

Proposed Submission Site Allocations Plan Representation Form



**Deadline for submitting representations:
5.00pm on Friday 20 September 2019**

You should use this form for submitting representations as this will assist all parties involved in the Examination process, in particular the Inspector, to understand what case you are making and, where applicable, how you wish the Plan to be modified.

Please submit your representation(s) in **ONE** of the following ways:

Do it online - use our INTERACTIVE DOCUMENT which allows you to click on specific sections and comment online or use the online Representation Form at www.stratford.gov.uk/siteallocations

Do it by email - download and fill in a Representation Form and email it to policy.consultation@stratford-dc.gov.uk

- Representation Form - pdf to download
- Representation Form - Word version (Save this RTF document as Word.doc to reduce memory size)

Do it by post – send your completed Representation Form to: Planning Policy, Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX or print off and complete a Representation Form and hand it in at the District Council offices at Elizabeth House, Church Street, Stratford-upon-Avon, CV37 6HX

Guidance on completing this Form is available at: www.stratford.gov.uk/siteallocations

The Representation Form has two parts:

Part A: Contact Information

- You must provide a contact name and address.
- You do not need to complete Part A more than once but please ensure you state your name and organisation as applicable at the top of each Part B form you submit.
- Please tick whether you wish to be notified of subsequent stages of the Site Allocations Plan.

Part B: Your Representation

- Complete a separate Part B of the Representation Form for each representation you wish to make.
- Please include your name and organisation and the relevant question number on any additional sheets you submit.
- Please refer to the guidance notes on making representations so that they address issues of legal compliance and/or soundness.
- You should cover succinctly all the information, evidence and supporting information necessary to justify your representation and the suggested modifications, as there will not normally be a subsequent opportunity to submit additional material. Further submissions will only be accepted at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- You must sign the declaration at the end of each Part B form you submit.

Please note that when representations are submitted to the Secretary of State with the Site Allocations Plan only Part B of the form will be published.

PART A: Contact Information

For official use only

Ref: /

You must provide a contact name and address.
Please complete Part A in BLOCK CAPITALS as appropriate.

Please use black font or pen throughout

	Person/Organisation	Agent (if applicable)
Title	MRS	
First Name	ADELE	
Last Name	STREET	
Job Title	WELFORD ON AVON PARISH COUNCIL CLERK	
Organisation	WELFORD ON AVON PARISH COUNCIL	
Address	WALNUT TREE HOUSE	
	HIGH ST	
	WELFORD ON AVON	
	WARWICKSHIRE	
Postcode	CV37 8EA	
Telephone	07715 211340	
Email	WELFORDPC@YAHOO.CO.UK	

Notification of subsequent stages of the Site Allocations Plan

Please specify if you wish to be notified of any of the following:

- Submission of the Site Allocations Plan for independent examination Yes No
- Publication of the recommendations of the person appointed to
carry out an independent examination of the Site Allocations Plan Yes No
- Adoption of the Site Allocations Plan Yes No

How we will use your details

Please note that your response will be published on the District Council's website. However, this will exclude the postal address, telephone number and email address of individual respondents. The details of respondents will only be retained by the District Council for the purposes of consulting on Development Plan and supplementary documents and will not be used for any other purpose.

PART B: Your Representation

Please use a separate form for each representation

Please use black font or pen throughout

Name of Person / Organisation (if appropriate) making representation:

For official use only	
Ref:	/
Duly Made:	Yes No

Name:	Adele Street – Welford on Avon Parish Council Clerk
Organisation	Welford on Avon Parish Council

1. To which part of the Proposed Submission Site Allocations Plan does this representation relate?	
Policy/Proposal Reference	All
Section/Paragraph Number	All
Map Reference	PART A – Reserve Housing Sites, PAGE 80 – WELFORD O AVON PART B – Self-Build and Custom-Build Housing Sites, PAGE 91 - NORTH OF MILLERS CLOSE, WELFORD ON AVON
Annex / Appendix Number	

2. In respect of this part of the Plan, do you consider the Proposed Submission Site Allocations Plan is:	
(a) Legally compliant?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
(b) Compliant with the Duty to Co-operate?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
(c) Sound?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

The considerations in relation to the Site Allocations Plan being compliant or sound are explained in the Guidance Note available at www.stratford.gov.uk/siteallocations.

If you have answered **No** to Question 2(a), please go to Questions 3 and 4.

If you have answered **No** to Question 2(b), please go to Question 5.

If you have answered **No** to Question 2(c), please go to Questions 6, 7 and 8.

Otherwise, please go to Questions 9, 10 and 11.

3. In what way do you consider this part of the Site Allocations Plan is not legally compliant? Please be as precise as possible.
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Welford-on-Avon Parish Council, in co-operation with a number of residents, has reviewed the new Site Allocations Plan (the 'SAP') and considers the SAP to be flawed in many ways. A report of the complete response has been sent by email to SDC Policy Consultation department along with this form. Points from this report have been detailed in this Representation Form. Every effort has been made to allocate the points correctly under the 3 nominated sections of this form, but in the case of any question marks on the allocation used, we have included all 3 sections in the same Part B form in order that they can be reviewed collectively.

Welford-on-Avon's 'Made' Neighbourhood Plan has been ignored

Both the Localism Act 2011 and the National Planning Policy Framework (NPPF) (as revised in 2019) encourage communities to develop their own Neighbourhood Development Plans. According to the Government's own document "A plain English guide to the Localism Act" (November 2011)", Neighbourhood Development Plans provide local communities with the opportunity to influence the future of the places where they live. When approved at a referendum, Neighbourhood Development Plans attain the same legal status as a local plan and come into force as part of the statutory development plan.

It can be taken from this that Welford-on-Avon's 'Made' Neighbourhood Development Plan, which has been inspected and approved, has legal significance. It sets out clearly, on page 37, the reasons why the village felt that it should not include Site Allocations in the Welford Plan. This has been ignored in the formulation of the Site Allocations Plan (SAP) and the village is having imposed on it, contrary to its wishes, four sites where development is being encouraged.

Lack of consultation

NPPF paragraph 16.c requires Plans *to be shaped by early, proportionate and effective engagement between plan makers and communities*. Consultation on the SAP with parish councils was late and hurried, particularly given the significant impact of this SAP on local communities. The nature of the response form required to be used, the legal language used and the short timescale for response will exclude the majority of the public from responding.

Releasing Reserve sites

NPPF paragraph 16.d requires that policies make it "*evident how a decision maker should react to development proposals*". Policy SAP.2 does not make it clear how, in the event of reserve housing sites being released to meet shortfalls in housing in one or more of the areas described in parts B – F of the policy, a decision maker should allocate the shortfall between reserve sites in the many parishes within the relevant HMA.

Level of dispersal to Local Service Villages

Paragraph 35.b of the NPPF requires Plans to be based on proportionate evidence. The explanation of policy SAP.1 at paragraph 2.1.9 refers to the Inspector's report on the Core Strategy which states:

"When identifying reserve sites the following principles should be taken into account:

- *Against the background of concerns about the level of dispersal to LSVs, this aspect of the*

policy might need to be revisited when allocating reserve sites in the SAP.

- *Given raised thresholds, dispersal of reserve sites to LSVs might not maximise the delivery of affordable housing.*

There is no evidence that either of these two principles have been considered, even less taken into account.

In fact, despite the Inspector's comments, there has been a growing trend to allocate proportionally more of the District's housing to LSVs as shown in the following table:

	LSV's	Total	LSV % of total
Core Strategy 2016	2,000	14,600	13.7%
Actual completions 2011/12 to 2017/18	1,122	4,857	23.1%
Actual completions 2017/18	422	1,295	32.6%
Site Allocations Plan 2019	1,257	3,027	41.5%

(All figures taken from SDC published information)

Also, paragraph 2.1.3 of the SAP reminds us that Policy CS.16D of the Core Strategy requires the Council to identify reserve sites capable of accommodating 20% of the housing requirement to 2031, i.e. 2,920 homes.

The Core Strategy targeted 84 houses for Welford on Avon as a LSV2 village and 20% of this figure would indicate 17 houses being required of the village.

It is important to note that these, and more, have already been delivered by Welford on Avon as evidenced in SDC's document "Housing Completions and Commitments – Settlements (as of 31 March 2019) published in July 2019. But even if they hadn't already been delivered, the suggested SAP figure of 91 houses for the village (including self-build/custom-build houses) would represent over five times the level suggested by the Core Strategy, a further indication of the growing and disproportionate allocation of reserve sites to LSVs generally and Welford-on-Avon specifically.

'Sustainable Development' is a key requirement of the NPPF

New Housing in Welford on Avon:

- Number of new houses built and committed for building – 124 (as of 31/3/19)
- Proposed Site Allocations Plan figure - 91 (incl 10 self-build/custom-build houses)
 - ⇒ Total of **215** new houses (ignoring any other planning proposals in the pipeline)
- Targeted number of new houses in Core Strategy by 2031 – **84**

This has placed, and will continue to place, a huge and growing pressure on the infrastructure and calls into question whether the proposed SAP sites could be considered 'Sustainable Development' in accordance with the NPPF. Yet the SAP fails to provide any reference, thoughts or guidance as to

how the infrastructure will cope or how it may be expanded.

The explanation of policy SAP.1 further states at paragraph 2.1.16 that *“the proposed sites have been identified following a rigorous assessment of land parcels in the SHLAA and taking into account various technical evidence including in relation to infrastructure capacity”*.

There seems no evidence of the process for this rigorous assessment of land parcels, nor of the evidence in relation to infrastructure capacity.

For example in Welford-on-Avon this evidence would show the lack of capacity at the village primary school and in the antiquated and under-capacity sewage system, and the lack of road capacity in supporting the two ‘pinch points’ on the main road through the village.

4. What modification do you consider is necessary to make the Site Allocations Plan legally compliant? You should explain why this modification would make the Plan legally compliant.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Welford-on-Avon’s ‘Made’ Neighbourhood Plan has been ignored

Welford-on-Avon’s ‘Made’ Neighbourhood Development Plan, which has been inspected and approved, therefore has legal significance and should be taken into account when formulating the Site Allocations Plan (SAP). The Welford Neighbourhood Development Plan clearly sets out on page 37, the reasons why the village felt that it should not include Site Allocations.

Lack of consultation

The timeframe for consultation on the SAP with parish councils should be extended, particularly given the significant impact of this SAP on local communities. Village residents have been left feeling excluded, confused and panicked by the current consultation process. The method, format and language required to respond to the consultation should be simplified to ensure it is accessible to members of the public.

Releasing Reserve sites

Clear guidance needs to be given on how, in the event of reserve housing sites being released to meet shortfalls in housing in one or more of the areas of the policy, a decision maker will allocate the shortfall between reserve sites in the many parishes within the relevant HMA.

Level of dispersal to Local Service Villages

Evidence is required to illustrate how the following principles have been taken into account when formulating the proportions of allocations to LSVs in the SAP.

“When identifying reserve sites the following principles should be taken into account:

- *Against the background of concerns about the level of dispersal to LSVs, this aspect of the policy might need to be revisited when allocating reserve sites in the SAP.*

Stratford-on-Avon District Council Proposed Submission Site Allocations Plan
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- *Given raised thresholds, dispersal of reserve sites to LSVs might not maximise the delivery of affordable housing.*

An explanation is required for the disproportionate allocation of reserve sites to LSVs in general and to Welford specifically.

An explanation is required as to why the suggested level of housing allocated to Welford in the SAP (91) is over five times the level suggested by the Core Strategy (20% of 84 => 17).

5. In what way do you consider this part of the Site Allocations Plan is not compliant with the Duty to Co-operate? Please be as precise as possible.

It should be noted that any non-compliance with the Duty to Co-operate is incapable of being resolved through modification at the Examination.

Welford-on-Avon Parish Council, in co-operation with a number of residents, has reviewed the new Site Allocations Plan (the 'SAP') and considers the SAP to be flawed in many ways. A report of the complete response has been sent by email to SDC Policy Consultation department along with this form. Points from this report have been detailed in this Representation Form. Every effort has been made to allocate the points correctly under the 3 nominated sections of this form, but in the case of any question marks on the allocation used, we have included all 3 sections in the same Part B form in order that they can be reviewed collectively.

Although Stratford District Council have conducted a reasonable consultation process as required under Regulation 22 there has been a significant omission in the process in that the selection of preferred sites was not offered for consultation.

This omission is outlined in the SAP on page 4. *"The Council has not consulted on 'preferred options' and has moved straight from scoping and initial options to the proposed submission stage. This is because the Site Allocations Plan is a second-tier plan and does not set strategy or requirements (these have been established by the Core Strategy) but provides further detail to the approach set out in the adopted Core Strategy".*

A Preferred Options consultation would have allowed the public to comment on which of the SHLAA sites would be allocated as reserve sites or perhaps, how that decision would be made.

As our comments will show, the choice of reserved sites for Welford is flawed and as such local consultation could have corrected some of these errors.

The justification that this is a second-tier plan is not right, considering the impact the Plan has on Core Strategy Policy CS15 - housing distribution and CS.16 - housing numbers allocated to Local Service Villages (LSV).

This plays down the significance of the SAP, yet the SAP is the first document to identify specific sites for villages. It has a distribution strategy that is far more detailed than the Core Strategy and is a matter that most people would have assumed merited consultation.

In LSV's where the quota has been reached, this is in effect further distribution over and above that allowed by the Core Strategy Policy CS.15.

During the development of the Core Strategy, SDC consulted on distribution options – should they build in Stratford, Main Rural Centres, LSV's or a new settlement? This produced the decision for a dispersal strategy as outlined below:

<https://www.stratford.gov.uk/doc/205866/name/ED12%20Focused%20Consultation%202011%202031%20Housing%20Requirement%20and%20Strategic%20Site%20Options%20Feb%202014.pdf>

This approach should have been adopted for this SAP especially given this isn't a minor adjustment to the existing Core Strategy dispersal strategy. It's very significant change, with Welford alone having 108% additional houses allocated to the village outside the 'Made' Neighbourhood Development Plan Built up Area Boundary.

Please ensure you sign the declaration at the end of the Form

6. In what respect do you consider this part of the Site Allocations Plan is unsound?

- | | | |
|-------|-------------------------------------|-------------------------------------|
| (i) | Not positively prepared | <input checked="" type="checkbox"/> |
| (ii) | Not justified | <input checked="" type="checkbox"/> |
| (iii) | Not effective | <input checked="" type="checkbox"/> |
| (iv) | Not consistent with national policy | <input checked="" type="checkbox"/> |

7. In what way do you consider this part of the Site Allocations Plan is unsound? Please be as precise as possible.

If you wish to comment on more than one of the four matters of soundness in relation to a specific aspect of the Plan, please complete a separate Part B sheet for each one.

Welford-on-Avon Parish Council, in co-operation with a number of residents, has reviewed the new Site Allocations Plan (the 'SAP') and considers the SAP to be flawed in many ways. A report of the complete response has been sent by email to SDC Policy Consultation department along with this form. Points from this report have been detailed in this Representation Form. Every effort has been made to allocate the points correctly under the 3 nominated sections of this form, but in the case of any question marks on the allocation used, we have included all 3 sections in the same Part B form in order that they can be reviewed collectively.

The Parish Council considers the Site Allocation Plan to be unsound in many ways. Areas of concern are highlighted below, they involve each of the four matters of soundness outlined above – i) not positively prepared, ii) not justified, iii) not effective, iv) not consistent with national policy.

Housing Distribution and Allocations

Housing Distribution

The Site Allocations Plan does not comply with Core Strategy Policies CS.15 or AS.10. Para 2.1.9 of the Site Allocations Plan says "Policy CS.15 of the Core Strategy sets out the distribution of development across the District, promoting a pattern of balanced dispersal in settlements which are sustainable locations for development. It is appropriate for the location and nature of reserve sites to be consistent with the distribution of housing development established in Policy CS.15."

Policy CS.15 states that in Local Service Villages development will only take place on sites identified in the Neighbourhood Development Plan or through small schemes on suitable sites within the Built-up Area Boundary (where defined). The sites at Welford-on-Avon identified in the Site Allocations Plan are all outside the defined Built-up Area Boundary and therefore is not consistent with Core Strategy Policy CS.15.

The sites at Welford-on-Avon are therefore contrary to both Core Strategy Policies CS.15 and AS.10, which seek to ensure that development within the District is distributed in a pattern of balanced dispersal, and should be removed from the list.

Strategic allocation of homes

The Site Allocations Plan is not consistent with Policy CS.16 of the Core Strategy, the Inspector's recommendations, or the NPPF.

Paras 102 and 103 of the NPPF recommend that the planning system should manage patterns of growth to support the objectives of promoting walking and cycling and offering a genuine choice of transport modes.

In his Interim Core Strategy Report the Inspector expressed concern over the large number of houses proposed in local service villages.

In para 201 of his report he says that any increase in the number of houses proposed at LSV's (ie: 2,000) would have to be robustly justified by the council. He also refers to a statement that "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."

In the case of Welford-on-Avon, the Site Allocations Plan promotes 91 additional houses in four sites in locations which would lead to an increase in the journeys undertaken by car and where there is little or no choice of alternate transport modes. This does not represent a balanced dispersal across the District and is contrary to Core Strategy CS.16.

Grade 2 agricultural land

The Site Allocations Plan is not consistent with the NPPF and Policy AS.10. Para 170 of the NPPF says that "planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land".

Policy AS.10 says that All proposals will be thoroughly assessed against the principles of sustainable development, including the need to avoid the loss of large areas of higher quality agricultural land.

In the NPPF 'best and most versatile agricultural land' is defined as grades 1, 2, and 3a. An inspection of Natural England's Agricultural Land Classification Map show that for the whole of the West Midlands east of the M5 is made up of grade 1, 2 and 3 land. In Stratford District the map shows the best agricultural land as grade 2. It is of vital national interest that this land is protected and preserved to contribute to the country's self-sufficiency for food.

Appendix VIII of the Site Allocations Plan indicates land quality but does not distinguish between grade 2 and grade 3a land. In respect of Welford-on-Avon, a detailed classification was made on the land at site WELF.A and this shows all the land to be grade 2. In addition, the Natural England map suggests that the other sites in Welford-on-Avon are on grade 2 land.

Infrastructure and Highways

The Site Allocations Plan does not meet the requirements of the NPPF and does not take account of the sufficiency of the existing road network.

Para 20 of the NPPF says that *“strategic policies should make sufficient provision for infrastructure for transport”*. It is only sensible that development be restricted to locations where the road infrastructure is sufficient to cater for the increased traffic.

On the 5th February 2019 in respect of a Planning Application for 35 houses on Reserve Site A in Welford (Milcote Road), WCC Highways stated *“At present the Highway Authority has concluded that there is insufficient capacity to accommodate significant levels of development south of the River Avon without the provision of a further crossing in the form of the South Western Relief Road.”*

Local Service Villages South of the River Avon include Clifford Chambers, Ettington, Halford, Long Compton, Long Marston, Loxley, Quinton, Tiddington, and Welford on Avon.

The Site Allocations Plan identifies 628 houses on Reserve Sites and Self-Build Plots in these villages and is a great deal more than the 35 which caused concern to WCC Highways, who insisted that the applicant undertook considerable further studies to demonstrate that the development would not adversely impact the road network. **This application was however still refused.**

The massive scale of development south of the River Avon will particularly affect the LSVs of Clifford Chambers, Long Marston and Welford on Avon. All reserve sites and self-build plots in these villages should be removed from the SAP on the ground of lack of adequate infrastructure.

Specific site comments

The Land Parcels Assessment (LPA) identifies the constraints, restrictions, and considerations that inform the selection of sites for reserve sites or for custom / self-build houses. The baseline for this is the 2018 Strategic Housing Land Availability Assessment (SHLAA).

However, this table does not properly follow the Coventry and Warwickshire Joint Method Statement for Strategic Land Availability Assessment (CWJMS) or the Site Allocations Plan Assessment Criteria (SEC). In addition, there are errors in the LPA, the SHLAA, and the tables in Appendix VIII of the Site Allocations Plan.

When the SEC is properly applied, and the errors are corrected, as below, the revised table would strongly indicate that the four sites selected in Welford-on-Avon are not suitable for inclusion in the list of Reserve Site or Custom / Self-Build sites.

Please see the comments below for each site:

WELF.04. Land North of Millers Close (Self-Build Plots)

SAP Policy 3 implies Millers Close is one of the 9 most suitable sites across the entire District. Where is the evidence to demonstrate this given the number of errors in the LPA?

Achievability:

The SEC table “Achievability” says that a site with a history of planning refusal or appeal dismissal should be assessed as **RED**. This site was refused planning consent by SDC in 2015 (14/02810/OUT) and an appeal was subsequently dismissed.

It would be perverse for the SAP to go against the Inspector’s decision by including this site as a

potential for self-build plots. This should therefore be assessed as **RED** (undeliverable), not **Amber** as shown in Appendix VIII.

The reasons for Refusal and Dismissal of the Appeal will not change and therefore this site is highly unlikely to ever be deliverable.

Site Access:

Table ii of the SEC says that if access to the site is unlikely to meet highway standards it should be assessed as **RED**. **The LPA incorrectly shows this as a Green.** Also, the table in Appendix VIII incorrectly states that the site *“has the potential for access to Millers Close and it is considered that suitable mitigation is possible to minimise any adverse effects.”*

In response to planning application 14/02810/OUT WCC Highways said in their letter of 2nd March 2015 that the access was **unsafe**. Furthermore, in Dismissing the subsequent Appeal the Planning Inspector said *“Due to the restricted visibility at the junction with Millers Close and that the junction with the High Street is so severely restricted by the pinch point any additional traffic, however numerically small, would increase the amount of potentially hazardous manoeuvres. This would be significantly detrimental to highways safety.”*

This indicates that even one house on this site would be detrimental to road safety and this was the main reason for the Dismissal of the Appeal. This site is clearly unsafe and should be assessed as **RED**.

Conservation Area:

The table in Appendix VIII incorrectly shows a Neutral effect saying that the site *“is approximately 300m from the Conservation Area and any listed buildings, with existing development in between.”* **The site is in fact adjacent to the Conservation Area and there is a Listed Building within 60m of the site.**

Employment Land:

The table in Appendix VIII says that the site does not create the loss of employment land. However, the site is an agricultural business that currently supports rural employment and housing development would lead to a loss of employment land. This should be assessed as a **RED** in accordance with the SEC.

Agricultural Land:

Table i (Major Planning Considerations) of the SEC says that Grade 2 agricultural land should be assessed as **RED**. The Agricultural Land Classification Map produced by Natural England shows that this site is wholly on Grade 2 agricultural land. This site should therefore be assessed as **RED** in Appendix VIII.

WELF.A (Appendix VIII ref WELF.09) Land North of Milcote Road.

Achievability:

The SEC table “Achievability” says that a site with a history of planning Refusal or Appeal Dismissal

should be assessed as **RED**. This site was Refused planning consent (13/0235/OUT) in 2014. Also following an Appeal and a Public Inquiry the Inspector Dismissed the Appeal in December 2014. And further, In June 2019 SDC Refused planning consent for another application at this location (18/03705/OUT).

It would be difficult to reconcile SDC Refusing planning consent twice and defending an Appeal, only to promote the site as a potential Reserve Site now. This site should be assessed as **RED**. However, the table in Appendix VIII does not take this into account.

The reasons for Refusal and Dismissal of the Appeal will not change and therefore this site is highly unlikely to ever be deliverable.

Coalescence of villages:

Table ii of the SEC regarding coalescence says that any site which forms an important contribution to defining and maintaining the separate identity of the settlement should be assessed as **RED** if it is a significant contribution. **The LPA incorrectly assesses this as GREEN.**

One of the reasons given for the District Council's Refusal for a planning application on this particular site in June 2019 (18/03705/OUT) was that reduction of the area between Welford and Weston "*would intensify the likelihood of coalescence between the two settlementsand put at risk their individual historic identity and integrity.*"

The reduction in the gap between Welford and Weston was also a reason given in the dismissal of the Appeal in December 2014. And further, the site falls within the area of land covered by Policy HE6 of the Neighbourhood Development Plan which states that "*Development will not be permitted in the land between the villages [of Welford and Weston] so as to preserve the identity and integrity of the settlements and the immediate natural environment.*"

In answering a specific question about NDP Policy HE6; **Planning Aid** said in their response is that "*SDC should avoid "conflict" with the NDP and need good evidence and reasons for its inclusion*". It is fair to say that we haven't seen any such evidence.

It is also inconsistent with Policies CS.15, CS.16 and AS.10 of the Core Strategy. This site should therefore be assessed as **RED**.

Grade 2 Agricultural Land:

Recent soil surveys for this land showed it to be wholly Grade 2 – the best grade available in the District. And development would remove this excellent land from food production forever.

Public Transport:

Table ii of the SEC says that if a site is not within 400m of a bus service, the site should be assessed as **RED**. This site is not within 400 metres of a bus service and should therefore be assessed as **RED**. **Not as amber** as shown in the LPA and appendix VIII.

Accessibility to Local Facilities:

The SEC says that if the site is not within 800 metres of local services and facilities (eg. shop, school, doctor's surgery) it should be assessed as **RED**. There is a shop within 800 metres of the site; **however, the nearest school is 1300 metres from the site and the nearest doctors' surgery is 6km from the site.** This site should therefore be assessed as **RED, not amber.**

Traffic:

The table in Appendix VIII of the Site Allocations Plan shows that increased traffic will have a neutral effect. That is clearly incorrect; any increased traffic will have a negative effect.

In their letter of the 5th February 2019 in respect of a Planning Application for 35 houses at this particular site, WCC Highways stated "At present the Highway Authority has concluded that there is insufficient capacity to accommodate significant levels of development south of the River Avon without the provision of a further crossing in the form of the South Western Relief Road." WCC were sufficiently concerned about the effect of 35 new houses on the road network to request detailed traffic modelling for this one site.

Overall Assessment:

At present the LPA shows **RED** against 2 of the 4 criteria; this should be 4 **RED's**. The initial assessment of the site is undeliverable but mitigation is proposed. The mitigation proposed relates **only to landscape** and will not alter the other major factors that would prevent delivery. Achievability, Agricultural Land, Public Transport, Local Facilities and Traffic. **The overall assessment should be RED**, the site is undeliverable.

WELF.B (Appendix VIII ref WELF.10) Land East of Hunt Hall Lane

This location is not consistent with Policy CS.15. Not only is it outside the Built-up Area Boundary, it is remote from the Built-up Area Boundary ie: not adjacent to it.

Local Services:

Table ii of the SEC says that if a site is not within 800m of local services the site should be assessed as **RED**. This site is more than 800 metres from the nearest shop and **should therefore be assessed as RED** and not as green as shown in the LPA and Appendix VIII.

Public Rights of Way:

The SEC says that a site where a public right of way runs along its edge should be assessed as **AMBER**. The LPA incorrectly shows this as **GREEN**; Footpath SD 32 runs alongside the edge of this site, it should therefore be assessed as **AMBER**

WELF.C (Appendix VIII ref WELF.17) Land East of Hunt Hall Lane

By SDC's own admission, this site is not consistent with Core Strategy Policies CS.15, CS.16 or AS.10.

Achievability:

The SEC table "Achievability" says that a site with a history of planning Refusal or Appeal Dismissal should be assessed as **RED**. This site was Refused planning consent in 2015 (15/02586/FUL). An Appeal was Dismissed in March 2016 and another application was Refused in 2017 (17/02338/FUL). **The site should therefore be assessed as RED.**

Agricultural Land:

Table i (Major Planning Considerations) of the SEC says that Grade 2 agricultural land should be

assessed as **RED**. Natural England's Agricultural Land Classification Map shows that this site is wholly on Grade 2 agricultural land and **should therefore be assessed as RED**.

Self & Custom Build Policy Questions – The Self & Custom Build policy section of the SAP seems not to address the following questions:

- Are the houses built under SAP Policy 3 part of, or in addition to, the 14,600 target for the district?
- Are these houses part of, or in addition to, the 84 homes allocated to Welford by Core Strategy CS.16?
- Why are 100 sites allocated across the district? Is this number supported by any evidence or is it just the total number 'promoted by the landowner' as in section 3.1.7? please provide detailed evidence.

Please ensure you sign the declaration at the end of the Form

8. What modification do you consider is necessary to make the Site Allocations Plan sound, having regard to the test you have identified at Question 6?

You should explain why this modification would make the Site Allocations Plan sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Housing Distribution and Allocations

Housing Distribution

The four proposed sites at Welford-on-Avon are contrary to both Core Strategy Policies CS.15 and AS.10, which seek to ensure that development within the District is distributed in a pattern of balanced dispersal, and should be removed from the list.

Strategic allocation of homes

The Site Allocations Plan is not consistent with Policy CS.16 of the Core Strategy, the Inspector's recommendations, or the NPPF. In the case of Welford-on-Avon, the Site Allocations Plan promotes 91 additional houses in 4 sites in locations which would lead to an increase in the journeys undertaken by car and where there is little or no choice of alternate transport modes. This does not represent a balanced dispersal across the District and is contrary to Core Strategy CS.16 and should therefore be re-assessed.

Grade 2 agricultural land

The Site Allocations Plan is not consistent with the NPPF and Policy AS.10 regarding the need to avoid the loss of large areas of higher quality agricultural land.

In respect of Welford-on-Avon, a detailed classification was made on the land at site WELF.A and this shows all the land to be grade 2. In addition, the Natural England map suggests that the other sites in Welford-on-Avon are on grade 2 land. It is of vital national interest that this land is protected and preserved to contribute to the country's self-sufficiency for food, these sites should therefore be removed from the SAP list.

Infrastructure and Highways

The Site Allocations Plan does not meet the requirements of the NPPF and does not take account of the sufficiency of the existing road network. The massive scale of development south of the River Avon will particularly affect the LSVs of Clifford Chambers, Long Marston and Welford on Avon. All reserve sites and self-build plots in these villages should be removed from the SAP on the ground of lack of adequate infrastructure.

Specific site comments

The Land Parcels Assessment (LPA) table should be re-assessed to follow the Coventry and Warwickshire Joint Method Statement for Strategic Land Availability Assessment (CWJMS) and the Site Allocations Plan Assessment Criteria (SEC). Errors in the LPA, the SHLAA, and the tables in Appendix VIII of the Site Allocations Plan must be corrected before a proper assessment can be made.

When the SEC is properly applied, and the errors are corrected, the revised table would strongly indicate that the four sites selected in Welford-on-Avon are not suitable for inclusion in the list of Reserve Site or Custom / Self-Build sites.

Please ensure you sign the declaration at the end of the Form

9. In what way do you support the legal compliance or soundness of the Site Allocations Plan?

The Parish Council does not support in anyway the Legal Compliance or Soundness of the Site Allocation Plan.

Please ensure you sign the declaration at the end of the Form

10. Does your representation relate to another document associated with the Site Allocations Plan, e.g. Sustainability Appraisal, Strategic Housing Land Availability Assessment? If so, please specify below with your comments on it.

N/A

Please ensure you sign the declaration at the end of the Form

11. Do you wish to express an interest to participate in the Examination?

Yes, I wish to participate at the oral Examination

No, I do not wish to participate at the oral Examination

If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary. Only where a modification is sought to the Site Allocations Plan is it appropriate for the representation to be heard at an Examination hearing session. Please note that the Inspector, not the District Council, will decide who should be invited to speak at the Hearing sessions and also which topics are to be covered at them.

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: 
Welford on Avon Parish Council

Date: 18th September 2019