

**Stratford-on-Avon District
Local Development Framework
Draft Core Strategy 2012**



Comment Form

Have you considered using the on-line comment form available on www.stratford.gov.uk/dcs2012

Please use black ink

A separate form should be used for each topic

Which part of the Consultation Core Strategy is your comment about?
(please give the reference no. used in the document if possible)

Section Policy Consultation Question

Other part of document

What is the nature of your comment?
(please tick appropriate box)

Support Object Other comment

Please give the reasons for your opinion on the other side of the form

Put your contact details in the box(es) below – please use BLOCK CAPITALS

Person(s) or Organization Submitting Comments		Agent (if applicable)	
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If you are using an Agent, future correspondence will be sent to them unless informed otherwise

Please note that responses cannot be treated as confidential

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 Local Development Framework consultation and will not be used for any other purpose.

Please state in the box below the reasons for your opinion on the topic:

Please note this is an Officer only response, this response is due to be endorsed by Members in June 2012, at which point confirmation will be sent that this is a formal Redditch Borough Council representation.

Specific Areas

Redditch Borough Council (RBC) strongly supports **paragraph 2.3.2 1), 10.8.21 and 7.1.6 3)** where reference is made for the potential need to accommodate Redditch related growth. RBC feels it is in a position to work closely with Stratford – on – Avon District Council (SoADC) on the progression of this aspect of the plan and can provide detailed information on the exceptional circumstances which demonstrate that cross-boundary growth is essential, particularly with regard to employment allocations at Gorcott Hill.

With regard to **Question 1)**, RBC suggests further joint working is required to demonstrate the exceptional circumstances for the location of new development.

Page 12 (and throughout the document including Consultation Question 13) refers to the West Midlands Sustainability Checklist, this tool no longer exists and its reference should be removed or replaced.

Question 179 – It is considered that Options 1 and 2 are likely to be unsuitable locations for development as these locations would reduce the gap between Studley and Redditch where this land serves an important Green Belt purpose. Development at these locations would contradict two of the principles contained within the Draft Plan which apply to Studley. These are - Principle 1 which is to *“Retain the separate and distinct identity of Studley and maintain the open gap between the village and Redditch.”* Principle 12 also states *“Protect the area of land separating Studley and Redditch, ensuring urban development does not encroach and undermine the character of the area as a separate entity.”* In addition **Paragraph 10.8.3** notes that *“While the village is surrounded on all sides by Green Belt, this area is particularly significant in preserving the separate identity of Studley from Redditch.”*

The first point of the future development strategy at **paragraph 10.8.14** also states, *“It is evident that the most critical feature about Studley which should be preserved is its separate identity from Redditch. One of the key purposes of the Green Belt is to prevent settlements from merging into one another and it is important that the gap of open countryside between the two is not encroached on by development.”*

With regard to **Section 1.1.1** the change to the end date of the plan is noted, it is anticipated that adoption would be 2013? RBC would suggest discussions with Bromsgrove District Council (BDC) and RBC regarding alignment of submission dates in the interests of cooperation.

Section 2.1.2 of the strategy refers to discussions between the authorities on determining the key cross-boundary 'issues' and we need to continue these discussion between the Authorities.

Section 2.3.2 Point 1) refers to 'the 'case for growth', this evidence base still exists for the purposes of the West Midlands Regional Spatial Strategy Phase 2, which is not yet revoked and lawfully this evidence base must still be considered. Until the Regional Spatial Strategy is formally revoked evidence must be provided which fully justifies an alternative approach otherwise the Duty to Cooperate will not be fulfilled.

SoADC is aware of the RBC evidence being collated to justify new growth options. RBC's consultation on growth options is to follow Stratford's consultation shortly. Officers at Redditch recognise the need to follow up any potential growth cross boundary with our neighbour's if it is required. It may be required that some of Redditch's growth need to be

met on land adjacent to Redditch (in SoAD) and this could be achieved where Green Belt boundary adjustments are not necessary (i.e. the A435 corridor). RBC considers that there is evidence to support such an allocation and would welcome further discussion about the land involved.

Section 5, Policy CS 1 'Sustainable Development' point a) states *"Protect, enhance and manage the character and appearance of the individual towns and villages and landscape within Stratford-on-Avon District, maintaining and strengthening the distinctiveness of special qualities, and protecting the integrity of the District's countryside."* RBC recognises the importance of this in relation to Studley and believes this is well evidenced by the jointly commissioned WYG 'Study into future growth implications for Redditch Stage 1 and 2'.

Section 7, District Designations, Point 3 - With regard to Gorcott Hill, RBC note the possible exceptional circumstance for employment related development at this location and recognise the site constraints. It may be applicable to add more detail into this section such as site size. It may also be useful to explain the reasons for these exceptional circumstances (i.e. the employment land supply constraints in Redditch) which the Council is willing to collaborate on.

With regard to **key drivers**, it is noted that the 'Study into Future Growth Implications of Redditch (2009)' is relevant and it may also be appropriate to refer to Redditch Employment Land Review as the exceptional circumstance is reflected here.

Section 9.03 - The first point of this paragraph is to *"Aim for lower net in-migration"*. RBC feels this risks being an un-deliverable aspiration as there is no strategy or agreement to reverse the in-migration.

The fourth point of this paragraph is to *"Preserve the special nature of the district"*. It could be made clearer which special character this is referring to, is this environmental characteristics? If this is the case is this supported by the Sustainability Appraisal which should suggest that there are insurmountable environmental issues of meeting housing needs where it arises.

Policy CS16 Spatial Distribution of Development contains a section which states *"To preserve the character of Stratford-upon-Avon estate sizes of a maximum of 100 homes will be required"*. There are infrastructure concerns with setting a maximum threshold as prescribed, for example an additional 20-30 homes may make infrastructure viable or 100 extra dwellings may overload a facility?

Section 9.7.13 states that *"Limited additional employment allocations are appropriate to support higher value economic growth in Class B1a offices and B1b research development sectors."* It is unclear exactly what is meant by this, further explanation and evidence could be provided to demonstrate why allocations are limited.

Section 9.7.14 states that *"there is a potential surplus of between 44.5-69 hectares of land across the District for the plan period to 2028. This land is currently primarily used for industrial activities (Class B1c and B2)."* It is considered that all surplus land should be vacant unused land, whereas this section states that surplus land is actually in use, and therefore cannot be considered as surplus.

Section 10.8.3 - with regard to Studley states *"...the village is surrounded on all sides by Green Belt, this area is particularly significant in preserving the separate identity of Studley from Redditch."* RBC agrees with this statement and there is evidence to support this.

Section 10.8.13 Studley Area Policy Profile, Policy Principles – a) environmental – bullet points 1, 4, 10, 12 and 13. RBC can assist with achieving these principles for development through Redditch's development proposals.

Section 10.8.20 *"In terms of employment development, the Employment Land Study concluded that there is no need to identify additional land given the scale of existing*

provision. While there is a high level of out-commuting to jobs, a large proportion of these are at nearby Redditch.” As referred to above, due to the significant amount of job opportunities available to Stratford residents within Redditch, this may be an appropriate rationale for allocating some suitable Redditch employment land in Stratford in particular the release of Gorcott Hill allocated for employment purposes to meet Redditch's needs (as referred to a paragraphs 10.8.21 and 10.8.22).

General

Redditch Borough Council would support the allocation of housing and some employment along the A435 Corridor.

It is noted from the plan that Redditch provides a significant amount employment to Stratford residents (*“9.7.9 -The most significant workplace destinations outside the District are Warwick District (11.5%), Worcestershire, particularly Redditch (5.7%)”*). In addition 7% of Alcester residents work in Redditch, 2% of Henley-in-Arden and 25% of Studleys employed residents work in Redditch). In addition paragraph 10.8.20 states that *“In terms of employment development, the Employment Land Study concluded that while there is a high level of out-commuting to jobs, a large proportion of these are at nearby Redditch.”* Accordingly it would be appropriate that some employment land need generated by Redditch should be accommodated in a suitable location within Stratford District.

Continue on a separate sheet if necessary

Date

Forms should be returned by **5.00pm on Friday 30 March 2012** to: Policy Team, Corporate Support
Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon CV37 6HX
or by email to planning.policy@stratford-dc.gov.uk

Thank you for contributing your views