

20th September 2019

Stratford-on-Avon District Council
Elizabeth House
Church Street
Stratford-upon-Avon CV37 6HX



By email to policy.consultation@stratford-dc.gov.uk

Dear Sir / Madam

SITE ALLOCATIONS PLAN FOR STRATFORD-ON-AVON DISTRICT. REGULATION 19 PROPOSED SUBMISSION CONSULTATION

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the draft Site Allocations Plan (SAP) for Stratford-on-Avon District ('the District').

The Board recognises the need for the District Council to identify suitable locations to accommodate the housing and employment needs identified in the District's Core Strategy. The Board also recognises that it may, in certain circumstances, be appropriate – and even desirable - to accommodate some of this need in the Cotswolds Area of Outstanding Natural Beauty (AONB) and / or in the setting of the AONB. In this context, it is imperative that this process should be done in a way that is compatible with – and helps to deliver – the statutory purpose of AONB designation (i.e. to conserve and enhance the natural beauty of the AONB).

The Board is pleased to see that AONB considerations have been an integral part of the Sustainability Appraisal and the Strategic Housing Land Availability Assessment (SHLAA). However, the Board considers that there are a number of aspects of the draft SAP which make it fundamentally flawed and unsound. In particular:

- **Purposes for identifying reserve housing sites:** It would be highly inappropriate to accommodate the unmet housing needs of nearby cities, strategic employment sites, the wider Warwickshire area, or even other parts of the District, in the Cotswolds AONB - a landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it. This would also be contrary to the policies of the National Planning Policy Framework (NPPF) and the government's Planning Practice Guidance (PPG). With regards to the purposes for identifying reserve housing sites, three of the four purposes ((b)-(d)) should not be applied in the Cotswolds AONB and it would be unsound to do so. Purpose (a) is only partially applicable in the AONB and it would be unsound to apply it, in its current form, in the AONB. The Board considers that the number of reserve housing sites - and the number of dwellings – proposed for the AONB in the SAP is also likely to be unsound.
- **Housing provision in the Cotswolds AONB:** Housing provision in the Cotswolds AONB should be based on robust evidence of affordable housing need arising within the AONB, including evidence that is specific to the individual settlements / parishes and the AONB sub-areas (i.e. the parts of the Cotswolds AONB that overlap with the District). This does not appear to be the basis of the proposed housing provision identified for the AONB in the SAP. The SAP also fails to set appropriate levels of affordable housing provision for housing developments in the AONB, including settlements that overlap with – but extend beyond - the AONB boundary. As such, the Board considers the SAP to be unsound.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

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- **Requirements of the National Planning Policy Framework (NPPF) and the statutory ‘duty of regard’:** The SAP has not adequately addressed the requirements of the NPPF (in particular, paragraph 172) and the statutory ‘duty of regard’. As such, the Board considers the SAP to be unsound. For example:
 - **Major development:** There does not appear to have been an assessment of whether the proposed reserve housing sites in the Cotswolds AONB constitute major development (either individually or collectively). Nor have the major development ‘tests’, specified in paragraph 172 of the NPPF, been applied.
 - **Great weight:** A number of the proposed reserve housing sites in the AONB - and in the setting of the AONB - have been identified as having major negative significance / effects on landscape and / or high landscape sensitivity. As such, it does not appear that great weight has been given to conserving and enhancing landscape and scenic beauty in the AONB.
 - **Scale:** The overall scale of housing proposed in some of the AONB settlements is completely disproportionate to the size of existing settlements.

To address these issues – and to ensure that the SAP is sound - the Board recommends that reserve housing sites should only be considered for the Cotswolds AONB (including settlements that overlap with – but extend beyond - the AONB boundary) if:

- There is **robust evidence of affordable housing need arising from within the AONB**, including evidence that is specific to the individual settlements / parishes and the AONB sub-areas ((i.e. the parts of the Cotswolds AONB that overlap with the District). This evidence should, ideally, be based on up-to-date Rural Housing Needs Surveys and / or ‘made’ Neighbourhood Development Plans. Data from choice-based lettings systems, such as Home Choice Plus, should not be used as a measure of housing need.
- They have been **assessed as not being major development**, in the context of paragraph 172 of the NPPF.
- They have not been identified in the SA and the SHLAA as having:
 - **major negative significance / effects** on factors that contribute to natural beauty (e.g. landscape, heritage and biodiversity)
 - **high landscape sensitivity;**
 - minor negative significance / effects on multiple factors that contribute to natural beauty.
- **The scale of the reserve housing sites (both individually and cumulatively) is proportionate** to the existing settlement.

Implementing these recommendations will help the District Council to fulfil its statutory ‘duty of regard’ by putting the conservation and enhancement of the natural beauty of the Cotswolds AONB central to the site allocation process. If the Board’s recommendations are not implemented, not only would the SAP be unsound, it would also undermine the statutory purpose of AONB designation and the value of the AONB in the national interest.

Further information on the Board’s views on the soundness of the SAP and on the Board’s recommendations is provided in the attached representation forms.

If you have any queries relating to the Board’s response, please do contact the Board to discuss these issues.

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Yours faithfully

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills MRT
Planning and Landscape Officer

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