**Wilmcote Neighbourhood Planning May 2015**

**Initial Site Selection Process**

**Introduction**

This document details the site selection process initially adopted by the Wilmcote Neighbourhood Planning Group.

It highlights the strategy adopted at the beginning which assumed no constraints on development sites. In reality the Local Service Village of Wilmcote is in the Green Belt which means the sites identified are to satisfy the requirements of Paragraph 89 of the NPPF. During this initial site selection process changes were made to the SDC Core strategy which affected the development sites that would be acceptable. The result of this initial exercise is that the majority of the sites that were identified would not meet these requirements. However it is useful to record the initial site selection as a great deal of work was undertaken.

At the May 2014 meeting of the Stratford-on-Avon District Council the Proposed Submission Core Strategy was approved. However, before it could be submitted to Government it was subjected to a six week period of public consultation for interested parties to comment on the legal compliance and soundness of the document.

With assistance from their planning consultants Wilmcote Parish Council made a robust reply particularly with regard to the proposals for Local Service Villages in general and proposals for Local Service Villages in the Green Belt, such as Wilmcote, in particular. The conclusion of the 12 page document submitted stated:

‘Wilmcote Parish Council objects to the Proposed Submission Core Strategy on the basis that policies and proposals have not been based on the finding of robust evidence-either because vital studies have not been undertaken, or because the District Council has chosen to ignore the findings and pursue policies which run counter to the evidence. Wilmcote Parish Council also objects to the failure of the District Council to meet the requirements of the National Planning Policy 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.’

Stratford-on-Avon District Council submitted its Submission Core Strategy to the Planning Inspectorate on 30 September 2014. The Inspector appointed to examine the Core Strategy was Peter Drew BSc (Hons) Dip TP MRTPI.

Both before and during the inspection the Inspector raised the issue of housing development in Local Service Villages in the Green Belt. As a result the District Council is revising its approach and has proposed major modifications to the Submission Core Strategy. The interpretation of these modifications is as follows:

• The number of new dwellings to be provided in the period 2011 to 2031 will not be defined numerically.

• All new dwellings in this period will have to satisfy the requirements of Paragraph 89 of the National Planning Policy Framework namely, limited infilling, local needs housing and redevelopment of previously developed sites.

• The proposal by Stratford District Council to remove Local Service Villages from the Green Belt if they should be unable to meet their new dwelling obligations has been dropped.

The Inspector has yet to make his final recommendations to the District Council regarding the treatment of Local Service Villages in the Green Belt but Stratford District Council has taken note of the comments made by Peter Drew, the Inspector, and is no longer proposing that Local Service Villages will be removed from the Green Belt if they cannot accommodate new housing to the level specified in the Stratford on Avon Submission Core Strategy.

It is expected that the number of new dwellings specified for Category 2 Local Service Villages in the Green Belt will be reduced from the current 51 – 75 level. It appears reasonable to expect that the maximum number for Wilmcote will be less than 50 new dwellings.

New dwellings in Wilmcote and Pathlow have to meet the requirements of paragraph 89 of the National Planning Policy Framework, namely: Limited infilling, Local needs housing, Redevelopment of previously developed sites.

The meaning of limited infilling in the NPPF is being questioned. SDC are now advising that limited infilling is “a gap in an otherwise built up frontage” but the Council does point out that “...in a recent appeal decision, relating to a site in Tanworth-in-Arden, the Inspector concluded that a 3 dwelling infill (not linear in form) did conform with the provisions of the NPPF and constituted limited infilling.” This may be a special case.

It is also interesting to note that Paragraph 53 of the NPPF states that “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”.

In the questionnaire sent to all residents the Wilmcote Parish Council decided not to name specific sites but to acknowledge that Wilmcote is within the Green Belt. Respondents were asked to give their opinion on the relevant sites as described in Paragraph 89 of the NPPF.

The results from the questionnaire are extremely interesting as:

• 85% of respondents agree that new housing should take the form of limited infilling.

• 79% of respondents agree that new housing should take the form of limited affordable housing for local community needs.

• 78% of respondents agree that new housing should take the form of redevelopment of previously developed sites.

This report records the initial site selection process adopted although the results were not carried forward into the Neighbourhood Plan.

**Initial Site Selection Process**

This paper summarizes the processes and actions initially taken to identify possible sites for development within the Parish of Wilmcote and Pathlow. It covers the period October 2013 to November 2014.

**Site Selection Process**

The process can be summarised as follows:

**a. Open Meeting Review**

At the first open meeting held at the village hall on 9th June 2014 attended by 85 residents informal views were taken on possible sites. Each individual was given 3 stickers, green, amber and red. They stuck the markers on a map in order of preference. Pathlow was not included as it was outside the LSV.

**b. July 2014 NPG Meeting**

The members reviewed residents’ observations at the meeting in July. The sites spread from Marsh Road to the Station, however most would not conform to NPPF. The exception may be:

* 1. Land to the North of the Conservation behind the Masons Arms as it is in the boundary of the village
  2. The Social Club Site, obviously this would be a problem as the Club would have to be replaced.
  3. Use of garden areas behind houses on Aston Cantlow Road. These would not be true in fill sites but they are within the boundary of the village.

There were several areas that need to be considered further, they were:

1. Playing Field by Village Hall
2. Edkins Park site
3. Land behind/adjacent to the Social Club, 2 sites
4. Garden areas behind Houses south of Aston Cantlow Road, 2 sites
5. Land behind Swanfold to the South
6. Land behind Masons Arms and adjacent properties, 2 sites

The above were reviewed and the site behind Swanfold was felt not to be suitable due to the topography of the site and being close to conservation area. It was considered suitable for recreational and possible car parking.

Access to Playing Field by Village Hall would have to be from Aston Cantlow Road as Glebe Estate Road is too narrow. Any development here should incorporate a new access to the village hall.

There was a large question mark over whether all the sites identified would be available for development. In addition it was felt development to the gardens to south of Aston Cantlow Road would be a major problem as it would involve so many individuals. It is also very unlikely that the owners of the land behind the Social Club would sell.

The results of this exercise identified 8 possible sites and one amenity site, making total of 9.

Following the above agreement certain members felt that, as an independent Planning Consultant was to undertake a review of the sites based upon NPPF and his experience of possible suitable sites there was no disadvantage, at this stage of incorporating further sites for review.

The interpretation of “Infill Sites” was then interpreted to include land that fell behind lines drawn between buildings on the periphery of the village. This resulted in the following key sites/areas:

1. Land behind Marsh Road and Aston Cantlow Houses to the South, 2 sites
2. Land to the East of the Conservation Area, running from Manor Drive to Station Road, 6 sites
3. Ribbon Development by Station on Station Road, 2 sites. These were felt to be outside the village boundary but as some residents had marked the areas they were included for this purpose.

This resulted in a further 10 sites being identified.

This resulted in 18 sites being identified plus 1 Amenity site.

Members of the committee also discussed sites in Pathlow. It was noted by the Chair that these were outside the LSV and were very unlikely to be considered. However 4 plots of land were identified in Pathlow and added to the total.

**Conclusion of Meeting**

As a result of the meeting, a total of 22 sites were identified plus an amenity site.

A map was marked up showing all the sites.

**Consultant’s Review and Reports (incorporating SDC Call for Sites-SHLAA)**

**Independent Planning Services**

The agreed process is to have public and committee input into potential sites and then use an experienced Planning Consultant to advise on whether the sites are likely to receive planning.

The Treasurer sought tenders from several planning consultants. They were selected on the basis that they had a broad experience of planning and had undertaken similar exercises for other Neighbourhood Planning Groups.

As a result of this exercise David Holmes was recommended and the NPG agreed to his appointment.

**Consultant’s Report, overview July 2014**

David Holmes lives in the District and is therefore familiar with the Core Strategy for the District and the individuals at the Planning Department.

David Holmes (DH) was provided with the map duly marked up to show all the sites as identified/discussed by the committee and/or residents.

DH reviewed the core strategy in July 2014 and visited all the sites. He also reviewed other data relating to the environment.

DH also met with the SDC Neighbourhood Planning Coordinator.

He reported back with his findings and recommendations to the NPG in August 2014.

The key findings were:

1. The 4 sites outside the LSV in Pathlow did not meet planning criteria.
2. Sites 6, 7 and 8 recommended as possible meeting planning guidelines.
   1. These were: Edkins Park, Social Club site and the Playing Field. Minimum of 45 houses.
3. Site 10 recommended, possibly 5 large houses.
   1. Land behind the Mason’s Arms. The adjacent land was felt to have too great an effect on the conservation area.
4. Site 5 not recommended due to impact on the views.
   1. Land to North of Aston Cantlow Road.
5. Site 11 felt suitable for amenity area only as the site is domed and overlooks properties. Also too close to conservation area.
6. Highlighted the Nature Conservation and linear Landscape Feature running between the Canal and Railway and surrounding areas. This area is identified as being in the Avon Valley Character Area. This rules out sites 18 and 19.
7. DH identified that, as a result of a recent Strategic Housing Land Availability Assessment (SHLAA) undertaken by SDC , Peter Brett Associates had identified land behind Glebe Farm and Stone Pits as having development possibilities and included in the Core Strategy in 2012. The land cannot be ignored at this time.

The findings clearly showed that there were sufficient sites that could possibly be granted planning that would provide sufficient houses to meet the 75 target less those already approved since April 2011. This ignores small windfall sites that will occur during the 20 year period.

Notes: 1. The notes above, need to be reviewed in conjunction with the full report from DH.

2. At the end of July 2014, the NPG received a letter from Phase 2 Planning and Development Limited dated 28th July 2014 outlining a development they were designing on land that lies between the railway line and the canal. This covers circa 9 acres and is a major extension of Site 18 that was ruled out as being in the Avon Valley Character Area and the Linear Landscape feature to the East of the Village.

**NPG Consultants Review**

The findings of the report and issues noted above were discussed at the NPG meeting number 10 held on 2nd August 2014.

The meeting, after a lengthy debate, accepted the recommendations with the exception to DH view on site 1 and 2. These sites where ruled out due to poor access. It was felt that any developer could purchase properties on Aston Cantlow Road to provide a good safe access.

**Matthew Neal’s Review September 2014**

SDC’s Neighbourhood Coordinator Matthew Neal (MN), who has circa 10 years’ experience in development within SDC, was asked for his comments on the selection process undertaken by DH.

Representatives of the committee including the chair met with MN on 11th September and visited all the sites.

MN replied to the NPG with his personal views, not SDC’s on 12th September 2014.

The following are the key issues of note:

1. 7 Houses can be assumed as already approved for planning against the 75.
2. The Core Strategy includes the LSV of Wilmcote not Pathlow.
3. Sites 12 to 18 are not suitable. This includes the development planned by Phase 2 Planning and Development.
4. Site 5 ruled out due to linear development by DH should be considered, if available.
5. Peter Brett Associates comments on development to the south as a broad location is more long term. Any development should be ‘in-fills’ plots and linear developments in line with the nature of the village.
6. Part of Site 12 off Manor Drive could possibly be used for 2 to 3 houses.
7. Garage block area off Glebe Estate could be used for 2 houses.
8. Sites 9 and 10 should be ruled out as they are in the conservation area and would have too greater an impact on Mary Arden’s House,
9. MN calculates that if the recommendations made by DH are accepted and his comments on site 12, 5 and the garage block there would be sufficient development land for between 74 and 77 houses dependent on whether site 12 is developed.

These notes must be read in conjunction with MN full report. MN wanted the NPG to maintain contact with the Planning Department and himself during the selection process. Quarterly reports by the NPG have been provided to support the verbal contact that has taken place during the year.

**SDC Call for Sites, SHLAA**

During September 2014 SDC put out a Call for Sites throughout the District. This was not known about at the time of the site selection process and the reviews

This meant that owners of sites across the Parish could register land as potential development sites irrespective of whether they conform to planning guidelines or not.

Sites identified were:

1. Land between the canal and railway line known as Station House. This was registered prior to the call for sites by Phase 2 Planning and Developments.
2. Edkins Park Land already identified as a potential site. Next to Playing Field.
3. Sites known as 15 and 16 behind Orchard Close.
4. Site 2, the field behind Aston Cantlow Road to the south with its own access off the highway.
5. Site 9, the field behind the houses to north of Aston Cantlow Road in the Conservation Area.
6. The fields behind Stone Pits identified by Peter Brett Associates in 2012 as a possible extension of the Village. Added into the map as Site 24.
7. Ribbon development between the Manor and the semi -detached houses on Billesley Road to the South. Added to the map as Site 28.
8. Land at the end of Manor Drive, going north towards Wharf Lane. Added to the map as Site 27.
9. The garden area of the house adjacent to Marsh Road and facing Aston Cantlow Road. Added to Map as Site 26.

The closing date was the end of September 2014. The details can be found on the SDC web site.

**Additional Review by Independent Planning Consultant (DH) and the SDC Coordinator (MN).**

Following the identification of further sites in the above, SDC ‘ Call for Sites’ it was felt important that they were reviewed on a similar basis as the previous 23 sites.

The findings can be summarised as follows:

1. David Holmes produced a report dated 11th October 2014.

His conclusion was**:** The four additional proposed sites are not favoured. Sites 25, 27 and 28 are effectively ‘greenbelt’ sites and unlikely to be visually acceptable especially given inter-relationship with the village centre. Site 26 is within the village envelope but is relatively remote from the village centre facilities. I therefore confirm that my favoured sites are 7, 8, 10 and possibly part of site 24.

1. Matthew Neal also produced a report dated 14th October.

The report was based upon MN previous visit and prepared to meet the next NPG meeting.

The principal points raised where:

* 1. Site 25. This is a domed piece of land between the canal and railway on the edge of the village looking over the conservation area. Unacceptable for development due to the above and in greenbelt.
  2. Site 26. Within the boundary of the village, access and visual impact may cause a problem. Also a long way from the centre of village.
  3. Site 27. An island development on flat land next to sites 12 to 14. These have been ruled out due to the area been part of the green corridor.
  4. Site 28. Site is detached from the village and would extend the village significantly. Also in greenbelt.

**Conclusion**

The findings of the additional reports meant that the original reports still stood with regard to the recommended sites for consideration for housing development. The exception could be site 26 which is in the envelope/boundary of the village.

**Infrastructure and Amenity Funding**

One of the core advantages of the NP is the ability of the NPG to review residents’ concerns on infrastructure and amenities and how they can be improved.

As part of any development, the District Council has the right to levy charges on developments; such charges are then ploughed back into the community. These charges were covered under Section 106 or 278 agreements. Following the introduction of the NPPF the levy charges were changed to Community Infrastructure Levies (CIL). Section 106 agreements are still being used on certain developments.

Such Levies are usually put into a designated pot within the SDC. Funds may be used for issues such as road improvements relating to a development or developments or amenities. However on many occasions funds are usually used for unrelated projects. i.e. Funds accrued on a Wilmcote development may end up being used elsewhere in the District not for the benefit of the Parish.

The NP process has 2 specific advantages over previous planning processes. They are:

1. The NP can identify what amenities and infrastructure is required to support and improve the quality of life in the village. Also, what additional facilities required if the village increases by 75 homes.
2. By identifying the sites for expansion the levy can be set on each site/house. This ensures the funds are sufficient to provide the infrastructure and amenities for the future. Some amenities/infrastructure may be linked to a development so the developer has to provide them as part of their development. The timing of such works could also be included.

Maximising the CIL contribution will be critical to improving the village life and its quality. With the Neighbourhood Plan in place contributions will be set and this will help drive down land prices. If this is not done, developers will end up buying sites or taking out options that may not be financially sound when CIL contributions are calculated. If this happens the need for homes is more important than facilities and CIL contributions are relaxed. If not, developers will sit on the sites until the market has strengthened, enhancing the land values, enabling the CIL contributions to be clawed back.

The underlying issue is, if CIL contributions are not linked to the developments in the Village, Stratford or the Parish will struggle to provide the correct amenities and infrastructure needs as funds will not be available.