNT) to be set up. This will require a Safer Neighbourhood Office to be secured through S106. It is estimated to cost around £450,000 (including 150sqm of office space, fixtures and fittings but excluding police equipment) if provided on a 'freestanding' basis for each settlement. Warwickshire Police would, however, be keen to explore the possibilities of multi-agency / shared service provision and this would be likely to reduce that cost. An estimated cost of £100,000 would provide 1x police post (to possibly include a co-located Safer Neighbourhood Post).

In addition the Police will seek a contribution from Stratford District Council's CIL receipts to help fund the additional general infrastructure requirements associated with meeting increased needs across the District. This would cover costs including police vehicles and custody provision. A provisional figure in excess of £0.5m has been allowed for this in the IDP pending a comprehensive review of service requirements later in 2015.

SDC will continually work with Warwickshire Police through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

## **6.2 Warwickshire Fire and Rescue Service**

The current objectives of the Warwickshire Fire & Rescue Service (WFRS) are to:

- Reduce the incidence of fires;
- Reduce loss of life in fires and accidents;
- Reduce the number and severity of injuries from fires and other emergencies;
- Safeguard the environment and protect the national heritage; and
- Provide communities with value for money.

In new developments these objectives would be supported by the provision of fire hydrants, sprinklers and smoke detector alarms.

~~The WFRS consultation on proposals to change the way front line services are delivered in the future proposes a new service delivery point at Jaguar Land Rover in Gaydon. As part of how WFRS deliver frontline services in the future, an additional fire engine has been introduced which will operate from a new service delivery point at Aston Martin Lagonda in Gaydon. This is intended to improve response times for the community and bring benefits to the site occupiers. The new station is critical to WFRS's proposed response model. The service will review feedback from the ongoing public consultation (due to end in June 2014) before proceeding with any implementation plan.~~

The WFRS is reviewing its position on 'low water areas' and may seek CIL funding to increase water availability to such areas in the future.

## **6.3 Ambulance Service**

The West Midlands Ambulance Service has largely completed its 'Make Ready' project for Coventry and Warwickshire with the provision of two new service hubs in Coventry and Warwick and a network of Community Ambulance Stations across the sub-region. These include stations at Stratford, Wellesbourne, Shipston and Southam. There is also a standby point in Alcester. ~~There are no outstanding requirements known during the plan period.~~

The Trust is required to respond to at least 75% of immediately life threatening emergency calls within 8 minutes. Due to the geography of South Warwickshire there is a challenge to meet this target due to

the travel times and distances involved in reaching some of the more remote villages and communities. Large scale strategic development may result in an increase in the number of incidents that the Trust will be required to respond to. As a result of the proposed housing growth in the District the provision of additional response posts will need to be considered in the strategic allocations.

SDC will continually work with the West Midland Ambulance Service through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

As a result of potential increased risk of cardiac arrest incidents from the expanded population and the importance of efficient defibrillation, the installation of at least one public access defibrillator in all publically used buildings within new developments in the district is recommended.

## **6.4 Stratford District Council CCTV Provision**

The Council's CCTV service includes the supply, maintenance and monitoring of Closed Circuit Television (CCTV) monitored 24 hours a day 7 days a week. The reasons for the service being established are registered by Stratford-on-Avon District Council with the Information Commissioner as: 'Crime prevention and detection and the apprehension and prosecution of offenders.'

CCTV is integral to delivery of the Crime and Disorder strategy in Stratford District. Police, Fire, Health and Probation are statutory partners in reducing crime and disorder. As such CCTV supports the objectives of partner agencies set out above as well as providing crime prevention and reassurance to the community.

In new developments bringing an increase in the number of residences and/or businesses to the district, the council will seek to maintain, develop and enhance the established CCTV scheme on a case-by-case basis following consultation on need with relevant bodies, emergency services and subject to an impact assessment(s).

The requirements will be determined based on a range of factors which could include, but are not limited to:

- Number of access routes to the development
- The road network in relation to the development
- The impact on other locations emanating from the development
- Number and location of residential properties
- Number and location of commercial properties
- Number and location of retail facilities
- Number and location of community facilities
- Number and location of leisure and recreational facilities
- Trends in crime and anti-social behaviour for similar developments, if available.

## **7. Water and Utility Services**

### **7.1 Water Supply and Waste Water**

Over most of the District, Severn Trent Water (STW) is responsible for water supply, the foul drainage network and wastewater treatment. A small part of the District (the south-eastern corner) is covered by Thames Water.

Every five years each water company is obliged to publish a 25 year 'Water Resources Management Plan' setting out its overall strategy. STW are currently developing a plan to cover the period 2015-2040 that ~~will be~~was finalised in 2014. ~~STW's current plan covers the period 2010 – 2035 and aims to:~~

- ~~• Reduce water demand by cutting leakage, encouraging household metering and increasing water efficiency;~~
- ~~• Improve supply resilience by investing in aqueducts, aquifer storage and recovery, providing new groundwater sources and improving the supply network; and~~
- ~~• Improve water quality by treating nitrates and preventing loss of deployable output due to worsening water quality.~~

The strategy is to reduce the overall demand for water and to make the best use of existing water resources through a more flexible and sustainable supply system. This will be achieved by:

- Reducing waste by driving leakage down;
- Reducing the demand for water, by working in partnership with customers to help them become more water efficient;
- Improving the ability to deploy existing resources flexibly and efficiently;
- Using water trading to make more efficient use of resources and improve resilience;
- Developing new sources of water when required, with a focus on expanding existing sources first.
- Using proactive catchment management measures to protect sustainable sources of drinking water supply from pollution risks.

Under the Flood and Water Management Act (2010), new development will no longer have the automatic right to connect surface water drainage to sewers. This, combined with water efficiency measures and metering of all new development, will reduce the new net burden on the wastewater network and at the treatment works (WwTWs).

Within the District there is generally capacity in the waste water treatment works to deal with the proposed level and distribution of growth set out in the Core Strategy. However, some works will require investment and development will need to be phased accordingly. STW request that they are consulted at an early stage of development proposals. Those WwTW likely to need upgrading during the Core Strategy period are listed in the Schedule of Infrastructure Projects. Some upgrading of the foul drainage network will also be required.

Site based infrastructure and network connections for water supply and collection of waste water will be provided by developers. STW will generally meet the cost of any upgrades to water supply and foul drainage networks and waste water treatment facilities.

The water supply network is only likely to need significant upgrading in relation to the proposed new settlement at Gaydon/Lighthorne Heath. Discussions will continue with the developers of the new settlement as the implications of adding this scale of development to the rural water supply and foul drainage networks are very significant.

The growth in the Itchen Bank and Long Marston WwTW catchments would need a potential new solution to be identified by the EA and STW. SDC will only give planning permission once both the EA and STW have indicated that they are satisfied with any proposed development affecting the area.

STW analysis shows that the most significant risk to long term supply and water quality is the impact of climate change. Policies in the Core Strategy address water conservation and the appropriate use of Sustainable Urban Drainage Systems to reduce pressure on water supply and treatment works.

New developments that implement SUDS will need to ensure that the design of the SUDS supports the findings and recommendations in the Warwickshire Surface Water Management Plan (SWMP) and Stratford on Avon District Council's Strategic Flood Risk Assessment.

Further advice can be found in the following documents:

- STW Water Resource Management Plan produced by Severn Trent Water and reviewed by 2019;
- Thames Water Resource Management Plan produced by Thames Water and reviewed by 2019;
- River Basin Management Plan Severn, Thames produced by EA and reviewed by Dec 2015; and
- Catchment Abstraction Management Strategies produced by EA and reviewed periodically.

## **7.2 Flood Risk Assessment and Flood Alleviation and Defences**

### **7.2.1 River Flood Management**

The Environment Agency is the lead agency on management of river flooding. Almost the entire District is covered by the River Severn Catchment Flood Management Plan (CFMP) with just the north-west corner falling into the Trent's catchment. The CFMP is a high level document produced by the Environment Agency with strategic policies designed to plan flood risk management in the catchment over the next 50-100 years. This CFMP identifies flood risk management policies to assist all key decision makers in the catchment. The CFMP for the River Severn was published in ~~September 2008~~ December 2009.

The River Avon and its tributaries run through the District. A large number of settlements are located within existing Flood Zones 2 and 3 and are therefore already at risk from fluvial flooding. The Core Strategy specifies that new development must not increase risk to existing development.

Support will be given to flood alleviation measures under consideration by the Environment Agency by safeguarding possible sites for storage and other channel works where necessary. The Environment Agency is currently planning flood alleviation works in Shipston-on-Stour, Henley-in-Arden and along the Racecourse Brook in Stratford.

The works in Shipston-on-Stour (estimated to cost £500-800k) would benefit the heart of the town, mainly the Church Street, Mill Street, West Street and Telegraph Street area. The works in Henley-in-Arden would benefit the High Street/Beaudesert Lane and Prince Harry Road area and would cost approximately £800k-£1.2m. Whilst these schemes would offer protection to existing properties they would also significantly reduce the risk of flooding of central areas. This would encourage regeneration of currently disused units as well as opening up additional areas for commercial and residential redevelopment.

The Environment Agency is also planning an alleviation scheme along the Racecourse Brook to the north-west of Stratford-upon-Avon. This will provide additional storage to protect commercial and residential properties against flooding on the eastern side of Birmingham Road (including Tesco and land to the north west of that site). Adjacent fields in the upstream catchment have been identified as a potential location for the storage. This project is anticipated to cost approximately £750-900k.

The main sources of funding for these projects are likely to be the Environment Agency's Flood Defence Grant in Aid (FDGiA) and Local Levy, contributions from local businesses and land owners, and Severn Trent Water for the scheme on the Racecourse Brook. CIL or S106 funding will also be sought to contribute to the cost of works where they facilitate growth. The Environment Agency states that it will only be able to deliver the above schemes through partnership funding. It understands that it is essential to seek opportunities to work with developers and local communities to enable new developments to make a positive contribution to reducing flood risk.

Level 1 Strategic Flood Risk Assessments (SFRAs) provide information on current and future flood risk from all sources, taking into account climate change. They are designed to enable decision makers to allocate development and infrastructure where risks are minimised. They also seek to

identify where flood alleviation measures are required to protect existing properties. Stratford District updated its flood risk assessment in September 2013 and will do so approximately every five years to ensure that the risks are properly understood. A contribution may be sought from CIL for this purpose.

The 2013 SFRA highlights a number of potential future (fluvial) flood alleviation schemes in the District, which have been identified by the Environment Agency as potentially benefiting local communities. These comprise the following locations:

- Bell Brook, Snitterfield;
- Lot Brook, Southam;
- Cherington, near Shipston-on-Stour; and
- Fenny Compton.

A contribution towards these flood alleviation measures could be sought from CIL or S106 where the works would enable new properties to be built without unacceptable risk of flooding. There is also a single case of surface water flooding identified in the SFRA (at Gaydon) – see below.

### **7.2.2 Surface Water Flood Management**

As surface water flooding is a known issue in Stratford-on-Avon District, a Surface Water Management Plan is required to enable opportunities to reduce existing risk through new development to be maximised. This is the responsibility of Warwickshire County Council as the Lead Local Flood Authority.

Some areas suffer from surface water flooding from artificial drainage, surface water and field runoff, particularly at times of heavy and prolonged rainfall. The Core Strategy locates new development in areas of lowest flood risk and specifies that new development must not increase risk to existing development. Contributions may be sought from strategic sites to contribute to flood risk management facilities where there is flooding downstream of a development.

The case of surface water flooding identified in the SFRA at Gaydon will be alleviated by works planned as part of the Gaydon/Lighthorne Heath new settlement proposal.

Under the Flood and Water Management Act (2010), new development will no longer have the automatic right to connect surface water drainage to sewers. Developers will be required to put Sustainable Drainage Systems (SUDS) in place in new developments. These should ensure that the effect of surface water runoff is consistent with green field rates on green field sites and that run off rates are attenuated on brownfield sites, as required by the Environment Agency.

Further detail is provided in the Warwickshire Sub-Regional Water Cycle Study (Halcrow, 2010) and the Water Cycle Study Updates (URS, 2012, 2014 and 2015).

## **7.3 Electricity, Gas and Renewable/Low Carbon Energy**

### **7.3.1 Electricity**

National Grid owns, maintains and operates the electricity transmission network in England and supplies energy from generating stations to local distribution companies. The local distribution company in Stratford on Avon District is Western Power distribution. It is their role to provide electricity to homes and businesses.



Western Power Distribution has stated that the electricity distribution networks can cope with the scale of growth predicted in the plan. They would wish to be consulted, however, at an early stage, on the development of any strategic sites.

On any individual site, connection to the network is the responsibility of the developer.

Policies in the Core Strategy aim to improve energy efficiency and encourage the use of renewable energy, thereby reducing pressure on the grid.

SDC will continually work with Western Power through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

### **7.3.2 Gas**

National Grid owns and operates the gas distribution networks through which gas is transported to users. It also is the gas supplier in the West Midlands. It has reported that it can cope with the scale of growth predicted in the Core Strategy.

On any individual site, connection to the network is the responsibility of the developer.

SDC will continually work with National Grid through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

### **7.3.3 Renewable and Low Carbon Energy**

Policy CS.2 Climate Change and Sustainable Construction encourages the development of renewable and low carbon energy infrastructure.

~~The mechanism of 'Allowable Solutions', whereby payment is made into a fund to offset carbon reduction targets that cannot be met on site, is potentially a significant source of funding for low and zero carbon energy projects. Work is ongoing within central Government to establish a definition of zero carbon and the scope, governance and implementation of Allowable Solutions Funds. The District Council is committed to establishing an Allowable Solutions Fund for local projects. It could top this up with CIL revenues, or Town and Parish Councils could contribute a share of their CIL monies, for individual projects that meet local priorities.~~ through existing measures to increase energy efficiency of new buildings in accordance with the government's climate change commitments contained in the 'Fixing the Foundations: Creating a more prosperous nation – HM Treasury, Jul 2015 document which promotes cost-effective innovation of making a transition to a low carbon economy.

Priority Areas for District Heating will be identified through a Heat Map and Energy Master planning Study which will be developed and used as evidence as part of the Core Strategy development.

## **7.4 Broadband**

For the short to medium term, growth in broadband services across the District will be realised through a combination of:

- Commercial expansion of 'next generation' broadband services in the more densely populated areas; and
- participation in the Coventry Solihull and Warwickshire Superfast Broadband Project, supported by BDUK, which is working in partnership with British Telecom to roll out superfast broadband to those areas that are not commercially viable.

This project, commenced in March 2011 and running until December 2015, aims to deliver the Government's 2015 targets, as set out in the December 2010 strategy document *Britain's Superfast Broadband Future*, that everyone should be able to access broadband at speeds of at least 2Mbps and that superfast broadband (minimum 24 Mbps) should be available to 90% of premises in each upper tier authority. It is expected to exceed these targets to provide the following benefits:

- By 2016 all domestic and business premises will have access to broadband speeds of at least 2Mbps, with 91% of premises in the sub-region able to access superfast services;
- Improved access to broadband in rural and non-rural areas for small and medium enterprises (SMEs) and citizens through the delivery of increased speeds to more areas in the sub-region;
- An opportunity for community groups and SMEs to develop broadband facilities further still on a "Big Society" basis if their areas are not fully covered by the proposals; and
- An enabling of E-service delivery across the public sector.

The Core Strategy looks beyond the aims of the sub-regional broadband project and seeks all new development to have connections enabling download speeds of 30Mbps in accordance with the Government's commitment to the EU2020 Digital Agenda. Where no strategic telecommunications infrastructure is available, developers should provide suitable ducting to the premises for later connection.

## **7.5 Waste**

Stratford-on-Avon has four Household Waste Recycling Centres at Shipston-on-Stour, Wellesbourne, Stockton and Burton Farm, Stratford-upon-Avon. WCC owns three out of the four sites. Burton Farm is leased for 25 years, starting in 2001. An additional 14,600 properties will result in an estimated increase in vehicle movements to the recycling centres of in the region of 1,550 movements per week (80,600 per year). It will therefore be necessary to make significant investment in at least one of these sites to support the extra demand. Based on standard unit costs, this is estimated to cost around £1-2 million over the Core Strategy period.

SDC will continually work with the WCC through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

## **8. Other Social Infrastructure**

### **8.1 Libraries and Cultural Facilities**

~~Discussions are on-going with Warwickshire County Council about appropriate developer contributions to enable the library service to serve the expanded population.~~

~~A new library is likely to be required at the new settlement at Gaydon/Lighthorne Heath, funded via a S106 payment from the developer. This is likely to be collocated with other community facilities. A provisional cost of £1.9 m has been allowed.~~

~~Money may also be sought from CIL to support community libraries (to fund stock and Eservices, for example) and to support the mobile library service. An initial estimate from WCC based on Department for Culture, Media and Sport (DCMS) guidelines, updated by SDC, suggests that a CIL contribution of around £115,000 might be appropriate over the Core Strategy period.~~

Warwickshire County Council Library and Information Service provide a wide range of books and materials to meet customer needs, including both popular and specialist stock. It also aims to provide the best value for money. There are over 900,000 items that are loaned approximately 3 million times each year with the majority of material available through the public library network.

There are 10 Library and Information centres within Stratford on Avon District. 5 of those are run as community libraries and 5 are managed by WCC. In addition there is also a mobile facility serving the more rural parts of the District. Discussions are on-going with Warwickshire County Council (WCC) about appropriate developer contributions to enable the library service to serve the expanded population. Currently negotiations are on-going with developers and WCC regarding the provision of a community facility at both GLH and LMA. An estimated cost towards services at GLH is approximately £43,000 which would fund stock.

In general, CIL will be used to fund stock and the potential co-location of library services throughout the district. WCC does not plan to construct or open new library buildings and it is envisaged that this will be the case indefinitely. However, the LMA contribution could potentially fund a co-location service with other community facilities on-site at an estimated cost of £950,000.

It is expected that developments of less than 25 homes, 1 bed flats and over 55 housing will not contribute towards the funding of library services.

SDC will continually work with the WCC through the development of the Core Strategy and the planning application processes of all strategic sites to identify capacity and demand and as a result will update the infrastructure schedule accordingly.

**Appendix 2 - Schedule of Infrastructure Projects**

**Table 1 – Main Schedule**

Note: Phase 1:2011/12 – 2015/16; Phase 2: 2016/17 -2020/21; Phase 3: 2021/22 – 2025/26; Phase 4: 2026/27 – 2030/31

Costs are indicative only as schemes are not yet defined in detail

1 - Transport & Highways						
Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<b>Stratford Transport Package</b>						
(01) Tiddington Road/Banbury Road/ Shipston Road 'Alveston Manor' junction including improvements to Banbury Road/Shipston Road roundabout – traffic signalisation to co-ordinate with the Bridgeway Gyratory scheme	WCC	Developers, SDC	Phase 1 or 2	£1.03m	CIL, other	Critical
(02) Bridgefoot/Bridgeway Gyratory – further co-ordinated traffic signalisation of Bridgeway/Bridgefoot and Bridge Street entry arms			Phase 1 or 2	£0.83m	CIL, other	Critical
Schemes (01) and (02) now being promoted as a single project						
(03) Evesham Road/Evesham Place roundabout – reconfiguration to a traffic signalised junction	WCC	Developers, SDC	Phase 3	£0.8m	CIL or S106/278, other	Critical
(06) Improvements to Shipston Road/ Clifford Lane Roundabout	WCC	Developers, SDC	Phases 3 & 4	£0.55 m	CIL	Critical
(07) Improvements to Shipston Road/Severn Meadows Road/ Trinity Way Roundabout	WCC	Developers, SDC	Phases 3 & 4	£0.55 m	CIL	Critical
Schemes (06) and (07) now being promoted as a single project						

(08) Birmingham Road widening between Regal Road and Hamlet Way	WCC	Developers, SDC	Phase 3 or 4	£1.7 m	CIL or <u>S106/278, other</u>	Critical
<b>Birmingham Road Study Schemes</b>						
<b>Short Term (next 5 years)</b>			Phases 1-4	£185,000+	CIL, other	Some critical
(a) Inbound slip lane into Tesco car park (developer funded)						
(b) Improvements to strategic signing – approx. £50,000						
(c) Pedestrian and cycle route improvements (not covered by SRZ)						
(d) Birmingham Road/Justins Avenue junction improvements - approx. £50,000						
(e) CCTV to improve operation of traffic signals on Birmingham Road corridor – approx. £85,000						
<b>Medium Term (5-10 years subject to further feasibility assessment)</b>						
(a) Maybird Shopping Park access improvements – scheme yet to be developed						
(09) Improvements to Birmingham Road/A46 'Bishopton Roundabout'	<u>Highways England</u>	WCC, Developers, SDC	Phases 3 & 4	£2.50 m	CIL or <u>S106/278 WCC</u>	Critical
(10) Improvements to Alcester Road/A46 'Wildmoor Roundabout'	<u>Highways England</u>	WCC, Developers, SDC	Phases 3 & 4	£ 2.50 m	CIL or <u>S106/278 WCC</u>	Critical
(11) Shakespeare Street/Mulberry Street one-way	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical
(12) Guild Street/Great William Street traffic signals	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical
Schemes (11) and (12) being promoted as a single project						
(13) Improvements to Warwick Road/A46 'Marraway Roundabout'	<u>Highways England</u>	WCC, Developers, SDC	Phase 3 or 4	£0.40 m	CIL, <u>WCC</u>	Critical
(14) Bridgeway/Warwick Road traffic signals	WCC	Developers, SDC	Phase 3 or 4	£0.20 m	CIL	Critical

<b>Warwick Road Dynamic Signage Strategy</b>	WCC	Highways England, Developers, SDC	Phase 2 or 3	£1.0 m	CIL, <u>WCC</u>	Critical
<b>On and off road pedestrian and cycle projects, including:</b>  (a) minor cycle infrastructure improvements contributing towards delivery of the Cycle Strategy within Local Transport Plan 2011-2026;  (b) other projects to facilitate walking and cycling across the district	WCC or landowner/ developer	SDC, Sustrans, WCC, landowner/ developer	Lifetime of Core Strategy	(a) £30,000  (b) n/a	CIL (cumulative impacts and completing strategic routes)  S106/ part of development (S278/ S38) where related to specific sites	Some critical
<b>Canal Quarter Regeneration Zone localised mitigation package, including:</b>  (a) Enhanced pedestrian and cycle link on Birmingham Road & Alcester Road including spurs to Masons Road and town railway station (section to the south of the canal falls within the site and so is part of the development package);  (b) Pedestrian/ cycle bridge across the canal  (c) Road/junction improvements	Developers	WCC, SDC	Phases 3 & 4	(a) + (b) pedestrian/ cycle links (incl. canal bridge) estimated at £0.8 m  (c) n/a	S106/ part of development (S278/ S38)	Critical
<b>Stratford Western Relief Road</b> (Evesham Road to Alcester Road)	Developer	WCC	Phases 2-4	£8.0 m	Part of development (S278/ S38)	Critical

<p><b>Transport and highways infrastructure for proposed new settlements at Gaydon/Lighthorne Heath and Long Marston Airfield:</b></p> <p><u>A. Strategic Highways Infrastructure</u> See separate schedules at Table 2 - Infrastructure Trajectory for Gaydon/Lighthorne Heath and JLR Employment, and Table 3 - Infrastructure Trajectory for Long Marston Airfield)</p> <p><u>B. Localised traffic mitigation/management measures</u> Contingency sum allowed for schemes yet to be identified</p> <p><u>C. Public Transport</u> TBC – likely to include Park &amp; Ride and express bus service</p> <p><u>D. Pedestrian and Cycle Links</u> TBC</p>	<p>A. <u>WCC</u></p> <p>B. <u>WCC</u></p> <p>C. <u>WCC</u></p> <p>D. <u>WCC</u></p>	<p>A. <u>Highways England, Developers, SDC</u></p> <p>B. <u>Highways England, SDC</u></p> <p>C. <u>Bus Operators,</u></p> <p>D. <u>Developer, Highways England, SDC, other</u></p>	<p>A. <u>Phases 2 and 3</u></p> <p>B. <u>Phases 2 and 3</u></p> <p>C. <u>TBC</u></p> <p>D. <u>TBC</u></p>	<p>A. <u>£56.17m</u> including some costs to be shared with Warwick District Council Local Plan</p> <p>B. <u>£5.1m</u></p> <p>C. <u>£4.3m</u></p> <p>D. <u>£1.5m</u></p>	<p>A. – D. <u>Developer (S278/38 and S106); Highways England</u></p> <p>B. <u>Developer (S278/38 and S106); Highways England</u></p> <p>C. <u>Developer/ other</u></p> <p>D. <u>Developer/ other</u></p>	<p>A. - D. Most provision critical</p>
<p><b>Widening of M42 north of Junction 3A</b> Highways Agency has retained this route protection as widening may be required in future</p>	<p><u>Highways England</u></p>		<p>Possible Phase 3 or 4 (or longer term)</p>	<p>n/a</p>	<p><u>Highways England</u></p>	
<p><b>Improving the A46(T) between Alcester and Stratford-upon-Avon</b> (long term aspiration in LTP3)</p>	<p><u>Highways England</u></p>	<p>WCC</p>	<p>Possible Phase 3 or 4 (or longer term)</p>	<p>n/a</p>	<p><u>Highways England</u></p>	

<b>Improving M40 Junction 12</b> Includes capacity for an additional 5,000 jobs at JLR/Aston Martin (excludes further improvements associated with a new settlement at Gaydon/Lighthorne Heath)	<u>Highways England/</u> WCC	Land owner/ JLR	Phase 2 (due for completion 2015)	£12 m	<u>Highways England, WCC, Regional Growth Fund, Local Pinch Point Funding</u>	Critical
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## 2- Education

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<p><b>Primary Schools (TBC)</b>            Investment likely to be needed to increase capacity at the following:</p> <ul style="list-style-type: none"> <li>• Stratford primary schools (new schools and investment in existing provision)</li> <li>• Southam primary schools</li> <li>• St Nicholas CE Primary, Alcester</li> <li>• Bidford Primary</li> <li>• Ettington Primary</li> <li>• Temple Herdewycke Primary</li> <li>• The Dasset CE Primary, Fenny Compton</li> <li>• Quinton Primary</li> <li>• Shipston Primary</li> </ul> <p>New settlement at Gaydon/Lighthorne Heath (<u>2300 dwellings over plan period</u>):</p> <ul style="list-style-type: none"> <li>• <u>new primary school (3 FE) with co-located nursery (Re-location of Lighthorne Heath Primary School and nursery – the new location may provide flexibility to house a Children’s centre and Adult care facility)</u></li> </ul> <p>New settlement at Long Marston Airfield (<u>2100 dwellings over plan period</u>):</p> <ul style="list-style-type: none"> <li>• <u>new primary school (2 FE) with co-located nursery and SEN (second primary school beyond 2031)</u></li> </ul>	<p>Various</p> <p>Developer</p> <p>Developer</p>	<p>WCC, other education providers, SDC, private sector</p> <p>WCC, other education providers</p> <p>WCC, other education providers</p>	<p>Lifetime of Core Strategy</p> <p>Phases 2-3 (some provision by 2018) – on-going negotiation</p> <p>Phases 2-3</p>	<p>£12.2m (excl. cost of pre-school provision)</p> <p><u>£4.7 m</u></p> <p><u>£5.0m</u></p>	<p>CIL, other, S106, Government</p> <p>S106</p> <p>S106</p>	<p>Critical</p> <p>Critical</p> <p>Critical</p>



<p><b>Secondary Schools (TBC)</b> Investment may be needed to increase capacity at the following:</p> <ul style="list-style-type: none"> <li>• Stratford (expansion of existing provision or possible new school)</li> <li>• Southam College</li> <li>• Henley High</li> <li>• Alcester Academy</li> <li>• Grammar schools and Catholic High Schools</li> <li>• Shipston High Academy (6<sup>th</sup> Form provision)</li> </ul> <p><u>New settlement at Gaydon/Lighthorne Heath (2300 dwellings over plan period):</u></p> <ul style="list-style-type: none"> <li>• <u>Upgrading and expansion of Kineton High School (to include the provision of new science, technology and IT blocks)</u></li> </ul> <p><u>New settlement at Long Marston Airfield (2100 dwellings over plan period):</u></p> <ul style="list-style-type: none"> <li>• <u>1x new secondary school with Post 16 (including provision of land/facilities)</u></li> </ul>	<p>Various</p> <p>Developer</p> <p>Developer</p>	<p>WCC, Academy, Foundation and other Schools, SDC, private sector</p> <p>WCC</p> <p>WCC</p>	<p>Lifetime of Core Strategy</p> <p>Phases 2-4 <u>some provision by 2019/20</u></p> <p>Phases 2-4 <u>some provision by 2019/20</u></p>	<p>£27.8 m</p> <p><u>£5.0 m</u></p> <p><u>£20.0m</u></p>	<p>CIL, Academy Funding, other</p> <p>S106</p> <p>S106</p>	<p>Critical</p> <p>Critical</p> <p>Critical</p>
<p><b>Special Needs Provision (primary and secondary)</b></p>	<p>WCC</p>	<p>Other education providers, developers</p>	<p>Lifetime of Core Strategy</p>	<p><u>£7.5 m</u> <u>(exclusive of SEN provision for GLH and LMA)</u></p>	<p>S106</p>	<p>Critical</p>

### 3-Primary and Acute & Community Health Services' Infrastructure

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<b>Primary Health Care</b>						
a) Stratford-upon-Avon: approx. 3 clinical rooms and associated infrastructure	South Warwickshire Clinical Commissioning Group (CCG)	Developers, Public Health Works, NHS England, NHS Property Services, GPs and other private sector, SDC	Lifetime of Core Strategy	a) <u>£285,000+</u>	a) S106 and/or CIL	Critical
b) LSVs and other rural: approx. 2 clinical rooms and associated infrastructure				b) <u>£190,000+</u>	b) S106 and/or CIL	Critical
c) <u>New 4GP practice facilities at Gaydon/Lighthorne Heath (to be provided as part of village hub offer – potentially housed in temporary accommodation during early phases of development)</u>				c) <u>£1.8 m</u>	c) S106	Critical
d) <u>Southam: approx. 1 clinical room and associated infrastructure</u>				d) <u>£95,000+</u>	d) S106	Critical
e) <u>Shipston-on-Stour: relocation of GP practice</u>				e) <u>tbc</u>	e) <u>tbc</u>	Critical
f) <u>Long Marston Airfield: approx. 5 clinical rooms and associated infrastructure</u>				f) <u>£2.4m</u>	f) S106	Critical
<b>Community and Acute Hospital Services' Infrastructure</b>						
a) A new ward block at the Warwick Hospital site - the main acute hospital services site	South Warwickshire NHS Foundation Trust	WCC, SDC, primary health organisations	Lifetime of Core Strategy	a) £24m of which some £17m sought from CIL or S106	Private borrowing, charitable donations, S106, CIL	Critical
b) A new hospital at the Stratford Hospital site including outpatient, diagnostic, treatment and inpatient facilities and a hub for community healthcare teams				b) <u>£23.9m</u>		Critical

#### 4 –Green Infrastructure, Open Space and Sports Provision

Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<p><b>Green Infrastructure (biodiversity aspects)</b></p> <p>The Coventry Solihull and Warwickshire Biodiversity Action Plan for Stratford-upon-Avon District. Projects to be identified on an on-going basis; including on-site and off-site measures by developers; agri-environment schemes; local projects identified by Town and Parish Councils in Neighbourhood Development Plans and Parish Plans etc.</p>	Various	WCC, SDC, Parish and Town Councils, land owners, others <a href="#">Defra/Natural England, Environment Agency</a>	Lifetime of Core Strategy	Biodiversity Action Plan estimated to cost £792 per annum in Stratford District	<ul style="list-style-type: none"> <li>• Grants (landfill tax, HLF etc.</li> <li>• Developers/ land owners with on-site green infrastructure;</li> <li>• Biodiversity offsetting;</li> <li>• CIL;</li> <li>• Agri-environment schemes;</li> <li>• Environment Agency;</li> <li>• Voluntary sources;</li> <li>• Town &amp; Parish Councils (CIL monies)</li> </ul>	Some provision critical
<p><b>Open Space and Sports Provision (Details in Open Space Needs Assessment and to be reviewed at a later date to encompass a Sports Playing Pitch Strategy)</b></p>						

<p><b>Stratford-upon-Avon</b></p> <ul style="list-style-type: none"> <li>• Parks, Gardens and Amenity Greenspace (PGA)</li> <li>• Provision for Children and Young People (CYP)</li> <li>• Accessible Natural/Semi Natural Greenspace (ANG)</li> <li>• Allotments/Community Orchards (ACO)</li> </ul> <p>Includes provision at West of Shottery, Canal Quarter Linear Park and upgrading of Stratford Leisure Centre</p>	Developer	SDC, Town Council, other	Phase 1 to 4	n/a	<ul style="list-style-type: none"> <li>• Shottery and Canal Quarter S106 (on-site provision or financial payment for off-site provision or enhancement of existing facilities)</li> <li>• Elsewhere S106/CIL</li> </ul>	Some provision critical
<p><b>Gaydon/Lighthorne Heath New Settlement</b></p> <ul style="list-style-type: none"> <li>• PGA</li> <li>• CYP</li> <li>• ANG</li> <li>• ACO</li> </ul> <p>Also</p> <ul style="list-style-type: none"> <li>• Outdoor and Indoor Sports (OIS), including provision of a community sports facility and sports hall, to serve this and surrounding villages, on or off-site. <u>Swimming pool at Kineton High School to be upgraded, including provision of a roof.</u></li> </ul>	Developer	SDC, Parish Council, other	Phase 2 to 4	n/a	<ul style="list-style-type: none"> <li>• S106(on-site provision)</li> </ul> <p>S106/CIL/Other</p>	Critical
<p><b><u>Long Marston Airfield New Settlement</u></b></p> <ul style="list-style-type: none"> <li>• <u>PGA</u></li> <li>• <u>CYP</u></li> <li>• <u>ANG</u></li> <li>• <u>ACO</u></li> </ul> <p><u>Also</u></p> <ul style="list-style-type: none"> <li>• <u>Outdoor and Indoor Sports (OIS), including provision of a community sports facility and sports hall, to serve this and surrounding villages, on or off-site</u></li> </ul>	<u>Developer</u>	<u>SDC, Parish Council, other</u>	<u>Phase 2 to 4</u>	<u>n/a</u>	<ul style="list-style-type: none"> <li>• <u>S106(on-site provision)</u></li> </ul>	<u>Critical</u>
<p><b>Main Rural Centres</b></p> <p>Various requirements across the MRCs (details in Needs Assessment) including all the following typologies in at least one centre:</p> <ul style="list-style-type: none"> <li>• PGA</li> <li>• CYP</li> </ul>	Developers	Town and Parish Councils	Phase 1 to 4	n/a	<ul style="list-style-type: none"> <li>• S106/CIL</li> <li>• Town &amp; Parish Councils</li> </ul>	Some provision critical

<ul style="list-style-type: none"> <li>• ANG</li> <li>• ACO</li> <li>• OIS</li> </ul>						
<b>Local Service Villages</b> Various requirements across the LSVs (details in Needs Assessment): <ul style="list-style-type: none"> <li>• PGA (especially in category 1 LSVs)</li> <li>• CYP</li> <li>• ACO (especially in categories 2, 3 and 4 LSVs)</li> </ul>	Developers	Parish Councils	Phase 1 to 4	n/a	<ul style="list-style-type: none"> <li>• S106/CIL</li> <li>• Parish Councils</li> </ul>	Some provision critical
<b>Indicative Projects (to meet future needs [using CIL/S106] and address shortfalls/other objectives [using other sources of funding])</b> a) Improvement to pathways, new signage and seating at the Recreation Ground and ground reinstatement to redevelop existing surfaces at North Recreation Ground and Bancroft Gardens (PGA)	SDC	Public Health Warwickshire	Lifetime of Core Strategy	£550,000	<ul style="list-style-type: none"> <li>• Lottery Funds</li> <li>• CIL/S106</li> <li>• Capital/Revenue Budgets</li> </ul>	
b) Tree planting on all existing sites to mitigate climate change through provision of greater shade and tree species suited to changing weather patterns (PGA)	SDC	Public Health Warwickshire, WCC Ecology	Lifetime of Core Strategy	£31,000	<ul style="list-style-type: none"> <li>• The Landscape Group Carbon Offsetting</li> <li>• The Tree Council</li> <li>• Landfill Tax Credits</li> </ul>	
c) 3 Outdoor Gyms to be installed in Stratford Town and the main rural centres across the District(PGA/CYP)	SDC or Town/ Parish Council	SDC or Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	£15k per facility	<ul style="list-style-type: none"> <li>• CIL/S106</li> <li>• External play space related grants</li> <li>• Town &amp; Parish Councils</li> </ul>	
d) Creation of pathways and some signage and seating at Shottery Fields and Bridgetown Meadowlands (ANG)	SDC	Public Health Warwickshire	Lifetime of Core Strategy	£50,000	<ul style="list-style-type: none"> <li>• S106/CIL</li> <li>• Capital and Revenue Budgets</li> </ul>	
e) Enhancement and development of the Warwick Road Lands, Stratford-upon-Avon, to include pathway improvements, information boards to improve accessibility to nature and education on the site (ANG)	SDC	Public Health Warwickshire, WCC Ecology	Lifetime of Core Strategy	£100,000	<ul style="list-style-type: none"> <li>• Landfill Tax Credits</li> <li>• Lottery Funds</li> <li>• CIL/S106</li> </ul>	
f) Creation of landscaped wildflower meadow within Stratford-on-Avon (ANG)	SDC or Town/	Public Health Warwickshire, WCC	Lifetime of Core Strategy	£20,000	<ul style="list-style-type: none"> <li>• Town &amp; Parish Councils</li> </ul>	

	Parish Council	Ecology, Parish/Town Councils			<ul style="list-style-type: none"> <li>• Prince Charles fund</li> <li>• CIL/S106</li> </ul>	
g) 7 Multi Use Games Areas (MUGA's) to be installed in Stratford Town and the Main Rural Centres across the District (CYP)	SDC or Town/ Parish Councils	Public Health Warwickshire	Lifetime of Core Strategy	£100k per facility	<ul style="list-style-type: none"> <li>• CIL/S106</li> <li>• External health related grants</li> <li>• Town &amp; Parish Councils</li> </ul>	
h) 5 Measured Miles (400 metre loop) and improved signage (Rural & urban) to be installed in Stratford Town and the Main Rural Centres across the District	SDC or Town/ Parish Council	SDC or Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	Rural £50k per facility £10k Urban signage	<ul style="list-style-type: none"> <li>• CIL/S106</li> <li>• External health related grants</li> <li>• Town &amp; Parish Councils</li> </ul>	
i) Enhancement of destination play spaces – recreation ground and skate park (play equipment) (CYP)	SDC or Stratford Town Council	Town/ Parish Councils, Public Health Warwickshire	Lifetime of Core Strategy	£1m per facility	<ul style="list-style-type: none"> <li>• CIL</li> <li>• SDC Capital /Revenue Budgets</li> <li>• External health related grants</li> </ul>	
j) Enhancement of local play spaces arising from greater use linked to the new development. To include play equipment and landscaping to create contours ('lumps and bumps') to promote increased and different usage (CYP)	SDC or Town/ Parish Council	SDC or Town/ Parish Council, Public Health Warwickshire	Lifetime of Core Strategy	£20k per facility	<ul style="list-style-type: none"> <li>• S106</li> <li>• SDC Capital/Revenue Budgets</li> <li>• External health related grants</li> </ul>	
k) Enhancement of the 3 District Council leisure centres outside of Stratford Town (including possible provision of a sports hall at Shipston to serve the town and surrounding villages including Brailes, Tredington and Long Compton) (OIS).	SDC or WCC or Town & Parish Councils	Public Health Warwickshire	Lifetime of Core Strategy	£150k per facility (more if incl. new sports hall)	<ul style="list-style-type: none"> <li>• CIL</li> <li>• SDC Capital/ Revenue Budgets</li> <li>• External health related grants</li> </ul>	
l) Creation of new allotments/community orchards across the District (ACO)	Town & Parish Councils	Public Health Warwickshire SDC	Lifetime of Core Strategy	£50,000	<ul style="list-style-type: none"> <li>• CIL/S106</li> <li>• Town &amp; Parish Councils</li> <li>• Lottery Funds</li> </ul>	

					<ul style="list-style-type: none"> <li>• Capital / Revenue Budgets</li> <li>• The Tree Council</li> <li>• Natural England</li> <li>• Landfill Tax Credits</li> <li>• DEFRA</li> </ul>	
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<b>5 - Emergency Services</b>						
<b>Infrastructure Type / Project</b>	<b>Lead Delivery</b>	<b>Other Partner Organisations</b>	<b>Timescale</b>	<b>Estimated Costs (£)</b>	<b>Funding</b>	<b>Critical to Delivery?</b>
<b>Police</b>						
a) Custody provision : additional cells	Warwickshire Police	Developers, WCC, SDC	Lifetime of Core Strategy	TBC	CIL, other sources	
b) Other police equipment and costs including vehicles, communications technology and surveillance equipment	Warwickshire Police	Developers, WCC, SDC	Lifetime of Core Strategy	£0.5 m	CIL	
c) A Safer Neighbourhoods Units are likely to be required at the new settlements at Gaydon/Lighthorne Health and Long Marston Airfield	Warwickshire Police	Developers, WCC, SDC	Phase 3	<u>£450,000</u>	S106	Critical
d) <u>Additional officer cost</u>	<u>Warwickshire Police</u>	<u>Developers, WCC, SDC</u>	<u>Lifetime of Core Strategy</u>	<u>£100,000</u>	<u>S106</u>	
<b>Ambulance Service</b>						
The service has recently implemented a premises review. There are no further requirements known during the plan period.	West Midlands Ambulance Service	n/a	n/a	n/a	n/a	

<u>Additional Response Posts (considered at LMA, GLH in consultation with WMAS)</u>	<u>West Midlands Ambulance Service</u>	<u>Developers, WCC, SDC</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	
<b>Fire &amp; Rescue</b>  Proposed new service delivery point at <u>Aston Martin Lagonda</u>  Provision of hydrants  Possible future project for Low Water Areas	Warwickshire Fire & Rescue Service (WRFS) Developers  WFRS	<u>AML</u>  WFRC  Private sector, WCC, SDC	Phase 1  Lifetime of Core Strategy  TBC	£0.5 m  n/a  n/a	CLG Transformation Funding Application S106/ development costs CIL, other sources	Critical to proposed response model Some critical
<b>CCTV</b>	SDC	Warwickshire Police, Town/ Parish Council	Lifetime of Core Strategy	TBC	S106 or CIL, capital reserves, other sources	

### 6 – Water and Utility Services

<b>Infrastructure</b>	<b>Lead Delivery</b>	<b>Other Partner Organisations</b>	<b>Timescale</b>	<b>Estimated Costs (£)</b>	<b>Funding</b>	<b>Critical to Delivery?</b>
<b>Water Supply and Waste Water Treatment</b>  1. Water Supply – development of a new settlement at Gaydon/ Lighthorne Heath will require upgrading of the water supply infrastructure.  2. Waste Water The following Waste Water Treatment Works are likely to need upgrading: <ul style="list-style-type: none"> <li>• Wellesborne</li> <li>• Cherington</li> <li>• Gaydon</li> <li>• Priors Marston</li> <li>• Tysoe</li> <li>• <u>Itchen Bank</u></li> </ul>	Severn Trent Water	Private developers, Environment Agency, SDC	Phases 2- 4	n/a	Severn Trent Water (private developers for on-site works and local connections)	Critical



<p>This list derives from the Council's Water Cycle Study Update <u>2015</u> which assessed the capacity of the District's WwTWs to accommodate the Core Strategy's proposed level and distribution of growth. There may be additional WwTWs that require further work over the plan period but these were not identified in that study.</p> <p><u>Long Marston WwTW now abandoned as a result of the current planning application and waste water now pumped to Stratford-Milcote</u></p> <p>Certain areas of the foul drainage network will also need upgrading, especially in relation to the proposed new settlement at Gaydon/Lighthorne Heath.</p>						
<p><b>Strategic Flood Risk Assessment (SFRA)</b></p>	SDC	WCC, other districts and boroughs, Environment Agency	Every 5 years during lifetime of Core Strategy	£8,000 per SFRA; 3 further FRAs are likely to be needed by 2031	<u>Revenue Reserves</u>	Critical
<p><b>Flood Alleviation and Defences</b></p> <p>The Environment Agency is currently planning flood alleviation works in Shipston-on-Stour, Henley-in-Arden and along the upper reaches of Racecourse Brook, Stratford.(The flood alleviation works on the Racecourse Brook would reduce flood risk to existing properties and alleviate flood risk on the Birmingham Road and at the Maybird Centre. This scheme will require partnership funding to secure delivery.)</p> <p>The 2014 SFRA identified potential further works to flood defences at Snitterfield, Southam, Cherington and Fenny Compton but these will not generally be related directly to new growth (use of SUDS and water recycling measures will ensure no developments increase flood risk).CIL/S106 may be sought where the works will facilitate further growth.S106 may also be required to deal with on-site or downstream flooding on large developments (e.g. to deal with surface water flooding at Gaydon as part of the new settlement proposals).</p> <p>Improvements to the Alveston Manor Junction may provide an</p>	<p>Environment Agency</p> <p>Environment Agency</p> <p>Environment</p>	<p>Defra, WCC, SDC, STW, landowners/ developers, Town and Parish Councils</p> <p>Defra, WCC, SDC, landowners/ developers, Town and Parish Councils</p> <p>WCC/</p>	<p>Phases 2-3</p> <p>Phases 3-4</p> <p>Phase 2</p>	<p>£2.0 - £2.9m (Shipston - £500-£800k), (Henley - £800-£1.2k), (Stratford - £750 - £900k)</p> <p>n/a</p>	<p>Environment Agency (FDGiA, Local Levy), commercial contributions, STW at Racecourse Brook</p> <p>Environment Agency (FDGiA, Local Levy),STW, commercial contributions, S106/CIL</p> <p>Food Defence</p>	<p>Critical</p>

<p>opportunity to alleviate flood risk along the Shipston Road and should be investigated as part of these works</p> <p>School re-development or expansion may provide opportunities to install SuDS features to mitigate against loss of green areas. SuDS features such as ponds can provide educational benefit.</p>	<p>Agency</p> <p>Various</p>	<p>Highways Agency/ Local Community</p> <p>WCC (education)/ Academy schools/ EA</p>	<p>Lifetime of Core Strategy</p>	<p>n/a</p> <p>n/a</p>	<p>Grant in Aid Funding from EA</p> <p>EA, WCC, S106/CIL</p>	
<p><u>Develop a list of prioritised local flood risk management - capital schemes to be taken forward for detailed analysis and development of options to reduce flood risk, based on the Environment Agency Communities at Risk data sites:</u></p> <ul style="list-style-type: none"> <li>• <u>Snitterfield</u></li> <li>• <u>Shipston on Stour</u></li> <li>• <u>Fenny Compton</u></li> <li>• <u>Welford upon Avon</u></li> <li>• <u>Gaydon</u></li> <li>• <u>Clifford Chambers</u></li> <li>• <u>Aston Cantlow</u></li> <li>• <u>Alcester</u></li> <li>• <u>Coughton</u></li> <li>• <u>Henley in Arden</u></li> <li>• <u>Long Marston</u></li> <li>• <u>Lower/Upper Brailes</u></li> <li>• <u>Ladbroke</u></li> <li>• <u>Stratford upon Avon</u></li> <li>• <u>Ardens Grafton</u></li> <li>• <u>Long Itchington</u></li> <li>• <u>Lower/Middle/Upper Tysoe</u></li> </ul> <p><b><u>Wastewater Treatment Works (WwTW) Catchment</u></b></p> <p><b><u>Itchen Bank</u></b></p>	<p><u>WCC</u></p> <p><u>WCC</u></p>	<p><u>EA, SDC, landowners/ developers, Town and Parish Councils, STW</u></p> <p><u>EA, SDC,</u></p>	<p><u>2017</u></p> <p><u>WwTW at permit level after an</u></p>	<p><u>n/a</u></p> <p><u>Tbc</u></p>	<p><u>Funding from EA, LA, WCC, S106 and CIL</u></p>	<p><u>Critical</u></p>

<u>Wellesbourne</u>	<u>WCC</u>	<u>STW</u>  <u>EA, SDC, STW</u>	<u>additional 1643 dwellings</u>  <u>WwTW at permit level after an additional 454 dwellings</u>	<u>Tbc</u>		
<b>Gas and Electricity (TBC)</b>	National Grid	Western Power Distribution, private developers, SDC	Lifetime of Core Strategy	n/a	Utility (power) companies and developers	Critical
<b>Renewable/Low Carbon Energy Projects</b>	Various	Various	Lifetime of Core Strategy	n/a	Allowable solutions fund, CIL, other	
<b>Improving Telecommunications</b> Stratford-on-Avon District Local Broadband Plan (part of the Coventry, Solihull and Warwickshire Superfast Broadband Project)	Coventry Solihull and Warwickshire Broadband Partnership (CSWBP) and private contractor (British Telecom)	SDC, LEP, Parish and Town Councils, Coventry University, DEFRA, European Commission	On-going	<u>£17.01 million</u> across the CSW partnership area	Central government; CSWBP, European Regional Development Fund (ERDF), Lottery Funds, DEFRA, CIL, British Telecom	
Further development of strategic network after completion of the Coventry, Solihull and Warwickshire Superfast Broadband Project	Various	Private contractors of telecom services, SDC, Town & Parish Councils	Lifetime of Core Strategy	n/a	Government Grants, CIL, Town and Parish Councils, commercial sources, other	
Connections to the strategic network (or ducting to the public highway/other suitable location) to be made by developers of all new	Developers	Various	Lifetime of Core Strategy	n/a	Part of normal development	

premises.					costs	
<b>Waste</b> <u>Capital investment to deal with additional household waste at the Household Waste Recycling Centres.</u>	<u>WCC</u>	<u>SDC, other</u>	<u>Lifetime of Core Strategy</u>	<u>£1.0-£2.0m</u>	<u>CIL, other</u>	

7 – Other Social Infrastructure						
Infrastructure Type / Project	Lead Delivery	Other Partner Organisations	Timescale	Estimated Costs (£)	Funding	Critical to Delivery?
<b>Libraries</b>						
a) support to library service including community libraries (stock purchase and E-services)	a) WCC or Town & Parish Councils	a) SDC, WCC/Town & Parish Councils	a) Lifetime of Core Strategy	a) 115,000	a) CIL, Town & Parish Councils	
b) Improvements to library services at Gaydon/Lighthorne Heath	b) developer	b) WCC, SDC, PC	b) Phase 3	b) <u>£1.9m.</u>	b) S106	
<u>c) Improvements to library services at Long Marston Airfield</u>	<u>c) developer</u>	<u>c) WCC, SDC, PC</u>	<u>c) Phase 3 or 4</u>	<u>c) £950k</u>	<u>c) S106</u>	

**Table 2 – Gaydon Lighthorne Heath incl JLR employment**

Note: Phase 1:2014/15 - 2023/24; Phase 2: 2024/25 -2026/27; Phase 3: 2027/28 – 2030/31

Costs are indicative only as schemes are not yet defined in detail

**Infrastructure Phasing Plan and Housing Trajectory**

	Phasing				PHASE 1							PHASE 2			PHASE 3						
					0	0	0	50	75	150	150	150	150	175	200	200	200	200	200	200	
<b>Cum Total</b>					0	0	0	50	125	275	425	575	725	900	1100	1300	1500	1700	1900	2100	2300
<b>Scheme Reference/Infrastructure Requirement</b>	<b>Cost (£ m)</b>	<b>FUNDING SOURCE</b>	<b>POLICY COMPLIANCE</b>	<b>TRIGGER [S]</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>	<b>2028/29</b>	<b>2029/30</b>	<b>2030/31</b>
<b>TRANSPORT</b>																					
1. M40 Junction 12 northbound on-slip lane	3.00	WCC /JLR/s106	TBC	TBC					3.00												
2. Extended right turn lane at Gaydon Junction (< 100m)	0.10	WCC /s106	TBC	TBC						0.10											
3. B4100 widening (Heritage Motor Centre to M40 Junction 12) (extra lane s'bound)	1.00	JLR/s106	TBC	TBC						1.00											

4. M40 capacity enhancements - lane gains/lane drops between Junction 12 and 13	5.00	<u>WCC</u> <u>/s106</u>	<u>TBC</u>	<u>TBC</u>							5.00								
5. Signalisation of M40 Junction 13 northbound off-slip	0.30	<u>WCC</u> <u>/JLR/</u> <u>s106</u>	<u>TBC</u>	<u>TBC</u>							0.30								
6. Widening of Fosse Way/Southam Road roundabout	0.50	<u>s278</u> <u>SDC/</u> <u>WDC</u>	<u>TBC</u>	<u>1<sup>ST</sup></u> <u>OCCUP</u> <u>ATION</u>							0.50		<u>0.50</u>						
7. Contingency for localised traffic impacts in villages only (Environmental Enhancement)	<u>3.00</u>	<u>s278</u>	<u>TBC</u>	<u>TBC</u>							<u>3.00</u>								
8. Fosse Way/Chesterton Road/Harbury Lane junction improvements	<u>1.50</u>	<u>s278</u> <u>SDC/</u> <u>WDC</u>	<u>TBC</u>	<u>1<sup>ST</sup></u> <u>OCCUP</u> <u>ATION</u>							<u>1.50</u>								
9. Right turn bay into Meadow Close/Spinney Close off B4100 Chesterton Hill	0.10	<u>s278</u>	<u>TBC</u>	<u>TBC</u>				0.10											
10. Signalisation of Greys Mallory roundabout	<u>0.50</u>	<u>s278</u>	<u>TBC</u>	<u>1<sup>ST</sup></u> <u>OCCUP</u> <u>ATION</u>							<u>0.50</u>								

11. Dualling of A452 Europa Way corridor (Part 1)	8.50	<u>s278</u> <u>SDC/</u> <u>WDC</u>	<u>TBC</u>	<u>TBC</u>						8.50										
12. Widening of A452 Europa Way – Banbury Spur (M40 jct 14-Greys Mallory) (Part 1)	0.75	<u>WCC</u> <u>/WD</u> <u>C/SD</u> <u>C</u>	<u>TBC</u>	<u>TBC</u>						0.75										
12. Widening of A452 Europa Way/Harbury Lane Roundabout	0.75	<u>WCC</u> <u>/WD</u> <u>C/SD</u> <u>C</u>	<u>TBC</u>	<u>TBC</u>						0.75										
13. A452 Banbury Road/Gallows Hill northbound flare/Warwick Tech Park Roundabout	0.45	<u>JLR</u> <u>SDC/</u> <u>WDC</u> <u>(TBC)</u>	<u>TBC</u>	<u>TBC</u>						0.45										
14. A425 Myton Road/Banbury Road signals	0.50	<u>JLR</u> <u>SDC/</u> <u>WDC</u> <u>(TBC)</u>	<u>TBC</u>	<u>TBC</u>										0.50						
<u>15. Europa Way/Myton Rd roundabout</u>	<u>0.11</u>	<u>JLR</u> <u>SDC/</u> <u>WDC</u> <u>(TBC)</u>	<u>TBC</u>	<u>TBC</u>																
<u>16. Europa Way/Shires Retail Pk roundabout</u>	<u>0.15</u>	<u>JLR</u> <u>SDC/</u> <u>WDC</u> <u>(TBC)</u>	<u>TBC</u>	<u>TBC</u>																

<u>17. Europa Way roundabout</u>	<u>0.17</u>	JLR SDC/ WDC (TBC)	TBC	TBC																
<u>18. Harwoods House roundabout</u>	TBC	JLR SDC/ WDC (TBC)	TBC	TBC																
<u>18. Bus Subsidy</u>	<u>1.20</u>	<u>S106</u>	TBC	TBC				<u>0.25</u>	<u>0.16</u>	<u>0.16</u>	<u>0.16</u>	<u>0.16</u>	<u>0.16</u>	<u>0.16</u>						
<u>19. Public Rights of Way Improvements (within 1.5mile radius)</u>	<u>0.21</u>	<u>s106</u>	TBC	TBC																
<b>EDUCATION</b>																				
<u>20. New primary school (3 FE) with co-located nursery and SEN (includes possible buildings as payment in-kind)</u>	<u>4.77</u>	<u>S106</u>	TBC	TBC				<u>0.50</u>	<u>0.89</u>	<u>0.89</u>	<u>0.89</u>			<u>1.6</u>						
<u>21. Contribution to Kineton Secondary School including 6<sup>th</sup> Form and SEN and potential coach park</u>	<u>5.00</u>	<u>S106</u>	TBC	<u>CLAW BACK TBC</u>				<u>0.50</u>	<u>0.50</u>	<u>0.50</u>	<u>0.50</u>		<u>0.50</u>	<u>0.50</u>	<u>2.00</u>					
<b>OTHER INFRASTRUCTURE</b>																				
<u>22. New 4 GP Facility (646 sqm) (potentially provisionally housed in temporary accommodation)</u>	<u>1.80</u>	<u>S106</u>	TBC	TBC				<u>0.15</u>		<u>0.15</u>	<u>0.50</u>		<u>0.50</u>	<u>0.50</u>						



23. Acute Care (to meet additional patient demand)	2.00	CIL	TBC	1 <sup>ST</sup> OCCUPATION																
24. Safer Neighbour Team Premise and staff (potentially co-located)	0.45	S106	TBC	COMPLETE CONTRIBUTION BY 1500 <sup>TH</sup>											0.45					
25. Provision of open space, sports and recreation to include: 6.3ha parks, gardens and amenity space, 4.3ha accessible natural and semi-natural green space, 1.3ha of on-site children and young people play provision, 9.3ha of outdoor sports provision, sports hall including provision of 2 badminton courts and 0.2ha of allotments and community orchards.	TBC	S106	TBC	TBC									TBC		TBC					TBC
26. Provision or improvement of libraries in community hub	0.04	S106	TBC	TBC																
27. Community Hub	2.35	S106	TBC	TBC			0.35		1.00	1.00										
28. Roof for Kineton Swimming Pool	1.90	s106	TBC	TBC																
29. Acoustic Noise Bund	TBC	S106	TBC	TBC									TBC							



### Table 3 – Long Marston Airfield

Note: Phase 1:2014/15 - 2020/21; Phase 2: 2021/22- 2024/25; Phase 3: 2025/26 – 2030/31

Costs are indicative only as schemes are not yet defined in detail

#### Infrastructure Phasing Plan and Housing Trajectory

	Phasing				PHASE 1						PHASE 2				PHASE 3						
					0	0	80	90	90	90	90	90	90	175	175	175	175	174	174	174	174
<b>Cum Total</b>					0	0	80	170	260	350	440	530	705	880	1055	1230	1404	1588	1752	1926	2100
Scheme Reference/Infrastructure Requirement	Cost (£ m)	FUNDING SOURCE	POLICY COMPLIANCE	TRIGGER (\$)	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
<b>TRANSPORT</b>																					
1. A4390/B493 Evesham Place Roundabout	0.80	TBC	TBC	TBC									0.80								
2. Contributions to Transport Schemes including Stratford Transport Package	TBC	CIL	TBC	TBC																	
3) Welford Road/Station Road Priority Junction	TBC	s278	TBC	TBC																	
4) B4632 Campden Road/Station Road priority junction	TBC	s278	TBC	TBC																	
5) Campden Road improvements	TBC	TBC	TBC	TBC																	
6) Public Transport (Bus Link)	£2.8m	S106	TBC	TBC																	
7) Travel Plan	£0.3	S106	TBC	TBC																	
8) Walking and cycling enhancements	£1.2m	S106	TBC	TBC																	
9) Rail contribution (or other as required)	TBC	TBC	TBC	TBC																	
10) A3400 Alveston Manor and Shipston Rd/A422 Banbury Rd Roundabout	1.89	S106 s278	TBC	TBC					1.03												
11) A3400 Bridgefoot/Bridgeway Gyratory		(TBC)	TBC	TBC								0.86									

12) A3400 Shipston Road/B4632 Clifford Lane Roundabout	1.10	S106 s278	TBC	TBC																
13) A3400 Shipston Road/A4390 Seven Meadows Road Roundabout		(TBC)	TBC	TBC						1.10										
14) Contingency for unforeseen traffic impacts	2.10	s278	TBC	TBC																2.10
15) South Western Relief Road (SWRR) Southern Extension	29.0	S106	TBC	TBC						29.0										
<b>EDUCATION</b>																				
16) 2x New Primary Schools with Early Years (including provision of land/associated facilities) Note: second tranche of £5m potentially beyond 2031.	10.0	s106	TBC	TBC								3.0	2.0							5.0
17) 1x New Secondary School with Post 16 (including provision of land/associated facilities) Shipston High School expansion contribution by LMA400	20.0	S106	TBC	TBC						1.7										20.0
<b>OTHER INFRASTRUCTURE</b>																				
18) Primary Health care: - £86k contribution to Meon Vale surgery by LMA400 - 5GP surgery (including provision of land/associated facilities) Note: second tranche of £1.4m beyond 2031 - Acute health care (hospitals etc)	2.4	S106	TBC	TBC						0.086										0.9
19) Provision of open space, sports and recreation to include: 25.36ha of natural and semi-natural greenspace, 0.46ha of on-site children and young people play provision, and 3.53ha outdoor sports facilities.	TBC	CIL	TBC	TBC																
20) Police	0.1	S106	TBC	TBC																

<u>21) Library (potentially co-located)</u>	<u>0.95</u>	<u>S106</u>	<u>TBC</u>	<u>TBC</u>														<u>0.95</u>			
<u>22) Community building (s) (Village Hall/Community Centre/Sports Pavilion)</u>	<u>0.95</u>	<u>S106</u>	<u>TBC</u>	<u>TBC</u>						<u>0.95</u>											
<u>23) Acute Care (to meet additional patient demand)</u>	<u>TBC</u>	<u>CIL</u>	<u>TBC</u>	<u>TBC</u>																	
<b><u>TOTAL INFRASTRUCTURE COSTS</u></b>	<b><u>73.59 plus Open Space plus CIL</u></b>																				

Notes:-

a) All infrastructure costings are indicative (as of November 2015)

b) Phasing based on Cala Homes/NLP Briefing Note – Long Marston Airfield Economic Aspect and Phasing - 08/06/15 and Long Marston Airfield New Settlement Vision – Masterplan – 02/14

c) The following estimates of when mitigation would be required are based on a high-level assessment of predicted highway network conditions in relation to the proposed housing trajectory

d) Scheme 10 would be required with 250 - 500 dwellings

e) Scheme 11 would be required with 500 - 1,000 dwellings

f) Scheme 1 is required to accommodate the effects of change in traffic movements at this junction following the delivery of the Stratford Western Relief Road (SWRR) which will exacerbate issues which are likely to occur as result of the overall growth within the area

g) Scheme 14 provides a contingency sum for schemes yet to be identified and is based on a rate of £1,000 per dwelling

h) Scheme 15 would be required at 400 dwellings

i) Scheme 19 to include Sports Hall including 4 courts is proposed at Meon Vale (09/00835/FUL) and 0.37 ha of allotments is being proposed at Long Marston depot (09/00835/FUL)

k) Schemes 12 and 13 - revised indicative scheme for these two junctions. However, an interim scheme has been proposed by the LMA developer which is due to be delivered to mitigate the impact of the initial 400 dwellings. The interim scheme is likely to be required by 2020/21 according to the trajectory outlined. Need to agree at what point the full scheme is required with the developer as part of the TA process

**Table 4 – Canal Quarter (SUA 1) and related employment site (SUA 2)**

Note: Phase 1:2014/15 - 2019/20; Phase 2: 2020/21- 2025/26; Phase 3: 2026/27 – 2028/29; Phase 4: 2029/30 – 2030/31

Costs are indicative only as schemes are not yet defined in detail

**Infrastructure Phasing Plan and Housing Trajectory**

	Phasing				PHASE 1						PHASE 2						PHASE 3			Phase 4	
					0	0	0	0	25	50	50	50	50	50	50	50	50	50	50	50	75
<b>Cum Total</b>					0	0	0	0	25	75	125	175	225	275	325	375	425	475	525	575	650
<b>Scheme Reference/Infrastructure Requirement</b>	<b>Cost (£ m)</b>	<b>FUNDING SOURCE</b>	<b>POLICY COMPLIANCE</b>	<b>TRIGGER (\$)</b>	<b>2014/15</b>	<b>2015/16</b>	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>	<b>2028/29</b>	<b>2029/30</b>	<b>2030/31</b>

**TRANSPORT**

<u>1) Contributions to Transport Schemes including Stratford Transport Package</u>	<u>TBC</u>	<u>CIL</u>	<u>TBC</u>	<u>TBC</u>																		
2) Contingency for unforeseen traffic impacts	0.70	<u>S278</u>																				0.70
<u>3) Enhanced pedestrian and cycle links – Birmingham Rd/Alcester Rd</u>	<u>0.80</u>	<u>S106</u>								<u>0.80</u>												

4) A46/A3400 Bishopton Roundabout	<u>0.40</u>	s278																		
5) A46/A422 Wildmoor Roundabout	<u>0.40</u>	s278											<u>0.40</u>							

**EDUCATION**

6) New 1 FE primary provision (off site)	2.25	s106																2.25		
7) Secondary School Place contributions	1.50	s106																1.50		

**OTHER INFRASTRUCTURE**

8) Extension/modernisation of existing health premises	0.06	s106											0.06							
9) Improvements to Community Centre and extension of Library Provision	0.35	s106											0.35							
<u>10) Provision of open space, sports and recreation to include: Linear Park alongside Canal (SUA1) and 0.36ha of on-site children and young people play provision.</u>	<u>TBC</u>	<u>S106</u>																		

TOTAL INFRASTRUCTURE COSTS	6.46 plus Open Space plus CIL																									
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Notes:-

a) All infrastructure costings are indicative (as of November 2015)

b) Phasing based on (Canal Quarter and Two Associated Employment Sites – Study of the Viability and Deliverability – Peter Brett April 2014) pro rata down from 700 to 650 units 2011- 2031

c) Scheme 2 provides a contingency sum for schemes yet to be identified and is based on a rate of £1,000 per dwelling

d) Scheme 10 based on current Open Space Sport & Recreation Assessment – update to the PPG17 2011 Study – September 2014