

Our ref: 10010 LPA01 HRW

FREEPOST RSLH – ZYKJ – TYAZ
Stratford on Avon DC
PO BOX 5341
Stratford upon Avon
CV37 1LE

By Email: planning.policy@stratford-dc.gov.uk

11th July 2014

Dear Sir/Madam

Stratford-on-Avon District Proposed Submission Core Strategy Consultation: Formal Representation on behalf of Wilmcote Parish Council

Tyler-Parkes Partnership is a Planning and Architectural Consultancy commissioned by Wilmcote Parish Council to submit formal representations on its behalf in response to the current consultation on the Proposed Submission Core Strategy and Sustainability Appraisal. Included with this formal letter of representation is a completed Proposed Submission Representation Form. As you will be aware, Wilmcote Parish Council has previously submitted representations to each version of the emerging Core Strategy.

We welcome the opportunity to make representations on behalf of our client to the Stratford-on-Avon Proposed Submission Core Strategy consultation and set out our formal representations below:

We raise **OBJECTION** to the Stratford-on-Avon Proposed Submission Core Strategy on the grounds that it is not 'sound' and it fails to fully meet the requirements of the National Planning Policy Framework (Framework) and National Planning Practice Guidance.

It is apparent that the approach taken to housing and employment land allocations in the Stratford-on-Avon Proposed Submission Core Strategy is not wholly consistent with the Framework which, amongst other matters, seeks to: locate development in the most sustainable locations; alter Green Belt boundaries only in exceptional circumstances; when reviewing Green Belt boundaries take account of the need to promote sustainable patterns of development; recognise the intrinsic character of the countryside; empower local people to shape their surroundings; and conserve heritage assets in a manner appropriate to their significance. It is



also apparent that parts of the Stratford-on-Avon Proposed Submission Core Strategy have disregarded conclusions from its own evidence contained in the Sustainability Assessment and Employment Land Study.

Wilmcote Parish Council **OBJECTS** to the following proposed policies and proposals:

- **Policy CS.15 Distribution of Development** which proposes distribution of development based on a pattern of dispersal using a hierarchy comprising - the main town of Stratford-upon-Avon, Main Rural Centres, the New Settlement in the vicinity of Gaydon, Local Service Villages and All Other Settlements. Dispersal of development to smaller settlements is contrary to the sustainability principles of the Framework;
- **Policy CS.16 Housing Development** which seeks to disperse 1,950 new dwellings across the smaller Local Service Villages, including strategic allocations in settlements washed over with Green Belt such as Wilmcote. This scale of development is inappropriate in the Green Belt without a Green Belt review and demonstrable 'exceptional circumstances', also the scale of development coupled with windfall development will put strain on the existing limited services and facilities;
- **Policy CS.10 Green Belt** which seeks to remove 15 hectares of Green Belt land east of Birmingham Road (north of A46) , Bishopton and allocate it for employment development under the terms of Development Proposal SUA.3. There is no demonstrable need or robust evidence in support of the proposal and no Green Belt review or consideration of alternative sites to justify removing this site from the Green Belt; and
- **Development Proposal SUA.3 East of Birmingham Road** which seeks to deliver employment and commercial uses relocating from the Canal Quarter Regeneration Zone on a minimum of 9 hectares of the total 15 hectare allocation. It is proposed the remaining land will be developed with uses which will facilitate the relocation process. Development is proposed to be delivered post 2016. The Council's own evidence, the 'Canal Quarter and Two Associated Employment Sites Viability and Deliverability Report', recommends that this allocation be excluded from the plan as there is no identified need in the plan period and no exceptional circumstances or Green Belt review to justify excluding the site from the Green Belt.

National Planning Policy Framework (Framework)

1. The Framework, published on 27th March 2012, sets out the government's planning policies for England and how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. It is therefore vital that the policies and proposals contained within emerging Development Plans are consistent with the objectives and requirements of the Framework.
2. Paragraph 14 states that at the heart of the Framework is a 'presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.' Paragraph 15 requires policies in Local Plans 'to follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
3. In Paragraph 7, the Framework recognises three dimensions to sustainable development; economic, social and environmental. The economic role requires identification of sufficient land of the right type in the right places to support growth. In respect of the social role, the Framework sees the planning system as needing to perform the role of, 'supporting strong, vibrant and healthy communities, by providing the supply of housing

required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being'. The environmental role of planning includes protecting and enhancing our natural, built and historic environment.

4. Paragraph 17, sets out 12 core planning principles, including that planning should ensure that, '...Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth...' and '...actively manage patterns of growth to make the fullest possible use of public transport, walking, cycling, and focus significant development in locations which are or can be made sustainable...' as well as '...take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it...'
5. Paragraph 17 also includes the core principle that planning should be genuinely plan-led, empowering local people to shape their surroundings with local and neighbourhood plans setting out a positive vision for the future. Plans 'should be based on joint working and cooperation to address larger than local issues.'
6. Paragraph 69 addresses the need to promote healthy communities and it requires local planning authorities to aim to involve all sections of the community in the development of Local Plans and in planning decisions.
7. Paragraph 47, Delivering a Wide Choice of High Quality Homes, requires local planning authorities to identify '...key sites which are critical to the delivery of the housing strategy over the plan period...' and identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against the identified housing requirement with an additional buffer of 5% to provide a realistic prospect of achieving the planned supply and ensure choice and competition in the market for land. Where there has been a persistent under delivery of housing, local planning authorities should increase the buffer to 20%. It also requires that local planning authorities should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15.
8. According to the footnotes in the Framework, to be considered deliverable, 'sites should be available now, offer a sustainable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable...To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.'
9. Paragraph 79 states, 'The Government attaches great weight to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'
10. Paragraph 83 notes that 'Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' Paragraphs 84 and 85 require, when reviewing Green Belt boundaries, that local planning authorities take account of the need to promote sustainable patterns of development. Where necessary,

they should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet the longer-term development needs stretching beyond the plan period. They should 'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.'

11. Paragraph 85 states that when defining Green Belt boundaries local planning authorities should, amongst other criteria, 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'
12. Chapters 11 and 12 require the planning system to contribute towards the conservation and enhancement of the natural and built environment. Heritage assets should be recognised as an irreplaceable resource and conserved in a manner appropriate to their significance.
13. Paragraph 155 requires 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses...a wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and set of agreed priorities for sustainable development of the area...'
14. Paragraph 157 states that, 'Crucially, Local Plans should...be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations...allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.'
15. Paragraph 158 states, 'Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects for the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'
16. In respect of business planning policies, paragraph 160 requires local planning authorities to have a clear understanding of business needs within the economic markets operating in the area. To achieve this, they should, amongst other requirements: maintain a robust evidence base; assess the existing and future supply of land available for economic development and its suitability to meet identified needs; and reappraise the suitability of previously allocated land.
17. Paragraph 182, Examining Local Plans, requires Local Plans to be 'sound' meaning that they must be: positively prepared; justified such that the 'plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence'; effective; and consistent with national policy to enable the delivery of sustainable development.

Policy CS.15 Distribution of Development and Policy CS.16 Housing Development

18. Our Client **OBJECTS** to these policies on the following grounds:

- The dispersal of development to the Local Service Villages is not supported by the Council commissioned Lepus Consultation Sustainability Appraisal, May 2014. This report for example, suggests at paragraphs 3.34, 3.35 and 3.37 that pursuing a policy of dispersed development would put strain on local service villages and the rural area with the lack of concentration of development meaning it is less likely to support provision of additional services and facilities. The report states that there is also potential to increase the need to commute and travel by car. The Council are proposing a departure from the sustainability principles of the Framework where housing should be concentrated in the larger settlements where there are most employment opportunities, infrastructure, public transport, community and social facilities. The dispersal policy is therefore contrary to the findings of the sustainability appraisal evidence, and contrary to the Framework – it is therefore not ‘sound’;
- It is misleading that the policy explanatory text in the Core Strategy - paragraph 1.1.9 states that the ‘...plan preparation process has revealed support for a spatial strategy on a wider dispersal of housing development than has occurred in recent years...’ with evidence to show, if handled with care, small scale housing development in a range of the ‘relatively more sustainable villages’ could help to promote more balanced communities and respond to local needs and help sustain services. Yet, as highlighted in the bullet point above, the Council’s own Sustainability Appraisal evidence does not support this proposed dispersed pattern of development.
- The allocation of housing number ranges to settlements according to the Council’s assessment of their size and facilities appears to have been undertaken as a desk-top exercise with no qualification given for the numbers proposed. There is no evidence to demonstrate that the numbers proposed could be achieved. There have been no detailed assessments undertaken in respect of potential development sites for each settlement. Without assessment of material factors such as landscape impact, effect on openness in the Green Belt, flood risk, ecology, impact on heritage assets and their surroundings, and the need to achieve safe highway access, there can be no certainty about achieving the scale of development proposed. It is unsound to include the proposed housing numbers within the Core Strategy set out in Policy CS.16 without the necessary background evidence to demonstrate they can be achieved. It is unsound to defer detailed assessment of development on this scale to the Site Allocations Development Plan Document and Neighbourhood Plan preparation stage;
- Settlements such as Wilmcote have grown naturally over time without the need for specific planning policies to direct a particular scale of residential development into the settlement. The Core Strategy includes within the overall housing supply calculation a proportion of housing numbers resulting from ‘windfall’ or unplanned development. Windfall development will no doubt continue to occur within many of the Local Service Villages including Wilmcote. This windfall development would be acceptable on its own and would satisfy the requirements of the Framework

which support small-scale development to enhance and maintain the vitality of rural communities. However, if the 'planned' scale of development is pursued by the local planning authority in the Core Strategy, it will further exacerbate the unsustainability of development in these smaller settlements, putting an unacceptable strain on services and facilities. The introduction of allocated housing numbers to smaller settlements in addition to windfall development is unsustainable. This approach is contrary to the Framework and therefore not 'sound';

- Localism and the greater empowerment of the local community promoted by the Government have not been embraced by the local planning authority. Wilmcote Parish Council have repeatedly voiced concerns about and objected to the current dispersal of housing development policy. The Framework requires the local community to be involved in the formulation of planning policies affecting their area and whilst the Parish has been consulted its opinions have, it would seem, largely been ignored. This approach is unsound.

19. The village of Wilmcote has been washed over by Green Belt to prevent development in the village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt - this would be in line with the requirements of paragraph 86 of the Framework. There has been no comprehensive Green Belt review undertaken by Stratford-on-Avon Council and therefore we contend it is unsound to propose changes to Green Belt boundaries on an ad hoc basis or even worse, exclude plots of land from the Green Belt to permit development where the village and surrounding area do not currently even have a Green Belt boundary. A Green Belt review should be the starting point for any strategy which proposes housing development across the local authority area in the Green Belt.
20. With no assessment of the impact on openness, safeguarding the countryside from encroachment, and preserving the setting and special character of the historic village, the removal of land from the Green Belt cannot be justified in one location rather than another. It is unsound to direct development towards particular settlements based purely on the current size and range of facilities of that settlement rather than by undertaking a comprehensive objective assessment of the Green Belt. All material considerations need to be weighed up when reaching a decision on strategic policies and the direction of growth.
21. Recent planning appeal decisions and national Planning Practice Guidance indicate that a lack of a five year deliverable housing land supply is 'unlikely' to be considered a very special circumstance to justify inappropriate residential development in the Green Belt. There are very many recent examples of appeal decisions where development proposals have been dismissed in the Green Belt because the lack of a five-year housing land supply is unlikely to be regarded as a very special circumstance to outweigh Green Belt protection.
22. For example, in June 2014 Communities Secretary, Eric Pickles dismissed a developer's appeal against refusal of planning permission for 750 homes on Green belt land in Essex even though the Council could not demonstrate a five-year housing land supply. Pickles agreed with the Inspector that the site was a strong candidate for development if it were not in the Green Belt but the harm to the Green Belt was not clearly outweighed by other considerations. Whilst this was a development control decision rather than a planning policy formulation decision, we contend it does emphasise the importance of Green Belt

protection and adds weight to the argument that there needs to be clear and justified evidence to demonstrate that an alteration to Green Belt designations is appropriate and necessary in the settlements identified in Policy CS.16.

23. In order for the policy of dispersal of residential development to villages in the Green Belt to be justified, it needs to be founded on robust and credible evidence and the strategy needs to be the most appropriate when considered against reasonable alternatives. It is clear that there has not been an objective assessment of the Green Belt or the development potential of each village. With respect to credible alternatives, Wilmcote Parish Council again contend that the most sustainable option for allocating additional residential development would be to identify an urban extension to Stratford-on-Avon town itself and to distribute additional dwellings around the Main Rural Centres.
24. In addition to the Green Belt protection of openness, part of Wilmcote village has been further protected by a Conservation Area designation to ensure that the historic core, which includes Mary Arden's House, is conserved and enhanced. Heritage assets and their surroundings are an irreplaceable resource and Wilmcote village clearly includes irreplaceable historically important resources. The Framework requires at paragraph 137 that within Conservation Areas opportunities should be sought for new development to enhance or better reveal the significance of heritage assets. We contend that development of between 51 and 75 new dwellings in addition to windfall development in the village would detrimentally affect the historic character and setting of the village.
25. Wilmcote village has virtually no employment opportunities and development on the scale proposed would inevitably increase the amount of out commuting. Whilst there is a train service this is inevitably limited by the route of the railway track and the timetable. It seems likely therefore that road traffic generation will increase contrary to the sustainability principles of the Framework.
26. It is relevant to note that Warwick District Council also propose a dispersal pattern of housing growth spread across what they classify as its 'Primary' and 'Secondary' villages. The Publication Draft Local Plan went out to consultation in April 2014 so the sustainability credentials of this approach have not as yet been tested at Public Examination. However, the evidence gathering during the plan preparation process resulted in a significant reduction in the numbers of new dwellings proposed in the majority of the settlements. In the June 2013 version of the plan, the 'Revised Development Strategy', the Council had proposed between 100 to 150 new dwellings in the five primary service villages which included Kingswood (Lapworth), a settlement inset in the Green Belt. Following detailed assessment of the impact on openness, landscape, ecology, flood risk, and highway access for development opportunities in each village, the housing allocation figure for Kingswood (Lapworth), for example, was reduced to just 43 new dwellings.
27. The Warwick District Council evidence gathering process clearly demonstrates the fundamental importance of undertaking the necessary appraisals to discover whether a policy is deliverable. It was necessary for Warwick District Council to identify substantial additional housing land supply options in its Publication Draft Local Plan to try to ensure that the housing requirement figure promoted by the Council could be achieved and a five-year housing land supply maintained. We contend it is unsound for Stratford-on-Avon to include the strategic objective of providing 1,950 dwellings in the Local Service Villages without evidence to demonstrate that this scale of growth could in reality be delivered.

28. The Shotton Appeal Inspector, Terry Phillimore commented in his decision allowing the appeal in October 2012, that '...the Council's present intentions for development in the District with development focused on rural areas with limited services and public transport, together with environmental constraints, appear to be contemplating a wholesale departure from sustainable development principles...' The implications of these comments made by an independent Inspector should have been fully considered by the policy formulation team at Stratford-on-Avon and should, we contend, have been seen as an opportunity to re-evaluate the current approach to dispersing growth.
29. Support for the policy of directing development away from more rural settlements was highlighted more recently in the South Gloucestershire Core Strategy Examination Report issued by Inspector Paul Crysell in November 2013 when he concurred with the Council's conclusion that a dispersed pattern of development directed into smaller villages was not sustainable. He states at paragraph 63 of his report, '...This was a view previously reached in the sustainability appraisal undertaken for the draft RS and one which, in principle, I support...' The approach of directing development towards the main urban areas and urban extensions has therefore been accepted as 'sound' in the South Gloucestershire Core Strategy Examination, based on the findings of sustainability evidence.
30. In summary:
- The policy of a dispersed pattern of growth into the local service villages is contrary to the sustainable development principles intrinsic within the Framework, as evidenced by the council commissioned Lepus Consultation Sustainability Appraisal;
 - There is no evidence to suggest that the scale of development proposed could be satisfactorily achieved and there is evidence to suggest that the allocation of housing numbers to particular settlement has been derived from purely a desk-based exercise;
 - The Sustainability Appraisal suggests that development on the scale proposed in the villages will put an unsustainable strain on services and facilities and encourage increased car based out-commuting, contrary to the requirements of the Framework;
 - It is unsound to pursue a policy which necessitates incursion into the Green Belt in a number of different settlement areas throughout the local authority area without a comprehensive Green Belt review. Alterations to the Green Belt boundary should only be proposed in exceptional circumstances which have not been demonstrated;
 - The feasibility of achieving sympathetic development on the scale proposed in the Core Strategy has not been tested. It is unsound to propose a policy when the deliverability is in doubt, all policies and proposals should be based on robust proportionate evidence. In this case, there needs to have been an assessment of the impact of the proposed scale of development for example, on the landscape, nature and heritage conservation, ecology, geology, highway safety and flood risk.

Proposed Modification to make Policies CS.15 Distribution of Development and Policy CS.16 Housing Development of the Core Strategy Sound

31. Wilmcote Parish Council formally requests that the Service Villages be allowed to grow through windfall development and in response to locally identified needs. They recommend a change in policy away from a pattern of dispersed development and instead encourage directing growth towards the main urban and main rural centres.

Policy CS.10 Green Belt and Development Proposal SUA.3 East of Birmingham Road

32. Policy CS.10 recognises the need to resist inappropriate development in the Green Belt yet proposes to remove three specified areas of land from the Green Belt (in addition to any land which might be removed from the Green Belt as part of the dispersal of housing development strategy) without a comprehensive Green Belt review. Also, there is no evidence that:

- there is a need for two new Business Parks on the scale proposed in the Core Strategy to be developed on the outskirts of Stratford-upon-Avon;
- any potential alternative sites outside the Green Belt have been assessed;
- the current occupants of the Canal Quarter Regeneration Zone would be willing to relocate to the 15 hectare site east of Birmingham Road within the plan period; and
- there are 'exceptional circumstances' to justify incursion into the Green Belt with the inevitable impact on the openness.

Therefore, policy CS.10 and development proposal SUA.3 are not 'sound' as the policy is not based on justified, proportionate evidence and reasonable alternatives have not been considered as required by the Framework.

33. The policy explanatory text beneath paragraph 4.1.6 relating to land East of Birmingham Road, states that, 'The release of this site from the Green Belt is based solely on providing scope for implementing the Regeneration Zone proposal.' However, the Council's own evidence, suggests that this could not be justified as an 'exceptional circumstances'.
34. The 'Canal Quarter and Two Associated Employment Sites Viability and Deliverability Report', April 2014, prepared by PBA Peter Brett Associates is damning in respect of proposed employment site SUA.3. It states in paragraphs 6.12.2 and 6.13.3 that, 'A selective review of the Green Belt and release of a site for employment purposes requires considerable and robust justification...We are not convinced that the evidence exists to provide the exceptional circumstances required to justify the release of the Green Belt, especially in view of the fact that a comprehensive Green Belt review has not been undertaken...'
35. Paragraph 6.14.4 of the 'Canal Quarter and Two Associated Employment Sites Viability and Deliverability Report' explains, 'It is apparent from our assessment that there is not an overwhelming need for the Green Belt site. The relocation of businesses from Western Road (identified as potential occupiers of the Green Belt site) is unlikely to come forward within the plan period. This is due to the fact that the majority of businesses at

this location are well established and have long leases left to run with the Town Trust at below market rates...’ It concludes at paragraph 6.12.5 that, ‘We have significant concerns about how the council would demonstrate and justify the release of Green Belt site SUA.3 and would recommend that it is not included within the local plan on the basis that it is for the relocation of businesses from the Canal Quarter.’

36. The case of need for the scale of Business Parks proposed by the council is further undermined by the ‘Stratford-on-Avon Employment Land Study Final Report’, August 2011, prepared by GL Hearn. This recommends at paragraph 11.40 that, ‘...an additional 5-10 hectares of land is allocated at Stratford-on-Avon for B1 uses for development within the 2008-28 plan period.’ It explains at paragraphs 11.42 and 11.43 that there is potential for selective release of existing poorer quality employment land, such as at Masons Road and within Western Road Industrial Estate (part of the Canal Quarter Regeneration Zone), but it states, ‘We would expect provision of some employment floorspace through redevelopment of these sites... We consider there is a need for allocation of additional employment land in the form of a business park for B1 uses...this should be around 5 hectares in size. 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...’
37. Therefore, it can be seen that the independent employment report clearly states that whilst a new business park is required close to the A46 and Stratford Parkway station, the size of the park should be limited to between 5 and 10 hectares. The report recommends that some employment floorspace should continue to be provided in the area referred to in the Core Strategy as the Canal Quarter Regeneration Zone. In line with the latter recommendation, Development Proposal SUA.1 includes a minimum of 3 hectares of class B1 employment uses as well as 650 dwellings. However, contrary to the recommendations in the evidence, the Core Strategy proposes two new business parks outside Stratford-on-Avon town centre: 20 hectares gross at SUA.2 South of Alcester Road the A46, west of Wildmoor roundabout; and 15 hectares gross at SUA.3 East of Birmingham Road. On both proposed business parks it is the intention that there will be relocation of businesses from the Canal Quarter Regeneration Zone – 9 hectares for this purpose at SUA.3 and at SUA.2 additional land above the 10 hectares to be released during the plan period, to correspond with the area taken up by businesses relocating from the Canal Quarter Regeneration Zone.
38. It is therefore contended that the evidence supports formation of only one Business Park and that this is on a smaller scale than that currently proposed. Given that SUA.2 lies on land outside the Green Belt, when comparing the two proposed options, this would be the site which best satisfies the requirements of the Framework which seeks to protect Green Belt land. The ‘exceptional circumstances’ to justify an alteration to the Green Belt boundary at SUA.3 is given by the council as solely based on the need for uses to relocate from the Canal Quarter Regeneration Zone to facilitate residential development. However, it is clear from the Council’s own employment report and viability and sustainability report that the identification of site SUA.2 is unnecessary as there should be no outstanding need in the plan period.
39. Development on Green Belt site SUA3 would be detrimental to the landscape and impact unacceptably on the openness of the countryside. It would be a visually intrusive urban development which would require the removal of much of the mature dense roadside vegetation to enable car sales businesses to have the prominent road frontage facility

required by the use. It would also necessitate removal of a number of trees and hedgerows within the site. The site is not adjacent to the settlement boundary, being surrounded by undeveloped Green Belt land, so it could not be classified as a sustainable urban extension. Whilst the A3400 and A46 delineate the west and south boundaries, there are no clearly defined physical features to delineate the north and east boundaries and provide a defensible boundary between the 'urban' employment uses and the agricultural countryside uses of the Green Belt. This allocation could effectively open up the countryside to development. There is likely to be an undesirable reliance on the car and road based service vehicles for commuting and deliveries to the site contrary to the sustainability objectives for development in the Framework.

40. There is no evidence to show that alternative potential Business Park development sites outside the Green Belt have been assessed. There appears to have been no assessment of potential employment sites, however, the Strategic Housing Land Availability Assessment (SHLAA) shows that land north of the settlement boundary and south of the A46 has been promoted by the landowner as a potential housing development site, site reference STR714. This site does not lie in the Green Belt, is adjacent to the settlement boundary, is in a sustainable location close to the parkway railway station and has a clear physical boundary in the form of built development and the A46. The SHLAA concludes that there may be approximately 10 ha of land available here outside the flood plain and not within the area proposed as open space. Therefore, this site, together with others, should have been considered for its potential for employment development. The size of the area identified as potentially developable on site STR714 would meet the size requirements for a Business Park recommended in the Employment Report ie. 5 to 10 hectares.

41. There is no evidence that local organisations, such as Wilmcote Parish Council, have been engaged proactively in the agreed priorities for sustainable economic development to the north of Stratford-upon-Avon contrary to the requirements of the Framework.

42. In summary:

- There has been no Green Belt review and there is no evidence to show that the proposed allocations have been considered against alternatives;
- There is no evidence to demonstrate that the size and scale of the proposed business parks would be needed, deliverable or viable, indeed the Councils' own employment report suggests that a Business Park on a much smaller scale would meet demand;
- There is no evidence to justify allocating employment sites some distance from the settlement boundary within the open countryside;
- There is no evidence of robust 'exceptional circumstances' to justify altering the Green Belt boundary, indeed the Council's own sustainability and viability report recommends that site SUA.3 be excluded from the plan; and
- There is no evidence to demonstrate that the intention to relocate employment uses from the proposed 'Canal Regeneration Zone' is deliverable given the existence of long leases and favourable rental rates.

Proposed Modification to the Core Strategy

43. It is clear that the SUA.3 Business Park development proposal is not consistent with national policy, has not been positively prepared, is not justified and is not effective. We therefore recommend that the employment allocation SUA.3 be removed from the Core Strategy to make the Core Strategy sound.

Conclusion

44. Wilmcote Parish Council object to the Proposed Submission Core Strategy on the basis that policies and proposals have not been based on the findings of robust evidence – either because vital studies have not been undertaken, or because the Council have chosen to ignore the findings and pursue policies which run counter to the evidence. They also object to the failure of the Council to meet the requirements of the Framework, in particular in respect of: the need to demonstrate exceptional circumstances before altering Green Belt boundaries; and the need to promote sustainable development strategies.
45. On this basis there is a strong case to make for finding the current proposals unsound.

We should be grateful if you would confirm receipt of this letter of representation.

Kind regards,

Yours faithfully,

Helen Winkler Bsc (Hons), Dip. T.P., MRTPI
Planning Consultant

h.winkler@tyler-parkes.co.uk

C/C Wilmcote Parish Council