

Quinton Neighbourhood Development Plan

Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012

Significant Comments from Stratford-on-Avon District Council

Section	Reference/ page	Comment
Paragraph 1.4	p.4	<p>The last line of this paragraph should be amended for accuracy and clarity. Suggested wording: "In this respect, the Plan includes policies relating to housing, design, the natural environment, infrastructure, and heritage assets".</p> <p>You could also note here that the NDP has identified a reserve housing site, Local Green Spaces and valued landscapes/views.</p>
2. The Role Of The Neighbourhood Development Plan	p.5	<p>Work has commenced on the South Warwickshire Local Plan which will replace the strategic policies of the Core Strategy once adopted. Reference to the South Warwickshire Local Plan should therefore be included at paragraph 2.8.</p> <p>It is also suggested to add a small section setting out how the NDP is required to meet the 'Basic Conditions'.</p>
Paragraph 2.4	p.5	NDPs are required to be in "general conformity" with the Local Plan. Suggested it would be better to read 'The Plan has been prepared to be in general conformity...'
Paragraph 2.10	p.6	For accuracy, it is suggested that this paragraph should be amended to read "The Plan has been prepared to be in general conformity with the SDC Core Strategy. In accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), an SEA Screening Document was prepared on behalf of Stratford-on-Avon District Council to determine whether the Quinton Neighbourhood Development Plan should be subject to a Strategic Environmental Assessment (SEA). It was determined that the NDP would not result in significant environmental effects in relation to criteria set out in the SEA Regulations or the Habitats and Species Regulations, and therefore did not require a SEA."
Paragraph 3.17	p.11	This paragraph states that the Long Marston Airfield development is outside the scope of the Neighbourhood Development Plan (NDP), however part of the site is in the Parish and neighbourhood designated boundary and as such 6.1.1 is incorrect as it states a significant amount of housing is underway ' <u>adjacent</u> to the area boundary...'; of course it is within the Neighbourhood Area also.

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		The NDP should acknowledge that the specific part of LMA within Quinton Parish is covered by the provisions of Core Strategy Proposal LMA and the Framework Masterplan Supplementary Planning Document.
4. Vision	p.16	<p>The 4th bullet should not be as restrictive regarding boundaries as some development may be necessary outside them. Suggest replace 'boundaries' with 'physical form'.</p> <p>The 5th bullet would be more precise if it read 'into and out of the Quinton villages'.</p>
5. Strategic Objectives	p.17	<p>2nd bullet point should read 'potential reserve housing sites' for clarity.</p> <p>5th and 6th bullet points both refer to green spaces, this is repetitive – could they be combined?</p> <p>8th bullet point should be deleted (please see separate comment on Policy NE.4)</p> <p>10th bullet point should be clear about what capacity is being referred to – presumably infrastructure and services.</p> <p>Last bullet point might be tweaked to read '...by future generations'</p>
General - Housing	p.18-25	<p>The Government has introduced criteria for 'First Homes', a specific kind of discounted market sale housing that is also classed as affordable housing: First Homes - GOV.UK (www.gov.uk)</p> <p>Local plans and neighbourhood plans submitted for examination before 28 June 2021 (Regulation 15), or that have reached publication stage (Regulation 14) by 28 June 2021 and subsequently submitted for examination (Regulation 15) by 28 December 2021, will not be required to reflect the First Homes policy requirement. However, this may mean that if the Plan is not submitted for examination before the 28 December 2021 the Plan may need to reflect this new guidance, therefore depending on your expected timings for the NDP to be submitted for Examination, it would be advisable to incorporate the First Homes requirement within an NDP policy.</p>
Policy HO.1	p.18	<p>The policy does not appear to cover as many exceptions as the Core Strategy in Policy AS.10. Furthermore, the policy should also state that the policy does not apply to areas covered by Core Strategy Proposal LMA and land covered by Policy AS.11 Large Rural Brownfield Sites.</p> <p>There is no mention of self-build and custom housebuilding being appropriate outside but adjacent to BUABs (as per the final paragraph of SAP Preferred Options Policy SAP.7). This should be included.</p> <p>Additionally, the 2nd bullet point would be more legible as a series of bullets.</p>

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Policy HO.2	p.18	<p>This is not written as a policy and there is no release mechanism. It is suggested to specify other requirements of development on the site, for example those identified in the Site Proforma for QUIN.08 in the SAP Preferred Options (see page 272).</p> <p>Suggested wording as follows: "The Plan safeguards land on the east side of Goose Lane (as shown at Figure 11) as a Reserve Housing Site, with the potential for future residential development of up to 30 dwellings. The safeguarded site will only be released during the Plan period if it can be demonstrated through the submission of evidence that there is an identified housing need for its early release having regard to the criteria in Policy CS.16 of the Core Strategy 2011-2031". This would replace the first 2 bullet points.</p> <p>The third bullet point could be retained, however it should be reworded for clarification. Suggested wording for the third bullet point is as follows: "An updated landscape sensitivity assessment should be provided as part of any future planning application for the reserve site. This assessment should pay specific attention to the proximity of the AONB."</p> <p>The supporting paragraph 6.1.34 should also be amended to clarify that the reserve site is being safeguarded within the NDP, in accordance with the suggested policy wording.</p>
Paragraph 6.1.12	p.21	<p>This notes the preference identified via the community survey for development sites under 10 homes. In practice, there are likely to be few, if any, 'windfall' sites greater than this size within the BUAB. The significance being that smaller sites are unlikely to trigger an affordable housing requirement. As such, if an identified need for affordable homes is to be met, this will most likely need to be met on a site outside the BUAB. This makes it all the more important that the Plan sets out a clear strategy for meeting the identified need, as evidenced in the 2019 Housing Need Survey. Although this need not necessarily take the form of an actual allocation for a 'Local Need' site, it may be prudent to consider whether a specific 'Local Need' policy would be appropriate.</p> <p>In addition, you may wish to consider a site-specific allocation for a 'Local Need' scheme, notwithstanding the support of the landowner would be needed to give credibility to such a site being deliverable.</p>
Paragraph 6.1.18	p.21	Policy CS.16 states in regards to Category 1 settlements that " <i>approximately</i> 450 homes in total, of which no more than <i>around</i> 25% should be provided in any individual settlement" – Policy CS.16 is not as definitive in

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		housing requirements as Paragraph 6.1.18 suggests, and therefore the paragraph should be amended to reflect this.
Para 6.1.23 & Figure 10	p.22	The SHLAA 2020 Update should be shown – it is also likely that a 2021 Update will have been produced by the time the NDP gets to the next stage.
Paragraph 6.1.30	p.23	<p>This paragraph states at an open day presentation, comments were received about the need for affordable housing and bungalows - however no mention is made as to how the plan could meet that need. Incidentally, the Housing Needs Survey found that 14 of the 19 homes required are bungalows (both affordable and market). Consequently, consideration could be given as to whether the NDP should include an additional policy dealing with stock mix, to reflect the findings of the 2019 survey, though such a policy should of course not hinder development.</p> <p>That being said, it is unlikely that there will be sites within the BUAB of a size that will require on-site affordable housing. Any reserve site will of course only be released as per the relevant triggers, as such the timing of the release would be uncertain and the identified need exists now.</p>
Paragraphs 6.1.31 and 6.1.32	p.23	These paragraphs are confusing to read as it is written in present tense and suggests that a reserve site has not yet been identified. The supporting text here and at 6.1.34 should clarify that the NDP is in fact safeguarding a reserve housing site at Policy HO.2 (not just 'influencing' its siting and size or 'supporting' it).
Policy HD.1	p.27	<p>This policy is very lengthy. Many of the key guiding design principles listed within the policy are repeated at Appendix 4, there is no reason to repeat them in the policy as long as the policy refers to those design principles (see Policy DP.1 of the Ilmington NDP which has passed referendum as an example).</p> <p>2nd design principle: It is not reasonable to protect every view into the village. Suggest amending to "the rural landscape setting should be conserved, and valued views into, out of and within the villages respected."</p> <p>An additional principle could be added to address climate change. Suggested wording "New development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption." (see paragraph 153 of the NPPF).</p>
Paras 6.2.7-11	p.30	References given are to the District Design Guide published in 2001 which has been superseded by the design section of the Development Requirements SPD. The latter should now be quoted.
Policy NE.1	p.32	Concern is raised as to whether the cluster of three verges labelled as site 7 just to the north of the church would meet the NPPF assessment criteria.

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		The size and shape of proposed LGS site 8 seems to be incorrect, when looking at it on GiS and the Landscaping Plan for the Reserved Matters permission (Ref: 17/00863/REM).
Figure 12	p.34	The BUAB on this map is different to the BUAB shown on Figure 9.
Policy NE.2	p.36	<p>The policy seems to cover vistas, views and skylines as well as landscapes. The policy title should be amended to reflect this.</p> <p>Second bullet point – all land parcels within a particular vista can't be 'maintained and safeguarded' in perpetuity. The phrase 'maintained and safeguarded' should be replaced by 'respected'.</p> <p>The policy wording should note that the valued landscapes/vistas/skylines are identified within Figure 23 to be clear as to how the policy should be applied. Figure 23 should be moved to sit beneath this policy, accordingly.</p> <p>Figure 23 includes "other valued views" but there is no explanation or justification for why these views are particularly special. It is unclear whether these "other valued views" are also intended to fall under the scope of Policy NE.2, and if so, why no descriptions/photographs of these views have been included in the Plan to justify their inclusion.</p> <p>Appendix 2 is titled "Valued Landscapes & Key Viewpoints" but Figure 23 is titled "Valued Landscapes and Key Views", whilst Figure 23 itself only seems to show views. Conversely, Policy NE.2 refers to valued landscapes, important views, vistas and skylines. This inconsistency in terminology should be rectified.</p>
Policy NE.3	p.38	How do you measure what is sufficient light for personal safety? Everyone will have their own 'standard'... In addition, highway safety is also a consideration. It is suggested to re-word this policy as per policy NE.6 of the Ilmington NDP which has passed Referendum.
Policy NE.4	p.41	Ridge and Furrow is a non-designated heritage asset and cannot be protected in the same way as designated heritage assets such as Conservation Areas or Listed Buildings. There is nothing in policy terms that can prevent ridge and furrow being ploughed- no specific consent is required. Additionally, non-designated heritage assets are already covered under Policy HA.1 of the Plan. Therefore, this policy should be deleted from the Plan.
Policy NE.6	p.46	This policy could be subsumed within policies NE.1 (amenity) and NE.5 (biodiversity).
Policy INF.2	p.49	The majority of points appear to be already covered by other policy/ legislation (eg. Building Regulations).

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Policy INF.3	p.52	The policy as worded would be difficult to implement. It doesn't really support new provision, as such. See Policy ETA.5 of the Ilmington NDP for more appropriate wording.
Section 6.5 – Heritage and Archaeological Assets	p.55	The Strategic Objectives on this page differ from those listed on p.17 (the last two bullet points). The Strategic Objectives on p.55 should be amended to match those listed on p.17.
Policy HA.1	p.55	<p>This policy does not distinguish between designated and non-designated heritage assets.</p> <p>Suggest re-wording policy to read as follows: "The Neighbourhood Plan Area's historic environment should be conserved and wherever possible, enhanced. Development should conserve designated and non-designated heritage assets in a manner appropriate to their significance. New proposals must be of high quality, sensitively designed and informed by a clear understanding of any potential harm to the significance of any heritage asset and its setting."</p>
Paragraph 7.18	p.62	<p>The 2019 HNS is mentioned in 7.18, but as already mentioned the plan does not account for how it proposes to meet this need. There has been/will be development at Lower Quinton / Meon Vale / Long Marston Airfield that could potentially address some of this identified need (although the developments are ostensibly intended to contribute to meeting District-wide needs) subject to the right stock and tenure profiles. However, the NDP does not indicate any preferences for how this identified need might be met locally, and there is not a policy in the NDP seeking to target the stock/tenure profile of any new developments to meet the identified need. This should be considered in the Plan.</p> <p>If the local community decide not to allocate a specific local need site, consideration could be given to a policy encouraging a high standard of accessibility (e.g. homes to Part M4(2) standard) as a means of meeting the identified need, justified by the findings of the HNS where 14 of the homes required are bungalows (both market and affordable).</p>
Appendix 3	p.69	The LGS Site Assessments should be stitched into the NDP, for ease of access, as they are currently separate from the NDP document.
General Comment	N/A	There is a lack of policy to address climate change in the context of the Climate Change Emergency. One possible approach might be to use Core Strategy Policy CS.2 (Climate Change and Sustainable Construction) as a starting point, and then consider whether there are any specific measures that could be taken at Neighbourhood Area level. The adopted SDC Climate Change Adaptation and Mitigation Supplementary

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		Planning Document would also be helpful in this respect. Whilst the NDP does have policies on flood risk, biodiversity and footpaths/cycle ways which all have a relationship to climate change, this is not made explicit in the Plan. The Plan could look at further measures such as the incorporation of renewable energy, the provision of electric car/charging points, and the design and layout of new developments in order to adapt/mitigate to the effects of climate change.