

**Walton and Wellesbourne Way  
Neighbourhood Development Plan  
Pre-Submission Version**



**August 2016**

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## APPENDICES

Appendix 1      Location Plan

# 1 EXECUTIVE SUMMARY

## 1.1 Context

- 1.1.1 These representations provide the response of Gladman Developments Ltd (Gladman) to the current consultation held by Wellesbourne and Walton Parish Council (WWPC) on the pre-submission version of the Walton and Wellesbourne Way Neighbourhood Plan (WWNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.2 Gladman have land interests at Wellesbourne Airfield, which falls within the designated Walton and Wellesbourne Way Neighbourhood Plan area. Gladman has promoted this site through the Local Plan process as a suitable location for sustainable growth. Representations submitted throughout the Local Plan preparation process, highlight how this site can positively contribute towards the continued growth of Wellesbourne and the wider area. The land to which Gladman are promoting is edged red on the plan located in Appendix 1 of this submission. The redevelopment of Wellesbourne Airfield will help to meet local housing need and demand and also assist Stratford-on-Avon District Council (SADC) in delivering the residual housing numbers through the emerging Site Allocation Plan (SAP). As such, the delivery of this development will not only be to the benefit of existing community members through the provision of significant improvements to the public realm but will also serve the needs of future generations.
- 1.1.3 Through this submission Gladman seek to provide an analysis of the WWNP's vision, objectives and policies as proposed, highlighting areas in which we feel that the document lacks clarity, insufficient justification for the policies that the Plan seeks to adopt that are unlikely to meet the basic conditions.
- 1.1.4 Gladman would like to offer its assistance in the preparation of the neighbourhood plan in order to help refine the proposed policies to ensure their consistency with the requirements of national policy, guidance and the neighbourhood plan basic conditions and invite WPC to contact us in this regard.
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## 2 LEGAL REQUIREMENTS, NATIONAL POLICY & JUDGMENTS

### 2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum, it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic conditions that the WWNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the order contributes to the achievement of sustainable development;
- e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

### 2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so, it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet identified development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

2.2.3 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning.

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- 2.2.4 Paragraph 16 of the Framework makes clear that qualifying bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.5 Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.
- 2.2.6 Paragraph 49 of the Framework is clear that *'relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'*. This applies not only to statutory development plan documents but is also applicable to both emerging and 'made' neighbourhood plans. This has also been confirmed in the High Court<sup>1</sup>.
- 2.2.7 Paragraph 184 of the Framework makes clear that the ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider area. To facilitate this, local planning authorities (LPAs) will need to set out clearly their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. Where a neighbourhood plan proceeds in advance of the adoption of a Framework-compliant Local Plan, this will create uncertainty as to whether the neighbourhood plan provides an appropriate basis for the spatial approach contained in its administrative area.

## **2.3 Planning Practice Guidance**

- 2.3.1 It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework are further supplemented by the by the advice contained in Planning Practice Guidance (PPG).
- 2.3.2 On 11 February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan. In particular, the changes to the PPG stress the importance of the need to consider the allocation of housing reserve sites, and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan. In this circumstance, the proposed allocation of 50 dwellings as a housing reserve site is not considered to be sufficient amount for a Main Rural Centre (MRC) should the need arise.

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<sup>1</sup> Woodcock Holdings Ltd v Secretary of State for Communities and Local Government [2015] EWHC 1173 (Admin)

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2.3.3 Paragraph 040 of the PPG<sup>2</sup> is of particular importance and states that:

*'Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need. In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.'*

2.3.4 On 19<sup>th</sup> May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy confirming this intention and include a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

2.3.5 Further, the PPG makes expressly clear that blanket policies restricting housing development in some areas and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence<sup>3</sup>. In this regard, we consider the use of Policy WW3 in the manner proposed which seeks to implement a blanket approach to development contrary to the requirements of national policy and guidance. Further details are contained in section 4 of these representations.

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<sup>2</sup> PPG Paragraph 040, Reference ID 41-040-20160211

<sup>3</sup> PPG Paragraph: 045 Reference ID: 41-

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## 3 DEVELOPMENT PLAN

### 3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework, PPG and Neighbourhood Plan Basic Conditions, the WWNP should be prepared to conform to strategic policy requirements set out in the adopted Development Plan. Where an up-to-date Local Plan has been adopted and is in place for the wider authority area, it is the strategic policy requirements set out in this document that a neighbourhood plan should seek to support and meet.
- 3.1.2 Whilst for much of the prepaying of the Neighbourhood Plan, the Development Plan for Stratford-on-Avon consists of the Stratford-on-Avon Local Plan Review (2006) which covered the period up to 2011, the new Stratford-on-Avon Core Strategy (SACS) was adopted on 11 July 2016. The WWNP must therefore be in general conformity with the strategic requirements confirmed in the Local Plan.
- 3.1.3 The Inspector's Main Modifications to the SACS, published March 2016, considered that the housing requirement should deliver 'at least' 14,600 dwellings to 2031 in order to ensure the Plan allows for sufficient flexibility to respond to market conditions, this is further emphasised in the Inspector's Report at §66. The use of minimum housing targets have previously been considered in Examiner's Reports for 'made' neighbourhood plans. An Examiner's Report for the Slaugham Neighbourhood Plan<sup>4</sup> in Mid Sussex stated that '*given the strategic objective of the plan refers to 'at least 130' I assume it is to be a minimum. If it were to be a maximum this would not allow for the flexibility the Framework seeks in responding to changing conditions.*' This has further been considered in the Examiner's Report to the Billesdon Neighbourhood Plan<sup>5</sup> in Harborough District in which the Examiner states at §24 that '*Core Strategy Policy CS2 refers to the overall housing provision for the District as a minimum, using the wording 'at least' I recommend that the reference to a target of 45 dwellings in Policy BP2 be stated as a minimum...*' Whilst the strategic requirements for the wider area are confirmed in the supporting text of Policy WW7, the WWNP makes no provision confirmed in policy that the housing target should be seen as the 'minimum' to be achieved.
- 3.1.4 It is important to the note that Policy CS.16a commits the Council to undertake a review of the Plan if evidence demonstrates that significant housing needs arising outside the District, notably from Birmingham and Coventry, will be met throughout the district. Furthermore, the Inspector's Report states at §68 that '*Acknowledging that a very modest component of the OAN might contribute towards the unmet needs of others, there can be no question that it is necessary to increase the scale of reserve sites to 20% to provide a positive and effective mechanism.*' The WWNP will need to take account of this latest position and whilst the Council envisage that the Site Allocations Plan (SAP) will allocate land to meet this total it would be considered prudent planning if the WWNP allocated further

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<sup>4</sup> [http://www.midsussex.gov.uk/media/SlaughamParishNeighbourhoodPlan\\_Examiners\\_Report\\_Final.pdf](http://www.midsussex.gov.uk/media/SlaughamParishNeighbourhoodPlan_Examiners_Report_Final.pdf)

<sup>5</sup> <http://mycommunity.org.uk/wp-content/uploads/2015/09/Billesdon-Examiners-Report.pdf>

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housing land/reserve sites to minimise any potential conflict that may arise as per s38(5) of the Planning and Compulsory Purchase Act 2004.

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## **4 WALTON AND WELLESBOURNE WAY NEIGHBOURHOOD DEVELOPMENT PLAN**

### **4.1 Context**

4.1.1 These representations are made in response to the current consultation on the pre-submission version of the WWNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This section highlights the key points that Gladman would like to raise with regard to the content of the WWNP as currently proposed.

### **4.2 The suitability of the Neighbourhood Plan Area to support growth**

4.2.1 The settlement of Wellesbourne is located approximately 5 miles to the east of Stratford-upon-Avon and 6 miles to the south of Warwick. Wellesbourne has excellent access to transport corridors being situated just off the A429, which bypasses the settlement to the west and leads to Junction 15 of the M40 approximately 4 miles north of the settlement.

4.2.2 The settlement is well served by local facilities including retail shops, post office, public houses, offices, local primary school, community and other facilities together with medical, veterinary, pharmacy, banking and other services.

4.2.3 The main employment area in the settlement is located at the M40 distribution park to the west of the settlement adjacent to Wellesbourne Airfield comprising of a number of existing industrial and warehouse buildings. Recent outline planning permission has been granted for the southern part of the Distribution Park to be redeveloped into a mix-use scheme including the recently opened Sainsbury's food store, 44,430sqm of new manufacturing, logistics and distribution space and up to 99 new dwellings.

4.2.4 The draft WWNP contains various statements regarding the intention to preserve Wellesbourne Airfield and the 'established flying functions'. This will significantly limit the ability to deliver housing growth within the neighbourhood plan area, contrary to the national policy imperative which seeks to 'significantly boost the supply of housing'.

4.2.5 Following the planned end of flying functions at the end of 2016, the airfield will represent a partially brownfield site, the redevelopment of which will bring about positive changes to the local area in accordance with the requirements of the Framework which seeks to deliver sustainable development and encourage the effective use of land. It regeneration will presents opportunities bring about substantial benefits to the local community.

4.2.6 Wellesbourne Airfield has a direct functional relationship with Wellesbourne, an identified Main Rural Centre, and provides a sustainable opportunity for future growth. The WWNP should not unduly act to prevent the future redevelopment of this important site, which in its current form seems to be one of the WWNP's main objectives.

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## 4.3 Neighbourhood Plan Policies

### Policy WW1

4.3.1 This policy proposes multiple areas for the designation of Local Green Space (LGS). In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in §76-77 of the Framework. In particular, §77 sets out three tests that must be met and states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area is local in character and is not an extensive tract of land.'

4.3.2 It is noted that Policy WW1 seeks to implement the provision that any proposed green space should be subject to LGS designations. This is not appropriate and undermines the concept of a LGS designation. If development does come forward and provides additional green space provision they are unlikely to meet the tests set out above as there is no evidence to support their justification for inclusion. Further, once 'made' the WWNP cannot seek to implement new policy designations unless it is subjected to the rigours of consultation and examination.

4.3.3 Gladman recommend that paragraphs 2 and 3 of policy WW1 be deleted.

### Policy WW3

4.3.4 Policy WW3 as drafted sets a much more onerous test than justified by NPPF §126-141. It requires that new development does *"not cause harm to the character and appearance"* of heritage assets specified in a) to c). By contrast, the NPPF is clear that what is to be considered is whether development would have to the "significance" of the heritage asset.

4.3.5 There is no justification for WW3 being more onerous than the clearly established national policy. It should be reworded to reflect the NPPF approach.

4.3.6 Whilst supporting the protection of designated heritage assets, Gladman has concerns of the approach taken to deciding what is included within the Local Lists of Heritage Sites (Appendix 2). The identification of non-designated heritage assets must follow specific national policy and guidance which has not been followed.

4.3.7 Gladman also makes specific comments on the proposal to include a number of items on the Local List:

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Wellesbourne Airfield

- 4.3.8 The proposed designation of Wellesbourne Airfield and the Airfield Museum (by association) has been undertaken in a manner which does not have regard to the guidance for the designation of non-designated heritage assets apart from 2 word reasons for preservation contained in appendix 2 (namely the fact that it was a “WW2 airfield”). Gladman submit that the proposed designation is contrary to the approach to heritage in the NPPF. It seeks to implement a blanket restriction to the redevelopment of the airfield in a manner which is strictly prohibited by the PPG<sup>6</sup>.

Airfield Museum

- 4.3.9 The reason for preserving this states that it is the “WW2 memorabilia housed in a WW2 bunker” which is to be protected. It is clear that the memorabilia itself is neither a building, monument or natural feature and is therefore not capable of being listed. The decision as to whether to include the bunker within the Local List must therefore solely relate to the bunker itself, not its current use. Further, it is questioned whether the structure is of sufficient historical significance to be included within the list.

Vulcan Bomber

- 4.3.10 This aeroplane is a movable vehicle. It is neither a building, monument or natural feature and is therefore not capable of being listed. Further, Appendix 2 states the reason to preserve is “Cold war nuclear deterrent”. However, the airfield ceased to have military use a few years after the end of the second World War and it is not the case that Vulcan bombers flew from Wellesbourne as part of the Cold War deterrent. It is located here because that is where its owners choose to keep it. It would not be a planning matter if owners the vehicle chose to relocate it to an alternative location outside the neighbourhood area.
- 4.3.11 Accordingly, in light of the above, Policy WW3 does not have regard to the advice and guidance issued by the Secretary of State as is therefore contrary to basic conditions (a), (d) and (e).

Policy WW4

- 4.3.12 Gladman raise concerns that this policy is too restrictive. In this regard, Gladman question the purpose of 1) which states ‘*The pattern of open spaces surrounding Wellesbourne and Walton must be retained....*’ No definition is given as to whether the pattern of open spaces refers to the proposed ‘green fingers’ or whether the Plan seeks to place an additional level of protection over all areas of open countryside beyond the built up area.
- 4.3.13 Overall, this policy provides no clarity on how a decision maker will apply this policy in a consistent manner through the development management process as landscape considerations are highly subjective, therefore, without further clarity, this policy is likely to lead to inconsistencies in the decision making process.

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<sup>6</sup> PPG Paragraph: 001 Reference ID: 50-001-20160519

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4.3.14 §113 of the Framework refers to the need for criteria based policies in relation to proposals affecting wildlife, geodiversity sites or landscape areas, and their protection should be commensurate with their status giving appropriate weight to their importance and contribution to wider networks. As currently drafted Gladman do not believe that this policy aligns sufficiently with the requirements of the Framework and as such is considered to be inconsistent with basic conditions (a) and (d).

4.3.15 It would be prudent of the Parish Council to revisit this policy to ensure that it is consistent with the use of criteria based policies as required by the Framework. Gladman recommend the following wording for consideration:

*“The Wellesbourne and Walton Neighbourhood Plan will seek to enhance the landscape character and local distinctiveness of the wider area. Where necessary, developers are encouraged to take into consideration the characteristics and features of a development site and its surroundings.”*

Policy WW7

4.3.16 Policy WW7 seeks to identify areas where housing development is considered acceptable. In principle, Gladman support the Parish Council’s decision to identify housing reserve sites to be brought forward for development to respond to changes in the market.

4.3.17 However, the two sites that have been selected are unlikely to make any substantial contribution to assisting SADC in delivering additional housing should the need arise. This is particularly important given Wellesbourne’s role in the settlement hierarchy as a sustainable location for growth. Gladman do not consider that the designation of ‘area 2’ is appropriate within the plan given that it is not intended to come forward until the following plan period. Accordingly, the Plan only seeks to deliver a maximum of 50 dwellings to the north of Wellesbourne.

4.3.18 With regards to Wellesbourne Airfield this policy states that ‘Area 8 on the map which is on the site occupied by the Airfield where the flying function business should be retained and no housing development should occur.’

4.3.19 The landowners have made clear their intention to cease flying operations on Wellesbourne Airfield, as such, the WWNP should not be prohibitive in terms of the use of the site given that if/when airfield operations cease a number of policies contained in the WWNP will no longer be relevant.

4.3.20 Furthermore, Gladman note that the questionnaire survey identifies an overwhelming majority support (78%) for the redevelopment of previously developed land (PDL). Accordingly, Wellesbourne Airfield should therefore be regarded as a suitable location for future growth. However, the Plan does not consider any land for development on brownfield land and therefore we question how the spatial approach has been arrived at. The lack of any subjective analysis as to the sustainability of sites considered brings into question how the planning judgements that have been made in selecting sites have materialised through arbitrary assumptions as opposed to undertaking a comparative exercise to ensure the sites selected are able to contribute to the delivery of sustainable development. Indeed, the only reason for the site being rejected was in favour of retaining the flying function, once these operations cease, the policies contained in the

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Plan will no longer apply to the proposal and the redevelopment of Wellesbourne Airfield provides a perfect opportunity to deliver market and affordable housing.

- 4.3.21 The need to undertake such an assessment is considered to be most pertinent given the recent decision by Aylesbury Vale District Council to no longer contest a legal challenge by Lightwood Strategic in respect of the housing policies contained in the Haddenham Neighbourhood Plan due to serious errors relating to the scoring system used to allocate areas for development this subsequently led to the quashing of the housing and development chapter of the Haddenham Neighbourhood Plan.

#### Policy WW8

- 4.3.22 Following the adoption of the Core Strategy WW8 serves no purpose as it essentially repeats policy contained at the strategic level. Accordingly, the Local Plan policies are part of the development plan and will be taken into consideration whether or not they are included in the neighbourhood plan. Gladman therefore recommend the deletion of policy WW8.

#### Policy WW9

- 4.3.23 Whilst appreciating the aims of this policy, it is questioned whether the WWNP has any power to determine the letting criteria of vacated affordable housing, given there is no development which requires planning permission when these are relet.

#### Policy WW10

- 4.3.24 This policy requires development to be constructed in accordance with the SADC Design Guide. In this regard, the SADC Design Guide merely provides guidance and it should not be the role of the neighbourhood plan to require development to be in accordance with a document that may stifle innovation or originality. Furthermore, this policy requires homes to meet the 'optimal "accessible and adaptable dwellings" standards as set out in part M4 (2) Building Regulations to facilitate later life living. The use of M4(2) is an optional requirement, as such, the Ministerial Statement dated 27<sup>th</sup> March 2015 makes clear that the optional technical standards should only be undertaken through an emerging Local Plan based on a clear and up-to-date assessment of need. Neighbourhood Plans should not be used to apply the new national technical standards. If this element of the policy is progressed it will likely be found inconsistent with basic conditions (a), (d) and (e).

#### Policy WW12

Newly planted trees will not necessarily be on land which is transferred to the Parish Council. The requirement to provide commuted sums should only apply where a transfer occurs.

#### Policy WW14

- 4.3.25 Whilst it is understandable that local utilities infrastructure is of some concern to the local community, the pre-conditions set out in policy WW14 require developers to demonstrate robust provision of utilities to new sites which may include the funding of upgrades to offsite utilities infrastructure. This approach does not have regard to the requirements of national policy as it is the
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responsibility of the respective utilities companies to manage the capacity of these facilities and not developers who are only required to mitigate any potential adverse impacts associated with a development proposal, not solve existing problems or fund desirable infrastructure. In this regard, policy WW14 is not consistent with the requirements of §204 of the Framework and therefore in conflict with basic conditions (a) and (d) and should be deleted.

#### Policy WW15

4.3.26 This policy is inappropriate and should be deleted. The requirement to pay CIL is one governed by statute so does not need a WWNP policy. Where the money is spent is determined by secondary legislation and the Local Planning Authority; the WWNP is not able to require it is wholly spent in Wellesbourne, given this is outside Applicants' control.

4.3.27 Whilst it is useful to have a projects the Parish Council intend to spend CIL receipts on, this would be more appropriate in an Appendix rather than a policy.

#### Policy WW16

4.3.28 §7.3.3 notes with regret the absence of secondary school provision in the settlement, and the associated reduction of young people's association with their local community.

4.3.29 The redevelopment of Wellesbourne Airfield has the potential to resolve this situation. Given that positive neighbourhood planning should consider ways to gain benefits for the local community through development, this should factor should be considered when forming an appropriate policy response to the imminent closure of the airfield.

#### Policy WW17

4.3.30 This policy needs to be considered against the changes in permitted development rights for conversion of commercial premises to residential use, to ensure there is no conflict.

#### Policy WW18

4.3.31 Policy WW18 seeks to retain existing commercial business premises and employment sites including Wellesbourne Airfield within the Wellesbourne and Walton Neighbourhood Plan area. In particular, this policy seeks to retain and safeguard the needs of associated businesses, leisure and training activities.

4.3.32 Through the Framework the Government is committed to securing economic growth ensuring that the planning system does everything it can to support economic growth and makes clear that planning policies should act to encourage and not act as an impediment to sustainable growth. In particular, §22 of the Framework states:

*'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being use for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use,*

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*applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'*

- 4.3.33 Accordingly, the retention of Wellesbourne Airfield for employment use is inconsistent with the approach required by the Framework given the landowners intention to cease the operational capacity of the airfield function. Notwithstanding this, the proposed redevelopment of Wellesbourne Airfield does offer the potential of new employment land to be used to support the expansion of existing businesses in the local area to the potential benefit of existing businesses and local community members. Given the employment on the airfield is at a very low density, there is clearly the potential for the commercial elements of the regeneration to create significantly increased employment.
- 4.3.34 In light of the above, policy WW18 does not have regard to national policy and is therefore inconsistent with basic conditions (a) and (d).

#### Policy WW19

- 4.3.35 Notwithstanding the issues previously raised regarding the retention of the airfield, policy WW19 seeks to encourage the retention of Chedham's Yard and Wellesbourne Airfield as local attractions through the establishment of circular walks that pass places of interest. A neighbourhood plan can only contain policies relating to the development and use of land in the neighbourhood area. In this regard, it is considered that this policy is more akin to an aspirational initiative rather than a policy relating to land use. Accordingly, we recommend the deletion of policy WW19.
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## 5 STRATEGIC ENVIRONMENTAL ASSESSMENT

### 5.1 Strategic Environmental Assessment/Sustainability Appraisal

- 5.1.1 The preparation of neighbourhood plans falls under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) which require that a Strategic Environmental Assessment (SEA) to be undertaken where a plan's proposals are likely to result in significant adverse effects to the environment.
- 5.1.2 The SEA is a systematic process that should be undertaken at each stage of the Plan's preparation. It should assess the effects of the neighbourhood plan's proposals and whether these would lead to significant environmental effects when judged against all reasonable alternatives. The SEA should be able to clearly justify its policy choices and it should be clear from the results of this assessment why some policies have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both the chosen and rejected alternatives. The Parish Council's decision-making and scoring should be robust, justified and transparent in this regard.
- 5.1.3 Both the SEA Directive and Neighbourhood Planning PPG make clear that an SEA Screening Assessment should be undertaken at the earliest opportunity. Should the need for SEA be found necessary reasonable alternatives should be identified and considered at an early stage in the plan making process as the assessment of these should inform the preferred approach<sup>7</sup>. No information has been provided to date that demonstrates to those interested parties as to whether the WWNP requires an SEA or whether SADC has even investigated the need for SEA.
- 5.1.4 It would have been more appropriate for this consultation to have proceeded founded upon the correct document to explain (a) whether SEA is required; (b) how SEA will be conducted. The lack of this evidence puts consultees at a disadvantage to make an appropriate response in this regard. If a SEA is required then the Plan has progressed without the necessary evidence in order to refine the policies to deliver the preferred approach.
- 5.1.5 Although neighbourhood plans are not required to undertake a Sustainability Appraisal (SA), the preparation of an SA will help demonstrate how the policies contained in the Plan help contribute towards the achievement of sustainable development, a neighbourhood plan basic condition. As recently demonstrated in the Examiner's Report to the Storrington, Sullington and Washington Neighbourhood Plan<sup>8</sup>, failure to ensure that the neighbourhood plan contributes to the achievement of sustainable development may result in the plan being found contrary to the basic conditions that the Plan must meet. Failure to demonstrate that the Plan contributes to the delivery of sustainable development may prevent its ability to progress to Referendum.

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<sup>7</sup> PPG Paragraph: 037 Reference ID: 11-037-20150209

<sup>8</sup> [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0019/31483/Storrington-Sullington-and-Washington-NP-Final-Report-24.3.16.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0019/31483/Storrington-Sullington-and-Washington-NP-Final-Report-24.3.16.pdf)

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- 5.1.6 Gladman recommend that the Parish Council seek to address this issue in collaboration with SADC to determine whether an SEA is required. Should an SEA be required, extending this assessment to the preparation of an SA is unlikely to require significant additional input.

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## 6 SITE SUBMISSION

### 6.1 Wellesbourne Airfield

6.1.1 The Parish Council are aware that Gladman are promoting land at Wellesbourne Airfield for residential development and associated community infrastructure. Gladman consider the site to be suitable, available and deliverable. Appendix 1 provides a site location plan.

6.1.2 Gladman's primary position remains that the site should be included as a housing led regeneration site allocation within the WWNP. Alternatively, given the closure of the airfield will present future opportunities, it should be designated as a housing reserve site.

6.1.3 The proposal offers the opportunity to deliver development that advances the three principles of sustainable development and will help add vibrancy to the local area by improving its economic capabilities, not only through providing essential jobs through the construction phase, but will also provide numerous employment opportunities to the benefit of local businesses and residents.

6.1.4 The delivery of this site would result in the comprehensive redevelopment of Wellesbourne Airfield to accommodate a high quality sustainable residential development and has the potential to include:

- Circa. 1500 residential dwellings that will assist in the delivery of unmet housing needs and will provide a well balanced mix of dwellings providing a choice of type and size in response to the identified housing demand in Wellesbourne.
  - Significant improvements to the public realm providing a considerable amount of public open space, including the creation of formal open space/playing fields and areas of amenity green space and extensive green infrastructure network enhancing the range of local biodiversity available.
  - A network of attractive pedestrian routes through the site, linking it to Wellesbourne centre and the surrounding area and therefore encouraging healthier modes of transportation.
  - Significant highway improvements to several junctions including a new access onto the A429 with secondary accesses onto Stratford Road, Loxley Lane and Loxley Road together with associated highway works.
  - Educational facilities comprising of a two-form entry primary school and secondary school with associated playing fields and open space.
  - Employment development providing a range of uses. This offers the potential for both existing and new businesses to grow and expand ensuring the economic vitality of the local area continues to prosper.
  - A new neighbourhood centre with the potential to incorporate a range of facilities including doctors, dentists surgery, retail, financial, professional services, café/restaurant, office space
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and a separate local centre for retail, restaurant etc. meeting a number of the local community's needs.

- 6.1.5 The delivery of the above will help to sustain and support the vitality and viability of the area and ensure that its businesses, services and facilities continue to thrive. In addition, a number of the benefits associated with the redevelopment of Wellesbourne Airfield will help to ensure the Plan's wider objectives are delivered i.e. the delivery of a range of housing types, public open space and a range of community facilities where provision has not been accommodated for in the Plan. The allocation of this land for redevelopment will therefore provide certainty that these facilities will be delivered to meet the needs of the local community.

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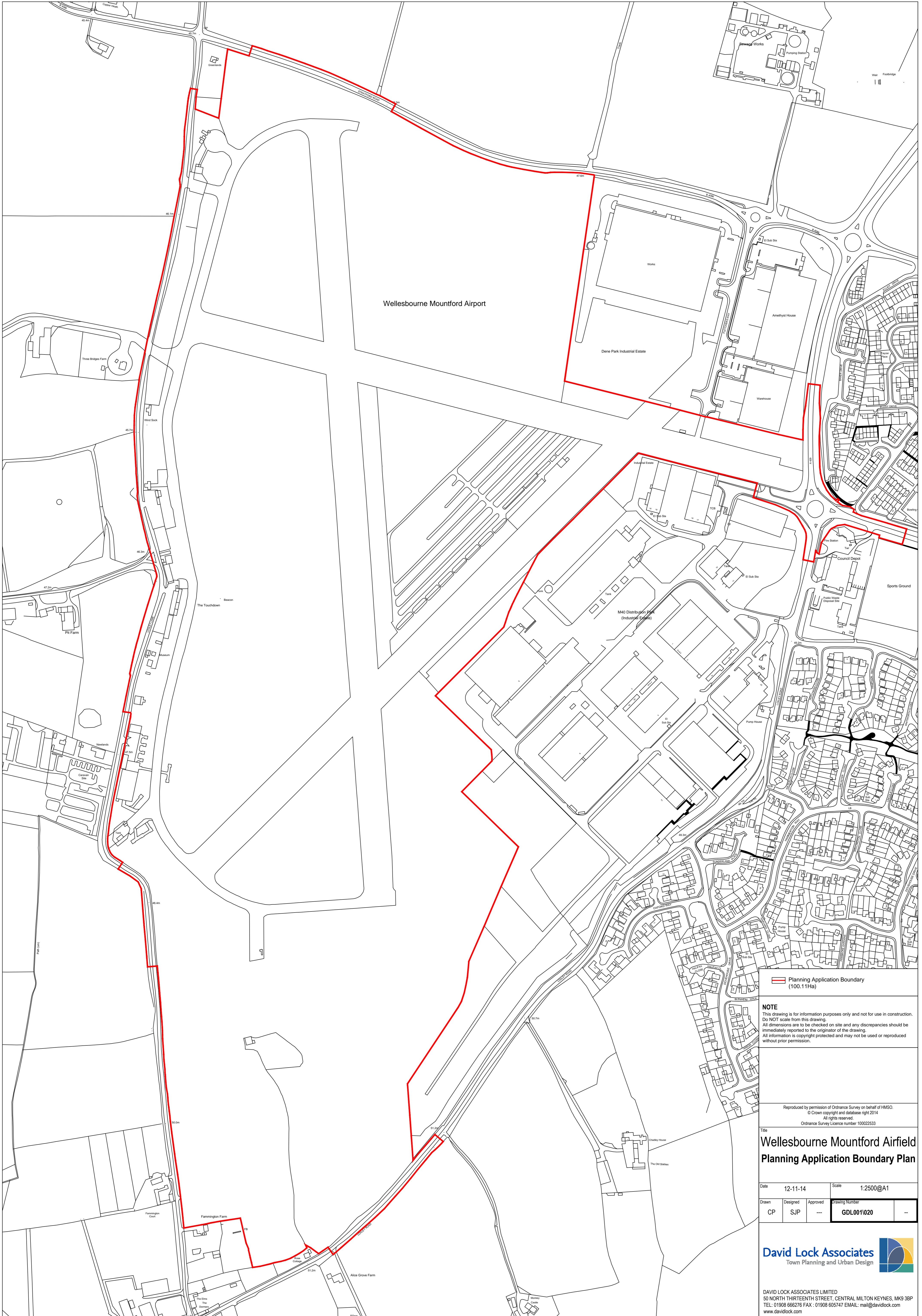
## **7 CONCLUSIONS**

### **7.1 Assessment against the basic conditions**

- 7.1.1 Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local area. However, it is clear from national guidance that the WWNP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence for the wider local authority area.
- 7.1.2 Through this response, we have sought to provide some constructive criticism and suggested a number of amendments to the Plan as currently proposed to ensure that they fully reflect the principles required by the Framework and PPG.
- 7.1.3 In order for the Plan to progress and be found consistent with all of the neighbourhood plan basic conditions set out in schedule 4b of the Town and Country Planning Act (as amended) the Parish Council must ensure that the Plan is reviewed to allow for a further degree of flexibility and its contents is based on robust and justified evidence.
- 7.1.4 The WWNP is contrary to the Framework/PPG and will likely be fail to meet a number of basic conditions if progressed in its current form. Specifically, the way in which the Plan unjustifiably seeks to designate Wellesbourne Airfield as a non-designated heritage asset in an effect to preclude the delivery of sustainable growth.
- 7.1.5 Gladman advise extreme caution proceeding the Plan to examination as currently drafted and would therefore like to offer our assistance to review the content of the WWNP in order to help refine the policies to ensure their consistency with the requirements of national planning policy and guidance and invite the Parish Council to contact us in this regard.
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# Appendix 1



Planning Application Boundary  
(100.11Ha)

**NOTE**  
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**Wellesbourne Mountford Airfield  
 Planning Application Boundary Plan**

Date	12-11-14	Scale	1:2500@A1
Drawn	CP	Designed	SJP
Approved	---	Drawing Number	GDL001020

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