

16th June 2014

Mr Rob Weeks
Head of Environment and Planning
Stratford upon Avon District Council
Elizabeth House
Church Street
STRATFORD UPON AVON
CV37 6HX

Dear Mr Weeks,

PLANNING APPLICATION REF 14/01186/OUT

**LONG MARSTON STORAGE DEPOT, CAMPDEN ROAD, STRATFORD UPON AVON,
WARWICKSHIRE CV37 8QR**

We make the following reply on behalf of the Joint Parish Council Working Group. The JPCWG has read the Statement of Community Involvement but it cannot find any support for a new settlement or for more housing on this site. There is vague reference to *“Feedback was mixed with a majority of those attending stating a number of concerns, principally about traffic and the potential impact on local facilities”*. Furthermore, the consultation questions did not actually ask if the local community wanted the approved Masterplan to be radically changed in this way. Whilst public consultation is a good thing, it does not follow that the public supports this proposal. The site is taking on the appearance of “Middle Quinton Ecotown” and subject to widespread opposition from local communities and district councils in 2008.

The JPCWG **objects** to application 14/01186/OUT.

Sustainability

The Depot was a large part of the Middle Quinton Eco-town proposal; a proposal that was not supported by Wychavon, Stratford-on-Avon or Cotswold District Councils, primarily because of its unsustainable location. The West Midlands Regional Spatial Strategy Phase 2 Review Panel Report considered the Middle Quinton proposal in paragraphs 2.72 and 8.65 to 8.75.

The current application documents constantly refer to brownfield development, but that is already being redeveloped via the approved Masterplan. The relocated leisure village will take place almost entirely on greenfield land. Therefore objection due to its remote location and unconvincing sustainability will accord with the RSS panel report conclusion.

Sustainability lies at the heart of the National Planning Policy Framework. Long Marston Storage Depot is situated in a very rural and sparsely populated location (see the JPCWG context map appended to this letter). It is not located within or adjacent to an *existing* settlement. An additional 550 houses will not enhance or maintain the vitality of *existing* rural communities. Although the approved Depot development is large scale, its driver is a leisure village. The Depot is not identified as a proposed settlement in any Development Plan, yet what else can we call a site with 1050 houses, leisure facilities, shops, primary school and industrial buildings? Of course, the only justification for the new primary school is

because of the large scale of new residential development. As a new settlement, it is not a sustainable one, given its rural location and lack of medical facilities and offices nearby.

The applicant tries to solve the problem of a lack of offices for the new population by proposing a S106 agreement involving adjacent land (we are not sure the exact location), “remote working units”, hot desks, meeting rooms etc. This is a rather ill-defined concept and does not give any confidence future households will work locally instead of travelling long distances to the nearest town. Furthermore, 550 houses, in addition to the 500 already approved, will place a great burden on the nearest secondary schools in Stratford-upon-Avon and Shipson.

Given the limited services and facilities available within the Depot and limited destinations for walking and cycling, future households will travel by car long distances in several different directions on rural roads and through nearby villages. This will cause urbanisation of minor roads passing near and through rural communities, in particular Upper and Lower Quinton, Mickleton, Pebworth and Long Marston.

Roads in the local area are not friendly to pedestrians and cyclists, including the nearby Campden Road and Long Marston Road. They lack pavements and street lighting and many are narrow and/or winding, eg, the roads to Upper Quinton, Pebworth, Mickleton and Chipping Campden. The nearby Greenway is a good leisure cycle route to Stratford-upon-Avon 6km away but this is too far for walking and cycling on a regular basis. Furthermore, the Depot development lacks many services and facilities, which will cause future households to make regular journeys off-site. Unpleasant road conditions and perceived and actual risk of accidents will dissuade future households from walking and cycling off-site.

In granting planning permission for the Depot Masterplan (09/00835/FUL), SDC sought to balance the drawbacks of its isolation with the carefully phased, the long-term “leisure village” aspirations of “enabling” Policy CTY.18. The new proposal will generate considerable additional traffic movements in a remote countryside location.

Policy CTY.18 of the Local Plan

The Depot is not identified as an existing or proposed settlement in the Development Plan. Instead, there is a bespoke planning policy which takes account of the particular circumstances of the Long Marston Storage Depot and enables a wide range of land uses to take place there.

The Depot site is a mix of brownfield and greenfield land. CTY18 refers to “*retention and enhancement of the extensive open landscape areas*” and to “*remove existing buildings and structures on the site*”. The proposal will lead to large scale loss of open landscape areas, in direct conflict with the policy. The approved Masterplan includes wide greenspaces for outdoor activities. These will be jettisoned. The planting of more trees will not compensate for the loss of green, open spaces. Built development on the western half of the site will be visible from a number of elevation locations, including the Cotswold AONB at Meon Hill.

Demolition has already been achieved via the approved Masterplan. It is counter-productive to build a large amount of new buildings (550 houses and school) having secured the demolition of existing buildings in the interest of improving openness and landscape quality.

CTY.18 requires a Masterplan to be subject to consultation with neighbouring local authorities. The JPCWG has seen no evidence of consultation with Wychavon or Cotswold districts, whose communities will be affected by the proposed large-scale development.

Local Housing Need

There is not a 5 year housing land supply in Stratford-on-Avon District. However, Policy CTY.18 is not a “relevant policy for the supply of housing” in the context of paragraph 49 of the Framework. It is “enabling policy” and allows several types of development at the Depot. CTY18 does not require or encourage the development of *any* housing at the Depot. Whilst a developer (St Modwen) has planning permission for mixed uses that include residential, planning permission could be granted for an alternative development that lacks housing. However, it is important that any development follows a Masterplan, and one such Masterplan has been granted under ref 09/00835/FUL (and again under 12/00484/VARY).

The JPCWG has considered the local need for housing. There is certainly affordable housing need in Stratford, Wychavon and Cotswold Districts. However, Policy CTY.18 requires residential development of the Depot site of a scale consistent with the needs of the local population (our emphasis). To this end, the Section 106 agreement attached to 09/00835/FUL will deliver up to 175 affordable houses to meet the affordable housing needs of 12 wards in three districts, in a cascade from Quinton ward outwards.

The nearest villages to the Depot have these populations:

- Weston on Avon 45 houses
- Dorsington 48
- Long Marston 180
- Clifford Chambers 205
- Pebworth 250
- Ilmington 300
- Welford-on-Avon 560
- Honeybourne 600
- Mickleton 700
- Quinton 735

550 more houses will result in a new settlement of 1050 houses, which is much larger than the nearest villages in the locality. The needs of existing settlements will not be met by the construction of a large new settlement at Long Marston Depot.

Villages within Stratford, Wychavon and Cotswold Districts can meet their own housing need for market and affordable housing in a variety of ways. In the case of Stratford villages, Policy COM1 (Local Choice) and CTY5 (housing exception schemes) of the SDC Local Plan Review are relevant. Similar policies for delivering housing within or adjacent to local communities apply to Wychavon and Cotswold districts. The scale of identified local housing need tends to be small in the local villages. For example, Pebworth Parish’s Housing Needs Survey (July 2012) identified a need for only 12 affordable houses during the next 5 years. Planning permission was recently granted for two schemes comprising 23 houses in Pebworth village, of which 7 will be affordable.

There is no evidence that an additional 550 houses will meet the affordable housing needs of communities with a ‘Local Connection’ and nor will an additional 550 houses be justified in relation to the approved Masterplan. Instead, qualifying households are likely to derive from larger settlements much further away, most likely from Evesham (13km away) and Stratford-upon-Avon (9km). Divorcing people from their existing communities is undesirable and these displaced households will travel long distances to maintain social and employment links. Hence there is conflict with Policy CTY.18 of the SDC Local Plan.

The Section 106 agreement, Adjoining Ward Plan and Deed of Variation attached to 09/00835/FUL includes a clause that 10% of all dwellings will be marketed as ‘worker

dwelling,' to be advertised to persons currently employed on the site. After 3 months of advertising, if the dwelling is unsold then it may be offered for sale on the open market. With regard to subsequent disposals, the advertising plan starts again, with a 3 month advertising period. Thus worker dwellings will be made available to local workers in perpetuity. The current application for 550 more houses includes no such "worker dwelling" clause. This weakens the relationship between the proposed houses and employment site, making it more likely the Depot will become a large commuter suburb in the countryside.

There is a strong possibility that 550 more market and affordable housing delivered on the Depot site will not accommodate households from local communities. As SDC states in its objection to the Codex proposal (see later in this letter): *"It is far more likely that the additional development would risk unbalancing the population by attracting a high proportion of retired in-migrants and out-commuters."*

There is no Affordable Housing Statement with the planning application and therefore the applicant has made no case the development meets a local housing need.

Relocating the leisure village

A leisure village will bring far greater economic benefit to the area than building houses. The approved Masterplan took account of the applicant's "Leisure and Tourism Options Review" and its Addendum prepared by Planning Solutions Consulting in 2008, which concludes:

"The above four uses represent realistic opportunities for the Long Marston site. Subject to further space-use analysis these uses could work well alongside each other to provide strong synergy and each would make a valuable contribution to the tourism product mix for Stratford. In addition, with appropriate zoning, screening and access arrangements, the tourism/leisure uses do not preclude appropriate employment and other land uses within the overall Long Marston site."

The applicant now wants to segregate the leisure village from the rest of the site, with its own access, away from residential and employment use. The site will be split in half, with residential located to the east and leisure to the west. There is nothing fundamentally wrong with this approach provided it helps to secure a long term viable leisure village.

However, the new layout ensures that the construction of new houses can "go its own way" and finish independently of the leisure village. The JPCWG is concerned that St Modwen is not seriously committed to the development of the leisure village. The applicant gives mixed messages with regard to the delivery of the leisure village, referring to "limited market interest" and "feedback from potential operators". The approved phasing plan is falling behind schedule.

The applicant proposes a new range of buildings at the north-west corner of the site – "leisure amenities" – for administration, food shop, indoor leisure uses, restaurant and café. However, these proposed leisure buildings are only at outline stage. Their deliverability is much less certain than the Central Facilities Building under construction. The CFB is quite capable of serving holiday makers and its viability is ensured by its mixed patronage – holiday makers and 500 new households. The applicant states that the proposal will "add critical mass to the approved central facilities building". But this claim is unconvincing given the proposed relocation of the leisure village away from the CFB means the CFB will lose the footfall of holidaymakers.

The amended layout pushes leisure uses to the periphery of the site, much further away from the CFB. Holiday makers will have further to walk to the CFB, which undermines the viability of a leisure use. Indeed, the cost required to build new leisure buildings in the north-

west corner, when the CFB is quite capable of performing that role, will undermine the deliverability of the leisure village.

The Phasing Plan

The proposed development shown on plan RG-M-42/D is fundamentally different to the approved Masterplan and phasing plan. Furthermore, RG-M-42/D is not a *comprehensivemasterplan* (as required by Policy CTY18) because it excludes large parts of the Depot – such as the Central Facilities Building, 500 houses, employment site and woodland. This is important because the whole Depot site is subject to a phasing plan, which seeks to integrate the completion of the leisure village in line with residential development. Moreover, condition 59 of 12/00484/VARY requires the siting of holiday lodges to be agreed through reserved matters applications.

A partial phasing scheme is proposed on page 80 of the Planning Statement. The new phasing programme:

- Takes no account of the first 500 houses already with outline planning permission and under construction.
- Takes no account of phasing plan SL01/N. Thus, for example, phase 1A of SL01/N is the CFB (shared with holiday makers), phase 2 is the caravan site (start date 2013, already delayed) and phases 2 and 3 the holiday homes (start date 2013, already delayed). Phase 3 is the second and final tranche of houses (up to 216 units). The two phasing programmes, side-by-side, are incomprehensible.
- We cannot find a phasing plan that corresponds with the table.
- It is heavily weighted towards the early construction of houses at the expense of the leisure village, which follow later in the timetable. Including the 500 houses already built there is a strong prospect of building over 740 houses before any development starts on the leisure village.
- Confusingly, Phases A and B of residential development have the same start date (2015).

Prematurity

The Focused Consultation 2011-2031 considered the option of 500 more houses at the Depot but this option was rejected by officers and Cabinet. A new settlement at Long Marston Airfield was also rejected. Thus the Submission Core Strategy has only one role for the depot site (Policy AS11), which provides no scope for a new settlement.

The proposed expansion of development at the Depot will result in the creation of a new settlement. It is of a sufficiently large scale to prejudice the strategic directions for growth in the SDC Submission Core Strategy. It will create a new settlement in a part of the district where none is proposed either in the Local Plan or the Submission Core Strategy. See SDC letter of objection 3 September 2013 to the Codex appeal.

The adjacent Sims Metals yard

The JPCWG is mindful that a major application by Codex on adjoining land within Wychavon District ref W13/00132/OUT is currently at appeal “*proposed mixed use development comprising up to 380 houses etc, Land adj to Sims Metals UK (South West) limited, Long Marston, Pebworth CV37 8AG.*”

In 2013, Stratford-on-Avon District Council **three times** objected to this planning application:

- committee report 17 April 2013
- supplementary letter of objection 3 September 2013

- letter from the Leaders of 5 local councils 21 October 2013.

It is evident from reading SDC's comments that in granting planning permission for the Depot Masterplan (09/00835/FUL), SDC sought to balance the drawbacks of the Depot's isolation with the carefully phased, the long-term "leisure village" aspirations of "enabling" Policy CTY.18.

SDC wrote:

- *The proposed additional 380 homes [at the Codex site] would effectively result in the creation of a new village housing a population of some 2,000 residents. It would also represent a 76% increase over the level of housing development envisaged in the approved proposals for the Long Marston Storage Depot.*
- *From this work it is evident that Long Marston should not be a preferred location for sustainable growth.*
- *The Sustainability Appraisal noted that development at Long Marston would result in a significant increase in car dependency.*
- *Given the scale of development already committed, it is unlikely that this proposal [Codex] would address unmet local need. It is far more likely that the additional development [of the Codex site] would risk unbalancing the population [of the Depot site] by attracting a high proportion of retired in-migrants and out-commuters.*
- *This Council believes that the additional development would undermine the arguably fragile sustainability credentials attaching to the development already taking place.*
- *Is not beneficial in terms of meeting the local housing needs relevant to this rural location because those needs are addressed by development already having the benefit of planning permission.*

It follows logically from the Council's objections to 380 houses on adjacent land that 550 more houses on the Depot will also be unsustainable and generate considerable additional traffic movements in a remote countryside location.

The transport, education, health, services and other environmental impacts of the St. Modwen proposal should be addressed by Stratford, Wychavon and Cotswold Councils. In doing so, consideration must also be given to the *cumulative* impact of the 500 houses already granted and the proposed Codex development (total 1430 houses). For example, paragraph 32 for the Framework states "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." (our emphasis).

There is no evidence of collaboration between the two adjacent landowners, as both seek to create their own settlements. The planning authorities of SDC, WDC and CDC must meet to co-ordinate their approach to "new settlements by stealth", seeing as the landowners seem incapable of co-ordinating their projects. For example, St Modwen is not prepared to await the outcome of the Codex appeal before launching their enlarged scheme. This lack of a co-ordinated approach between adjacent landowners may result in a poorly integrated development.

Conclusion

The Depot is a highly unsustainable location. It does not lie within or adjacent to any of the settlements in the Local Plan or Submission Core Strategy's development hierarchy. A total of 1050 houses is greater than the individual housing requirements of Long Marston,

Quinton and other nearby villages. 550 more houses will imbalance the identified housing requirement for the south-west of the District and is alien to the distinctive character and function of existing settlements. It will experience high levels of car dependency, create a significant need to travel and encourage long journey distances for future residents. Despite a new bus service, 550 more homes will rely heavily on the private car and thus will generate large scale greenhouse gas emissions. Thus an additional 550 houses is in conflict with the sustainability objectives of the Framework, specifically paragraphs 17, 30, 34, 55 and 95.

Segregating the leisure village from the rest of the site and away from the central facilities building, combined with a partial phasing programme that gives priority to housebuilding, will harm the deliverability of the leisure village.

The Joint Parish Council Working Group therefore objects to this planning application.

Yours sincerely,

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Appendices

1. Context map
2. SDC committee report 17 April 2013
3. SDC supplementary letter of objection 3 September 2013
4. Letter from the Leaders of 5 local councils 21 October 2013.