

# Proposed Submission Site Allocations Plan 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>	JOHN	
<b>Last Name</b>	MILLS	
<b>Job Title</b>	PLANNING AND LANDSCAPE OFFICER	
<b>Organisation</b>	COTSWOLDS CONSERVATION BOARD	
<b>Address</b>	THE OLD PRISON	
	FOSSE WAY	
	NORTHLEACH	
	GLOUCESTERSHIRE	
<b>Postcode</b>	WR12 7PW	
<b>Telephone</b>	01451 862004	
<b>Email</b>	<a href="mailto:john.mills@cotswoldsaonb.org.uk">john.mills@cotswoldsaonb.org.uk</a>	

### 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>JOHN MILLS</b>
<b>Organisation</b>	<b>COTSWOLDS CONSERVATION BOARD</b>

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

<b>Policy/Proposal Reference</b>	
<b>Section/Paragraph Number</b>	Section 1.3 (Cross Boundary Issues)
<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.**

N/A

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.

N/A

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.

N/A

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

**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 COTSWOLDS CONSERVATION BOARD'S POSITION**

Section 1.3 of the Site Allocations Plan (SAP) relates to cross boundary issues, including the need for Stratford-on-Avon District to accommodate some unmet needs arising from elsewhere.

The Board acknowledges that, through the duty to cooperate, the District's Core Strategy has identified that the District is required to meet some of the unmet needs from other areas, such as Birmingham, Coventry and the wider Warwickshire area. However, the Board is concerned that Section 1.3 makes no reference to the principle (outlined in the Government's Planning Practice Guidance) that it is not appropriate for the Cotswolds Area of Outstanding Natural Beauty (AONB) to accommodate unmet needs from areas outside the AONB.

Given that the Site Allocations Plan does not explicitly refer to – or address – the principle outlined above and does not base its housing provision in the AONB upon this principle, the Board is of the opinion that this part of the SAP is:

- not justified, because it is not the most effective strategy;
- not effective, because there are regulatory and national planning barriers to delivery (e.g. the District Council would not be fulfilling its statutory 'duty of regard' under Section 85 of the Countryside and Rights of Way Act 2000);
- not consistent with national policy.

**JUSTIFICATION / EVIDENCE BASE FOR THE COTSWOLDS CONSERVATION BOARD'S POSITION**

Paragraph 172 of the National Planning Policy Framework (NPPF) specifies that the scale and extent of development in AONBs should be limited. Paragraph 172 The Government's Planning Practice Guidance (PPG) on landscape issues, as updated in July 2019, expands on this policy by making the following statement:

- *The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.<sup>1</sup> (N.B. Underlining added for emphasis).*

AONBs are designated as such because their distinctive character and natural beauty are considered to be so outstanding that it is in the nation's interest to safeguard them. As such, it would be highly inappropriate to accommodate the unmet housing needs of nearby cities, strategic employment sites and the wider Warwickshire area (as well as

<sup>1</sup> <https://www.gov.uk/guidance/natural-environment#landscape>

other parts of the District) in the Cotswolds AONB.

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.

The Cotswolds Conservation Board recommends that Section 1.3 should include explicit reference to the fact (as stated in the Government's Planning Practice Guidance) that AONBs are unlikely to be suitable areas for accommodating unmet needs from non-designated areas (i.e. unmet needs arising outside the AONB).

The Board also recommends that Section 1.3 should explicitly state that the Cotswolds AONB will not be required to accommodate unmet needs arising outside the AONB.

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.**

This representation relates to those sections of the Sustainability Appraisal and the Strategic Housing Land Availability Assessment that relate to the local service villages of:

- Brailes
- Ilmington
- Long Compton
- Quinton
- Tysoe

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.

To support the arguments and recommendations made in this representation.

Continue on a separate sheet/expand box if necessary

Stratford-on-Avon District Council Proposed Submission Site Allocations Plan  
Representation Form – August/September 2019

**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:

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

Date: 20/09/19