

# Proposed Submission Core Strategy 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](http://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](mailto: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](http://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)
<b>Title</b>	Mr	
<b>First Name</b>	David	
<b>Last Name</b>	Roache	
<b>Job Title</b>	Councillor	
<b>Organisation</b>	Tysoe Parish Council	
<b>Address</b>	Fallowfield	
	Badgers Lane	
	Lower Tysoe	
	Warwick	
<b>Postcode</b>	CV35 0BY	
<b>Telephone</b>	01295 680309	
<b>Email</b>	djroache@buzzinternet.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

**For official use only**

Ref: /

**Duly Made:** Yes  
No

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

<b>Name:</b>	<b>David Roache</b>
<b>Organisation</b>	<b>Tysoe Parish Council</b>

**1. To which part of the Proposed Submission Site Allocations Plan does this representation relate?**

<b>Policy/Proposal Reference</b>	8 Policies Map Reserve Housing Sites – p77
<b>Section/Paragraph Number</b>	
<b>Map Reference</b>	
<b>Annex / Appendix Number</b>	

**2. In respect of this part of the Plan, do you consider the Proposed Submission Site Allocations Plan is:**

(a) Legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(b) Compliant with the Duty to Co-operate?	Yes <input checked="" type="checkbox"/>	No <input 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](http://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.**

--

Continue on a separate sheet/expand box if necessary

**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.

Continue on a separate sheet/expand box if necessary

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

**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.

Continue on a separate sheet/expand box if necessary

**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             | X <input type="checkbox"/> |
| (ii)  | Not justified                       | X <input type="checkbox"/> |
| (iii) | Not effective                       | X <input type="checkbox"/> |
| (iv)  | Not consistent with national policy | X <input 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.

The SAP identifies a disproportionate number of Reserve Sites around LSVs. In its Core Strategy SDC seek to limit the contribution of new housing made by LSVs to approximately 2000 homes or 13.7% of the target 14,600 or 12.7% of the “targets” identified in the Requirements section of CS16. The development of the reserve sites identified in the SAP would increase significantly the contribution made by LSVs to a much higher proportion than the Core Strategy envisaged. **We believe this to be unsound and unjustified** especially as it is our understanding that already the LSVs and Main Rural Centres have identified new housing numbers above the numbers envisaged in the Core Strategy. In addition, we understand that the Inspector commenting on SDC’s Core Strategy advised that no additional development, beyond what was already identified in the allocation of the 14,600 “target”, should be sought from the LSVs.

On page 84 the Core Strategy identifies certain requirements for the distribution of sites according to policy CS15. Development of sites A, B and E identified in the SAP for Tysoe would certainly breach requirements 1,2,3,4, and 5 as set out in CS15 – **why is SDC ignoring the requirements of its own Core Strategy?**

There is a total lack of clarity regarding how the sites identified in the SAP interact with sites already identified in a village’s Neighbourhood Plan. Are they to be incremental to the NDP’s sites or, where a village NDP has already identified Reserve Sites should this be sufficient making the sites identified in the SAP redundant? In the briefing note submitted by John Careford and Cllr Pemberton to introduce the SAP to Councillors ahead of the 15<sup>th</sup> July, 2019 Cabinet Meeting section 3.6 on page 15 states – *“It should be noted that Ilmington and Tysoe parishes are included within the Site Allocations Plan at the current time. Both neighbourhood plans, however, identify reserve housing sites and are moving towards an advanced stage of preparation (i.e. examination) later this year. As such, in line with its approach, it is likely that the Council will need to remove sites in both parishes from the Site Allocations Plan prior to formal submission”* This clearly implies to us that the Reserve Sites identified in the SAP which do not correspond with either allocated or reserve sites in the emerging Tysoe NDP should be removed – **why were they still included in the SAP submitted to Cabinet?**

The SAP identifies 5 potential Reserve Sites for Tysoe. We strongly object to three of them – A, B and E.

During consultation on Tysoe’s Neighbourhood Plan (now at Reg 16) residents were asked to rank the acceptability of various sites (including SHLAA sites) around Tysoe. Site B received a 81% disapproval rating, Site E received a 95% disapproval rating and Site A was not specifically mentioned by residents.

**Site B** is a large proportion of a site which was the subject of a Planning Application some years ago by Gladman, the application was refused and Gladman appealed. SDC spent a very considerable sum of money a time in successfully challenging the appeal for the following (summarised) reasons – too large, impact on Grade 1 listed building and proximity to Cotswold AONB. It would therefore seem perverse for SDC to be promoting this site as a potential Reserve Site.

**Site E** is adjacent to two listed buildings – the village primary school and the St Mary’s church. The site is also a well preserved and valuable example of ridge & furrow. The emerging Tysoe NDP has proposed a “Strategic Gap” to prevent development which would coalesce the two settlements of Middle and Lower Tysoe – Site E is located within this proposed Gap. The site is also adjacent to a Conservation Area and the Cotswold AONB – all things that residents took trouble to point out when ranking the acceptability

of sites during the NDP consultation. Development of this open countryside adjacent to such sensitive amenities and features would be very unwelcome.

**Site A** also sits within the proposed Strategic Gap and any development of the site would extend the northern boundary of Middle Tysoe towards the southern boundary of Lower Tysoe, something that residents were strongly opposed to during the NDP consultation. The site is immediately adjacent to the Cotswold AONB and as such any development would be very unwelcome and detrimental to the rural nature of the village. Also, a planning application was recently refused on this site.

The Strategic Objectives of the SAP, as stated in 1.4.3 state:

1. The rural character of the District will have been maintained and enhanced....
2. The historic character of the District will have been maintained and enhanced....
3. The character and local distinctiveness of the District will have been reinforced .....taking into account the intrinsic and special value of its landscapes and townscapes.

We believe that any development of Sites A, B and E (which would add up to 70 houses or an increase of 16% to the housing stock in the three settlements) would run absolutely counter to each of these objectives by adding a hugely disproportionate amount of housing to the three main settlements of Tysoe (which currently has circa 450 houses in the main settlements), by severely compromising the rural nature and landscapes surrounding Tysoe and severely compromising the historic character and distinctiveness of Tysoe.

Whilst we have no objections to the inclusion of Sites C (included in the NDP as an allocated site) and D (included in the NDP as a proposed Reserve Site) we have concerns over the proposed density of housing that is indicated in the SAP. Site C has been proposed in the Tysoe NDP as a possible site for up to 10 affordable houses plus a number (possibly 5 or 6) market houses. The SAP proposes up to 21 houses at 35 per hectare – we believe that this is far too many. Equally site D is proposed as a reserve site in the NDP for approximately 16 houses at a density of 18/Ha rather than the 21 proposed in the SAP. We believe that the density of 30 or 35 dw/hectare indicated in the SAP is more appropriate for an urban setting than the rural setting which prevails in Tysoe.

Finally, and by way of summarising our comments, we believe that the proposed SAP is an example of centralised planning being prioritised over localism. Where communities have gone to very considerable lengths to prepare a Neighbourhood Plan involving extensive consultation with residents this should not be “trumped” by a rather heavy-handed central policy document (the SAP) which ignores both local sentiment and the strictures of its own author – the District Council, as contained in its Core Strategy.

Continue on a separate sheet/expand box if necessary

**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.

We would like to see Sites A, B and E taken out of the SAP altogether. The justification for including them is not supported either by local facts and circumstances or by the Strategic Objectives as stated in the SAP.

Continue on a separate sheet/expand box if necessary

**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?**

Continue on a separate sheet/expand box if necessary

**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.**

Continue on a separate sheet/expand box if necessary

**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.

Tysoe Parish Council feel sufficiently strongly about this matter and we believe that the arguments we make are so compelling that we would seek to be given the opportunity to make these representations in person.

Continue on a separate sheet/expand box if necessary

**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:

Date: