Your Ref: STR.03 (SHLAA Ref), Land south of A46, Stratford

Our Ref: Clopton Quarter, Stratford



6<sup>th</sup> March 2023

By email only: <a href="mailto:swlp@stratford-dc.gov.uk">swlp@stratford-dc.gov.uk</a>

South Warwickshire Local Plan Issues and Options Consultation
Promotion of Land known as Clopton Quarter Stratford-Upon-Avon (South of A46)
Davidsons Homes

This representation has been prepared in response to the South Warwickshire Local Plan Issues and Options Consultation running until 6<sup>th</sup> March 2023 in relation to land known as Clopton Quarter, Stratford (South of A46) which is controlled by Davidsons Homes.

This representation follows previous ones submitted in response to the Call for Sites and Scoping Consultation in 2021. The previous Call for Sites submission has not been duplicated within this response, as it is understood that the previous submission will still be considered.

Since the last round of consultation, the National Planning Policy Framework (NPPF) has launched a consultation on significant changes to the current version of the NPPF. We would like to express our support in principle for the Council continuing plan-making against a back-drop of changing National Policy; we believe this is the right approach given that the NPPF consultation draft sets out transitional arrangements for plan-making, which South Warwickshire will benefit from which will achieve sustainable growth.

Whilst the land under our control is known as Clopton Quarter (see Appendix 1 for Site Location Plan), the Issues and Options consultation assesses the land as part of a wider 'Broad Location for Growth – Stratford North-East'. We consider the extent of the Stratford North-East Broad Location for Growth (shown in Figure 1 below) to be unrealistic given the landscape and heritage constraints which lie further east / southeast of our site.

Therefore, the land under our control at Clopton Quarter should come forward as a standalone extension to Stratford for the reasons set out in detail in this response. The site will deliver the following benefits:

- A leading example of a 20-minute neighbourhood by virtue of its sustainable location.
- 700 units, including affordable housing.
- 40% of the site designated as multi-functional green / blue infrastructure (14ha)
- Biodiversity net gain and ecological enhancement.
- Restoration of the Vale Orchard landscape through new orchard planting with native fruit trees.
- A new, mixed use pedestrian gateway into the Welcombe Hills Country Park.
- Infrastructure improvements to the highway network.

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Davidsons Homes South Midlands
Rickyard Barn, Blisworth Hill Farm, Stoke Road, Blisworth, Northants NN7 3DB
T: 01604 953200 www.davidsonshomes.co.uk

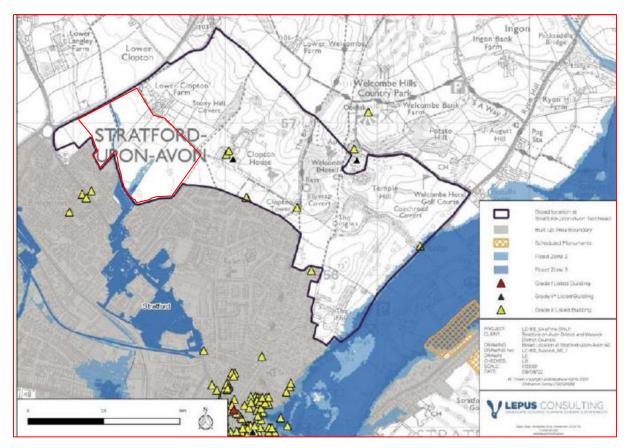


Figure 1: Extract of Potential Broad Location for Growth B.26 'Stratford-Upon-Avon Northeast' showing Clopton Quarter outlined in red.

Our response to the Issues and Options Consultation in relation to Clopton Quarter is set out below. Each question, where relevant, is taken in turn.

### Chapter 3 – Vision and Strategic Objectives

### Q-V3.1 - Do you agree that the Vision and Strategic Objectives are appropriate?

An extract of the proposed vision is shown below:

The vision is to meet South Warwickshire's sustainable development needs to 2050, while responding to the climate emergency. Where appropriate and agreed, this could include unmet need from neighbouring authorities. The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:

- A climate resilient and Net Zero Carbon South Warwickshire adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development
- A well-designed and beautiful South Warwickshire creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area
- A healthy, safe and inclusive South Warwickshire enabling everyone to enjoy safe and healthy lifestyles with a good quality of life
- A well-connected South Warwickshire ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel
- A biodiverse and environmentally resilient South Warwickshire strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire

Yes, we agree in principle with the Vision and Strategic Objectives set out within the consultation document. We are pleased to see an explicit inclusion of housing within the Vision as this was a concern we raised previously.

We support in principle the now 11 objectives (including the addition of an objective related to heritage assets). We would comment in relation to providing new infrastructure through new development; it is vital that the funding is proportionately related to the scale of proposals and that developers aren't necessarily bearing the burden of overly expensive infrastructure projects. The Council should look to secure other means of funding to pool alongside reasonable developer contributions in the interests of viability.

Key to the evolution of the Local Plan is how the 11 objectives are translated in to strategic and non-strategic policies and land allocations. It is inevitable that tensions will arise in applying the ten objectives — for example delivering new housing whilst also protecting and enhancing the most important historic and environmental assets. Choices will inevitably need to be made, and a balance struck.

It is vital that housing needs are met in full and that the Council do not attempt to row back from meeting their need in full in the event that general sustainability objective cannot be met; the housing requirements must be met in full in any event.

### Q-V3.2 - If no, please indicate why:

N/A.

### Chapter 4 – Meeting South Warwickshire's Development Needs Sustainably

Q-I1 - Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

We make comments specifically on the 'Stratford-upon-Avon Northeast' (reference B.26) site assessment within the Sustainability Appraisal (SA) which includes land under our control at Clopton Quarter and is identified as a Broad Location for growth.

Whilst we do not disagree with the SA impact key (with a traffic light system) and general approach to the SA, we have significant concerns about the presumptions made in coming to the SA conclusions. The site assessed is larger than that under our control and states it could deliver up to 2,000 units, however much of the land particularly to the east / southeast (outside of our control) has heritage and landscape constraints which means it is unrealistic to assess this larger site for the delivery of 2,000 units.

Instead, the land under our control at Clopton Quarter is capable of coming forward for 700 units without any technical constraints and will be able to enhance connections to the public footpaths and wider countryside in a sensitive manner, respecting the = heritage and landscape consdierations further east..

Appendix 2 of this response sets out a true SA assessment of the land under our control and we request that the SA is updated to reflect this new assessment.

### Q-12 - Please select the option which is most appropriate for South Warwickshire

The two options set out within the consultation document are as follows:

- 1) Option I2a: Set out infrastructure requirements for all scales, types and location of development.
  - If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.
- 2) Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy
  - In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts.

These options are unclear because option 12b proposes to relate infrastructure to the growth strategy, which is the same as option 12a which will set out infrastructure requirements related to all scales, types, and location of development. All scales, types and location of development will **be** the growth strategy, therefore the options are the same.

We will however stress it is important that there is clarity about the infrastructure requirements needed to support the growth strategy, and that the type of infrastructure and route options are decided on as early as possible to provide certainty. For example, in West Northamptonshire the Northern Orbital Route has been committed so far along, but then no progress has been made on the route options for the remainder of the route from Pitsford to Moulton. This has meant that as the work on West Northamptonshire's Strategic Plan has progressed, growth options have been proposed which would be reliant on the completion of the Northern Orbital route, and there is uncertainty for developers as these sites are promoted about whether or not there will be significantly more infrastructure costs than would otherwise be the case.

Historically, as part of our previous submissions to the emerging Local Plan, we have submitted evidence showing how Clopton Quarter is capable of coming forward for residential development and be acceptable in highways terms. In order to mitigate impact on the highway network as a result of the development low intervention measure such as traffic control at Bishopton roundabout would offset the development's impact as shown by previous reports by ADC Infrastructure. However, we recognise that the growth of Stratford from other sites is likely to require more advanced traffic intervention, and as such, we propose contributions towards upgrading Bishopton roundabout to a 'hamburger' roundabout which will be partially traffic signal controlled with a westbound A46 cut through. The roundabout is capable of being delivered within highway land and land controlled by Davidsons, without the use of all of the proposed safeguarded land shown within the emerging Site Allocations Plan. This is considered the best solution to accommodate future growth in the area as a solution that solves the infrastructure constraints currently in Stratford for and beyond the plan period. An early plan showing these proposals is provided at **Appendix 3**.

National Highways have no identified or committed scheme to address the identified need for improvement at the Bishopton roundabout in the next 8-18 years of their RIS2 and RIS3 policies. Therefore, this constraint to highways at the key junction for Stratford has the potential to prove a bottleneck for delivering the required housing growth in the next Local Plan period. The South Warwickshire Plan Officers are therefore encouraged to proactively lead these conversations with National Highways and the site promoters who are capable of delivering these solutions to unlock the Local Plan growth.

In terms of direct access from the Clopton Quarter site, we propose installing a new roundabout connecting onto the A46 which will be acceptable in highway terms. Discussions with National Highways are ongoing, with the latest meeting being held in December 2022. The final investigation works looking at matters including layby surveys and recommissioning the Road Safety Audit will be carried out in Spring. This approach resonates with the IM land approval further south on the A46 which also includes direct access from the A46.

### Q-I3 - Please select the option which is most appropriate for South Warwickshire:

- 1) Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan.
- 2) Option I3b: Each District Council to produce its own Levy.

Option 13a – a South Warwickshire CIL covering the whole of the District – is most appropriate. This will give developers more certainty about the amount of chargeable CIL that will apply to a development and, as the consultation highlights, different CIL zones can be established within a single levy which would be able to respond to different areas and changing circumstances.

#### Q-S3.2 - Please select the option which is most appropriate for South Warwickshire

- 1) Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.
- 2) Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location.

#### 3) Option S3.2c: None of these.

We acknowledge that the NPPF encourages the use of brownfield land and that the emphasis on a 'brownfield first' approach is ever more prevalent, although, whilst previously developed land is a policy objective, it is not a sequential approach. Therefore, out of the options above, we do support the inclusion of some brownfield land within the Local Plan in principle, where it aligns appropriately with the growth strategy.

Any brownfield development must correspond with the identified growth strategy and be in a sustainable location. We also stress that brownfield sites come with more constraints and viability issues and are therefore suited to delivering only a specific type of development (housing of higher density and of certain tenures to suit both the site and lifestyle). It is also impossible for all of the District's housing need to be delivered on brownfield land; the Lichfields LPDF report (Banking on Brownfield (June 2022) identified that: "even if every identified site was built to its full capacity, the capacity of previously-developed land equates to 1,400,000 net dwellings. This equates to just under a third (31%) of the 4.5m homes that are needed over the next fifteen years".

Therefore, the Council should not overly rely on brownfield sites and need to release greenfield and Green Belt sites such as Clopton Quarter to deliver the majority of their housing targets and associated infrastructure.

# Q-S4.1 - Do you think that growth of some of our existing settlements should be part of the overall strategy? (Yes / No / Don't Know)

Yes, the main delivery mechanism for the growth strategy should be growth at existing settlements in order to not rely solely on new settlements. The potential for growth at Stratford is supported as it is already recognised as one of the most sustainable settlements within the consultation papers and within existing policy.

Land at Clopton Quarter lies adjacent to Stratford and adjoins the A46. It is a highly sustainable location for new residential growth and will bring a host of benefits including:

- A leading example of a 20-minute neighbourhood by virtue of its sustainable location.
- 700 units, including affordable housing.
- 40% of the site designated as multi-functional green / blue infrastructure (14ha)
- Biodiversity net gain and ecological enhancement.
- Restoration of the Vale Orchard landscape through new orchard planting with native fruit trees.
- A new, mixed use pedestrian gateway into the Welcombe Hills Country Park.
- Infrastructure improvements to the highway network.

### Q-S4.2 - Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on.

Within the settlement analysis Stratford has been split into 4 different areas: northwest; northeast; southwest and southeast. Land at Clopton Quarter lies within the southeast area which is identified as a potential Broad Location for growth within the emerging Local Plan and Sustainability Appraisal (SA) (see Appendix 4 for our commentary on this SA).

We wholly disagree with the conclusions of Heritage and Settlement Sensitivity Assessment which concludes that from a heritage perspective, development beyond the north-eastern edge of Stratford should be avoided and that development should be restricted to the northwest, east, south and west

of Stratford. Clopton Quarter in the northeast is able to come forward for 700 units without causing unacceptable harm in heritage terms given it is a smaller area than the Broad Location for growth considered for 2,000 units.

This representation includes a copy of the Vision Document previously submitted to promote Land at Clopton Quarter for residential development. A heritage assessment has been carried out which summarises that Land at Clopton Quarter is able to come forward for 700 units.

There are no known below ground, archaeological constraints to the promotion/development of the site and whilst further surveys would be required to support any future planning application the site is assessed to have a low/negligible potential for significant remains of all periods.

In respect of non-designated built heritage assets, the HER identifies Clopton Park located immediately adjacent (south-east and north-east) of the site. This landscape comprises a post-medieval former deer park which also incorporates elements of seventeenth and nineteenth century landscape design surrounding Clopton House (Grade II\* Listed Building).

The allocation of the site would have the potential to affect the heritage significance of Clopton House (Grade II\* Listed Building) and the non-designated built heritage assets of Clopton Park, Lower Clopton Farm, Clopton Cottages and Gable Cottage through changes within their settings. This is however, not considered a constraint to the allocation of the site as the potential harm can be mitigated through design and master planning of the development, as demonstrated through our Vision Document Masterplan. This has heavily influenced the design of the initial masterplan. Furthermore, other options around the edge of Stratford, such as the remainder of the Broad Location B.26 and land to the west of Stratford would have greater heritage impacts that Land at Clopton Quarter, for example, harm to the setting of Anne Hathaway's Cottage.

Containing growth to the land under Davidsons control will also prevent encroachment towards Tiddington; the current Broad Location for Growth in this area for up to 2,000 units will result in unacceptable heritage and environmental impacts and will risk a sense of coalescence towards Tiddington, however Land at Clopton Quarter will not result in these impacts and will deliver 700 valuable units to Stratford.

In addition to the site being suitable for development in itself, it is also important to highlight that it is the only logical location for further growth at Stratford, and Stratford must take some growth.

Land to the west / north west is designated as Green Belt too, however this area has no defensible boundaries and the release of this Green Belt land would result in unrestricted sprawl into the open countryside and it is severed from Stratford-Upon-Avon by the A46, meaning that residents would be separated with no permeability into the town. This location is also further from Stratford than Clopton Quarter, meaning it is a less sustainable option.

Whilst the land to the southwest / south / southeast is not designated as Green Belt, these areas bring their own problems in delivering sustainable development in Stratford.

Land to the south of the racecourse is designated as Flood Risk Zone 3, and so would not be suitable.

Any development towards Long Marston as part of a new settlement and any further development off Banbury Road / the A3400 to the southwest of Stratford would be reliant on the completion of the South West Relief Road. This road was rejected for Housing Infrastructure Fund (HIF) funding and whilst the Cala scheme has contributed £45million towards the road, there is a funding gap of £86million with no clear delivery mechanism. Without this road further development will create chronic traffic

problems in the centre of Stratford as the only way to join the A46 would be to use Bridge Street / Bridge Foot. Traffic along this route would be increased to an unacceptable level.

Any further development to the west would be further away from the centre of Stratford and would thus be less sustainable. It would also bring unacceptable heritage impact to Anne Hathaway's Cottage and the surrounding area.

Further development to the northwest would also be too detached from Stratford, leading to unsustainable development and an over-reliance on the car.

In conclusion, the site is acceptable in heritage terms and is a logical location for growth considering that the other locations around the edge of Stratford are not suitable and will lead to unacceptable highway impacts. We therefore request that Land at Clopton Quarter is considered in isolation, excluding the remainder of the potential Broad Location for growth, as a suitable residential allocation within the South Warwickshire Local Plan.

### Q-S5.2 - Do you think new settlements should be part of the overall strategy? (Yes / No / Don't Know)

We remain cautious and advise against the allocation of new settlements to the extent that it would result in an over-reliance on them for the delivery of housing in the short — medium term. Other sites such as land at Clopton Quarter will be able to come forward quicker and would ensure a buffer should any new settlements fail to deliver, as they often do. Realistic delivery rates should be considered. There are numerous examples of where plan have failed because of the inclusion of new settlements (for example, Uttlesford and North Essex), therefore we oppose new settlements.

Any development towards Long Marston as part of a new settlement and any further development off Banbury Road / the A3400 to the southwest of Stratford would be reliant on the completion of the Southwest Relief Road. This road was rejected for Housing Infrastructure Fund (HIF) funding and whilst the Cala scheme has contributed £45million towards the road, there is a funding gap of £86million with no clear delivery mechanism. Without this road further development will create chronic traffic problems in the centre of Stratford as the only way to join the A46 would be to use Bridge Street / Bridge Foot. Traffic along this route would be increased to an unacceptable level.

## Q-S5.3 - In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?

We have no objection in principle to rail corridors being the preferred approach to identifying potential locations for growth and Land at Clopton Quarter would fit with this growth strategy.

Land at Clopton Quarter to the northeast of Stratford, south of the A46 would suitably fit with a rail-based growth strategy given that it is in close proximity to the Stratford-upon-Avon parkway both by car but more importantly by pedestrian and cycle connections being a 10-minute walk from the centre of the site. Our Vision Document at **Appendix 2** shows the creation of pedestrian and cycle routes to the A46 and through to Birmingham Road towards the parkway.

### Q-S7.2 - For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:

- 1) Option 1: Rail Corridors
- 2) Option 2: Sustainable Travel
- 3) Option 3: Economy
- 4) Option 4: Sustainable Travel and Economy
- 5) Option 5: Dispersed

All growth strategy options include growth at Stratford, therefore in principle we agree that growth should be accommodated at Stratford, however we disagree with the proposed growth location shown in orange to the northwest of Stratford for each option.

The orange shading showing the growth location at Stratford for each growth location should include growth at the northeast of Stratford and include Land at Clopton Quarter.

The reasons for this are set out earlier in this response at our answer to question Q-S4.2.

### QS9 - Please select the option which is most appropriate for South Warwickshire:

- 1) Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.
- 2) Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.

Option S9b is preferred. We welcome a review of settlement boundaries where relevant in order to accommodate the strategic growth at this Part 1 stage and to assist with the smaller scale allocations to come forward within the Part 2 plan.

Q-H1-1 - The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

It is recognised that the Statistics Regulator and ONS accept that there have been issues with estimating and projecting the population in Coventry and thus it is the Council's intention to move away from the Standard Method 2014-based household projections and instead use a trend-based projection which takes account of the initial 2021 Census data releases and applies more up-to-date assumptions about fertility, mortality and household formation rates.

We do not consider that an alternative approach has been robustly evidenced and exceptional circumstances for this have not been set out. We caution against deviating from the Standard Method as this approach can only be used in exceptional circumstances, and it will be heavily scrutinised at Examination. A lower figure than the Standard Method must have robust evidence to show the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances to justify the approach. This has not been demonstrated.

This alternative method results in a reduction in the overall housing need for South Warwickshire from 5,554 dwellings per annum to 4,906 dwellings per annum; a reduction of 648 dwellings.

Whilst we understand the reasoning behind applying this lower figure, ideally the 2014 projections should continue to be used. If an alternative method is absolutely necessary, a buffer of at least 10% should be added to the identified local housing need in order to ensure choice and competition in the market and to safeguard against any shortfall in the delivery of housing over the plan period. Therefore, the Local Housing Need should be at least 5,396 dwellings per annum.

Whatever the housing need, it cannot fully be met on brownfield and greenfield sites so it will be necessary for Green Belt sites such as Clopton Quarter to be released to meet the housing need. This

was clearly demonstrated at a previous workshop with 'Lego houses' hosted by the South Warks Local Plan team.

## Q-H2-1 - What is the best way to significantly increase the supply of affordable housing across South Warwickshire?

The delivery of affordable housing is, for the most part, via allocated and windfall sites. If the housing requirement is reduced, so too will affordable delivery. And affordability ratios in Warwickshire are substantial.

The best way therefore to significantly increase the supply of affordable housing is to allocate greenfield sites, including the release of Green Belt, for 10+ units across the District. Non-brownfield sites have fewer viability and deliverability issues than brownfield sites and are therefore often capable of delivering a policy compliant level of affordable housing, unless site specific constraints such as the need to ground large overhead powerlines indicates otherwise.

### Q-H2-2 - Please select the option which is most appropriate for South Warwickshire:

- 1) Option H2-2a: A single South Warwickshire wide affordable housing requirement.
- 2) Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts
- 3) Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire

We do not agree with a more localised approach with separate affordable housing requirements for different localities. This will lead to affordable housing across the District becoming fragmented and could also potentially impact on viability more in some locations than others.

The approach either needs to be one % requirements across South Warwickshire or one in each District (i.e. different standards for the Stratford-on-Avon area and one for Warwick District. Otherwise, the requirements will be too complicated and piecemeal.

#### Q-H3 - Please select all options which are appropriate for South Warwickshire

- 1) Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.
- 2) Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.
- 3) Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.
- 4) Option H3d: None of these

Option H3a – do not seek to include minimum space standards in a policy in the SWLP. It is onerous to prescribe in policy that minimum space standards should be met.

We would support in principle a policy which requires "up to X%" to be built to M4(2) or M4(3) standards but this should not be a requirement for all dwellings.

Q-H4-1 - Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District? (Yes / No / Don't Know)

Policy SAP.4 of the Stratford-on-Avon Site Allocation Plan Revised Preferred Options (June 2022) intends to provide Stratford's contribution to meeting Greater Birmingham & Black Country's shortfall to 2031 on the following sites:

- STR.A North of Evesham Road, Stratford-upon-Avon
- STR.B East of Shipston Road, Stratford-upon-Avon
- STR.C South of Alcester Road, Stratford-upon-Avon
- MAPP.A West of Birmingham Road, Mappleborough Green

We do not object in principle to the majority of the unmet need being provided in Stratford, however the three sites proposed in Stratford are less suitable locations for growth than to the northeast of Stratford for the reasons set out in our answer to question Q-S4.2.

It is identified that an additional shortfall of some 78,000 homes for the Greater Birmingham and Black Country HMA will be required up to 2042. Whilst the review of Birmingham City Council's Local Plan to 2042 is ongoing, we encourage the Council to be proactive and look to plan for accommodating part of this unmet need within South Warwickshire, which is likely to be greater than 78,000 homes should the plan period match the SWLP to 2050.

Q-H4-2 - Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan.

The scale of any shortfall to meet the housing needs of the Birmingham and Black Country HMA should be proportionate and reasonable for South Warwickshire. Whilst the current draft of the Levelling Up and Regeneration Bill looks to remove the Duty to Co-operate, this has not yet gained Royal Assent and the transitional arrangements within the NPPF mean that the current NPPF planmaking rules will apply to this emerging Local Plan and therefore paragraph 35(a) will still apply which required unmet need to be accommodated where it is practical to do so and is consistent with achieving sustainable development.

The collapse of the Birmingham Development Plan has created uncertainty about how much housing will need to be exported to areas including South Warwickshire. It is likely that the figure will increase the SWLP will need to contribute towards meeting this need.s

Q-H4-3 - If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?

If the Council are required to meet housing shortfalls from outside of South Warwickshire it should be accommodated in the most sustainable locations for growth even if this means releasing further Green Belt land to achieve sustainable patterns of growth.

### Q-H5 - Please select all options which are appropriate for South Warwickshire

- 1) Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.
- 2) Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.

3) Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.

Option H5b is not acceptable. It is impracticable to require mainstream housebuilders to provide self / custom build plots throughout a development as it leads to a fragmented development with unbuilt plots left empty on a phase or phases when the rest of a phase is built and occupied. Opportunities for self / custom build should be made through specific site allocations for that purpose only under H5a above alongside encouraging applications under H5c.

### Q-H6 - Please select all options which are appropriate for South Warwickshire

- 1) Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes.
- 2) Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site.
- 3) Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.

Option H6a should be taken forward. It is not acceptable to require large development to provide a portion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site. This will affect sites' cohesive design and placemaking, impacting on sales rates and viability.

### Q-C4.1 - Please select all options which are appropriate for South Warwickshire:

- 1) Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.
- 2) Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.
- 3) Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards.

Option C4.1a is preferred as it would be onerous to set a standard higher than the building regulations requirement. A policy could encourage a local standard beyond building regulations but should not mean that an application should be refused because it does not meet regulations over and above the national standard. In time, the building regulations will evolve to allow a phased approach to reaching Net Zero. A separate approach would hinder plan delivery due to developers having to have a different design, building process and materials to the regulations, slowing the pace of delivery and reducing viability.

Davidsons are committed to energy efficiency in our homes and currently build to a high standard than buildings regulations require.

### Q-C9.1 - Please select the option which is most appropriate for South Warwickshire:

- 1) Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity.
- 2) Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity.

We do not object in principle to the inclusion of a policy requiring a net gain in biodiversity provided that the policy wording allows for flexibility and allows for off-site mitigation where a net gain cannot be met in full on-site. This requirement will soon gain Royal Assent through the Environment Bill; therefore, it is prudent to include a policy on biodiversity net gain.

It seems onerous to include in policy a requirement that less than 50% of a wider site is to consist of paved / hard surfaces. It could be an aim or ambition but needs to allow for site flexibility (e.g. a site might require 52% hard surfaces but still be more than acceptable in drainage terms.

### Q-D.2 - Please select all options which are appropriate for South Warwickshire:

- 1) Option D2a: Develop a South Warwickshire Design Guide
- 2) Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change.
- 3) Option D2c: Develop design guides/codes for strategic development sites/locations.

It would be onerous to produce design guides or design codes for specific places or strategic development sites through the Local Plan process. In line with the anticipated Levelling Up and Regeneration Bill and the requirement for Local Authorities to produce whole area design codes, it would be prudent for the Council to produce a South Warwickshire Design Guide. It need not cover every aspect of design or every type of development.

There is then the option for site specific design codes to be produced for large scale strategic sites through the application process. Option D2a would therefore be preferred.

### Q-D3 - Please select all options which are appropriate for South Warwickshire:

- 1) Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.
- 2) Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District i.e. minimum 30d.p.h.
- 3) Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire and specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.
- 4) Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.
- 5) Option D3e: None of these

Option D3a is the best option here. Any policy on density will need to be flexible enough to be able to adapt to the different needs of each site and location. It is too onerous to specify density ranges on a location or area basis, therefore in policy terms it is enough for policy to highlight the relevance and importance of density and acknowledge that it may change on a site-by-site basis.

Q-D5 - Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2? (Yes / No / Don't Know)

Heritage is obviously an important consideration when looking at the growth strategy and deciding on draft allocations, however it is important to remember that other factors such as sustainability and the level of public benefit brought by a site can outweigh any heritage harm, particularly where such harm can be mitigated through design principles. It is too straight forward to base plan allocations heavily on heritage impact.

The Part 1 Plan should continue with high-level strategic policies but should include draft allocations for strategic site such as Clopton Quarter. This would be informed by the further evidence base to be prepared including the Green Belt review.

On a site-specific basis, Clopton Quarter is located on a key entrance to the historic town. As shown on the masterplan and within the vision document, and by our award-winning developments elsewhere (see Houlton and Leicester Forest East), Davidsons are committed to creating exemplary frontages which respect and enhance the immediate location.

#### Conclusion

To conclude, Land at Clopton Quarter sits to the northeast of Stratford within the assessed 'Broad Location for Growth' B.26 'Stratford Northeast'.

We consider the extend of the Stratford North-East Broad Location for Growth to be unrealistic given the landscape and heritage constraints which lie further east / southeast of the Clopton Quarter site.

Therefore, the land under our control at Clopton Quarter should come forward as a standalone extension to Stratford for the reasons set out in detail in this response. The site will deliver the following benefits:

- A leading example of a 20-minute neighbourhood by virtue of its sustainable location.
- 700 units, including affordable housing.
- 40% of the site designated as multi-functional green / blue infrastructure (14ha)
- Biodiversity net gain and ecological enhancement.
- Restoration of the Vale Orchard landscape through new orchard planting with native fruit trees.
- A new, mixed use pedestrian gateway into the Welcombe Hills Country Park.
- Infrastructure improvements to the highway network.

In addition to the site being suitable for development in itself, it is also important to highlight that it is the only logical location for further growth at Stratford, and Stratford must take some growth.

Whilst the land to the west / southwest / south / southeast is not designated as Green Belt, these areas bring their own problems in delivering sustainable development in Stratford.

Land to the south of the racecourse is designated as Flood Risk Zone 3, and so would not be suitable.

Any development towards Long Marston as part of a new settlement and any further development off Banbury Road / the A3400 to the southwest of Stratford would be reliant on the completion of the Southwest Relief Road. This road was rejected for Housing Infrastructure Fund (HIF) funding and whilst the Cala scheme has contributed £45million towards the road, there is a funding gap of £86million with no clear delivery mechanism. Without this road further development will create chronic traffic problems in the centre of Stratford as the only way to join the A46 would be to use Bridge Street / Bridge Foot. Traffic along this route would be increased to an unacceptable level.

Any further development to the west would be further away from the centre of Stratford and would thus be less sustainable. It would also bring unacceptable heritage impact to Anne Hathaway's Cottage and the surrounding area.

Further development to the northwest would also be too detached from Stratford, leading to unsustainable development and an over-reliance on the car. This area has no defensible boundaries and the release of this Green Belt land would result in unrestricted sprawl into the open countryside and it is severed from Stratford-Upon-Avon by the A46, meaning that residents would be separated with no permeability into the town. This location is also further from Stratford than Clopton Quarter, meaning it is a less sustainable option.

The site is acceptable in heritage terms and is a logical location for growth considering that the other locations around the edge of Stratford are not suitable and will lead to unacceptable highway impacts. We therefore request that Land at Clopton Quarter is considered in isolation, excluding the remainder of the potential Broad Location for growth, as a suitable residential allocation within the South Warwickshire Local Plan.

Therefore, Land at Clopton Quarter should be released from the Green Belt and be allocated for up to 700 units for the reasons set out in this representation. We will be engaging with the Green Belt Review process once this commences.

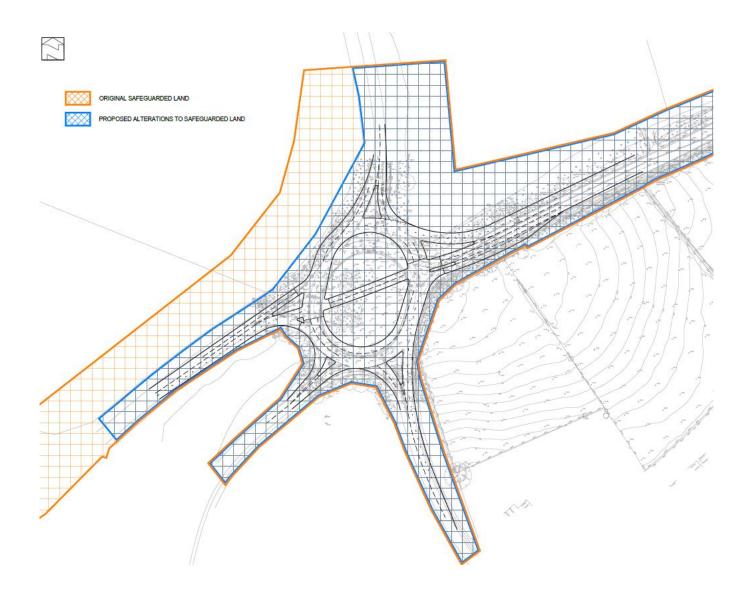
Appendix 1 – Site Location Plan



### Appendix 2 – Previously Submitted Vision Document.

See email attachment accompanying this submission.

Appendix 3 – Proposed Upgrade to Bishopton Roundabout



### Appendix 4 – Updated Sustainability Appraisal (SA) for Clopton Quarter Ref: B.26

All comments 'upgrading' the SA score are evidenced within the submitted Vision Document with technical reports prepared by technical consultants.

SWLP Sustainability Appraisal Score	Receptor	SWLP Commentary	Davidsons Revised Sustainability Appraisal Score for Clopton Quarter	Davidsons Commentary for Clopton Quarter
	Potential increase in carbon footprint.	Large scale residential-led development is likely to result in an increase in GHG emissions. Development in this Broad Location could deliver up to 2,000 dwellings and therefore could increase carbon emissions in the District by more than 1% and result in a major negative impact.	++	Firstly, any development is going to increase the GHG emissions in the area, in fact Land at Clopton Quarter is located adjacent to Stratford and proposes enhanced non-vehicular modes of transport into town and to the railway station. This, combined with the energy efficiency of new homes, electric car charging points, and a net gain in biodiversity will actually help contribute towards the District's ambition to reduce GHG emissions and deliver a climate betterment. The score should therefore be upgraded to '++'
0	Riparian Flood Zones	Less than 10% of the Broad Location coincides with Flood Zones 2 and/or 3. A negligible impact on flooding in riparian flood zones would be expected at the Broad Location.	++	In all respects the development proposals are considered sustainable from a flood risk and drainage perspective. Almost the entire site is within Flood Risk Zone 1, with a small area of Flood Risk Zone 3 running north -> south which is to be utilised as surface water attenuation and to retain the existing copse of trees. The score should therefore be upgraded to '++'
0	Surface Water Flood Risk	Less than 10% of the Broad Location coincides with areas at high risk of surface water flooding. A negligible impact from surface water flood zones would be expected at the Broad Location.	++	In all respects the development proposals are considered sustainable from a flood risk and drainage perspective. There will be no impact from surface water flood zones which means the site should score positively in this regard. The score should therefore be upgraded to '++'

+/-	Habitats Sites	The nearest Habitats Site is 'Bredon Hill' SAC located approximately 26km southwest of the location. At present, potential impacts on this and other Habitats sites are uncertain. The emerging HRA will provide further information regarding potential impacts on Habitats Sites and any mitigation required. Mitigation: Avoid impacts on site integrity through HRA process.	+/-	No change.
0	SSSIs	Located within a SSSI IRZ which does not identify the residential development as a threat to SSSIs.	0	No change
0	NNRs	There are no NNRs in proximity to the location.	0	No change
0	Ancient Woodland	There is no ancient woodland in close proximity to the location.	0	No change
	Local Nature Reserve	A major negative impact on LNRs could be expected as a large proportion of the Broad Location coincides with 'Welcombe Hills' LNR. Mitigation: Only a complex solution will avoid irreversible impacts.	++	In isolation, the smaller Broad Growth area option only including our Land at Clopton Quarter results in a scoring of ++ because the area excludes the Welcombe Hills LNR entirely and in fact enhances it by providing a pedestrian gateway to the Welcombe Hills Country Park. The score should therefore be upgraded to '++'
-	Local Wildlife Site	A minor negative impact on LWSs could be expected as the Broad Location coincides with various LWSs such as: 'Clopton House Meadow'; 'Welcombe Estate'; and	0	With sensitive layout and landscape considerations, this score can be upgraded to a '0'.

0	Local Green Space	'Bishopton Meadow'. The Broad Location is also adjacent to 'The Lench Meadows' LWS. Mitigation: Avoid impacts through the location and layout of future proposals.  The Broad Location does not coincide with any LGSs.	0	No change
-	Priority Habitats	A minor negative impact could be expected as small proportions of the Broad Location coincide with 'deciduous woodland'.  Mitigation: Avoid impacts through the location and layout of future proposals.	+	Avoiding any impacts through the location and layout of future proposals is an opportunity to create a positive impact for wildlife and biodiversity net gain on the site. Therefore, the score should be upgraded to '+'.
0	National Landscapes/AONBs	Located approximately 9km from the Cotswolds NL. Development in this location wo	0	No change
-	Landscape Character	Located within Avon Character Area, Vale Orchard Belt. Broad Location could be discordant with this Character Area and a minor negative impact on landscape could arise. Includes areas of the landscape suitable for enhancement in the 1993 Landscape Project. Mitigation: Mitigate through use of landscape-led site design practices and follow the management strategy presented in the 1993 Warwickshire Landscape Project Assessment and Strategies document.	0	With sensitive layout and landscape considerations, this score can be upgraded to a 'O'. The site in isolation is entirely in accordance with the character of the area with defensible boundaries on all 4 sides and a limited landscape impact as shown within the Vision Document.
·	Landscape Sensitivity	The landscape in this Broad Location is identified as being of 'high', 'high-medium 'and 'medium' sensitivity to housing development in the White's study.	0	With sensitive layout and landscape considerations, this score can be upgraded to a '0'. As above.

	Special Landscape Areas	Development in areas identified as being of higher landscape sensitivity could result in major negative impacts on the character of the local landscape. <i>Mitigation: Seek to reduce landscape impacts by avoidance of more sensitive landscapes, the appropriate design of GI provision to integrate development into the landscape and though the layout and design of built form.</i> The Broad Location wholly coincides with 'Arden' SLA, where a small proportion of the SLA overall could potentially be affected. A minor negative impact on local landscape could be expected. <i>Mitigation: Mitigate through use of landscape-led design</i>	0	With sensitive layout and landscape considerations, this score can be upgraded to a '0'.
-	Country Parks	Located in close proximity to Welcombe Hills Country Park; possibly coincident with the designation although at the time of writing a digital file of the extent of the park was not available.  Mitigation: Reduce impacts through the location and layout of future proposals.	++	With sensitive layout and landscape considerations, this score can be upgraded to a '++'. The setting of the Welcombe Hills Country Park is not affected but in fact enhanced by creating a gateway to Welcombe Hills.
-	Views for PRoW Users	Coincides with various PRoW footpaths. A minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected. Mitigation: Mitigate through use of landscape-led site design practices.	0	With sensitive layout and landscape considerations, this score can be upgraded to a '0'.
0	Coalescence	This Broad Location is unlikely to lead to coalescence between settlements.	0	No change

0	Grade I Listed Building	Not located in proximity to any Grade I Listed Buildings.	0	No change
	Grade II* Listed Building	There is potential for a major negative impact on the setting of a Grade II* Listed Building which coincides with the Broad Location: 'Clopton House and Attached Former Stable Block, Walls and Gate Piers. A minor negative impact could also be expected on the setting of Grade II* Listed Building 'Welcombe Hotel' which is located approximately 45m from the Broad Location.  Mitigation: Avoid impacts through the location and layout of future proposals.	+	With sensitive layout and landscape considerations, this score can be upgraded to a '+' as we will be reinstating the historic tree planting along the northern boundary footpath.
	Grade II Listed Building	There is potential for a minor negative impact on the setting of various Grade II Listed Buildings which coincide with the Broad Location such as: 'Lodge To Welcombe Hotel'; 'Clopton Tower'; and 'Gate Pier to Former Entrance to Clopton Park, To East of Road'. Mitigation: Avoid impacts through the location and layout of future proposals.	0	With sensitive layout and landscape considerations, this score can be upgraded to a '0'.
0	Registered Parks and Gardens	Not located in proximity to any Registered Parks and Gardens.	0	No change
-	Conservation Area	Stratford-on-Avon CA is located adjacent to the Broad Location. A minor negative impact on the setting of this CA would be expected as a result of development at the Broad Location. Mitigation: Landscape led site design and further heritage	0	With the landscape mitigation as suggested and with further supporting heritage assessments, this <b>score can be upgraded to a '0'.</b> This is only an issue for the wider assessment area.

		assessments to help conserve and enhance the setting of this CA.		
0	Scheduled Monument	The Broad Location is located approximately 470m from the 'Tiddington Roman Settlement' SM. Due to the nature of existing development between this Scheduled Monument and the Broad Location, a negligible impact on local cultural heritage would be expected.	0	No change
-	AQMA (Pollution)	A proportion of the Broad Location coincides with 'Stratford-upon- Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution. A minor negative impact would be expected as a result of development at the Broad Location.  Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.	++	After well thought through design, green buffers and vegetation retention / planting there will not be any harmful impact in respect of air quality. Therefore, the score should be upgraded to '++' as there will be a neutral impact. Air Quality information is included in the Vision Document.
	Main Road (Pollution)	A minor negative impact on air and noise pollution would be expected as the A3400, A439 and A46 are located less than 200m from the Broad Location. <i>Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and</i>	++	After well thought through design, green buffers and vegetation retention / planting there will not be any harmful impact in respect of pollution. Therefore, the score should be upgraded to '++' as there will be a neutral impact.

0	Railway Line	vegetation retention / planting to maintain and enhance air quality and provide electric charging for vehicles.  Not within 200m of a railway line.	+	No change. The site is not within 200m of a railway line therefore there is not expected to be any noise impacts in this regard. In terms of sustainability, the site is located less than 1 mile to Stratford-upon-Avon parkway.
-	Watercourses  Groundwater SPZ	The River Avon is located approximately 135m from the Broad Location. As a result, a minor negative impact on this watercourse would be expected as a result of development at the Broad Location. Mitigation: Appropriate management of construction and incorporate sustainable drainage and GI to reduce impacts during the operation of the development.  The Broad Location coincides with SPZ 1, 1C and 2C. Development could have a minor negative impact Ground water SPZs Mitigation: Appropriate management of	+/-	After proper construction management and sustainable drainage measures there will not be any negative impact on the watercourse. Therefore, the score should be upgraded to '+ / -' as there will be a neutral impact.  Or there will be a betterment as there is the possibility for the site to throttle back current surface water run off which sometimes floods Birmingham Road.  After proper construction management and appropriate design measures there will not be any pollution of the groundwater. Therefore, the score should be upgraded to '+ / -' as there will be a neutral
	ALC Grade	construction and appropriate design measure to prevent pollution of the ground water.  A large proportion of the Broad Location is	-	impact.  Score ++ should be given to grade 1 and 2 agricultural
		on ALC Grade 3 land, with smaller proportions situated on Grade 4 and Urban land. Development on Grade 3 land would lead to a major negative impact on loss of BMV soils. Mitigation: While 40% of the land area could be used for GI and soils could be retained in these areas, the loss of BMV soil is a long term, permanent impact.		land therefore for grade 3 this score should be upgraded to a '+'.

-	Mineral Safeguarding Areas	A minor negative impact on natural resources could be expected as the Broad Location partially coincides with an MSA, where consultation is required prior to development.  Mitigation: Mitigate as far as possible by seeking to retain areas of land for greenspace use or other uses for undeveloped land, including non-permeant/reversable uses.	-	No change.
	Potential increase in household waste generation	Residential-led development is likely to result in an increase in household waste generation, to some extent. The potential for the development of up to 2,000 dwellings could potentially increase household waste generation by more than 1% in comparison to current levels within Stratford-upon-Avon. A major negative impact on waste could be expected. Mitigation: Waste management policies are set out in the Warwickshire Waste Core Strategy 2013, which support the waste hierarchy, including waste prevention and increasing the recycling of waste.	0	Any development will result in household waste therefore this assessment should be <b>upgraded to a '0'</b> given that it would have a neutral effect compared to other development options.
++	Housing provision	Residential-led development is likely to result in a net gain in housing. The provision of up to 2,000 dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision.	++	No change – in fact we can deliver 700 units on a much smaller % of the assessed Potential Broad Location for Growth.

-	NHS Hospital with A&E Department	A minor negative impact on access to healthcare would be expected as the Broad Location is outside of the sustainable target distance to an NHS hospital with an A&E department. The closest NHS hospital is 'Warwick Hospital'. Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest hospital for these services.	0	Stratford has a hospital in the centre of town therefore it should be capable of accommodating a development of up to 700 units, particularly with any requested contributions towards the CCG where reasonable.
-	Access to GP Surgery	A minor negative impact would be expected as the Broad Location is located outside of the target distance to a GP Surgery.  Mitigation: Indirect measures such as improved public transport schemes could improve travel times and travel options for residents to access the nearest GP surgeries for these services.	0	The site would have no effect or an insignificant effect on the achievement of the SA Objective in relation to access to a GP surgery. As land under Davidsons control is a smaller area than the unrealistic growth option of 2,000 units in this location with larger heritage impacts, proximity and connectivity to the GP surgery is improved from the Council's current assessment. The score should be upgraded to a '0'.
+	Access to Leisure Facilities	The Broad Location is within the sustainable target distance to 'Stratford Leisure Centre' leisure facility. A minor positive impact would be expected on access to leisure facilities.	++	<b>Upgrade to '++'</b> – we will provide excellent connectivity to the Welcombe Hills Country Park.
-	AQMA (Health)	Coincides with 'Stratford-upon-Avon' AQMA. Development near an AQMA could potentially expose end users to higher levels of transport associated air and noise pollution which could lead to a minor negative impact on health. Mitigation: Avoid impacts through the location and layout of future proposals or mitigate	+	Whilst the Council's current assessment here is understandable, it is noted that impacts can be avoided through the location and layout of proposals and green buffer. Our proposed layout includes such mitigation and therefore the score should be upgraded to '+' with mitigation.

		through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.		
-	Main Road (Health)	A minor negative impact on could be expected as the A3400, A439 and A46 is located less than 200m from the Broad Location. Traffic on these roads would be likely to expose some end users to air and noise pollution.  Mitigation: Avoid impacts through the location and layout of future proposals or mitigate through implementation of green buffers and vegetation retention/planting to maintain and enhance air quality and provide electric charging for vehicles.	+	As above. The score should be upgraded to '+' with mitigation.
++	Access to Greenspace	A major positive effect on health would be expected as the majority of the Broad Location is located within the target distance to one or more greenspaces.	++	No change
+	Access to PRoW / Cycle Path	Located within target distance to the PRoW network with a small proportion of connectivity to the cycle network. A minor positive impact on the health and wellbeing is expected.	++	Significantly enhanced footpath provision and connections would be provided within the site, therefore the score should be upgraded to ++.
+	Bus Stop	The Broad Location is partially within the target distance to a bus stop providing regular services. A minor positive impact would be expected on end users' access to sustainable transport.	++	The site controlled by Davidsons is the closest part of the proposed broad location for growth and is therefore the closest to existing bus stops. We are willing to re-route an existing bus route into the site if this is requested in order to enhance the sustainability of the site. We can also provide footpath access to existing stops on Birmingham Road.

++	Railway Station	Majority of the BL is located within the sustainable target distance to a railway station. A major positive impact on site end users' access to rail services is expected.	++	No change
0	Connectivity	The majority of the Broad Location lies within areas of good and moderate connectivity, a proportion in the to the north is within an area of poor connectivity. A negligible effect might be expected.  Mitigation: Road and pedestrian network improvements. Public transport improvement schemes and active travel measures.	++	The site controlled by Davidsons is very well connected to public footpaths, to Stratford-Upon-Avon Parkway and to Stratford town centre. Therefore, the score should be upgraded to ++.
+	Food stores	The Broad Location is within the sustainable target distance to a food store. A minor positive impact on access to food stores would be expected.	+	No change
+	Access to Primary School	The Broad Location is within the sustainable target distance to 'Thomas Jolyffe Primary School' and 'St Gregory's Catholic Primary School'. A minor positive impact on access to primary educational facilities would be expected.	+	No change
+	Access to Secondary School	The Broad Location is within the sustainable target distance to 'King Edward IV School' and 'Stratford-upon-Avon School'. A minor positive impact on access to secondary educational facilities would be expected.	+	No change

+	Access to Further Education	Wholly within the target distance to post- 16 (further) education. A minor positive impact on access to further educational facilities would be expected.	+	No change
+/-	Employment Floorspace Provision	The Broad Location currently comprises undeveloped land and is not likely to result in a loss of current employment space. As well as the provision of up to 2,000 homes, the Broad Location could provide employment opportunities such as the development of a local centre which could include shops and services, resulting in employment opportunities for current and future local residents. At this stage the employment floorspace provision and potential impacts on the local economy for this Broad Location is uncertain.	+/-	No change
+	Access to Employment Opportunities	A minor positive impact on the local economy could be expected as the location is within the target distance to various employment opportunities, including various business offices located in central Stratford-upon-Avon.	+	No change