



# Quinton

## Neighbourhood Development Plan

2011 – 2031

### Consultation Statement

17<sup>th</sup> December 2021

## CONTENTS

1. Introduction	3
2. Aims of Consultation	3
3. Background	3
4. Communications	4
5. Consultation Process and Timetable: Residents	5
6. Consultation Process and TIMETABLE: Regulation 14 pre-submission	7
7. Consultation Input	8
8. Appendix 1 - Quinton Steering Group (QSG): Timetable of events	9
9. Appendix 2 - Parish Council: timetable of key decisions	13
10. Appendix 3 - Flyers and Posters	14
11. Appendix 4 - Newsletter Articles: samples	20
12. Appendix 5 - Consultation Process	27
13. Appendix 6 - Residents Survey May 2018: Final Report	31
14. Appendix 7 - Housing Needs Survey REPORT: May 2019	32
15. Appendix 8 - Regulation 14 Pre-Submission Consultees May/June 2021	33
16. Appendix 9 - Regulation 14 Pre-Submission Consultation Responses	36
17. Appendix 10 - Strategic Environmental Assessment REPORT: April 2021	38
18. Appendix 11 - The significant comments from SDC	40
19. Appendix 12 - The minor comments from SDC	47
20. Appendix 13 - Changes based on comments from SDC	48
21. Appendix 14 - Changes based on comments from Severn Trent et al	53
22. Appendix 15 - Comments from WCC	56
23. Appendix 16 - Comments from Severn Trent	59
24. Appendix 17 - Comments from Historic England	64
25. Appendix 18 - Comments from Cotswolds Conservation Board	66
26. Appendix 19 - Comments from Rosconn	68
27. Appendix 20 - Comments from Redrow	79

## 1. INTRODUCTION

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012, Section 15(2). Part 5 of the Regulations set out what a Consultation Statement should contain:

- a. Details of the persons and bodies consulted about the proposed neighbourhood plan;
- b. Explains how they were consulted;
- c. Summarises the main issues and concerns raised by the person consulted;
- d. Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

## 2. AIMS OF CONSULTATION

The aims of the Quinton Neighbourhood Development Plan (NDP) consultation processes are:

- a. To ensure that Quinton's residents, local businesses and other interested parties have the opportunities to input to the Neighbourhood Planning process;
- b. To ensure this broad consultation took place at critical points in the process;
- c. To ensure the consultation process used a variety of approaches and techniques in order to maximise community and business input;
- d. To provide feedback to the community and local businesses.

## 3. BACKGROUND

Quinton Parish Council (QPC) first began to consider the benefits of a Neighbourhood Plan in 2017.

QPC agreed to form a sub-group (the 'Steering Group') to develop the NDP for the Neighbourhood Area (see Appendix 1 and 2 Steering Group and Parish Council: timetable of key meetings/decisions). It was agreed that the group should be a mix of Parish Councillors and volunteers. Paul Milliken, Councillor, offered to act as Chairman and 2 fellow Councillors also agreed to join. Volunteers were sought through an article in the Church Newsletter and in the Parish Council Minutes posted on Parish noticeboards. This resulted in 7 Neighbourhood Area residents (later reduced to 5) joining the 3 Councillors on the steering group. The members of the group were living in both of the 2 main villages (Upper and Lower Quinton) of the Neighbourhood Area.

Meetings of the steering group commenced in September 2017 and a modus operandi was agreed which included meeting monthly and taking Minutes. Progress Reports were given at each Parish Council meeting attended by members of the public. The terms of reference for the Steering Group were approved by the Parish Council on 23rd January 2018.

The strategy that emerged through discussion was to ensure that consultation focused on 3 groups and in ways that would engage them most effectively. These groups were: Neighbourhood Area residents (through Newsletter articles, flyers, open days), and landowners/businesses in the Neighbourhood Area and other local interest groups such as the Primary School (consulted through one-to-one interviews).

## 4. COMMUNICATIONS

A number of communication channels were used to ensure the maximum coverage of residents.

**Flyers:** typically, these are one-page Flyers (double sided) printed on glossy robust paper by a printer in Stratford-upon-Avon which volunteers then post through the letterboxes of each household in the Neighbourhood Area. They are used to provide information on the NDP and to encourage residents to complete the residents survey and to visit Open Days and the NDP website. See Appendix 3 for examples.

**Noticeboards:** there are noticeboards in both Upper and Lower Quinton as well as Meon Vale. These are used to communicate information on the progress of the Plan via the Parish Council Agenda and Minutes. They are also used to display posters advertising Open Day communication and consultation events. See Appendix 3 for an example.

**Church Newsletters:** These are booklets of about 10 pages (double sided) distributed by volunteers to every household in the Neighbourhood Area every 2 months. It contains news and information on Neighbourhood Area events and each issue has an update on Parish Council matters. The Newsletters contain specific information and updates on the NDP with the contact information for the Steering Group in case of questions. See Appendix 4 for examples.

**NDP website:** this can be found at [www.quinton-plan.org](http://www.quinton-plan.org). It is used to provide both current and historical information on the development of the NDP together with notices of open days and provides residents with the ability to download draft versions of the NDP and associated material.

**Facebook:** this has been used to publicise open days to encourage attendance by residents.

## 5. CONSULTATION PROCESS AND TIMETABLE: RESIDENTS

(See Appendix 5 Consultation: examples of open day materials, and Appendix 6 residents survey and Appendix 7 housing needs survey).

### Process

**Open Days:** The Quinton Village Hall was chosen as the location given its central position in the Neighbourhood Area. The format was similar for all three Open Days: a series of stands held posters covering the relevant material which visitors were encouraged to walk around at their leisure. Volunteers from QPC and the Steering Group were on hand to help explain the material and answer questions. Visitors were encouraged to write comments and provide input on large 'post-it' notes which were then put on tables so all could see them. After each Open Day the Steering Group reviewed the day and analysed all the comments and the key themes were used to help improve and revise the relevant sections of the draft Plan.

The Open Day in June 2021 was subject to Covid restrictions so in this case visitors were asked to provide comments via email to the consultation email address: [consultation@quinton-plan.org](mailto:consultation@quinton-plan.org)

**Residents Survey:** This was designed using the advice and resources of the Performance, Consultation, and Insight Unit (the Unit) at Stratford on Avon District Council (SDC). The survey was hand delivered to each household in the Neighbourhood Area (1111 properties) by volunteers during May 2018. The Unit suggested that 2 forms should be delivered to each household to allow for 2 adults each to submit a survey. This was agreed. It was also agreed that extra forms would be provided at the Quinton Post Office or via the website should there be more than 2 adults in each household. Residents were provided with a Freepost envelope to send the completed forms to the Unit for analysis.

**Housing Needs Survey:** this was designed by Warwickshire Rural Community Council (WRCC) and together with a covering letter written by the Steering Group was posted to each household in the Neighbourhood Area to be returned by 13th April 2019. Completed survey forms were returned by Freepost envelope direct to the Rural Housing Enabler at WRCC. The Survey Report was produced in May 2019 and this report was then reviewed by the Steering Group. See Appendix 7.

**Interviews:** local businesses and stakeholders were invited to participate in interviews with members of the Steering Group and QPC. These were held with Lower Quinton Primary School, Meon Medical Centre, the Spencer family (Farm and SweetPea business), Rosconn (developer), Redrow (developer), Anthony Hodges and agent (landowner), Savills (agent for Magdalen College). The findings of these interviews were discussed within the Steering Group to help refine the draft NDP.

### Timetable

#### Event: Open Day on 21st April 2018 1030-1600 Quinton Village Hall

**Purpose:** To communicate the purpose of the NDP and the scope of the upcoming residents survey and asked for input on the questions that would be most useful. Draft questions were produced to help respondents understanding of the survey scope and intent.

**Outcome:** attracted 72 visitors and generated 133 comments/input which helped to refine the questions in the survey to ensure that they covered the areas of most concern and were clear to residents.

#### Event: Residents Survey May/June 2018

**Purpose:** To inform the development of proposals within the Plan and to ensure that these reflected the views of the residents. In particular residents were asked which if any of the sites immediately adjacent to the Built-Up Area Boundaries of Lower and Upper Quinton would be suitable for future housing

development. This input was designed to help the steering group determine the location of a potential reserve site for housing.

**Outcome:** A total of 413 survey responses were received (372 paper plus 41 online). A summary report was produced by the Unit for the Parish Council and the final report was produced in July 2018. The Steering Group and the Parish Council discussed the survey findings and these were used as the basis for the draft policy proposals that were developed for the NDP.

**Event: Open Day on 13th April 2019 Quinton Village Hall**

**Purpose:** To focus on the outcome of the survey and how it fed into draft policy proposals on Housing, Green Spaces, Landscape Views and Dark Skies including potential reserve site locations. The draft Vision for the NDP was also presented for comment.

**Outcome:** attracted 93 visitors and generated 107 comments/input. This input helped to refine the proposals including the draft Vision statement. In particular the comments received on the Housing proposals helped to determine which sites would be considered as potential reserve sites.

**Event: Housing Needs Survey April/June 2019**

**Purpose:** To identify specific housing needs from resident households

**Outcome:** 35 forms were returned. The findings were then analysed by WRCC, and a report issued which was reviewed by the steering group on 17<sup>th</sup> June 2019. See Appendix 7. These findings were used to further inform the policy proposals in the draft NDP concerning housing needs.

**Event: Open Day on 21<sup>st</sup> June 2021 Quinton Village Hall** (organised to be compliant with ongoing Covid requirements).

**Purpose:** To present the proposals contained within the draft NDP as part of the Regulation 14 pre-submission consultation. Hard copies of the draft NDP were available for visitors to peruse. Given the need to minimise contact and the use of pens/paper visitors were asked to submit comments via the dedicated email address on the website.

**Outcome:** 35 visitors attended. Their comments and input were captured in the table of Regulation 14 consultation input (see Appendix 8).

## 6. CONSULTATION PROCESS AND TIMETABLE: REGULATION 14 PRE-SUBMISSION

Discussions were held initially with Matthew Neal and thereafter with Louisa Slator of SDC to ensure that the QPC and the Steering Group fully understood the requirements of Regulation 14 consultation. A draft NDP was shared with SDC for an informal 'health check' prior to formal submission.

We were advised by SDC at this point that the draft NDP would need to be screened by various statutory bodies to establish whether a Strategic Environmental Assessment (SEA) would be required.

**Strategic Environmental Assessment:** in April 2021 SDC's Planning Manager confirmed that "having read the submitted draft NDP, SEA Screening Document and responses from the three statutory consultees, I concur with the view that a SEA is not required for the Quinton NDP". See Appendix 9.

### Regulation 14 Consultation

QPC were briefed on the consultation requirements at the PC meeting on 4 May 2021 and determined that the 6-week consultation period should be from 17 May to 27 June 2021 inclusive.

**Statutory Consultees:** in May 2021 SDC (Louisa Slator) advised on the consultation requirements and also forwarded both a list of statutory consultees and also a list of other contacts (e.g., Councillors) which SDC required to be consulted. In the week commencing 17 May 2021 each consultee was emailed asking for input on the draft NDP and was sent a link to the NDP webpage which included a dedicated email address for the receipt of consultation input. In addition, the email to consultees included an attachment containing the policy proposals in the draft NDP for ease of reference. See Appendix 8 for the list of consultees.

**Residents:** the quarterly Newsletter which was distributed to all households in the Neighbourhood Area at the end of the week commencing 17 May contained the policy proposals in the draft NDP and information on the consultation process and how to submit comments by email or post. Posters were put up in the Neighbourhood Area advertising the Open Day held on 21 June 2021 in Quinton Village Hall. See Appendices 3 and 4 for examples of flyers and Newsletter articles.

**Consultation Responses:** 32 respondents provided input mostly by email (some emails included the names of more than one respondent). Of these 14 were residents. By far the largest number of comments was made in the input provided by SDC. The comments received were reviewed by a small sub-group of QPC and a table prepared summarising the nature of the input from each respondent and the proposed response. This table was shared with all the members of the QPC and at the QPC meeting of 7 September 2021 the responses to the consultation were agreed. Subsequently the draft NDP was amended where required to incorporate the input received. See Appendix 8 for the table which outlines the responses to the comments/input received during Regulation 14 consultation.

## 7. CONSULTATION INPUT

Most input from residents and landowners and their agents concerned the issue of future housing development and in particular the selection of a potential reserve site for the Neighbourhood Area. In parallel to the NDP consultation process SDC was also developing and consulting on a Strategic Housing Land Availability Assessment (SHLAA) and a Site Allocation Plan for the District and as part of this process an assessment was made by SDC of those sites adjacent to the Built-Up Area Boundaries of Lower and Upper Quinton. This assessment together with the views of residents and other stakeholders helped shape the proposals in the Plan regarding potential reserve sites. See Appendix 6 Residents Survey Report.

Two landowner agents (Rosconn and Redrow) proposed alternative sites to that proposed in the Plan. These alternatives were considered by the steering group and the Parish Council before determining the final reserve site policy. The agent (Savills) for the principal landowner around Lower and Upper Quinton (Magdalen College) supported the site proposed in the Plan. See Appendix 5: Regulation 14 consultation.

The other principal issues raised during the consultation concerned the identification of Local Green Spaces, the preservation of the separate identities of Lower and Upper Quinton villages and the preservation of the rural character of the Neighbourhood Area. Residents also commented on the impact of the large housing developments (Meon Vale and Long Marston Airfield) that are on the boundary of the Neighbourhood Area. However, these developments are outside the scope of the Plan.

## 8. APPENDIX 1 - QUINTON STEERING GROUP (QSG): TIMETABLE OF EVENTS

### 2017

**October 12:** Initial Meeting of 8 Volunteers

**November 2:** Agreed to adopt the Parish boundary as the Neighbourhood Area boundary as proposed by Stratford District Council (SDC); roles within the QSG defined and agreed

**December 7:** QSG expanded to 10 volunteers; Terms of Reference (TOR) drafted

### 2018

**January 4:** Website and mailbox hosting arrangements and domain name agreed

**February 1:** Workshop used to generate policy areas and topics for the NDP

**March 3:** Flyers produced for distribution to Quinton households; Briefing by Simon Purfield (consultant with SDC) on designing and producing a resident survey questionnaire; agreement to seek community input and feedback on the questions to be used

**April 5:** Design of the community Open Day

**April 21:** QSG run the community Open Day to communicate the purpose of the NDP, the process to be followed and to share and seek feedback on the proposed resident survey questionnaire

**May 26/27/28:** The survey is distributed to resident households by the QSG

**August 9:** Final report on the survey findings reviewed; communication by leaflets and the website of the report and findings agreed

**September 6:** Review of information provided through consultation with Savills (agent for Magdalen College – principal landowner) and SDC (Strategic Housing Land Availability Assessment – SHLAA)

### 2019

**January 17:** Draft framework (Chapter headings, content areas) agreed; Vision statement agreed; commissioning of a Housing Needs survey agreed

**February 21:** Local Green Spaces draft reviewed and agreement to use the assessments and produced by Avon Planning; Housing allocation approach (to focus only on potential reserve sites) agreed

**April 4:** Design and organisation of the community Open Day agreed

**April 13:** QSG run the community Open Day to gain feedback on proposals concerning Housing, Local Green Spaces, Landscape Views and Dark Skies.

**May 20:** Draft Housing proposals agreed

**August 30:** Review of Housing proposals following the publication by SDC of the draft Site Allocation Plan for the district

## 2020

**May 13:** Draft reviewed for submission to SDC for a 'health check'

**June 15:** Draft submitted to SDC for a 'health check'

**July 24:** Comments received from SDC; in particular stating that the proposed 'reserve site' (Airfield House) would be acceptable as the land has been classified as brownfield

**September 14:** Final meeting of the full QSG (via Zoom); agreed that the 3 Parish Councillors on the QSG should now take the work forward to further refine and complete the Plan and liaise with the Parish Council and SDC as required; the other members of QSG would be kept abreast of progress and would have the opportunity to comment/input via email as required

## 2021

**June 12:** QSG volunteers are present at the Open Day Reg. 14 consultation event to assist residents understanding of the Plan's content and the consultation process

## **QSG Composition (2017-2020)**

**Paul Milliken Chair:** Parish Councillor, Lower Quinton resident

**Chris Watson Secretary and Website host:** Parish Councillor, Upper Quinton resident

**Robert Spooner Housing focal point:** Chair of the Parish Council, Lower Quinton resident

**Jim Barton:** Lower Quinton resident

**Roger Jenman:** Lower Quinton resident (left the QSG in 2019)

**Mary Johnson:** Upper Quinton resident

**Jan Gullachsen:** Lower Quinton resident

**Jim Sampson:** Lower Quinton resident

**Dick Sheppard:** Lower Quinton resident (left the QSG in 2018)

**Emma Vergette:** Lower Quinton resident

## Quinton Neighbourhood Plan Steering Group Terms of Reference

- 1. Purpose** To oversee the preparation of the Neighbourhood Plan for Quinton Parish that will then progress to Independent Examination, and a successful community referendum leading to adoption by Stratford upon Avon Council as part of planning policy.
- 2. Principles** The Steering Group will engage the local community to ensure that the Plan is representative of views in the Parish. Care will be taken to ensure that as far as possible/practicable there is every opportunity for all sections of the community to express opinions and ideas, and to be consulted on proposals.
- 3. Roles and Responsibilities** The Steering Group will : a) Be accountable for developing the Neighbourhood Plan for Quinton Parish; b) Produce, monitor and update a project timetable; c) Produce a consultation and engagement plan; d) Regularly report back to the Parish Council; e) Undertake analysis and evidence gathering to support proposals and conclusions; f) Liaise with the Parish Council to secure funding as required; g) Ensure that appropriate advice and input from the relevant authorities is obtained; h) Consult so that the draft and final Plan is representative of community views; i) Provide a final version of the Plan for the Parish Council to ratify and submit.
- 4. Membership** The Steering Group will be made up of volunteers from the community including Parish Councillors. To ensure effectiveness, the Group will have no more than 10 members but will be able to co-opt additional members as required who have specific expertise or information to contribute. The Group will elect a Chair and Secretary and also nominate other members as focal points for specific areas as required.
- 5. Decision Making** The Steering Group has full delegated authority from the Parish Council to discharge its specific roles and responsibilities as detailed above. The overall Neighbourhood Plan process remains the responsibility of the Parish Council as the qualifying body. All publications, consultation and community engagement exercises will be undertaken by or on behalf of the Parish Council with appropriate recognition.
- 6. Meetings** Steering Group meetings will take place monthly or more frequently as required. Minutes of meetings will be kept and made available to the public through the normal Parish Council process. Decisions made by the Group should normally be by consensus; if required the Chair has the casting vote.
- 7. Working Groups** Where necessary, the Steering Group may establish working groups to aid in specific areas; such groups may require additional volunteers from responsibilities as detailed above. The overall Neighbourhood Plan process remains the responsibility of the Parish Council the community. The lead in such groups will be a member of the Steering Group.
- 8. Finance** All grants and funding will be applied for and held by the Parish Council. The Steering Group will advise the Parish Council of planned expenditure and where significant this will be advised before it is incurred. Steering Group members and volunteers may claim back from the Parish Council agreed expenditure incurred during any Neighbourhood Plan related work. In cases of doubt advice from the Chair or Secretary must be sought.
- 9. Conduct** It is expected that all Steering Group members abide by the principles and practice of the Parish Council Code of Conduct including declarations of interest. Throughout their work, the Steering Group will treat everyone with equal respect regardless of their age, gender, sexual orientation, ethnicity or religion and belief, and actively promote equality of access and opportunity.
- 10. Changes** Any amendment to these Terms of Reference requires the approval of Changes Any amendment to these Terms of Reference requires the approval of the Parish Council.
- 11. Dissolution** The Steering Group will be dissolved once its purpose has been met and exceptionally can be dissolved at any earlier stage at the discretion of the Parish Council.

*Agreed with Quinton Parish Council 23rd January 2018*

## 9. APPENDIX 2 - PARISH COUNCIL: TIMETABLE OF KEY DECISIONS

### 2018

**January 23:** Approval of Terms of Reference for the Steering Group

**September 4:** Input agreed to the Strategic Housing Land Availability Assessment (SHLAA) using the findings of the Residents Survey

**October 23:** Funding agreed for the appointment of an external consultant (Avon Planning) to assist with the assessment of Local Green Spaces

### 2019

**March 5:** Commissioning of a Housing Needs Survey agreed

**March 9:** Review of draft NDP policy proposals circulated by the Steering Group

**September 3:** Input agreed to the Site Allocations Plan consistent with the draft proposals in the Neighbourhood Development Plan

### 2020

**March 10:** Draft of NDP policy proposals agreed for submission to Stratford District Council

**July 7:** Chair of the Steering Group confirms that the latest version of the draft Plan has been submitted to Stratford District Council for a 'health check' following circulation to Parish Councillors

### 2021

**May 4:** Regulation 14 consultation period agreed for May 17 to 27 June inclusive

**July 6:** Regulation 14 consultation outcomes and responses shared and agreed

### 2021

**May 4:** Regulation 14 consultation period agreed for May 17 to 27 June inclusive

**May 25:** Details on the upcoming 12 June Open Day consultation event captured in the Parish Council Minutes for the information of residents

**July 6:** Regulation 14 consultation outcomes and responses shared and agreed

**Sept 7:** Responses to Regulation 14 consultation input agreed. Avon Planning consultants engaged to assist with the preparation of the basic conditions statement.

## 10. APPENDIX 3 - FLYERS AND POSTERS

Flyers were hand delivered to each household. The original flyers can be found on the Plan website: [www.quinton-plan.org](http://www.quinton-plan.org)

- 1) **Flyer 2018:** introduction to the Neighbourhood Development Plan
- 2) **Flyer 2018:** summary of Residents Survey Findings
- 3) **Poster 2021:** several posted around the Neighbourhood Area to advertise the Regulation 14 consultation event (hand delivery not used due to Covid concerns)



## OUR QUINTON NEIGHBOURHOOD PLAN

### **What's it all about?**

Quinton residents need a bigger say in how the parish develops. The parish includes Meon Hill, Upper and Lower Quinton villages and the surrounding rural countryside, parts of Meon Vale and Lower Clopton.

Our Neighbourhood Plan will give us a bigger say but only if it reflects the views of people in the parish. This leaflet is the start of helping you as a Quinton resident understand what will be involved and how you can help.

### **What will the Plan be and what will it do?**

The Plan will state what types of development if any would be supported by us the residents and by the business and land owners in Quinton. It will also include our views on the preservation of key heritage features and improvements to village facilities. The Plan, once approved, has to be taken into account by Stratford District Council when they review planning applications in Quinton.

### **Can we use the Plan to stop any more housing being built?**

No. The purpose of a Neighbourhood Plan is not simply to block developments but rather to increase the influence of residents in the planning approval process. Stratford District Council already have a Plan for housing numbers covering the period 2011-2031. They have confirmed that including the developments already approved, there is no short term need for Quinton to have extra housing schemes. However

<http://www.quinton-plan.org/>



they are looking to identify 'reserve sites' in each parish in case this position changes.

### **How can Quinton residents get their views into the Plan?**

In different ways : there will be meetings in the Village Hall, a questionnaire, input via the internet and interviews with business and land owners. Watch out for more on this shortly. Also look for updates on our Plan website at this address : [www.quinton-plan.org](http://www.quinton-plan.org)

### **Who decides what goes into the Plan?**

Stratford District Council will require that the Quinton Neighbourhood Plan has been developed using the views expressed by the residents and they will use an independent assessor to help with this. We as residents will then be asked to approve the Plan by means of a parish referendum. So **Quinton residents will have the final say.**

During 2018, the Plan will be developed by the Quinton Parish Council using a Steering Group of volunteers from across the parish. These volunteers can help with questions. They are : Paul Milliken, Chris Watson, Robert Spooner, Emma Vergette, Mary Johnson, Jim Barton, Ian Ferguson, Roger Jenman, Dick Sheppard, Jim Sampson.

Updates on the Plan are provided at each Parish Council meeting so please come along if you want to hear more.

**Our Plan will only be as good as the input we get from you so please participate as and when you can. Thank you.**

<http://www.quinton-plan.org/>

11.2. Flyer August 2018 (In Colour, 1 page 2 sided)



## OUR QUINTON NEIGHBOURHOOD PLAN

Many thanks to everyone who sent in a completed resident survey in June, either by post or online. These survey returns (413 from 1100 households) have now been analysed by Stratford District Council and a final report has been sent to the Parish Council. This report summarises the key findings and also contains all of the comments received. It represents good evidence of the views and wishes of the residents of Quinton parish in terms of development and community issues in the parish. It will be used to help draft the Quinton Parish Neighbourhood Plan and will also be used by the Parish Council to identify areas of community concern that require action.

### **Key Findings on future development**

The vast majority of respondents (82%) do not want to see more housing in the parish. 10% would be happy and 8% had no opinion.

To help protect the quality of our environment, 83% believe that preserving the views of Meon Hill is a priority. The preservation of other views in the parish, including around the Church, is clearly also important to residents as 283 responses and comments were received on this issue.

70% of respondents also saw it as a priority that the identities of the existing villages and hamlets were preserved. Protection of woodland, footpaths and bridleways, and local wildlife habitats were also seen as priorities by over 70%.

<http://www.quinton-plan.org/>



### **Other findings**

Traffic is clearly a concern : 180 responses were received on danger spots that needed attention and road improvements were seen as the top priority in terms of infrastructure. On parking, 50% had no concerns but 34% did highlight school parking as a concern and there were 136 additional responses on specific parking issues.

Overall respondents were satisfied with the facilities in the parish (medical, schooling, shopping etc). However we had a large number (254) of responses on areas for improvement and 157 responses on the need for additional facilities.

### **How do I find out more?**

The full report including all responses and comments is 100 pages long so it is too big to be displayed or distributed. It will be on the website by the end of August at this address : [www.quinton-plan.org](http://www.quinton-plan.org).

A copy of the key findings, with charts and tables, will be available to view at Meon Vale and Quinton Village Halls, St. Swithin's Church, the Meon Medical Centre, the Post Office and Lower Clopton Farmshop cafe.

### **Next Steps**

Stratford District Council is looking to identify 'reserve sites' for possible future housing across the District should current plans fail to deliver. Our draft Neighbourhood Plan will use the views and responses of residents in the survey to help input into this process. In addition the Parish Council will be developing a work plan to help address the key concerns expressed in the survey.

**Thank you again.**

<http://www.quinton-plan.org/>

**QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN**

***OPEN DAY at QUINTON VILLAGE HALL***

**SATURDAY 12 June 2021**

**10-12pm and 2-4pm**

**Come and have your questions answered  
See Key Maps and a Paper Copy of the draft Plan  
Input your comments**

**This Plan will influence the next 10 years of  
development in Quinton Parish so please let us  
know what you think**

**More details on our Website : [www.quinton-plan.org](http://www.quinton-plan.org)**

**Quinton Parish Council, June 2021**

## 11. APPENDIX 4 - NEWSLETTER ARTICLES: SAMPLES

Note: The newsletter is distributed to every household in the Neighbourhood Area

- 1) March 2019
- 2) May 2021
- 3) July 2021

### 12.1. Articles in the March 2019 Newsletter

#### **Neighbourhood Plan Update**

The Steering Group is planning to hold another 'open day' in the Village Hall on Saturday 13<sup>th</sup> April 1030-1600 hrs to update residents on progress and to get further input and comments. Importantly we will be sharing our draft plans on the protection of green spaces and landscape views and on any future housing developments. We know from the residents survey that people in the parish see preservation of our green spaces and open rural views as very important. We also know that residents do not favour further housing developments which extend the built-up areas of Upper and Lower Quinton villages. Our Neighbourhood Plan can help us achieve these aspirations as once adopted it will add another layer of legal protection in our aim to preserve the character of our parish. So please come along if you can. Our Plan will only be adopted by Stratford District Council if we can demonstrate that it reflects the views of residents.

We will also be undertaking a Housing Needs survey to help provide evidence for our Housing policy. You will see a separate article on this in the Newsletter.

*Paul Milliken - Chair Neighbourhood Plan Steering Group*

#### **QUINTON HOUSING NEEDS SURVEY**

A copy of this survey will be sent to each Quinton parish household shortly. The last survey was done in 2007 so the Neighbourhood Planning Committee of Quinton Parish Council need a more up to date understanding of the housing needs of the parish. The main aim of the survey is to establish whether residents and their children or other relatives are likely to have difficulties in finding suitable housing in the parish to meet their future housing needs.

Too often we hear of villages where the children cannot decide to live there either for financial reasons or lack of suitable housing. The results of this confidential survey will help to inform the Parish council & Stratford District Council of the extent of this problem within the Quinton parish when considering future housing plans.

*Jan Gullachsen*

*Neighbourhood Plan Steering Committee.*

## Quinton Neighbourhood Development Plan (NDP)

Quinton Parish Council (QPC) has prepared a draft NDP containing policies that will help shape future development in the parish. QPC has agreed with Stratford District Council (SDC) that the draft NDP can now be shared with residents for a 6-week consultation period May 17 – June 27. This stage in the process is known as Regulation 14 Pre-Submission consultation.

QPC is required to review any comments made by residents on the draft NDP before a final version is submitted to SDC. This final version will be reviewed by an external examiner and if the Plan is passed by the examiner, then the Plan will be put to a residents vote in a referendum which would be held later this year.

The full draft Plan with maps etc can be found on the NDP website at [www.quinton-plan.org](http://www.quinton-plan.org) together with other useful NDP documents.

Below are the policy proposals in the Plan. **We would ask that residents review these and any comments should be sent by email to QPC at [quintonpcclerk@gmail.com](mailto:quintonpcclerk@gmail.com) or posted to Councillor Paul Milliken, Four Thatches, Friday Street, Lower Quinton CV37 8SQ. Comments need to be received before June 28 to be considered.** No personal information such as email address will be used or retained by QPC.

We are hoping to arrange at least one opportunity during June for residents to view details of the Plan with maps etc in the Village Hall. This is subject to the QPC being satisfied that this can be done consistent with Govt Covid guidance.

One word on the Housing Proposals. SDC is required to identify so called 'reserve sites' so that these can be called upon in case there is a shortfall in the housing numbers required across the district. We know from our previous survey that most residents do not want additional housing built that would extend the boundaries of the Lower and Upper Quinton villages. However, it makes sense for our NDP to identify at least one potential site in order that we can influence where any potential future housing might be built. The site on Goose Lane that we have identified is estimated by SDC to be able to take 30 houses and is the 'least worst' option in the view of your Parish Council.

Paul Milliken, Parish Councillor and Chair NDP Steering Group

### NDP Proposals @ May 2021

#### 1. HOUSING: Future Housing

Proposals for new dwellings within the Built-Up Area Boundary (BUAB) of Lower Quinton and the BUAB of Upper Quinton will be supported in principle.

All areas outside the BUAB are classed as countryside. New dwellings within the countryside will be strictly controlled and limited to Rural Exception Sites, replacement dwellings and dwellings that are essential for rural workers, development that would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets, the re-use of redundant or disused buildings which enhances immediate setting, the subdivision of an existing dwelling or a new dwelling, the design of which is of exceptional quality

It is proposed that a reserve site is identified in order that the Plan makes a positive contribution towards potential future housing development in the Neighbourhood Area.

The location of the identified reserve site is on Goose Lane (East) immediately north of the new Quinton Fields development.

It is proposed that an updated landscape sensitivity assessment is provided as part of any future planning application for the reserve site. This assessment needs to pay specific attention to the proximity of the Area of Outstanding Natural Beauty (AONB).

## **2. HOUSING: Design and Layout**

All new development proposals should have regard to the key guiding design principles below and the Design Guide contained within the Plan taking full account of the historic character and heritage assets within the Neighbourhood Plan Area.

The key guiding design principles are:

The rural character of the Neighbourhood Plan Area should be preserved and enhanced, and urbanisation avoided.

The rural landscape setting should be conserved, and views into, out of and within the villages protected.

The important informal balance between open and built areas should be maintained and where possible, enhanced.

The location of new housing or other development should not compromise the open character of the villages including significant views and aspects.

New building, including extensions, conversions and alterations, should where possible improve the quality of the public realm and should complement and be in sympathy with the surrounding architecture in the Neighbourhood Area, in terms of size, scale, quality of design, materials, existing character, housing density and distribution.

Good quality innovative design will be encouraged where it is sympathetic to its setting in terms of size, scale and materials and where it reflects and complements the immediate local environment and maximises sustainability benefits.

New development should strive for design excellence.

New housing, including layout and orientation, will be sensitive to the setting, existing built form, neighbouring uses, landscape character and topography of the site and locality. Proposals should reflect the context of the locality, ensuring a continuity of key design features (see Design Guide). Conventional estate layouts which are more suited to suburban areas should be avoided.

Development of existing agricultural buildings and farm buildings should respect the rural character of the villages and hamlets.

Development proposals which fail to satisfactorily consider and implement these design principles, as appropriate, will not be supported unless there is significant justification which indicates otherwise.

## **3. GREEN SPACES**

This Plan designates the following areas of Local Green Space as defined at the following locations in the Neighbourhood Area:

1. Swithin's Wood: three parcels of green space within the development
2. Millfield Close Green: a small green with trees
3. Quinton Primary School: the playing field at the rear of the school
4. Neighbourhood Area playing fields: the large field and recreation area by the Village Hall
5. Allotments off Back Lane: community allotments on Church land
6. St. Swithin's Church: includes the graveyard and other land within the Church boundary
7. Village green: the green areas between and around the College Arms and the Church
8. New green on Main Road: the green at the front of the Quinton Fields development
9. The Firs: a small green at the entry to the Firs housing area
10. Fordway: the green at the heart of the Fordway development
11. Goose Lane green: a triangular green area within the Goose Lane housing area
12. Thackery Close: a small green within the dense housing of this area
13. Upper Quinton: the large village green at the heart of Upper Quinton
14. Upper Quinton: the orchard by Upper Quinton Green
15. Meon Vale: several parcels of green space within the Neighbourhood Area boundaries of this large development

Development that would harm the openness or special character of a Local Green Space or its significance and value to the local community will not be supported unless there are very special circumstances which outweigh the harm to the Local Green Space.

#### **4. VALUED LANDSCAPES**

Development proposals should ensure that any impacts on valued landscapes, and important views and skylines, as listed in the Plan are minimised, and mitigated especially where they relate to heritage assets, rising land, village approaches, settlement boundaries and to and from the AONB.

Development proposals should ensure that all valued landscapes, and important vistas and skylines, as listed in the Plan are maintained and safeguarded, particularly where they relate to heritage assets, rising land, village approaches, settlement boundaries and to and from the AONB.

In particular, proposals need to ensure conformity with the specific protections given to the AONB in national and district policies.

#### **5. DARK SKIES**

Where relevant, lighting within new developments should be limited to what is required for personal safety.

#### **6. RIDGE AND FURROW**

The fields in the Neighbourhood Area that have evidence of Ridge and Furrow should be protected and preserved as far as possible as important and rare heritage assets. Proposals which would result in the partial or complete loss of ridge and furrow will only be permitted if there are exceptional circumstances.

#### **7. BIODIVERSITY**

Development will not be supported unless it protects, enhances and/or restores habitat biodiversity.

Where necessary, development proposals will be expected to demonstrate that they will:

- Provide a net gain in biodiversity where possible
- Protect or enhance biodiversity assets
- Avoid negative impacts on existing biodiversity

Development will only be supported in areas where Notable Bird Species or other rare or vulnerable wildlife or plant species are present as long as it can be demonstrated that it does not affect the conservation status of such species.

## **8. AQUATIC HABITAT**

The village pond in Lower Quinton should be preserved so it can continue to provide a habitat for wildfowl and aquatic life thus protecting its value as an amenity to be enjoyed by the Neighbourhood Area.

## **9. INFRASTRUCTURE: Flood Risk**

Proposals will only be supported if they satisfactorily identify and address the risk of flooding in line with Planning Policy and Guidance at national and local level

Appropriate Sustainable Drainage Systems (SuDS) will be proportionally incorporated in all scales of development.

SuDS features must be located outside areas of identified flood risk.

Proposals on sites crossed by a watercourse must include a site-specific flood risk assessment that includes modelling of the watercourse with SuDS features located outside areas of risk in accordance with Warwickshire County Council Flood Risk & Drainage Standing Advice.

Infiltration and above ground SuDS attenuation, such as swales, ponds and other water based ecological systems, should be used.

Where mitigation measures involve cut off ditches, balancing ponds and or similar, proposals should demonstrate the means by which these shall be maintained to ensure their satisfactory performance in perpetuity.

Proposals should include opening up any existing culverts for greater amenity and biodiversity benefits where practicable.

Proposals including new culverts should minimize the length and be built in accordance with Warwickshire County Council Guidance and have appropriate approvals.

## **10. INFRASTRUCTURE: Foul Water Drainage Mitigation**

All new development must demonstrate adequate means of foul drainage in line with Building Regulations and submit evidence to demonstrate sufficient capacity exists within the system.

Proposals to erect new dwellings should include measures to:

Store discharges of foul water from the development and prevent its discharge into the public foul water sewer unless capacity is available to accept it without contributing to existing overload 'down-stream'.

Prevent pressurised foul water from back feeding from the public sewer into the property or its curtilage.

Suitable techniques for "domestic grey water recycling" should be adopted where it will reduce the volume of 'buffer' storage required above.

Developers shall ensure that foul and surface water from new development and redevelopment are kept separate. Where sites which are currently connected to combined sewers are redeveloped, the opportunity to disconnect surface water and highway drainage from combined sewers shall be taken.

Should any connections into combined systems be unavoidable, the system should remain separate on site up to the point of connection.

## **11. FOOTPATHS, CYCLEWAYS AND BRIDLEWAYS**

As appropriate, development proposals should demonstrate how walking and cycling opportunities have been prioritised and connections made to existing routes. Proposals which either adversely affect existing walking and cycling routes or do not encourage appropriate new walking and cycling opportunities will not be supported.

## **12. HERITAGE AND ARCHAEOLOGICAL ASSETS**

The Neighbourhood Plan Area's historic environment will be protected and enhanced for its inherent value and for the enjoyment of present and future residents and visitors. This includes designated heritage assets such as Listed Buildings, sites of archaeological importance and non-designated heritage assets.

New proposals will be high quality, sensitively designed and integrated with the historic context and informed by an understanding of the significance of the historic asset and environment.

*Quinton Parish Council, May 2021*

12.3. Article in the July 2021 Newsletter

**Neighbourhood Development Plan Update**

Thank you to those who provided comments on the draft Plan and attended our open day on 12<sup>th</sup> June. We also received some valuable input from Severn Trent Water and Historic England which will help to strengthen our proposals on flood protection, water management and the preservation of local archaeology.

All input will be considered before the Parish Council is asked to agree a final draft which will then be forwarded to Stratford District Council. They will then co-ordinate the remaining consultation, review and approval processes before Quinton residents are asked to vote on the Plan in a local referendum. We hope this will take place before the end of the year.

Please visit our webpage for further information: [www.quinton-plan.org](http://www.quinton-plan.org)

*Paul Milliken, Parish Councillor*

## 12. APPENDIX 5 - CONSULTATION PROCESS

### 12.4. Open Days: poster examples

There were 3 Open Day consultation events in 2018, 2019 and 2021. These were held in Quinton Village Hall at a weekend and involved poster displays containing information on the purpose of the day, the NDP process, maps, Plan content such as survey findings, policy proposals and post-notes for residents to write comments and provide input/feedback.

Volunteers from the Steering Group attended to help explain the purpose of the day, the content on the posters and the process for providing input/feedback.

Two of the posters used in the April 2019 Open Day are shown below as examples. The posters were professionally produced and were mounted on display boards and typically were in A3 or A2 format.

**QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN  
OPEN DAY 13 APRIL 2019**

**PURPOSE OF TODAY**

- **SHARE OUR VISION FOR QUINTON PARISH**
  
- **SHARE OUR DRAFT PROPOSALS ON GREEN SPACES, LANDSCAPE VIEWS AND HOUSING**
  
- **THESE ARE 3 AREAS RELEVANT TO THE NDP THAT WERE HIGHLIGHTED IN THE RESIDENTS SURVEY**
  
- **WE ARE LOOKING FOR YOUR COMMENTS AND INPUT**
  
- **THERE WILL BE FURTHER CONSULTATION WITH RESIDENTS ONCE WE HAVE FINALISED OUR PROPOSALS LATER THIS YEAR**

## **THE NDP: A REMINDER**

- **The Neighbourhood Development Plan will represent the views of Quinton Parish residents on the future development of the parish**
- **It will only be adopted (ie come into force) if supported by the majority in a referendum**
- **Once adopted it has legal force and Stratford District Council must take it into account when considering proposed planning developments in Quinton**
- **The NDP covers proposals on aspects such as : Protection of Green Spaces and Landscape views; future Housing development and infrastructure, Protection of heritage assets and the environment.**
- **The NDP must also be consistent with National and District Planning**
- **The NDP must also be consistent with National and District Planning Policies**
- **Before residents can vote on the proposed NDP, it must be approved by an external examiner**

12.5. Open Days: Photos



## 13. APPENDIX 6 - RESIDENTS SURVEY MAY 2018: FINAL REPORT

Please click [here](#) to open and read a copy of the Residents Survey Report.

## 14. APPENDIX 7 - HOUSING NEEDS SURVEY REPORT: MAY 2019

Please click [here](#) to open and read a copy of the Housing Needs Survey Report.

## 15. APPENDIX 8 - REGULATION 14 PRE-SUBMISSION CONSULTEES MAY/JUNE 2021

### **Generic Consultation consultees**

Akins Ltd  
ancient monuments society  
arqiva  
Birmingham International Airport  
CABE  
Canal and River Trust  
Capital and Property Projects  
Coal Authority  
Council for British Archaeology  
Council for British Archaeology  
Cotswold Conservation Board  
Coventry Diocese DAC Secretary  
Civil Aviation Authority  
Coventry Airport  
CTC - National Cycling Charity  
CTC - National Cycling Charity  
Historic England  
English Heritage Parks and Gardens  
Environment Agency  
Environment Agency  
Force Crime Prevention Design Advisor  
Forestry Commission  
Forestry Commission  
Garden History Society  
Georgian Group  
Homes England  
Highways Agency (Midlands)  
Inland Waterways Association  
Joint Radio company  
Kernon Countryside Consultants  
London Oxford Airport  
MBNL(Acting for Everything Everywhere)  
Ministry of Defence  
Accessible Stratford  
Mr Butler (CPRE)  
CPRE  
National Air Traffic Services  
National Grid Gas Distribution  
National Grid UK Transmission  
National Planning Casework Service  
National Trust  
National Trust  
Natural England  
Natural England  
Network Rail  
Ofcom  
Off Route Airspace  
SDC Conservation  
WCC Principle Highway Control Officer

Ramblers Association  
SDC Planning and Environment  
Royal Agricultural Society of England  
RSPB  
Severn Trent Water  
Severn Trent Water  
Sport England West Midlands  
Sport England West Midlands  
Stratford-on-Avon Gliding Club  
Stratford-on-Avon Gliding Club  
Sustrans  
Thames Water Utilities  
Thames Water Utilities  
The Design Council  
Theatres Trust  
Upper Avon Navigation Trust Ltd  
Victorian Society  
Warwickshire Badger Group  
Warwickshire Bat Group  
Warwickshire Police  
Warwickshire Police  
Warks Primary Care Trust  
NHS Property Services Ltd  
Warwickshire Rural Housing Association  
Warks Wildlife Trust  
WCC - planning  
WCC Archaeology  
WCC Extra Care Housing  
WCC NDP Liaison Officer  
WCC Flood Risk  
WCC Flood Risk  
WCC Ecology  
WCC Forestry  
WCC Fire & Rescue Service  
WCC Gypsy & Traveller Officer  
WCC Health & Communities  
WCC Highways  
WCC Land Registry  
WCC Libraries  
WCC Rights of Way  
Wellesbourne Airfield  
Wellesbourne Airfield  
Western Power Distribution  
Woodland Trust  
Warwickshire Rural Community Council  
Warwickshire Amphibian and Reptile Team  
Stansgate Planning  
Coventry and Warwickshire Partnership NHS Trust  
South Warwickshire Clinical Commissioning Group  
Community Forum - Stratford area  
Stratford Business Forum  
Strutt and Parker  
Bromford Housing Group  
Stonewater Housing Association  
Fortis Living Housing Association  
Warwickshire Rural Housing Association

Orbit Group  
Waterloo Housing Group  
Shakespeares England  
SSA Planning, Nottingham  
SDC Planning Policy  
Delta Plannning (Stefan Stojsavljevic)  
Julie Warwick (JMW Planning Solutions Ltd)  
Tetlow King Planning  
Richmond Planning Consultants  
Holt Property  
Holt Property  
Quod - Planning and Development Consultants  
National Grid  
Mather Jamie - Commercial Land Agents  
Barton Willmore  
Avison Young  
Barton Willmore  
Barratt Developments  
Barrat Homes  
WSP  
Persimmon Homes  
Michael O'Driscoll  
Lichfields

**Quinton Consultees**

Quinton  
Welford  
Ettington  
Admington PC  
Preston-on-Stour PC  
Clifford Chambers and Milcote  
Weston-on-Avon  
Long Marston  
Wychavon  
County Councillor Mike Brain  
County Councillor Izzi Seccombe

**Other Quinton Consultees**

Savills as land agent for Magdalen College  
Meon Medical Centre  
Quinton Primary School  
HK Stores  
Lower Clopton Farm  
Lower Quinton Garages  
Thompson as land agent for Anthony Hodges  
Spencers (and Rosconn - agent)  
Redrow (landowner agent)  
Owner of College Arms PH  
Seaspray Fish and Chip shop  
Cooks (landowners/farming)

## 16. APPENDIX 9 - REGULATION 14 PRE-SUBMISSION CONSULTATION RESPONSES

Name	Comments made	Response and Action taken
Stratford District Council	Supportive but many significant comments - see Appendix 11; also some minor comments - see Appendix 13	All SDC comments were reviewed; all significant comments have been accepted and incorporated in the Plan and some other rewording done to reflect minor comments; see Appendix 13
Warwickshire County Council	Flood Risk proposals should be updated in line with latest guidance (examples given) - See Appendix 15	Agree and done - see Appendix 14
Severn Trent	Suggestions made to reword and add to proposals on water management and flood protection - See Appendix 16	Agree to rewording; proposals added - see Appendix 14
Historic England	Pleased with the document. Add a policy to cover the treatment of archaeological remains - See Appendix 17	Agree; policy added - see Appendix 14
Cotswolds Conservation Board	Consider adding 2 key views looking N/NW from the National Footpaths on Meon Hill - See Appendix 18	An additional key view added as suggested together with photo - see Appendix 14
Magdalen College, Oxford	Support reserve site 8 as landowner of this site. Map of Green Space 8 is wrong. Object to specific protection for Ridge and Furrow.	Map amended; Ridge and Furrow now removed as a specific policy
Rosconn	Insufficient evidence given to justify the proposed reserve site 8; Site 2 (2020 SHLAA) proposed as alternative; other comments (see Appendix 19)	Evidence to support the proposed reserve site 8 reviewed to confirm the PC's preference for this site; Site 2 (proposed by Rosconn) reviewed but not supported based on SHLAA grading (Red) and resident survey findings; also see Appendix 14 for other responses
Redrow Homes	The Plan should be based on the 2020 SHLAA; Sites 18 and 19 are now amber (from red); so should be considered; other comments (see Appendix 20)	SHLAA update done; Sites 18 and 19 reviewed but not supported given potential number of houses and other reasons; also see Appendix 14 for other responses.
Meon Medical Centre	Site 18 would be preferred as a reserve site if this would assist connection of the Medical Centre to the main sewer	The main sewer connection suggestion is speculative; the PC prefers site 8 for the reasons set out in the Plan
Lower Quinton Garages	Site 8 supported as the reserve site. Additional land to extend this site is available and controlled by LQG	Noted (no change to the Plan).
Highways England	No impact on network so the Plan is for local determination	N/A
Sport England	Ensure consistency with national sport policy - see NPPF paras 96 and 97	Checked and no changes needed
National Grid	Consult National Grid if any proposed developments are close to the 2 gas pipelines crossing the parish	None; the proposed reserve site does not impact the pipelines
Coal Authority	No specific comments	N/A

Clr Manuella Perteghella	Consider adopting a conservation area policy	None; SDC have advised that this is not a NDP issue
Network Rail	No comments	N/A
Meon Vale Residents Assoc	Support proposed Green Spaces for Meon Vale in policy NE.1	N/A
Hilda Blount	Consider adding a plan of ditches and culverts to assist with flood protection	None; this will be complex and time consuming; flood protection proposals have been strengthened consistent with recommendations from Severn Trent Water
N Bond	Fully support	N/A
Nicholas Butler	Presentation and tone need to be stronger	Achieved through the incorporation of comments from Stratford District Council and others
Emily Kiefer, Anthony Dewhirst	Support proposed reserve site. Consider adding the ridge and furrow field west of Dobbie Road as a Green Space.	None; fields do not meet the criteria for a Local Green Space
Amanda Lockie	Proposed reserve site is supported	N/A
Zelie Mason	Fully support	N/A
David and Liz Moore	Fully Support. Check for typo line 4 para 6.1.16	Done and amended
Liz Neal	Fully support. Well considered and reflects local needs	N/A
Adam Sherriff	Support protection of views to/from Meon Hill. Consider adding Taylor's Lane verges as Green Space	None; Verges cannot be given specific protection
Robert Spooner	Consider adding a Green Space : between nos 30 and 32 Millfield Close	None; the proposed Green Space does not meet the criteria (too small)
Verena Telling	Consider adding the ribbon development along the B4632 to the Meon Vale BUAB	None; the BUAB for Quinton has been determined by SDC
Ann Wilson	Support esp Green spaces, ridge and furrow and valued landscapes proposals	N/A
Steve Wrigley, Lucy Mitchell	Add Taylor's Lane and verges as Green Space. Dark Skies : Lighting on Campden Rd roundabouts is an issue.	None; see above re Verges; Dark Skies policy covers lighting

## 17. APPENDIX 10 - STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT: APRIL 2021

### 16.1. Letter from Stratford on Avon District Council

Switchboard: 01789 267575  
e-mail : [louisa.slator@stratford-dc.gov.uk](mailto:louisa.slator@stratford-dc.gov.uk)  
My ref : Quinton NDP  
Your ref :  
Date : 28 April 2021



Quinton Parish Council  
c/o Paul Milliken  
Quinton Neighbourhood  
Development Plan Steering Group  
**(e-mail only)**

Dear Mr Milliken,

**QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN  
SCREENING FOR STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)**

In accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), Lepus Consulting has prepared a SEA Screening Document on behalf of Stratford-on-Avon District Council to determine whether the Quinton Neighbourhood Development Plan (QNDP) should be subject to a Strategic Environmental Assessment (SEA).

The Screening Document explored the potential effects of the proposed QNDP and concluded that on the basis of the SEA Screening Assessment, the QNDP would not result in significant environmental effects in relation to criteria set out in the SEA Regulations or the Habitats and Species Regulations.

This screening document was subsequently submitted to the statutory environmental bodies of Historic England, Environment Agency and Natural England for comment, in accordance with the SEA Regulations. The three consultees concurred with the conclusions of the Screening Document that the preparation of a SEA was not required, however there were a number of suggested recommendations by the Environment Agency which you have been notified of.

Having read the Submitted Draft NDP, SEA Screening Document and responses from the three statutory consultees, I concur with the view that a SEA is not required for the QNDP.

I hope this is sufficient for your needs. However, should you have any queries please do not hesitate to contact Louisa Slator, Policy Planner, whose details are at the top of this letter.

Yours sincerely



John Careford  
Policy Manager (Enterprise, Housing and Planning)

Elizabeth House  
Church Street  
Stratford-upon-Avon  
CV37 6HX  
telephone 01789 267575  
minicom 01789 260747  
website [www.stratford.gov.uk](http://www.stratford.gov.uk)  
DX700737 STRATFORD-ON-AVON 2

---

**Stratford-on-Avon District Council**

16.2. SEA Screening Document

Please click [here](#) to open and read a copy of the full SEA Screening Document prepared by Lepus Consulting for Stratford District Council.

## 18. APPENDIX 11 - THE SIGNIFICANT COMMENTS FROM SDC

### 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	<p>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...'</p>
Paragraph 2.10	p.6	<p>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).</p> <p>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."</p>
Paragraph 3.17	p.11	<p>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.</p> <p>The NDP should acknowledge that the specific part of LMA within Quinton Parish is covered by the provisions of Core</p>

Section	Reference/ page	Comment
		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>2<sup>nd</sup> bullet point should read 'potential reserve housing sites' for clarity.</p> <p>5<sup>th</sup> and 6<sup>th</sup> bullet points both refer to green spaces, this is repetitive – could they be combined?</p> <p>8<sup>th</sup> bullet point should be deleted (please see separate comment on Policy NE.4)</p> <p>10<sup>th</sup> 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: <a href="https://www.gov.uk">First Homes - GOV.UK (www.gov.uk)</a></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 2<sup>nd</sup> bullet point would be more legible as a series of bullets.</p>
Policy HO.2	p.18	This is not written as a policy and there is no release mechanism. It is suggested to specify other requirements of

Section	Reference/ page	Comment
		<p>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	<p>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 housing requirements as Paragraph 6.1.18 suggests, and therefore the paragraph should be amended to reflect this.</p>

Section	Reference/ page	Comment
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’ it’s 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>2<sup>nd</sup> 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.

Section	Reference/ page	Comment
		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 &amp; 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	<p>How do you measure what is sufficient light for personal safety? Everyone will have their own 'standard'...</p> <p>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.</p>
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).

Section	Reference/ page	Comment
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 Planning Document would also be helpful in this respect. Whilst the NDP does have policies on flood risk, biodiversity

Section	Reference/ page	Comment
		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.

## 19. APPENDIX 12 - THE MINOR COMMENTS FROM SDC

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

#### Minor comments from Stratford-on-Avon District Council

Section	Reference/Page	Comment
General	N/A	A Glossary may help readers of the Plan to understand all of the terminology used in the NDP.
Contents Page		It isn't clear why the document jumps from p.69 to p.134?
Figure 1	p.7	The title might be better worded as Extent of Cotswolds AONB in Quinton Parish; and in 3.15.
Paragraph 3.28	p.14	Suggest for accuracy that 1 <sup>st</sup> line reads 'is made up mostly of housing that was built...'
Para 6.1.2	p.19	It should be stated that construction has now commenced at LMA.
Figure 9	p.20	Figure 9 should be enlarged to A4 size (in landscape orientation), for ease of reading.
Paragraph 6.1.17	p.21	The references to the Core Strategy should be amended to note that the Core Strategy was adopted on 11/07/2016 (not 'approved' or 'accepted').
Paragraph 6.1.21	p.22	This paragraph appears to be missing part of the sentence, it does not seem to make sense currently.
Paragraphs 6.1.33/38/39	p.23/25	Replace 'orange' with 'amber' in accordance with SHLAA notation.
Section 6.2/6.3	p.26/31	There is a lot of empty space on these pages, could some photographs be put here for visual interest?
Policy INF.1	p.48	It is unclear what the purpose of the words "both national and local" is in the first bullet point.
Policy INF.3	p.52	There are two full stops at the end of the policy wording.
Section 6.5.7	p.56	This section should note that Meon Hill Fort is a Scheduled Monument. It is also considered that its location should be shown on an accompanying Figure.

## 20. APPENDIX 13 - CHANGES BASED ON COMMENTS FROM SDC

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

#### Changes made based on Comments from Stratford-on-Avon District Council (July 11)

Section	Reference/ page	Changes
Paragraph 1.4	p.4	The last line of this paragraph amended to : 'In this respect, the Plan includes policies relating to housing, design, the natural environment, infrastructure, and heritage assets.'  Added to paragraph 1.5 : 'The Plan has also identified a reserve housing site and makes proposals on Local Green Spaces and valued landscapes/views.'
2. The Role Of The Neighbourhood Development Plan	p.5 & 6	Added to paragraph 2.8 : 'Work has commenced on the South Warwickshire Local Plan (SWLP) which will replace the strategic policies of the Core Strategy. Once the SWLP is adopted then the Plan will be reviewed as required.'  A new paragraph 2.12 added : 'The Plan is also required to meet the so called 'basic conditions' that are relevant to neighbourhood development plans. This Plan is accompanied by a basic conditions statement which sets out how the Plan meets the requirements of each basic condition and other legal tests.'
Paragraph 2.4	p.5	The first line amended to read : 'The Plan has been prepared to be in general conformity...'
Paragraph 2.10	p.6	The paragraph 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	The last sentence amended to read :

Section	Reference/ page	Changes
		'This part of the airfield development is not covered by this Plan but is covered by the provisions of the Core Strategy Proposal for the Long Marston Airfield and the Framework Masterplan Supplementary Planning Document.'
4. Vision	p.16	In the 4th bullet 'boundaries' replaced with 'remain physically separate'. In the 5th bullet replace "Quinton" with "the Quinton villages".
5. Strategic Objectives	p.17	2 <sup>nd</sup> bullet point reworded to read : 'reserve housing sites' not 'reserve sites'. 5 <sup>th</sup> bullet deleted and the 6 <sup>th</sup> bullet point amended by starting 'To preserve and protect the rural character of the Neighbourhood Area and in particular the green spaces .....' 8 <sup>th</sup> bullet point deleted 10 <sup>th</sup> bullet point amended to start : 'To provide adequate infrastructure and services capacity.....' Last bullet point : add '... and other sites....' and replace 'for future' with 'by future'
Policy HO.1	p.18	2 <sup>nd</sup> bullet amended as follows : after 'limited to ...' in second line is added 'those exceptions defined in Policy AS.10 of the Core Strategy'. The remaining words are put into a 3 <sup>rd</sup> bullet starting with 'These exceptions include Rural Exception Sites ....' etc 4 <sup>th</sup> bullet added : 'This policy does not apply to areas covered by the Core Strategy Proposal for the Long Marston airfield and land covered by Core Strategy Policy AS.11 Large Rural Brownfield Sites.'  5 <sup>th</sup> bullet added : 'It is recognised that self-build and custom housebuilding may be considered adjacent to built-up area boundaries as per the provisions of the Stratford on Avon Site Allocations Plan Policy SAP.7.'  6 <sup>th</sup> bullet added : 'Development proposals would be expected to demonstrate adaptation to/mitigation of climate change such as the provision of electric charging points and the provision of renewable energy.'
Policy HO.2	p.18	1 <sup>st</sup> and 2 <sup>nd</sup> bullets replaced with : '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 replaces the first 2 bullet points.

Section	Reference/ page	Changes
		<p>The 3<sup>rd</sup> bullet is reworded to : ‘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 first line of para 6.1.34 is reworded as follows : ‘The Parish Council agreed that one site on Goose Lane should be safeguarded within the Plan as a Reserve Housing Site in accordance with Policy HO.2.’</p>
New Policy HO.4	p.19	<p>New policy added : ‘Policy HO.4 : Affordable Housing and Housing Stock Mix’</p> <p>1<sup>st</sup> Bullet : ‘Proposals for new dwellings should take account of the preferences indicated by residents including for small developments and for 2/3 bedroom houses and bungalows’ 2<sup>nd</sup> Bullet : ‘Proposed developments should also consider the provision of affordable homes to reflect the needs identified in the local Housing Needs survey’ 3<sup>rd</sup> Bullet : ‘Proposed developments should also be in conformity with the requirements of the Government’s ‘First Homes’ policy’</p> <p>Add to the Reference Documents list : First Homes policy : First Homes – GOV.UK(<a href="http://www.gov.uk">www.gov.uk</a>).</p>
Paragraph 6.1.18	p.21	The first line amended to read ‘...approximately 450 homes in total, of which around no more than around 25% should be provided in any individual settlement’.
Paragraphs 6.1.23 & Figure 10	p.22	Paragraph 6.1.23 first line amended to read : ‘.updated in 2019 and 2020 – see...’ Existing map replaced with the map in the SHLAA 2020 Update document
Paragraphs 6.1.31 and 6.1.32	p.23	<p>Paragraph 6.1.31 reworded to read : ‘Residents were also made aware of the requirement for reserve housing sites in the District as part of the need for SDC to meet its Five-Year Housing Supply (5YHLS) target.’ Paragraph 6.1.32 reworded to read : ‘The Parish Council decided to safeguard a reserve site that took account of residents views and which was as far as possible consistent with the Vision and Strategic Objectives of the Plan.’</p>
Policy HD.1	p.27	1 <sup>st</sup> Bullet amended to read : ‘Development proposals should have regard to these design principles and the guidance set out in the Design Guide (see Appendix 4).’

Section	Reference/ page	Changes
		<p>2<sup>nd</sup> Bullet : added to the end ‘...and to its rural character and landscape setting’.</p> <p>3<sup>rd</sup> Bullet reworded to read : ‘Any new housing or works to existing houses should be sensitive to the setting, existing built form, neighbouring uses and landscape of the site and locality.’</p> <p>4<sup>th</sup> Bullet reworded to read : ‘Any new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.’</p>
Paragraphs 6.2.7-11	p.30	References to the District Design Guide published in 2001 replaced with references to the SDC Development Requirements SPD (July 2020).
Policy NE.1	p.32	The size and shape of proposed LGS site 8 corrected to be in accordance with the Landscaping Plan for the Reserved Matters permission (Ref: 17/00863/REM).
Figure 12	p.34	The BUAB on this map is amended to ensure consistency with the BUAB shown on Figure 9.
Policy NE.2	p.36	<p>Policy Title changed to : ‘Valued Landscapes and Key Views’</p> <p>1<sup>st</sup> Bullet point – ‘important views and skylines’ replaced by ‘key views’. At the end of the Bullet is added ‘See Figure 23 to identify valued landscapes and key views’.</p> <p>2<sup>nd</sup> Bullet point – ‘maintained and safeguarded’ replaced by ‘respected’ and ‘important vistas and skylines’ replaced by ‘key views’.</p> <p>In Appendix 2 the phrase ‘Key Viewpoints’ in the title is replaced by ‘Key Views’. In the Key, ‘Other valued views’ is replaced by ‘Other views’.</p>
Policy NE.3	p.38	<p>The policy is reworded to read :</p> <p>1<sup>st</sup> Bullet : ‘Development must respect the Neighbourhood Area’s dark skies’</p> <p>2<sup>nd</sup> Bullet : ‘Development should aim to minimise light pollution by avoiding obtrusive external property lighting.’</p>
Policy NE.4	p.41	Policy NE.4 on ridge and furrow is deleted. The text relating to ridge and furrow is moved to a new paragraph 6.5.16 etc. Paragraph 6.5.11 is deleted and the title of paragraph 6.5.16 reads ‘Non-Designated Heritage Assets : Ridge and Furrow’ and the ridge and furrow text is pasted in from paragraph 6.3.17 onwards.
Policy INF.3	p.52	<p>Policy reworded to read :</p> <p>‘Developments should provide for safe access to existing walking and/or cycling routes. The improvement of existing walking and/or cycling routes and the provision of new walking and/or cycling opportunities will be supported. Developments which harm existing walking and/or cycling routes will not be supported. The above policy provisions also apply to bridleways.’</p>

Section	Reference/ page	Changes
Section 6.5 – Heritage and Archaeological Assets	p.55	Strategic Objectives – third paragraph deleted. The 2 <sup>nd</sup> paragraph reworded to read ; 'To protect heritage assets and other sites of historic importance from harmful development so that they can be enjoyed for future generations.'
Policy HA.1	p.55	Policy reworded to read : '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.'
Appendix 3	p.69	The LGS Site Assessments are now included as part of the NDP document.
Other	P 7 P14 P 19 P 20 P 21 P 22 P 23 to 25 P 48 P 52 P 56	Figure 1 renamed to : 'Extent of Cotswolds AONB in Quinton Parish' First line changed to '..is made up mostly of housing....' Paragraph 6.1.2 : extra line added : 'Construction has now started at Long Marston Airfield.' Figure 9 enlarged Paragraph 6.1.17 : last line changed from 'accepte' to 'adopted' Paragraph 6.1.21 : 'is' changed to 'was' References to 'orange' to 'amber' 1 <sup>st</sup> Bullet : the phrase 'both national and local' is deleted Policy wording : one of the full stops at the end is deleted Paragraph 6.5.9 : The wording at the beginning is amended to 'Meon Hill Fort is a Scheduled Monument and is....' . At the end of this line the following is added '(See Figures 1 and 2 for location of the Fort)'

21. APPENDIX 14 - CHANGES BASED ON COMMENTS FROM SEVERN TRENT ET AL

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

**Changes made based on Comments from Severn Trent, Historic England,  
Cotswold Conservation Board, WCC, Rosconn and Redrow (August 11)**

Section	Reference/ page	Changes
<b>The following changes are in response to Severn Trent Water input:</b>		
Policy HO.3	p.19	The 3 <sup>rd</sup> and 4 <sup>th</sup> bullets are combined into one bullet point  A new 4 <sup>th</sup> bullet is added to read as follows :  'Utilises appropriate Sustainable Drainage Systems (SuDS) to manage surface water drainage.'
Policy HD.1	p.28	A 5 <sup>th</sup> bullet is added as follows :  'Developments should demonstrate that they are water efficient incorporating where possible innovative water efficiency and water re-use measures.'
Policy NE.1	p.32	An extra paragraph is added as follows :  'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely affect the primary function of the green space.'
Policy INF.1	P.44	An extra bullet is added as follows  'All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy so that discharges to the public sewerage systems are avoided where possible.'
Policy INF.2	p.45	A new 2 <sup>nd</sup> bullet is added as follows :  'Developers should contact Severn Trent at an early stage in the planning process to allow for detailed hydraulic modelling to assess the impact on the network and provide sufficient time for capacity upgrades to be made should they be required.'  The 2 bullets starting : 'Store discharges....' and 'Prevent....' are deleted.
<b>The following changes are in response to Cotswold Conservation Board input:</b>		
Paragraph 2.5	p.5	'Paragraph 14' is amended to 'Paragraph 11'
Paragraph 6.3.11	p.37	A new key view 'G' is added to the table described as follows :  'View from the Monarch's Way on Meon Hill'

Section	Reference/ page	Changes
Paragraph 6.3.9	p.37	Added to the last line : 'including those walking the Heart Of England Way, Monarch's Way and Centenary Way'
Appendix 2	p.63	A new view 'G' plus photograph is added to Figure 23 which has an arrow pointing North/North West from the Monarch's Way on Meon Hill
<b>The following changes are in response to WCC input:</b>		
Policy HO.1	p.18	To the last bullet is added 'include sustainable drainage systems and' between 'expected to' and 'demonstrate'
Policy 6.4 Infrastructure	p.45	An additional reference document is added : Ordinary Watercourse Land Drainage Consent Guidance Document with the link address : <a href="https://www.warwickshire.gov.uk/watercourse">https://www.warwickshire.gov.uk/watercourse</a> Also added to Appendix 6
<b>The following change is in response to Historic England input:</b>		
Policy HA.1	p.51	A third bullet is added to Policy HA.1 as follows :  'Development proposals should take full account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Warwickshire Historic Environment Record (HER). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence.'
<b>The following change is in response to Rosconn input:</b>		
Policy NE.2	p.36	The 2 <sup>nd</sup> bullet in the policy box is deleted. (This repeats the 1 <sup>st</sup> bullet in slightly changed wording so is confusing).
<b>The following changes are in response to Redrow Homes input:</b>		
Paragraph 6.1.33	p.25	The word '6' in the first line is deleted. After the word 'proposals' in the first line, a new second and third line are added as follows : 'These proposals were further updated in 2020 – see Figure 10. The potentially deliverable sites are shown as amber'. The current words in brackets ie 'shown as.....10' are deleted.
Paragraph 6.1.38	p.27	Last line : the phrase '2019 proposals' is replaced by '2020 proposals'
Paragraph 6.1.41	P. 27	The word '23' is deleted in the phrase 'Sites 3, 7 and 23' A new paragraph 6.1.42 is added to read as follows :  'Sites 18 and 19 were shown as undeliverable in the SHLAA 2019 proposals but were then amended to amber (ie potentially deliverable) in the revised 2020 proposals. The SHLAA indicates the potential for a sizeable number of dwellings on these two

Section	Reference/ page	Changes
		<p>sites which if built would enlarge significantly the BUAB of Lower Quinton and extend the building line southwards towards the AONB. There would also be the requirement for a new access road with the consequent impact on road traffic onto Goose Lane. The Parish Council reviewed the Plan's reserve site proposals in the light of this amendment to the SHLAA and concluded that Site 8 remained the preferred option compared to Sites 18 and 19 when judged against the views expressed by residents and the Plan's strategic objectives.'</p>

## 22. APPENDIX 15 - COMMENTS FROM WCC

Your ref:  
My ref: Quinton NP



Councillor Paul Milliken  
Four Thatches  
Friday Street  
Lower Quinton  
CV37 8SQ

**Communities**  
Strategic Growth and Infrastructure  
PO Box 43  
Shire Hall  
Warwick  
CV34 4SX

**Tel: (01926) 418646**  
Janetneale@warwickshire.gov.uk  
[www.warwickshire.gov](http://www.warwickshire.gov)

22<sup>nd</sup> June 2021

Dear Councillor Milliken,

### **Regulation 14. Pre- Submission Consultation on the Quinton Neighbourhood Plan**

Thank you for notifying Warwickshire County Council of the steps you are taking to produce a Neighbourhood Plan and for providing us with the opportunity to comment on your draft.

The County Council welcomes communities proposing Neighbourhood Plans that shape and direct future development. The County Council manages a number of services including highways and transport, education, social care, recycling and waste centres and the environment. This list is not exhaustive and all service areas within the County Council have been given an opportunity to comment on your draft plan.

### **Financial implications of Neighbourhood Plans**

As with all Public Sector organisations, the County Council has the responsibility to deliver its services as effectively and efficiently as possible. It is important that our response to you makes it clear that the County Council cannot commit to any financial implications from any proposals emanating from your Neighbourhood Plan. As such, your Plan should not identify capital or revenue schemes that rely on funding from the Council. The County Council will, however, be happy to assist communities in delivering infrastructure providing they receive any funding that may arise from Developer Contributions or any other sources.

We have the following comments to make as a guide. I have referred to your draft plan where possible to help as much as possible.

### **Road Safety**

It should be noted that any changes to the highway i.e. speed limits, traffic calming measures, will need to meet the relevant criteria and receive any required consultation. In addition, funding will also need to be sought.

### **Transport Planning**

The impact of growth on the highway will be considered as part of any future planning applications as will adaptations to public transport provision.

### **Flood Risk Matters**

The Flood Risk Management Team has made several observations and I hope you find these helpful. Should you require clarification on anything please let me know.

Page 16, The Vision for Quinton in 2031  
Page 17, Quinton Plan Strategic Objectives  
Page 31, Natural Environment

We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground Sustainable Drainage Systems (SuDS) could be utilised in open spaces.

Page 18, Policies for Quinton  
Page 27, Design Principles

You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites. All developments will be expected to include sustainable drainage systems.

Page 20, Background  
Page 21, Point 6.1.9  
Page 25, Point 6.1.40

If a site is for over 10 houses it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.

If a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review.

Page 48, Flood Risk

You could develop the fifth point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable. The sixth bullet point is good. The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance. Proposals including new culverts (and any other obstruction within the channel) will require Ordinary Watercourse Land Drainage Consent from the LLFA. We would also expect any new culverts to be kept to a small a length as possible. Within the reference documents list, you could reference our Ordinary Watercourse Land Drainage Consent Guidance Document.

The link address is: <https://www.warwickshire.gov.uk/watercourse>

Page 51

You have included a screenshot of the surface water flood risk associated with Quinton. It may also be useful to include a screenshot of the Flood Zone mapping available at the link address: <https://flood-map-for-planning.service.gov.uk>

**Education**

Colleagues in the Education service have considered the draft but do not feel there are any issues they need to raise.

I appreciate this is a lengthy response, but I hope you will find it useful.

Yours sincerely

*Janet Neale*

Janet Neale  
Infrastructure Planning Lead  
Strategic Growth and Infrastructure

## 23. APPENDIX 16 - COMMENTS FROM SEVERN TRENT

ST Classification: OFFICIAL PERSONAL



16 June 2021

Our ref: Stratford 14

Dear Sir/Madam

### Quinton Neighbourhood Development Plan 2011- 2031 Draft Version

Thank you for the opportunity to comment on your consultation, we have the following specific comments to make.

**Policy HO.2: Reserve Sites -** The reserve location site at Goose Lane has undergone a high level risk assessment to determine the impact of growth on the existing network. It has been classified as Medium risk due to the risk of flooding in the downstream network and cumulative growth to Lower Quinton. As such we recommend that the developer contact Severn Trent at the earliest opportunity to further discuss the site and allow time for more detailed hydraulic modelling to be undertaken. As there is a watercourse bordering the site we would not expect any surface water connections to the foul sewer.

**Policy HO.3: Infill within Built up area boundary –** We recommend that this policy also include a statement ensuring that any new infill development follow the Drainage Hierarchy and utilise SuDS when establishing a surface water drainage strategy.

**Policy HD.1: Design Principles** - Severn Trent recommend that an addition is made to this policy to ensure that new development is built according to water efficient design. New development will result in a need for an increase in the amount of water to be supplied across the Severn Trent region, and issues with the sustainability of some of our water sources are placing our supply resilience at risk. It is therefore vital that we reduce the amount of water used. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We therefore encourage inclusion of the following policy wording:

*Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures'*

Reasons for supporting the inclusion of this wording within policies include:

National Planning Policy Framework (July 2018) Paragraph 149 states:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

**Policy NE.1: Local Green Space** - Severn Trent are supportive of Local Green Spaces, it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. Green spaces can also be enhanced where a good SuDS, scheme that incorporates design principles to enhance biodiversity and Amenity as well as attenuation. We would therefore recommend the following policy wording is added:

*'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.'*

**Policy INF.1: Flood Risk**- Severn Trent is supportive of this policy, particularly the emphasis on SuDS. We would encourage you to go further and include wording regarding the drainage hierarchy to ensure that surface water is managed in the most sustainable way so that surface water connections into the foul and combined sewer are avoided.

*'All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.'*

Reasons for including this wording within your policies include:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

**Policy INF.2: Foul Water Drainage Mitigation** – Whilst we understand the reasons such wording has been included in this policy so as to reduce further risk of sewer flooding as a result of new development we would recommend that bullet points 3 and 4 are reworded as these are not the developers responsibility. Under the Water management Act the sewerage undertaker has a duty to provide capacity for foul discharges to the public sewer network. Instead we would recommend that you put the following wording in to direct developers to contact Severn Trent so that there is sufficient time to assess and plan any capacity improvements should they be required as a result on new development.

*“Developers should contact Severn Trent at an early stage in the planning process to allow for detailed hydraulic modelling to assess the impact on the network and provide sufficient time for capacity upgrades to be made should they be required.”*

For your information we have set out some general guidelines that may be useful to you.

#### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

#### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewerage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### **Water Supply**

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### **Water Efficiency**

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.

- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Rebecca McLean

Strategic Catchment Planner

[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)

## 24. APPENDIX 17 - COMMENTS FROM HISTORIC ENGLAND



Historic England

Mr Paul Milliken

Direct Dial: 0121 625 6887

Quinton Parish Concil

Our ref: PL00749602

15 June 2021

Dear Mr Milliken

### **QUINTON NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION**

Thank you for the invitation to comment on the above Neighbourhood Plan.

Historic England is supportive of both the content of the document and the vision and strategic objectives set out in it. We are very pleased to note that the Plan evidence base takes a very thorough approach to the historic environment and is well informed by reference to the Warwickshire Historic Environment Record alongside formal historic environment assessment and archaeological sensitivity mapping.

The emphasis on the conservation of local distinctiveness and variations in local character through good design and the protection of locally significant green space, valued historic buildings and historic landscape character including ridge and furrow and key views is to be applauded.

The Quinton Design Guide is admirable in its detail providing an invaluable context for the Plan that will be of great assistance in ensuring future development respects and reinforces local distinctiveness

We do note that the Plan makes it clear that Quinton has at least medieval origins and a wealth of heritage assets, therefore as highlighted by the archaeological sensitivity mapping it is highly likely that there will be a correspondingly rich resource of archaeological remains, both above and below ground. Accordingly, we would recommend the inclusion within the Neighbourhood plan of a policy to cover the appropriate treatment of archaeological remains within the planning process.

The Policy below would be suitable and has been adopted successfully elsewhere in



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888  
HistoricEngland.org.uk



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



Historic England

Warwickshire:

*“Development proposals should take full account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Warwickshire Historic Environment Record (HER). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence”.*

Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a very thorough and suitably proportionate approach to the historic environment of the Parish.

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.

I hope you find this advice helpful.

Yours sincerely,

P. Boland.

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888  
HistoricEngland.org.uk



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

## 25. APPENDIX 18 - COMMENTS FROM COTSWOLDS CONSERVATION BOARD

Councillor Paul Milliken  
Four Thatches  
Friday Street  
Lower Quinton  
CV37 8SQ



By email only to: [consultation@quinton-plan.org](mailto:consultation@quinton-plan.org)

25 June 2021

Dear Councillor Milliken,

### QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN

Thank you for consulting the Cotswolds Conservation Board on the draft Quinton Neighbourhood Development Plan (NDP).

We are pleased to see that the draft NDP makes multiple references to the Cotswolds Area of Outstanding Natural Beauty (AONB) and to the factors that contribute to the natural beauty of this nationally important landscape including landscape and scenic beauty, tranquillity, dark skies, cultural heritage and natural heritage.

Our main concern with the draft NDP relates to the issue of 'key views' (i.e. Figure 23 and Policy NE.2 (Valued Landscapes) and associated explanatory text (paragraphs 6.3.6 – 6.3.11)). Whilst we are pleased to see the recognition given to views looking towards Meon Hill, we are concerned that the proposed key views do not include views from the Heart of England Way, Monarch's Way and Centenary Way on Meon Hill, looking north / north-west across the Vale of Evesham.

As mentioned in the draft NDP, Meon Hill is an outlier of the Cotswold escarpment. As such, in the Cotswolds AONB Landscape Character Assessment, it forms part of Landscape Character Type (LCT) 1 - Escarpment Outliers ([link](#)). The dramatic panoramic views from the escarpment outliers, looking over the vale, are one of the key features / characteristics of LCT 1.

As explained in the Board's 'Development in the Setting of the Cotswolds AONB' Position Statement ([link](#)), great weight should be given to the impact of development outside the AONB on views from the AONB. In the context of Landscape and Visual Impact Assessments (LVIAs), views that are experienced by receptors on promoted recreational routes (such as the Monarch's Way, etc.) have more value / weight than views from 'ordinary' public rights of way or from roads.

The amount of development that has already taken place, is committed or is being proposed in Meon Vale, Long Marston airfield and Lower Quinton makes this issue particularly significant. With Upper Quinton currently being included in the Quinton 'Local Service Village' there is also development pressure within the AONB itself. The potential re-opening of the Stratford-Honeybourne train line and the opening of a train station in the Long Marston area would add further development pressure in the Quinton NDP locality.

#### Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

[cotswoldsaonb.org.uk](http://cotswoldsaonb.org.uk)

Chairman:  
**Brendan McCarthy**  
Vice Chair:  
**Rebecca Charley**

We therefore recommend that the NDP should identify key, named views looking north / north-west from:

- the Heart of England Way on Meon Hill (@ GR: SP17544619 and GR:SP17144582); and
- the Monarch's Way / Centenary Way on Meon Hill (@ SP18004598).

On a related point, you may be interested to see our recent response to the South Warwickshire Local Plan Scoping consultation (attached) in which we set out some key principles and recommendations relating to development in the Quinton / Meon Vale / Long Marston area.

With regards to the statements in paragraph 2.5 of the draft NDP, regarding the presumption in favour of sustainable development, it is worth noting that the 'tilted balance' in favour of granting planning permission does not apply were the application of AONB-related policies provide a clear reason for refusing development. A 'clear reason for refusal' can potentially include the adverse impacts of development outside the AONB on views from the AONB. This issue is also relevant to paragraph 6.131 of the draft NDP.

Incidentally, the issue of the presumption in favour of sustainable development is now addressed in paragraph 11 of the National Planning Policy Framework, not paragraph 14 (following the updating of the NPPF in 2019).

If you have any queries regarding this consultation response then please do not hesitate to get in touch.

Yours sincerely,

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

John Mills  
Planning & Landscape Lead  
[john.mills@cotswoldsaonb.org.uk](mailto:john.mills@cotswoldsaonb.org.uk) | 07808 391227

## 26. APPENDIX 19 - COMMENTS FROM ROSCONN



Rosconn House  
1 Grove Road  
Stratford upon Avon  
Warwickshire  
CV37 6PE  
**T:** 01789 868211  
**E:** [enquiries@rosconngroup.com](mailto:enquiries@rosconngroup.com)  
**W:** [www.rosconngroup.com](http://www.rosconngroup.com)

25<sup>th</sup> June 2021

**Issued by email only:** [consultation@quinton-plan.org](mailto:consultation@quinton-plan.org)

Dear Sir/Madam

**Re: Quinton Neighbourhood Development Plan – Regulation 14 Pre-Submission Draft Consultation**

Rosconn Strategic Land (RSL) write in response to the above in respect of its interests in Quinton, specifically Land North of Main Road, Lower Quinton. RSL have an agreement with the landowner to promote this land for residential development. A Site Location Plan and Illustrative Masterplans outlining our proposals are enclosed with this document for your consideration.

RSL welcomes the opportunity to comment on the Draft Quinton Neighbourhood Plan (QNP) and having reviewed the document, provide comments below. With regards to the requirements of Neighbourhood Plans, Paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004, sets out that only a Neighbourhood Plan that meets each of the basic conditions can be put forward to referendum and be made. Having considered the document and associated evidence base, we wish to raise a number of objections to the Draft QNP on the basis that it is considered this fails to meet the following basic conditions:

- (a) Have regard to national policies and advice contained in guidance issued by the Secretary of State.
- (d) Contribute to the achievement of sustainable development.
- (e) Be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

**National Policy and Guidance**

As advised by the NPPG on Neighbourhood Planning, Neighbourhood Plans provide the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways which meet identified local need. It continues that the Neighbourhood Plan should support the delivery of strategic policies set out in the local plan.

In respect of the local plan, it is important to acknowledge that the QNP is being prepared in the context of local plan policies being updated. The Stratford-on-Avon District Core Strategy was adopted in July 2016 and the NPPF requires such documents to be reviewed at least every 5 years – the Core Strategy will be 5 years



Part of Rosconn Group

Rosconn Strategic Land  
Registered in England & Wales  
Registered No: 05479606  
Registered Office: Llanmorris House,  
Blythe Gate, Blythe Valley Park,  
Solihull, B90 8AH



old in July 2021. As a result, the decision has been made by the District Council, in conjunction with Warwick District Council, to initiate a review of the Core Strategy by preparing a new joint Local Plan for South Warwickshire (SWLP). This intends to plan for future development needs for the period up to 2050.

National guidance does not preclude preparation of a Neighbourhood Plan where a local plan is in the process of being updated. The NPPG advises however that whilst a draft Neighbourhood Plan is not tested against the policies in an emerging plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions, with for example up to date housing need evidence being relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. In addition, the guidance requires the local planning authority to take a proactive and positive approach, working collaboratively with a qualifying body by sharing evidence and seeking to resolve issues to ensure the neighbourhood plan has the greatest chance of success at examination. It also notes the importance of this collaborative working to ensure complementary neighbourhood and local plan policies are produced to avoid any conflicts between policies in an emerging plan, including housing supply policies.

Turning to the specific issue of housing, where a qualifying body is intending to identify and meet housing need, paragraphs 65 and 66 of the NPPF (and echoed in the NPPG) advise that strategic policy-making authorities should provide a housing requirement figure for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development. Where this is not possible, the local planning authority should provide an indicative figure, if requested to do so by the qualifying body, which will need to be tested at Examination. The indicative housing requirement figure can be derived from the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area. The NPPG also advises that neighbourhood plans should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed, thereby helping to minimise potential conflicts and ensure policies are not overridden by a new local plan.

The NPPG also advises on how a neighbourhood planning body should use a housing requirement that has been provided to them. Where the body has decided to make provision for housing within its plan, as is the case here, the housing requirement figure and its origin should be set out within the plan as a basis for their housing policies and any allocations they wish to make. Neighbourhood plans are encouraged to meet or where possible, exceed their housing requirement and they should consider providing for a sustainable choice of sites to accommodate housing to provide flexibility if circumstances change and allowing the plan to remain up to date over a longer time period. Whilst the housing requirement is not binding on the neighbourhood planning body, a failure to meet or otherwise fully accommodate this figure would undoubtedly need to be addressed through the additional allocations within the neighbourhood area being made in the SWLP. Furthermore, it would also undermine the ability for a neighbourhood area to benefit from the protection provided by paragraph 14 of the NPPF should the District be unable to demonstrate a 5-year deliverable housing land supply (i.e. criterion (b) of NPPF paragraph 14, requiring a neighbourhood plan to have made allocations to meet its identified housing requirement, would not be satisfied).

The NPPG continues that where neighbourhood plans intend to allocate sites for development, the qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. It also advises on the need to plan for infrastructure, requiring this to be done at the earliest stage of plan-



making, particularly where new development is proposed within the plan that may need additional infrastructure to ensure it is delivered in a sustainable way. Such consideration should include an assessment of the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which will help shape decisions on the best site choices.

#### **Approach to Housing in the Draft QNP**

Paragraph 2.9 of the QDP sets out that the Plan is “*designed to allow the Neighbourhood Area to develop through thoughtful and sympathetic housing growth and development whilst contributing to the District’s housing target and meeting the housing needs of the community*”.

Section 5 identifies the QNP’s Strategic Objectives, which *inter alia*, includes:

- Providing sustainable housing growth;
- To identify suitable reserve sites within the Neighbourhood Area; and
- To provide adequate capacity to support future planned development.

Section 6.1 of the QDP then reiterates the strategic objectives relevant to housing, as identified above, before proceeding to detail a number of policies and explanatory text. Policy HO.1: ‘Future Housing and Growth’ supports new dwellings within the built-up area boundary and restrict such development outside it, other than where it meets one of a number of exceptions, duplicating Policy CS.15 of the adopted Core Strategy. Policy HO.2: ‘Reserve Site’ then proposes to identify a reserve site the purpose of which ‘makes a positive contribution towards potential future housing development in the Neighbourhood Area’. Finally, Policy HO.3: ‘Infill within the Built-up Area Boundary’ seeks to permit limited infilling within the built-up area, subject to certain criteria, although this effectively repeats the content of Policy HO.1, and again duplicates what is already permitted by Core Strategy Policy CS.15.

The housing policies are then followed by an ‘Explanation’ and ‘Background’, albeit neither provides any clarity as to the approach being adopted by the Plan in helping to meet either the local community or wider District’s future housing needs. It is only at paragraph 6.1.18 that some clarification is provided. Here it states that as planning permission has been permitted for 110 dwellings since 2011 which are either committed or have been built, the village has met its obligations set out within the Core Strategy.

A further statement is made at paragraph 6.1.27 that the QNP takes account of the positive role that neighbourhood plans are intended to play in the assessment of future housing development by SDC and this includes reserve sites. It then proceeds to explain at paragraph 6.1.31 that should SDC fail to meet its 5 year housing land supply target, the QNP needs to have a positive proposal to help influence the siting and size of any potential reserve site. It then explains how it has determined the most appropriate reserve site for this purpose.

#### **RSL Comments on QNP Housing Policies**

The QNP purports to plan for the future housing needs of both the local community and the wider District, as reflected at paragraph 2.9 and the Strategic Objectives at Section 5. However, this assertion appears to be based on a soon to be out of date Local Plan, which is currently the subject of review. The SWLP is being prepared in the context of the Government’s Standard Method to calculate its local housing need and over a proposed plan period to 2050. The QNP, intended to only cover a period of less than 10 years, makes no reference to the SWLP, and whilst it appears that it



has made the decision to make provision for housing within its plan, which is welcomed, it does not appear there is any evidence that this will be achieved.

If it is the intention of the QNP to achieve the strategic objectives identified in respect of meeting housing need, there is no evidence indicating that the relevant Government guidance, as summarised above, has been followed. In circumstances where there is an emerging plan, a neighbourhood plan's housing supply policy should use up to date evidence in respect of housing need that informs the local plan process, if the basic condition regarding sustainable development is to be satisfied. There is no evidence to indicate this has taken place or furthermore, that the Qualifying Body has requested an indicative figure from the Local Authority, as required by national planning guidance. This is pertinent in the context of Quinton, which is identified as a Category 1 Local Service Village within the current Core Strategy, and as outlined by Policies CS.15 and CS.16, is one of the most sustainable villages within the District and suitable to accommodate housing growth in a sustainable manner in view of the range of local services and the objectives of helping sustain its future, meet the needs of its community and provide scope for new households to move into it.

Only once a housing requirement has been identified, can the QNP claim to be making a positive contribution towards meeting the future housing requirements of its community and the wider District. Whilst it is appreciated that the SWLP is at an early stage, the Standard Method is clear in determining the future housing requirement of an area and can therefore be treated as an accurate indication of future housing needs. The national guidance within the NPPG makes provision for scenarios such as this where a neighbourhood plan is being prepared in the context of an emerging Local Plan and once confirmed, the guidance advises that the neighbourhood plan should allocate reserve sites to ensure the emerging evidence of housing need is addressed. As highlighted above, this does not appear to have taken place, so this should be rectified through the next iteration of the QNP, if the intention remains to meet the strategic objectives identified therein. Whilst it is also recognised that the QNP proposes to allocate a reserve housing site, its justification for doing so does not accord with national planning guidance – indeed, the intention to do so does not appear to be justified by any evidence based on up to date housing need.

On the basis that the QNP does intend to make provision for housing, and an up to date indicative requirement is provided by the Local Authority, the guidance then encourages plans to consider providing for a sustainable choice of sites to provide flexibility if circumstances change and enable the plan to remain up to date over a longer period. In completely overlooking the emerging SWLP and the up to date evidence of housing need, flexibility and the ability for the QNP to remain up to date for a longer period will be lost. Significantly, a failure to make allocations to meet its identified housing requirement would mean the neighbourhood plan area would not benefit from the protection provided by paragraph 14 of the NPPF, a key benefit in preparing a neighbourhood plan.

Notwithstanding the context and justification in this instance of the proposed allocation of a reserve housing site, we also wish to raise concerns about this specific proposal. Again, with reference to the NPPG, where the intention is to allocate sites for housing, the Qualifying Body are required to carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. It appears that the Qualifying Body has principally relied on the Local Authority's SHLAA to determine its choice for the most appropriate site for future housing growth in the village. Whilst the SHLAA is an important part of the evidence base, as noted on the Local Authority's website, the identification of a site in the SHLAA does not, in itself, determine whether or not it will be allocated for housing in a development plan. This clearly indicates that other matters are material alongside the SHLAA to inform a decision as to which site



or sites should be allocated. Unfortunately, other than a couple of paragraphs within the QNP itself, there is no evidence that a reasonable or objective assessment of the available options has been considered and indeed, only 6 of the 23 sites within the SHLAA were even considered (it should be noted that in respect of RSL's land north of Main Road, Lower Quinton, submissions have been made to SDC's SHLAA, challenging a number of inaccurate assumptions made regarding the suitability, achievability and deliverability of the site on the basis this should be reclassified overall as 'Amber').

Importantly, when considering the most appropriate site or sites to allocate, no apparent consideration appears to have been given to what the implications of allocating land for housing will have in terms of associated infrastructure, again a matter that the NPPG advises should be considered. In such circumstances, the NPPG advises that an assessment of the likely impacts of proposed allocations may have on physical infrastructure and the capacity of existing services should be undertaken, which could help shape decisions on the best site choices. This indicates that infrastructure is a key issue to be considered in the context of site selection, but the QNP and its evidence base appears to be very light in terms of this issue, with specific infrastructure policies only covering matters relating to flood risk, drainage and PROW. This is surprising considering the discussion at paragraphs 6.1.1-4 of the QNP, which highlights real concerns about recent development in the wider area that has impacted on local infrastructure and facilities. The Residents Survey also evidences various issues regarding the pressure on local services and facilities, including the following:

- 50% of residents were concerned about parking in the village, with 34% of these concerned about parking around the school.
- 28% were not satisfied with the availability/suitability of sports, leisure and recreation facilities.
- 24% were not satisfied with the facilities for the young.
- All residents wanted to see improvements to traffic calming due to danger spots/speeding traffic in the village.
- All residents wanted to see improvements to physical infrastructure within the village, with most (53%) identifying local roads as being most in need of urgent improvements.

The Appendix to the Residents Survey also provides individual comments in response to what improvements, over the short term (next 5 years), should be undertaken to existing facilities within the village. Key points commonly raised by residents as requiring improvement are summarised as follows:

- Lack of adequate Medical Centre and Dental facilities
- Lack of sufficient primary school, pre-school and childcare capacity
- Need for additional/improved Sports and Recreation facilities (esp. cricket, football and tennis)
- Need for a wider choice of local food shops / restaurants

Neighbourhood Plans give communities direct power to develop a shared vision for their neighbourhood and shape development and growth of their local area. Whilst the Residents Survey provides a valuable insight into the issues of greatest concern to local residents, this important locally-derived evidence base does not appear to have been reflected in either the objectives or decisions made in respect of site selection for future growth within the village, nor its impact on local infrastructure.



Finally, a Housing Needs Survey was undertaken in 2019 by Warwickshire Rural Community Council, having been commissioned by the Parish Council. This is referred to as a 'Reference Document' after Policy HO.3 of the QNP. Only one further reference is made to this document in the final paragraph 7.18 – this merely states that the findings of the Survey were reviewed by the steering group at their meeting in June 2019 (no minutes of this meeting are available on the Neighbourhood Plan website). Whilst the Survey also cannot be found on the Neighbourhood Plan website as part of the QNP's supporting evidence base, it is available on the Local Authority website. This up to date survey of local housing needs identifies 19 households with a local connection that are in immediate need of housing. The Survey notes at Section 2 that there is scope for the local community to prepare a neighbourhood plan to steer development within their area and, in particular, assist in meeting any local housing that may be identified in this report.

Whilst a reserve site is proposed for allocation within the QNP, Policy HO.2 does not specify how or when the site would be released, which in itself is vague and uncertain. Paragraph 6.1.24 does later make reference to the Site Allocations Plan (SAP) whose principal purpose is to identify reserve sites to be brought forward should the Local Authority be unable to demonstrate a deliverable 5-year housing land supply. Whilst this does not help clarify the purpose or intentions in respect of Policy HO.2, it appears to suggest that the QNP reserve site will only be released if the Local Authority cannot demonstrate a 5-year supply. Again, this causes confusion on the basis the SAP already draft allocates sites within Quinton for this purpose. What Policy HO.2 does not do is make provision to meet the immediate and identified local housing needs of the 19 households evidenced by the Housing Needs Survey. As such, we therefore question whether the QNP's intention to contribute both the District's housing target and meet the housing needs of the community (as asserted at paragraph 2.9 of the QNP) will actually be achieved.

#### **Policy HO.2 Site Selection**

In the context of comments above, the selection of a site or sites to meet future housing need should firstly be founded on an up to date evidence base, after which an assessment of potential options is made. Neighbourhood Plans give power in shaping and directing growth to the local community and site selection must follow an assessment of the available options, taking account of the available evidence base. Equally as important to a plan prepared by the local community, is to identify a site or sites which will help achieve the objectives of the plan as a whole, having regard of other issues identified by the local community, such as the Residents Survey or the Housing Needs Survey for instance. Again, as referred to above, there are clearly issues of concern raised by the community in respect of the capacity of local infrastructure and clear identified needs regarding how facilities and services within the village could be improved. This is certainly the approach supported by the NPPG, noting that an important factor in shaping decisions on the best site choices should include an assessment of the likely impacts of proposed site allocation options on physical infrastructure and on the capacity of existing services.

Notwithstanding the context and justification for the proposed allocation of a reserve site under Policy HO.2, there is no available evidence base to demonstrate how the site selected conforms to national guidance in respect of the consideration of infrastructure and how this has informed the particular choice made. Whilst the SHLAA may indicate that the site is 'likely to be developable', this is not the sole issue that needs to be considered in the context of selecting the most appropriate site to allocate within a neighbourhood plan. The QNP fails to demonstrate issues of infrastructure and important local objectives identified by the local community have informed this decision. For instance, what impacts will the development likely have in respect of



services such as the local primary school or medical centre, and will the proposal help mitigate existing congestion and parking issues around the primary school? Will it be able to address issues regarding the need for improvements to local sports, recreation and leisure opportunities within the village or help traffic calm local roads? There is no evidence to indicate such matters have been considered as relevant criteria in selecting the most appropriate site to help address the future needs of the local community.

RSL are of the opinion that its site north of Main Road, Lower Quinton has the ability to meet Quinton's future housing needs whilst also providing significant infrastructure improvements that would benefit the wider community and fully align with the objectives of the QNP, and should therefore be considered either as an alternative or in addition to the reserve site allocation at Goose Lane.

As set out above, due to the limitation of the QNP only considering the six sites assessed as Amber in the SHLAA 2019, there has been no consideration of Land North of Main Road, Lower Quinton. RSL has prepared a comprehensive evidence base which has firstly helped demonstrate that there are no insurmountable constraints to development of the site, which has in turn informed Illustrative Masterplans capable of delivering approximately 100 dwellings. RSL have previously engaged with the Parish Council, School Governors, Ward Members and the wider local community over recent years in order to refine these proposals.

The proposal's at Land North of Main Road, Lower Quinton offer significant benefits which are summarised as follows:

- A wide range of house types, including smaller dwellings for newly forming households or those looking to downsize, as well as bungalows which are in high demand in the local area;
- 35% Affordable Housing, sufficient to meet both the immediately identified local housing need, as well as those that may arise in the near future;
- Ability to transfer land to the local Primary School to enable it to expand on its existing site and accommodate future growth;
- Additional land to help expand the adjacent community sports pitches and play area, delivering a significant upgrade in much needed local sports and recreation facilities;
- Vehicular access is proposed at the western end of the village via a retained access through the recently completed Cameron Homes development, ensuring all traffic generated by the development is routed to the edge of the village and away from Main Road;
- Following discussions with School Governors, provision is made for a new Drop Off/Pick Up point to the rear of the primary school, alongside additional on-site parking for school staff, thereby assisting in alleviating existing congestion outside the school during peak periods; and
- Extensive areas of new Public Open Space with associated landscaping and pedestrian routes connecting the village to the wider countryside.

#### **Summary of RSL concerns in respect of QNP Housing Policies**

RSL's principal concerns regarding the Housing Policies within the QNP are summarised as follows:

- The QNP purports to positively plan for the future housing needs of both the local community and the wider District but there is no evidence to support this.



- The QNP fails to acknowledge the SWLP as an emerging plan and make no provision to address in full, its future housing requirement.
- Whilst a reserve site has been identified, this appears to be in the context of the Core Strategy, a soon to be out of date development plan.
- Whilst there is an local identified need for housing within the Neighbourhood Area, the proposed reserve site will not meet this immediate need as it is only intended to address a 5 year housing land supply if this arises in the District – notwithstanding, there are no provisions to release the site in Policy HO.2 in such circumstances and is therefore ineffective.
- There is no evidence that the QNP has undertaken a reasonable and objective assessment of available site options for allocation, relying principally on the Local Authority's SHLAA. No account appears to have been given to local aspirations and objectives to address specific concerns relating to local infrastructure or how the proposed reserve site would help address these.
- Proper consideration has not been given to RSL's land north of Main Road, Lower Quinton that has the ability secure many benefits for the local community, much of which would also directly address concerns identified by the local community in respect of supporting infrastructure.

#### **Policy NE.2 Valued Landscape**

Whilst the first bullet point of Policy NE.2 seeks to ensure that any impacts of development proposals on valued landscapes, important views and skylines are minimised and mitigated, the second bullet point then goes one step further by also requiring that such features are maintained and safeguarded. It is considered that this is confusing in that the first bullet suggests some level of development impact on such features may be acceptable provided they are minimised and/or mitigated to an acceptable level, whilst the second is far more restrictive, suggesting that any development that does not maintain or safeguard such features will not be acceptable. The relevant strategic policy within the Core Strategy is Policy CS.5 and it is this policy against which Policy NE.2 must ensure it is in general conformity with. A similarly restrictive policy was proposed in the Napton-on-the-Hill Neighbourhood Plan, with the Examiner requiring modifications so that it was positively worded and capable of meeting the basic conditions. Policy CS.5 of the Core Strategy requires development takes place in a way that minimises and mitigates its impact and where possible, incorporates measures to enhance the landscape.

We therefore consider that in order to be positively worded and able to meet the basic conditions, the second bullet point should be deleted.

#### **Policy NE.4: Ridge and Furrow**

Policy NE.4 is a further overly restrictive policy, seeking to protect multiple areas of apparent ridge and furrow which the QNP considers to be important to protect as far as possible, on the basis they are important and rare heritage assets. However, no Heritage Statement has been prepared to support this contention. Conversely, RSL's Heritage Statement undertaken in respect of land north of Main Road, one of the fields identified for protection under Policy NE.4, has assessed this particular matter and concludes that the earthworks within the site are typical of the extant remnants of a medieval open field and are common within the surrounding landscape. It is considered that given the level of impact on the ridge and furrow in subsequent years and the nature of survival, the remains of the ridge and furrow are considered to be of low significance. RSL are happy to share this information with the Qualifying Body.



Furthermore, despite its best intentions to protect and preserve what it considers to be a rare heritage asset, the QNP proposes to allocate land at Goose Lane which paragraph 6.1.36 of the QNP confirms as having ridge and furrow on the gently undulating vale at the foot of Meon Hill. Paragraph 6.3.18, which provides an Explanation to Policy NE.4, highlights that the ridge and furrow features in this part of the neighbourhood area are particularly striking on the slopes of Meon Hill, but this appears to have been overlooked when deciding to allocate this particular site, indicating inconsistency when considering this matter.

Core Strategy policy CS.8 Historic Environment relates to maintaining and enhancing the historic character of the District. Policy CS.8 does not prevent development on land with ridge and furrow and notes that where appropriate, applicants will be required to undertake and provide an assessment of the significance of an asset and the likely impact the proposal will have on the asset's historic interest. CS.8 also notes that for non-designated heritage assets, proposals will be assessed having regard to the scale of any harm or loss and the significance of the heritage asset, reflecting the need for a balanced judgement, as advised by paragraph 197 of the NPPF.

We therefore consider that Policy NE.4 should either be: deleted entirely; reference to the designation at land north of Main Road, Lower Quinton omitted from Figure 23; or otherwise the final sentence of the policy is deleted so that it is more positively worded and in conformity with Policy CS.8 of the Core Strategy and the NPPF.

#### **Policy HA.1**

This policy intends to inform development proposals relating to heritage and archaeological assets within the neighbourhood area. Firstly, it is unnecessary to duplicate or repeat national policy and Core Strategy Policy CS.8. Notwithstanding, if a policy on heritage is to be retained, it should accurately reflect the stance within national policy and distinguish between tests relevant to designated and non-designated heritage assets, so it is consistent and in conformity with national and local planning policy.

#### **Conclusion**

RSL's principal concerns regarding the Regulation 14 version of the QNP is in respect of housing. The QNP confirms that it intends to make provision to meet its housing requirement, but fails to do so. Whilst a reserve site is proposed, this is in the context of a soon to be out of date Core Strategy that is in the process of being updated. In such circumstances, if a qualifying body is intending to meet its housing requirement, it should request an up to date, indicative housing figure from the Local Authority against which it should seek to allocate sufficient reserve sites to ensure that emerging evidence of housing need is addressed, thereby minimising potential conflicts and ensure policies are not overridden by a new local plan. There is no evidence that this has taken place and no evidence to support the approach the QNP takes in respect of future housing growth, which is entirely inconsistent with national guidance and as such, will fail to contribute to the achievement of sustainable development.

Notwithstanding the above, we are also concerned about the approach the QNP has taken in respect of site selection. There is no proportionate, robust evidence to demonstrate that this approach is consistent with national guidance, with an overreliance on the SHLAA and no reasonable assessment of the options available, or consideration given to issues such as infrastructure, to ensure that an informed decision is made to choose the best site or sites that can maximise benefits for the local community and address concerns and aspirations identified by its residents. Our experience of other Neighbourhood Plans has shown that the local community will



often be consulted on potential options for housing allocations with the positive and negative aspects of each site being highlighted so that residents can make an informed choice over which site(s) should be allocated. No such efforts have been made to obtain local community input into the choice of sites, the current QNP providing very little if any evidence to show how issues of importance to the community have been properly considered when selecting the site at Goose Lane. The local community are therefore very much in the dark about other suitable alternatives and the benefits they can deliver, including RSL's land north of Main Road, Lower Quinton.

Concerns are also raised in respect of other development management type policies such as Policies NE.2, NE.4 and HA.1, all of which are not considered to be positively prepared, seeking to apply additional layers of unnecessary and overly restrictive policy which at the very least duplicate existing national and local planning policy, and in some cases, go well beyond them. At worst, these appear to introduce additional constraints that will prevent its future housing requirements from being achieved and/or less sustainable options being brought forward.

An overarching concern regarding the QNP is the apparent lack of clarity about what evidence has been used and how this has informed decisions about the scope and content of policies within the Plan. The NPPG states clearly that proportionate, robust evidence should support the choices made and the approach taken, and this evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the Plan. We do not consider that sufficient evidence base has been collated to support the choices made within the QNP and in some cases, whilst the evidence base is available, this has not been presented alongside the draft QNP or otherwise appears to have been disregarded.

As a result, RSL consider that the draft QNP currently fails to meet basic conditions (a), (d) and (e). We trust however that the content of this submission assists in helping address the various concerns raised, prior to preparing the Regulation 16 version of the QNP and the associated evidence base that will be needed to fully support it.

Whilst the qualifying body's intention to allocate a site or sites within the QNP to meet its future housing requirement is fully supported, the approach that has been adopted does not accord with national guidance. Should this remain an objective of the QNP moving forward, RSL would welcome the opportunity to discuss the significant community benefits that could be delivered by its proposals at land north of Main Road, Lower Quinton, as well as provide further evidence to address any specific concerns they may have regarding its suitability for housing and associated uses. We strongly believe that the positive benefits the site can deliver will fully address many of the issues of concern raised by the local community and therefore suggest that the qualifying body consult local residents to seek their views on the most suitable site or sites to meet its future housing needs. The QNP can then truly reflect the objectives of Neighbourhood Planning, in that the community are given the power to develop a shared vision for its area and are given a genuine opportunity to help decide where new development is located and support proposals which meet their identified needs.

We would therefore respectfully request that changes are made to Plan as necessary to address the objections raised in preparing the Submission Draft QNP. Please keep me informed regarding the progress of this document and if in the meantime there are any queries or you require further information, please do not hesitate to contact me.

Yours faithfully



A handwritten signature in black ink, appearing to read 'D. Hatcher'.

Daniel Hatcher  
**Planning Director**

Mobile: 07587 201372  
E-mail: [daniel@rosconngroup.com](mailto:daniel@rosconngroup.com)

Encs.



## QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN (REGULATION 14) JUNE 2021

Representations on behalf of Redrow Homes Ltd

JBB8630.C7739  
1  
25 June 2021

[rpsgroup.com](http://rpsgroup.com)

## REPORT

### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
1	Draft for client review	DRO	JB	JB	2/6/21
2	Final draft	DRO	JB	JB	25.6.21

### Approval for issue

Cameron Austin-Fell	Cameron Austin-Fell	25 June 2021
---------------------	---------------------	--------------

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

#### Prepared by:

**RPS**

Cameron Austin-Fell  
Planning Director

321 Bradford Street  
Birmingham, West Midlands B5 6ET

T +44 121 622 8520  
E cameron.austin-fell@rpsgroup.com

#### Prepared for:

**Redrow Homes Ltd**

## Contents

1	INTRODUCTION .....	1
2	POLICY AND LEGAL FRAMEWORK.....	2
3	QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN.....	10
4	QNDP SITE ASSESSMENT AND SELECTION PROCESS.....	16
5	THE QNDP EVIDENCE BASE .....	22
6	LAND WEST OF GOOSE LANE, LOWER QUINTON.....	23
7	SUMMARY AND CONCLUSIONS .....	26

## Appendices

Appendix 1 – Vision Document: Land West of Goose Lane, Lower Quinton (June 2021)

## 1 INTRODUCTION

- 1.1 RPS has been commissioned by Redrow Homes Midlands (Redrow) to prepare representations on the Draft (Regulation 14) Quinton Neighbourhood Development Plan ('QNDP'). In respect of this process, the Qualifying Body responsible for preparing the QNDP is Quinton Parish Council ('QPC') and the Competent Authority is Stratford-Upon-Avon District Council ('SADC').
- 1.2 The representations submitted as part of this process are in respect of Redrow's interests in Land West of Goose Lane, Lower Quinton. Redrow has a long-standing commitment to bring forward this site for development. The emerging proposals for the site are presented in chapter 6 of this submission. The proposals for the site have been informed by a range of technical studies and other evidence gathering that demonstrates the site is deliverable for the proposed development. Redrow therefore considers the Land at Goose Lane to represent an ideal site for allocation as a reserve site.
- 1.3 In light of this, the representations submitted here provide a response to the draft policies and supporting information in particular with respect to the housing policies set out in section 6 of the QNDP. These responses are presented in the context of the policy and legal framework at the national level and the local policy framework, both adopted and emerging (chapter 2), but also respond to the evidence base that underpins the process of selecting reserve sites at Lower Quinton (chapter 4). Responses on individual policies (chapter 3) highlight concerns regarding the justification for the preferred approach, whilst responses (chapter 5) also highlight concerns with the overall scope and nature of the evidence base presented at this stage.
- 1.4 It is noted that the Regulation 14 stage does not constitute the 'basic conditions' consultation (this would be undertaken at the Regulation 15 stage). Nonetheless, the concerns identified in this submission do, in RPS's opinion, have implications regarding the ability of the QNDP to meet the basic conditions test if submitted in its current form. These concerns are highlighted at the relevant points in the submission.
- 1.5 It should also be noted that the site is not only relevant in the context of the QNDP, but is also currently being promoted through the emerging Site Allocations Plan ('SAP'), and has also been submitted to SADC as part of the call for sites exercise in support of the emerging South Warwickshire Local Plan, both of which affect the future planning framework for Lower Quinton. This is to ensure that both the South Warwickshire Authorities, as well as QPC, are fully aware of Redrow's intention for the site.

## 2 POLICY AND LEGAL FRAMEWORK

### National Policy and Guidance on Neighbourhood Plans

2.1 This chapter highlights the key elements of national policy and practice guidance that the Qualifying Body and the Competent Authority must have regard to in the preparation of the Quinton Neighbourhood Development Plan (QNDP). This includes the requirement for appropriate co-ordination between both these bodies, in particular the sharing of information and evidence that can properly inform the preparation of policies in the neighbourhood plan, thus ensuring the plan has a sufficient evidential basis and that potential conflict between neighbourhood and local plan policies can be avoided. This also includes ensuring that the process of consultation and engagement has been effective allowing all parties to input into the process at the appropriate stages of plan production.

2.2 In respect to all policies, Paragraph 31 of the National Planning Policy Framework (NPPF) 2019 makes very clear that:

*"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned..." (RPS emphasis)*

2.3 And in respect to neighbourhood plans, clarity in the policy and an appropriate evidence base are also necessary as emphasised in Neighbourhood Planning section of the PPG, as follows:

#### ***"How should the policies in a neighbourhood plan be drafted?"***

*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."<sup>1</sup> (RPS emphasis)*

2.4 Therefore, if policies are not clear and supported by sufficient and appropriate evidence, it would be difficult to conclude that they contribute to the achievement of sustainable development or are consistent with national planning policy.

2.5 Paragraph 37 of the (NPPF) 2019 also explains that:

*"Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum."*

---

<sup>1</sup> PPG Paragraph: 041 Reference ID: 41-041-20140306

## REPORT

---

- 2.6 The basic conditions are set out in Paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG. They are as follows:
- (2) *A draft order meets the basic conditions if—*
- (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);*
- (f) *the making of the order does not breach, and is otherwise compatible with, EU obligations;*  
*and*
- (g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order*
- 2.7 While it is often considered (by some) that the examination of Neighbourhood Plans embodies a “light touch” approach, the PPG makes clear that should not be case. There is significant guidance on what neighbourhood planning involves, the interaction between Neighbourhood Plans and strategic policies contained in extant and emerging development plans, and how the basic conditions can be met.
- 2.8 Paragraph 30 of the NPPF also explains that,
- “Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”*
- 2.9 Neighbourhood Plans are therefore a powerful tool for development management purposes insofar they are not superseded by subsequent policies. It is important therefore that Neighbourhood Plans are carefully and coherently drafted to ensure that they do not prevent sustainable development, are consistent with existing and also, insofar as possible, emerging plans, and national planning policy and guidance.

## REPORT

---

- 2.10 The interaction between the QNDP and the extant development plan<sup>2</sup> as well as the emerging development plan is important. The QNDP must be in general conformity with the strategic policies of the development plan (in this case, the Stratford Core Strategy), but the Neighbourhood Planning section of the PPG also explains the following very important points in respect of emerging plans (in this case, the Stratford Site Allocations Plan), which is of particular relevance here:

***Can a neighbourhood plan come forward before an up-to-date local plan or spatial development strategy is in place?***

*“...Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.*

*Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- *the emerging neighbourhood plan;*
- *the emerging local plan (or spatial development strategy);*
- *the adopted development plan;*

*with appropriate regard to national policy and guidance.”*

*The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.*

*The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced.*<sup>3</sup> (RPS emphasis)

- 2.11 The sensible and straightforward reason for that approach is explained in the same paragraph:

*“It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.” (RPS emphasis)*

---

<sup>2</sup> The Development Plan comprises the Local Plan Part 1 – Stratford-upon-Avon District Core Strategy 2016

<sup>3</sup> Paragraph: 009 Reference ID: 41-009-20190509

## REPORT

---

2.12 It is clearly important therefore that there is a cogent evidence base at a strategic and local level, and that the QDNP has regard to evidence gathered by the LPA. It is clearly the intention of the PPG that conflicts between emerging plans are to be avoided.

2.13 In respect of site allocations, the PPG contains the following guidance:

***“Can a neighbourhood plan allocate sites for development?”***

*A neighbourhood plan can allocate sites for development, including housing. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites and on viability is available.”<sup>4</sup> (RPS emphasis)*

2.14 This guidance relates back to the national policy imperative for policies to be underpinned by relevant and up-to-date evidence that is also adequate and proportionate. If this is not demonstrated, then the policies to which the evidence relates cannot be credible.

2.15 In the context of site allocations, while there is no legal requirement for neighbourhood plans to have a Sustainability Appraisal (SA), the PPG explains that it might be useful. Moreover, the PPG in respect of SA explains that there may be instances where a neighbourhood plan is likely to have significant environmental effects, and so will require a Strategic Environmental Assessment (“SEA”) in line with the EU Directive<sup>5</sup>. The allocation of sites in a NDP is recognised in the PPG as likely to have significant effects that would trigger the need for an SEA:

***“Is an environmental assessment required of a neighbourhood plan?”***

*A neighbourhood plan may require a strategic environmental assessment if the draft neighbourhood plan falls within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004. This may be the case if it is likely to have a significant effect on the environment. This may be the case, for example, where a neighbourhood plan allocates sites for development.*

*A qualifying body is strongly encouraged to consider the environmental implications of its proposals at an early stage, and to seek the advice of the local planning authority on whether the Environmental Assessment of Plans and Programmes Regulations 2004 are likely to apply...”<sup>6</sup> (RPS emphasis)*

2.16 Taking a precautionary tone, the PPG also advises neighbourhood planning bodies to consider the need for SEA at an early stage when preparing the NDP, stating:

***“How should a neighbourhood plan allocate sites for development?”***

---

<sup>4</sup> Paragraph: 042 Reference ID: 41-042-20170728

<sup>5</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (oft referred to as the Strategic Environmental Assessment (SEA) Directive).

<sup>6</sup> Paragraph: 073 Reference ID: 41-073-20190509

## REPORT

---

*Where a neighbourhood planning body intends to allocate sites for development, it will need to carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.*

*Guidance on general principles for assessing sites and on viability can provide the framework for the assessment of sites. The neighbourhood planning toolkit on site assessments may also be used. A strategic environmental assessment may be required if the plan is likely to have a significant effect on the environment. A neighbourhood planning body is strongly encouraged to consider the environmental implications of its proposals at an early stage, and to seek the advice of the local planning authority...<sup>7</sup> (RPS emphasis)*

- 2.17 If likely significant environmental effects are identified, initially through a process of screening usually undertaken by the competent authority, an environmental report must be prepared. Regulation 12 of the Environmental Assessment of Plans and Programmes Regulation 2004 sets out the formal requirements of an 'environmental report', which can form an integral part of the sustainability appraisal report and is a core output of any strategic environmental assessment. This is also one of the basic conditions (f) that will be tested by the independent examiner as to whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).
- 2.18 Arguably of most critical importance is the need to ensure that plans are appraised in light of all reasonable alternatives. As stated in the guidance:
- "The environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The environmental report must clearly show how these requirements have been met."<sup>8</sup> (RPS emphasis)*
- 2.19 There are also consultation requirements in relation to the SEA, set out at Regulation 13 of the Environmental Assessment of Plans and Programmes Regulation 2004. The consultation should be for such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.
- 2.20 Consequently, this consultation must be carried out prior to submission of the QNDP to the Examiner in order to allow the Qualifying Body to take into the representations made and make any necessary modifications to the QNDP in response, prior to formal submission of the QNDP to the Competent Authority at the Regulation 15 stage of the preparation of the QNDP under the Neighbourhood Planning (General) Regulations 2012.

---

<sup>7</sup> Paragraph: 098 Reference ID: 41-098-20190509

<sup>8</sup> Paragraph: 039 Reference ID: 11-039-20140306

## REPORT

---

### **The Current and Emerging Development Plan**

- 2.21 Set out below is a very brief summary of the development plan framework to which all neighbourhood plans in Stratford need to be in general conformity with.

#### **Stratford-upon-Avon Core Strategy 2016**

- 2.22 Stratford Core Strategy (SCS) Policy CS.15 (Distribution of Development) identifies seven general sustainable locations across the District, setting out the types of development that are appropriate and where development will take place up to 2031:

- A. Main Town (Stratford-on-Avon).
- B. Main Rural Centres (MRC).
- C. New Settlements.
- D. Local Service Villages (LSV) - across four categories.
- E. Large Rural Brownfield Sites.
- F. All Other Settlements.
- G. Local Needs Schemes.

- 2.23 Policy CS.16 (Housing Development) of the SCS identifies a minimum target of 14,600 dwellings to be delivered in the District by 2031. Of this, approximately 2,000 dwellings are to be delivered at the LSVs by 2031. Under sub-section B of that policy, the LSV1 settlements should accommodate approximately 450 dwellings of 2,000 dwelling target over the same period.

- 2.24 Policies CS.15 and CS.16 therefore comprise two very important strategic policies for the purposes of preparing neighbourhood plans in Stratford, including the QNDP. As acknowledged in the QNDP (at paragraph 6.1.18) the SCS identifies the settlement of Quinton (which includes Lower Quinton and Upper Quinton) as a Category 1 Local Service Village (LSV1), in line with the 'balanced dispersal' of development under Policy CS.15. In this regard, Policy CS.15 is clear that development should be distributed in accordance with the '*distinctive character and function*' of settlements in the District.

- 2.25 In addition, Policy CS.16 also establishes the need to identify a specific supply of 'reserve sites' comprising up to 20% of the total housing requirement to 2031, which means it is inevitable that additional sites will be identified which exceed the minimum housing requirement established through the development plan.

- 2.26 Accordingly, neither of these policies seek to establish absolute limits or 'ceilings' on the potential scale of development at any given settlement, including those defined as LSV1s, and so should not be interpreted in this way.

## REPORT

---

### Emerging Stratford Site Allocations Plan

- 2.27 In line with Policy CS.16, Stratford-upon-Avon District Council is currently preparing a Site Allocations Plan (SAP), which will include a number of 'reserve housing sites' (RHSs). The requirement to identify RHSs through a separate Development Plan Document, in this case the SAP, was in response to the main findings of the Core Strategy Inspector who stipulated that such a policy was required in order that the SCS could be found 'sound' and capable of adoption<sup>9</sup>.
- 2.28 The SAP is currently at the preferred options (2<sup>nd</sup> Regulation 18) consultation stage, having been published in October 2020. The latest version of the SAP identifies four proposed reserve housing sites at Quinton, one of which includes part of the land under the control of Redrow (NB: the reference used in these representations is SHLAA ref. 'Site 18'). The SAP is also supported by a range of evidence base documents, including Sustainability Appraisal, the Strategic Housing Land Availability Assessment April 2020 ('SHLAA 2020'), and other topic-related papers and evidence material. RPS submitted representations to the SAP consultation on behalf of Redrow, which were supportive of the proposal to allocate the portion of the site as identified but raised objections on the exclusion of the remainder of its land interests from the SAP at Lower Quinton.
- 2.29 The process of bringing forward the SAP is therefore currently ongoing and RPS understands that the next consultation (likely to involve a second Regulation 19 stage) will be delayed until later in 2021, though no clear timetable is currently available. The result is this is that the SAP and the QNDP are effectively moving forward in tandem, but with some uncertainty as to the respective timing of when they might be 'adopted' or 'made'.
- 2.30 It is therefore the case that both these plans are cognizant of each other and that, in line with the PPG<sup>10</sup>, it is important that there is adequate consistency and co-ordination between the two plans, particularly with regard to the sharing of evidence base underpinning the emerging SAP, in order to reduce the potential for conflicts. Therefore, RPS contends that the QNDP should, in line with PPG, take into account the most up to date evidence underpinning the higher order plan, which in this case is the SAP.

### Summary

- 2.31 In summary, based on the precis of national and local policy and practice guidance set out above, it is clear that:
- Quinton Parish Council is promoting its own neighbourhood plan for the parish, including site allocations (reserve site) and may come forward in advance of the adoption of the emerging SAP for Stratford, which also proposes to allocate reserve sites for housing at Quinton.

---

<sup>9</sup> Site Allocations Plan Preferred Options Consultation Version (October 2020), paragraph 2.1.2

<sup>10</sup> Paragraph: 009 Reference ID: 41-009-20190509

## REPORT

---

- In light of this, it is paramount there is appropriate integration and co-operation between the two plan-making processes, in order to prevent the potential for duplication and conflict, thus ensuring that the neighbourhood plan and the emerging local plan are complimentary with each other, in accordance with national policy and guidance. This is particularly relevant with regards to the sharing of the evidence base which support the policies of the emerging SAP relating to proposed reserve housing sites at Quinton.
- It is therefore important that there is a cogent evidence base at a strategic and local level and that the QNDP also has regard to relevant evidence gathered by the LPA. It is clearly the intention of the PPG that conflicts between emerging plans are to be avoided.
- In relation to proposed site allocations (reserve housing sites), national guidance anticipates that where there are likely to be significant effects this would then trigger the need for Strategic Environmental Assessment (or 'SEA'). Such SEA would therefore be an integral part of the evidence base required to justify the plan proposals and, in particular, the choice of sites identified in the QNDP. This process would also require an assessment of the proposal in light of reasonable alternative site options in accordance with the EU Directive and in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. If this is not done, then the QNDP might be considered unlawful.

2.32 The next two chapters look to expand on these initial observations on the content of the QNDP in more detail.

### 3 QUINTON NEIGHBOURHOOD DEVELOPMENT PLAN

- 3.1 This chapter provides a response on the proposals set out in the QNDP, with particular emphasis on the approach to housing.
- 3.2 The QNDP proposes three housing-specific policies, covering the following topics:
- Policy HO.1: Future Housing and Growth.
  - Policy HO.2: Reserve Site
  - Policy HO.3: Infill within the Built-up Area Boundary.
- 3.3 These policies are, in turn, underpinned by a set of strategic objectives, which include the provision of sustainable housing growth and the identification of suitable potential reserve sites within the QNDP area. These are broad and over-arching objectives that, at face value, seek to establish a positive framework for managing development of housing over the plan period (up to 2031). To this extent, therefore, RPS broadly acknowledges the intentions of the QNDP with regards to planning for future housing growth in Quinton.
- 3.4 Nonetheless, RPS has concerns with the wording in these policies, as drafted, and these are discussed below.

#### Policy HO.1: Future Housing and Growth

- 3.5 This policy is drafted under two bullet points. Under the first bullet, the policy supports new dwellings within the built-up area boundary of Quinton. The built-up area boundaries (BUABs) relevant to Quinton are shown in Figure 9 of the QNDP. Overall, this general policy approach is not in dispute.
- 3.6 The second bullet however seeks to define those types of housing development that would be appropriate outside the BUABs of Quinton. The first part of the bullet states:
- "All areas outside the built-up area boundary are classed as countryside. New dwellings within the countryside will be strictly controlled and limited to...(types of development listed after)..."*
- 3.7 RPS disputes the policy as drafted on the grounds that the wording is not in general conformity with the development plan, nor is it consistent with national policy. This is because the development plan, through Policy CS.15 (Distribution of Development) and Policy AS.10 (Countryside and Villages), allows for opportunities to bring forward development that, whilst not being located within a defined BUAB, may nonetheless fall within the 'physical confines' of the settlement. This would suggest there is some measure of flexibility in how proposals are assessed where they sit adjacent to existing built-up areas, which is not reflected in the wording of Policy HO.1.
- 3.8 Similarly, Policy AS.10 (in the penultimate paragraph) also allows for development in the countryside where it would, *"...offer significant benefits to the local area and not be contrary to the overall development strategy..."*. RPS suggests that this policy provides support where such benefits can be secured in locations including those at defined Local Service Villages, one of which is Quinton, where development is supported under Policy CS.15.

## REPORT

- 3.9 Furthermore, national policy no longer seeks to protect all areas of countryside for its own sake, but rather policy and decisions should “...recognise the intrinsic character and beauty of the countryside...” (NPPF 2019, paragraph 170).
- 3.10 The need for flexibility in the policy is also reflective of the fact that the adopted district-wide housing requirement (at least 14,600 dwellings by 2031) and the housing apportionment for the LSVs, are not absolute limits or maximum targets that, once met, should not be exceeded. This is important given the suggestion in the QNDP (at paragraph 6.1.18-6.1.19) that the housing target for Quinton has already been met. As highlighted above, RPS contend that the housing figures set by the SCS are based on minimum and approximations of growth and so should not be interpreted as ceilings on future development.
- 3.11 RPS therefore recommends that a greater measure of flexibility is incorporated into Policy HO.1 to allow appropriate development to come forward on the edge of Lower Quinton where significant benefits can be secured, consistent with both local and national policy. In this regard, the development vision for the Land West of Goose Lane site promoted by Redrow offers such an opportunity.

### Policy HO.2: Reserve Site

- 3.12 As highlighted in the previous chapter, the principle of identifying reserve sites or additional housing sites over and above those already allocated in NDPs, was established in the Policy CS.16 of the Core Strategy. As a matter of principle therefore, RPS does not dispute this approach. RPS notes that QPC proposes the identification of a single reserve site in the QNDP, namely ‘Goose Lane (on the east side)’, referenced in the QNDP under this policy as ‘Site 8’.
- 3.13 The location of the preferred reserve site is shown in Figure 11 of the QNDP, represented below (shown as Figure 3.1).

**Figure 3.1 Location of proposed reserve site in QNDP (Goose Lane)**



- 3.14 However, whilst noting that the preferred site is owned by Magdalen College, RPS is not aware that any house builder or developer has been engaged to bring forward the site should it be released.

## REPORT

---

RPS contend that deliverability is a key consideration in the choice of which sites to allocate as reserve sites, and therefore any reserve site that is identified should be 'ready to go' if it is triggered for release. In light of this, RPS suggests that if the policy is retained then additional sites should be identified that are deliverable and capable of being brought forward quickly, including Land West Goose Lane which is under control of a national house builder, Redrow.

3.15 Furthermore, given QPC has only allocated a single site, where other reasonable alternative are known to exist at Lower Quinton, it is therefore imperative that the process and procedures followed in selecting the site are in accordance with local and national policy and guidance, as well as meeting other necessary provisions under specific matters, notably on strategic environmental assessment. This includes the need for plan proposals to be underpinned by relevant and up to date evidence.

3.16 In this context, QPC's justification for the selection of Site 8 is set out in commentary under paragraphs 6.1.34-6.1.37 of the QNDP. RPS provides a summary of the reasoning taken from the QNDP, along with some observations in response:

### Justification for selecting Site 8 (East of Goose Lane)

- *"The site has already been proposed by SADC as part of the SAP consultation process in 2020 and has been supported by QPC as part of that consultation. It is owned by Magdalen College and in discussions with their agent it is understood that this would be their preferred site for further development should a reserve site be required in Quinton by SDC"* (para 6.1.34).

RPS observations:

- It would appear QPC have selected the site merely because they already support its inclusion in the SAP. It would also appear that landownership has formed a key consideration that has influenced the selection of the site. It is not clear, therefore, what planning considerations have informed the reasons given here. In this regard, it is also noted that all six sites considered by QPC are owned by a single landowner, Magdalen College. QPC admit to having 'discussions' with the College on the selection of potential sites, who have themselves made it clear which site they would prefer to see allocated in the QNDP. Given that all the other sites considered by QPC are also owned by the College, RPS raises obvious concerns as to whether the approach to site assessment and selection has followed a fair and transparent process. The lack of any clearly stated criteria for the assessment of site options raises further questions marks as to the approach that has been applied in this case.
- *"It is a relatively small parcel of land adjacent to an existing development and the loss of this land would not materially affect the College's farming activities"* (para 6.1.34)

RPS observations:

## REPORT

---

- It would appear that the impact on the farming operations of Magdalen College has formed a significant criteria in the selection of the site. Again, it is not clear what planning considerations have informed the reasons given here.
- *"This site is located approximately 200m north of the AONB. It needs to be acknowledged that development on this site would impact views of the church and of the AONB. It would also generate additional road traffic although the position of the site would allow for residents to walk to the school, the Post Office/Shop and to the Medical Centre"* (para 6.1.35)

RPS observations:

- It must be noted that other sites at Lower Quinton (inc. Land West of Goose Lane) are equally well located to local community facilities and so this is not a reason to exclude other sites from consideration as reserve sites in the QNDP.
- *"A Landscape Sensitivity Study (White Consultants 2012) has determined the sensitivity of land to housing and commercial development around Lower Quinton. Reserve Site 8, for residential use, is located within zone 'Q01' which is identified as being at 'medium' sensitivity to housing development...The inclusion of the reserve site at this location may have local landscape impacts, however, the landscape assessment evidence concludes that it is possible to mitigate these impacts and those that might arise in association with the setting of Meon Hill and the AONB."* (para 6.1.36-6.1.37)

RPS observations:

- Again, the reasoning given here, particularly with respect to mitigation, could equally apply to other suitable sites at Lower Quinton and would not preclude consideration of them (inc. Land West of Goose Lane) from potential allocation as reserve sites in the QNDP.

3.17 In light of these observations, RPS questions whether some of the reasons given for preferring Site 8 are actually based on planning considerations sufficient to justify the identification of East of Goose Lane as a reserve site, as part of the justification would appear to relate to the significant landownership interests and private farming operations attached to Magdalen College at Lower Quinton. On this basis, RPS considers that such reasons are not planning-related and so should be discounted from the consideration of the site. Similarly, whilst some planning considerations have been identified, for example in relation to landscape and proximity to services, these are considerations that are equally applicable to other sites at Lower Quinton, including Land West of Goose Lane, and so do not separate out the preferred site as being the only suitable site for allocation at Lower Quinton. The commentary set out in the QNDP therefore provides limited assistance in understanding why East of Goose Lane (site 8) should be the only site considered appropriate for allocation as a reserve site in the QNDP, to the exclusion of all other sites.

3.18 Furthermore, evidence presented within the QNDP itself, on flood risk, shows that the site is at risk of flooding and so does not represent a sequentially preferable site at Lower Quinton as required by

## REPORT

national policy, and thus brings into question the justification for its selection in the QNDP. This is explained below.

- 3.19 National policy stipulates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (NPPF 2019, paragraph 155). To do this, the NPPF requires, "... all plans to apply a 'sequential (risk-based) approach' to the location of new development so as to avoid, where possible, flood risk to people and property.." (paragraph 157). The aim of the sequential approach, the NPPF states is, "...to steer new development to areas with the lowest risk of flooding..." with the overall objective being that, "... Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding..." (paragraph 158) (RPS emphasis).
- 3.20 The extract taken from Figure 19 of the QNDP, represented below (as Figure 3.1), shows the extent of likely flood risk from surface (pluvial) sources at Lower Quinton, drawn from SADC's own evidence base on Strategic Flood Risk Assessment.

**Figure 3.1 Flood Risk from Surface Water (taken from Regulation 14 Draft QNDP, June 2020)**



- 3.21 It can be seen that the area of land to the east of Goose Lane, running along a north-south axis between Lower and Upper Quinton, and which includes the location of the preferred reserve site (Site 8), is within a larger area at risk of flooding from surface water. This is therefore clearly a matter that should be investigated and addressed as part of the site assessment and selection process, as well as part of the assessment of significant effects (this is discussed in more detail in the next chapter).
- 3.22 Furthermore, any new development in that location is likely to increase the flood risk to people and property based on available information. Under these circumstances, new development should be directed to areas at lower risk of flooding, in accordance with the sequential approach under national policy. On the other hand, the land under Redrow's control, including Land West of Goose Lane, is

## REPORT

---

located on the southern edge between Lower and Upper Quinton, on land which is not affected by surface water flood risk (or any other form of flood risk). This site, in accordance with national policy, would clearly represent a reasonably available site appropriate for the proposed development in an area with a lower risk of flooding that would be sequentially preferable to the preferred site in the QNDP (Site 8). This would be a factor that would count in favour of the West of Goose Lane site as part of any site assessment process, but which has not been taken into account at this stage.

- 3.23 The result is that the QNDP is seeking to allocate a site (site 8) that is less sequentially preferable to another site (site 18), contrary to national policy on managing flood risk and new development. Furthermore, as highlighted in our response to Policy HO.2, the likely impact from flood risk on new development within site 8 due its location east of Goose Lane has not been taken into account by QPC in selecting the site. RPS contend that, on these grounds, the choice of site 8 as the only preferred reserve site in the QNDP has not been justified.
- 3.24 Consequently, there are clear grounds for the QNDP to consider other suitable sites for allocation as reserve sites at Lower Quinton where these are known. This includes Land West Of Goose Lane, which is under the control of a different landowner, Redrow. However, as explained in the next chapter, the QNDP has ignored the site from specific consideration despite support for it in the latest version of the SAP.

## 4 QNDP SITE ASSESSMENT AND SELECTION PROCESS

- 4.1 Chapter 2 of this submission has highlighted the importance of ensuring that, when different plans covering the same area are being progressed concurrently, any potential for conflicts should be minimised through proper co-ordination and co-operation between the Local Planning Authority and QPC. This would include coordination and sharing of the evidence base underpinning both plans. Chapter 3 has also highlighted concerns regarding a lack of justification provided in the QNDP for the preference for only a single reserve site at Lower Quinton.
- 4.2 A review of the information published by QPC at this stage therefore suggests that the advice at national level has not been applied in the preparation of the QNDP. This raises concerns regarding the ability of the Parish to demonstrate it has met the basic conditions should the QNDP be submitted to the Competent Authority (Stratford-upon Avon District Council) as currently drafted; in particular, having regard to national policy (condition a), contributing to the achievement of sustainable development (condition d) and compatibility with EU obligations (condition f).
- 4.3 The key areas of concern are set discussed below. This draws on the commentary at paragraphs 6.1.20-6.1.41 of the QNDP relating to the process followed by QPC in assessing and selecting the preferred reserves site under Policy HO.2.

### Inconsistency with the Site Allocations Plan proposals at Lower Quinton

- 4.4 RPS notes that QPC has made some reference to the Stratford-on-Avon District Site Allocation Plan: Preferred Options Consultation (published in October 2020) in the 'Reference Documents' section on page 19 of the QNDP, as well as a brief mention in the supporting text.

*Figure 4.1 Reserve Housing Sites – SAP 2020 – Quinton (inc. Lower Quinton)*



- 4.5 The QNDP rightly highlights (at paragraph 6.1.24) that the latest SAP consulted on four potential reserve sites at Lower Quinton. The extract from the SAP above (Figure 4.1) shows the location of the preferred sites. For reference, these are as follows:

- East of Back Lane (north) – (SHLAA Site 4 / SAP ref. A).

## REPORT

---

- East of Goose Lane (north) – (SHLAA Site 8 / SAP ref. D) (NB: the ‘preferred site in the QNDP)
  - West of Goose Lane – (SHLAA Site 18 / SAP ref. C - the Redrow site)
  - East of Back Lane (south) – (SHLAA Site 22 / SAP ref. B).
- 4.6 RPS notes however that there are no other substantive references in the QNDP to the latest SAP consultation held during October-November 2020 (except a cursory mention in paragraph 6.1.38). On this basis, RPS must surmise that either the Parish has sought to ignore the latest SAP proposals consulted on during 2020, or has simply made a grave error in the drafting of the document for some other reason.
- 4.7 The fact that the Regulation 14 draft QNDP has not taken into account the latest version of the SAP is significant. This is because the QNDP currently relies on the previous (now superseded) version of the SAP consulted on during 2019, namely the ‘Site Allocations Plan Proposed Submission (Regulation 19) Consultation Version, July 2019’, to draw on sites which it considers as having ‘potential’ for identification as ‘reserve sites’ in the QNDP. However, whilst this earlier version of the SAP included sites 4, 8 and 22, it did not include the ‘Land West of Goose Lane’ (Site 18). This site is under the control of Redrow and forms the subject of the representations made here.
- 4.8 It is clear therefore that SADC considers the ‘Land West of Goose Lane’ site suitable for identification as a reserved site in the SAP, but QPC does not make any reference to it in the QNDP. RPS contends that QPC would have been aware of the proposal to include Site 18 in the SAP, given they are a formal consultee on emerging Plans in the District. However, there is no explanation in the QNDP as to why Site 18 should be specifically excluded based on the proposals set out in the latest SAP.
- 4.9 RPS contends that this clearly shows a disconnect between the SAP and QNDP position on reserve sites at Lower Quinton. The implications are that there is a lack of cooperation or coordination between the two bodies responsible for these plans that could result in two conflicting plans being taken forward. This potential for conflict between the two plans undermines the intentions in national guidance for such conflicts to be avoided. A further implication of the lack of coordination and cooperation on reserve sites is that it is now uncertain as to which sites are going to be allocated as reserve sites at Lower Quinton; will it be four sites, or just one? This uncertainty could well undermine confidence in the plan-making system amongst the local community in Lower Quinton who are being asked to vote on the QNDP, if two documents covering their area are being progressed at the same time but which are so out of sync on site allocations.
- 4.10 Under these circumstances, RPS contends that the uncertainty caused by two plans progressing along similar timelines, but which differ so markedly on site allocations, undermines the achievement of sustainable development and thus would, as drafted, not meet the basic conditions (condition e).

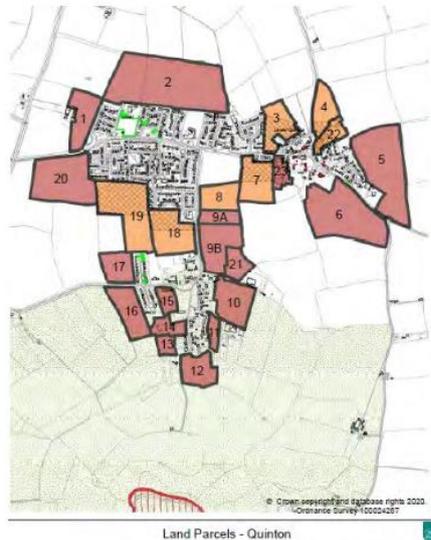
## REPORT

---

### **Inconsistency with regard to the evidential basis for site selection**

- 4.11 As highlighted previously, the QNDP proposes to allocate a single site as a reserve site at Lower Quinton (Site 8) East of Goose Lane, for 30 dwellings.
- 4.12 On reviewing the QNDP, the evidence base used to underpin this preference is drawn predominantly from SADC's Strategic Housing Land Availability Assessment published in June 2019 ('SHLAA 2019'). This version of the SHLAA identified six sites that SADC considered at the time to have potential for allocation as reserve sites, based on their 'amber' scoring, and which were consulted on as part of the Proposed Submission (Regulation 19) Consultation in July of that year.
- 4.13 In terms of a methodology for the assessment of sites, QPC then 'reviewed' the six potential ('amber') sites taken from the SHLAA 2019, by considering each site in relation to the objectives of the Plan using information provided in the SHLAA and in the 2018 survey of residents (paragraph 6.1.33). However, RPS notes that QPC has not published any results of the specific technical assessments work that has been undertaken to support its assessment of sites. Therefore, it is not clear how the 'review' has been undertaken, including what criterion, if any, has been applied as part of the methodology to assist the Parish in carrying out the assessment. This lack of information prevents any clear understanding as to why only one site should be identified as a reserve site at Lower Quinton.
- 4.14 Of more fundamental concern however is the need for plans to be underpinned by relevant and up to date information, in accordance with national policy (NPPF 2019, paragraph 31). As highlighted previously, the SAP version consulted on during 2019 was superseded by a second preferred options consultation undertaken during October-November 2020. This consultation was also supported by a revised SHLAA, published during April 2020, which supersedes the SHLAA 2019 version relied upon by QPC as the basis for its consideration of reserve sites in the QNDP.
- 4.15 As a result, the latest iteration of the SHLAA now represents the 'relevant and up to date' evidence required to underpin policies in accordance with national policy, and in doing so renders the previous version as superfluous. This is significant because, consistent with changes proposed by SADC to the SAP between 2019 and 2020, the SHLAA 2020 assessments on some individual sites were also updated to reflect new evidence.
- 4.16 As shown below (Figure 4.2) some important changes were made in the SHLAA 2020 version in relation to certain sites at Lower Quinton, in particular Site 18 (Land West of Goose Lane). As a result of the re-appraisal of this site, the score applied to the site was upgraded from 'red' (not deliverable) to 'amber' (likely to be deliverable). A re-appraisal of Site 19, also under the control of Redrow, resulted in a similar upgrading in the scoring for that land parcel too. Thus, when applying QPC's own methodology, a score of 'amber' would automatically trigger the assessment of Sites 18 and 19 as part of the QNDP process alongside all the other amber sites. However, the QNDP excludes both Site 18 and Site 19 from any consideration at this stage. This is clearly the result of QPC's use of information (based on the SHLAA 2019) that is not up to date.

**Figure 4.2 Quinton land parcels assessment – SHLAA April 2020 update (inc. Site 18 and 19)**



4.17 RPS therefore contends that the site assessment process has not considered all potential reserve sites at Lower Quinton, including the exclusion of Sites 18 and 19 as part of this process. This further undermines the basis for selecting only one reserve site at Lower Quinton given that the consideration of sites has ignored the evidence available to the Parish, notably the evidence underpinning the latest version of the SAP set out in the SHLAA 2020. For this reason the QNDP, as drafted, is contrary to national policy (paragraph 31) and so, under these circumstances, it is argued that the QNDP would not, as drafted, meet the basic conditions test condition (a) (have regard to national policy).

**Failure to address the requirements for Strategic Environmental Assessment (SEA) in light of reasonable alternatives.**

4.18 In chapter 2 of these representations, it was highlighted that where site allocations (including reserve sites) were being proposed or considered in preparing a neighbourhood plan this would most likely result in the need for an assessment into the likely ‘significant effects’ of those proposals as part of a Strategic Environment Assessment (SEA) <sup>11</sup>. Furthermore, when preparing the Environmental Report for the SEA, such an exercise also requires the consideration of all reasonable alternatives.

4.19 Government guidance suggests that the most appropriate mean by which to incorporate the requirements of SEA is through a Sustainability Appraisal (SA). Sustainability Appraisal (SA) incorporates the requirements of the SEA Regulations, which implements the requirements of the SEA Directive on the assessment of the effects of certain plans and programmes on the

<sup>11</sup> Paragraph: 073 Reference ID: 41-073-20190509

## REPORT

---

environment. Sustainability Appraisals ensure that the potential environmental effects are given full consideration together with social and economic issues. The Government has stated that a Sustainability Appraisal is not legally required for Neighbourhood Plans but has said that it must be demonstrated how the Neighbourhood Plan contributes to the achievement of sustainable development in the area. It is down to the qualifying body to demonstrate how its Neighbourhood Plan will contribute to achieving sustainable development (and thus demonstrate that the NDP meets the basic conditions).

- 4.20 However, at this point, no SEA has been issued as part of this consultation stage on the QNDP. Furthermore, no screening assessment<sup>12</sup> has been published either in order to determine that SEA is not required in this case. Unless an assessment of significant effects of the proposal to allocate sites is prepared, and sufficient opportunity is made available for all stakeholders to comment on it, the QNDP cannot proceed in its current form.
- 4.21 This represents a significant oversight by both QPC and SADC. Given the time period between the latest iteration of the SAP (October 2020) and the publication of the Regulation 14 version of the QNDP (June 2021) of around 8 months, ample time has been available in order for SADC to issue a screening assessment on the emerging proposals for reserve sites as part of the QNDP. RPS contends that this is further evidence of the lack of coordination between the two bodies on preparing the necessary information needed to support the proposals in the QNDP. More importantly, by not providing the requisite information as part of the consultation, this prevents stakeholders and interested parties from the opportunity to provide informed comments and representation on those proposals, thus undermining the value of the consultation process as a whole.
- 4.22 In light of this clear omission in the information published on the QNDP, RPS suggest that QPC has two options to ensure the QNDP is legally compliant, on SEA grounds, and can, at the same time, meet the basic conditions (all things being equal). Firstly, QPC should, at the earliest opportunity, seek a screening assessment from SADC on whether or not SEA is required in this case. Or, secondly, withdraw Policy HO.2 – this would almost certainly guarantee that a SEA would not be required as the QNDP would then not be proposing any site allocations. Nonetheless, regardless of which option is chosen, RPS would also recommend that QPC reissues the QNDP alongside the SEA and/or screening assessment for a second round of consultation under Regulation 14, prior to formal submission of the QNDP at the Regulation 15 stage. This would ensure that all local residents and other stakeholders have adequate opportunity to present their views to QPC on any changes they propose to the QNDP prior to the formal examination stage.
- 4.23 Nonetheless, as currently drafted, RPS contends that without an SEA, or a screening assessment which clearly demonstrates that an SEA is not required, the QNDP does not accord with the SEA

---

<sup>12</sup> In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Council (in this case SADC) must determine if the QNDP requires an environmental assessment. This process is commonly referred to as a "screening" assessment.

## REPORT

---

Regulations and so, as a consequence, would not meet the basic conditions test (f) (in breach of EU obligations as enshrined in UK law).

## 5 THE QNDP EVIDENCE BASE

- 5.1 In terms of an evidence base to support the QNDP, RPS notes that Appendix 6 to the QNDP Regulation 14 refers to a number of 'reference documents'. Whilst it is acknowledged that many neighbourhood plans 'borrow' documentation prepared by the Local Planning Authority, or from other sources, it is usually the case that some 'neighbourhood-level' evidence is prepared the qualifying body to support the policies and proposals in the plan. The preparation of evidence specific to the neighbourhood area becomes even more critical when those plans propose the allocation of sites, for whatever use or purpose those sites are put, as is the case here.
- 5.2 However, having trawled QPC's own website ([www.quinton-plan.org](http://www.quinton-plan.org)) and the neighbourhood planning webpages on the SADC website, RPS has unearthed just two pieces of evidence that pertain to the proposals currently being consulted on; these are, the Local Green Space Assessment (January 2019), prepared by APS; and the Residents Survey Results 2018, prepared by SADC, both on behalf of QPC.
- 5.3 Therefore, RPS notes that the only evidence documents that have been made available as part of the consultation process relate to the protection of green spaces and the results of views from local people requested in response to a set of pre-prepared questions. Whilst it may suit the Parish to focus on certain topics and gather information only from certain sources, QPC is not resiled from ensuring that the full suite of evidence necessary to justify its policies and proposals are prepared and consulted on as part of the plan-making process.
- 5.4 In light of this, and as alluded in previous comments, there does not appear to be any housing-specific evidence documents to support the QNDP. There is reference to the 'Quinton Neighbourhood Area Housing Needs Survey (2019)' in the housing policies section of the QNDP, but this is not available from the Parish or SADC website nor is it mentioned in Appendix 6 list of reference documents. On this basis, RPS considers that the evidence base prepared in support of the QNDP has not been adequately presented to allow easy reference for those wishing to make representations.
- 5.5 Most notably, there are clear gaps in the evidence base at this time, in particular with respect to the assessment of all potential site allocations (or reserve sites). This is in direct contravention of advice set out in national guidance, which makes clear that the qualifying body, in this case Quinton Parish Council, should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria<sup>13</sup>. This also includes the need for an appraisal of significant effects in accordance with the regulations on strategic environmental assessment.
- 5.6 On this basis, RPS considers the lack of any detailed assessment of potential sites, at this stage, represents a major flaw in the evidence base used by QPC to justify its preferred approach in the QNDP.

---

<sup>13</sup> Paragraph: 042 Reference ID: 41-042-20170728

## 6 LAND WEST OF GOOSE LANE, LOWER QUINTON

6.1 The representations set out in this submission have identified significant flaws in the emerging policies and supporting evidence used to underpin the QNDP Regulation 14 stage consultation. This is in particular with respect to the site assessment and selection process carried out to support the proposal for single reserve site under Policy HO.2, but which ignores other reasonable alternative sites at Lower Quinton, notably Land West of Goose Lane.

6.2 This chapter sets out a brief summary of the emerging proposals for the West of Goose Lane site, drawing on available information as well as technical evidence prepared on behalf of Redrow. The full assessment of the site is presented in a Vision Document, which includes an Illustrative Concept Plan for the site, which is appended to this submission (Appendix 1).

### Development Proposals

6.3 Redrow has updated its proposals in light of more recent technical work prepared on its behalf. The extract below from the Vision Document presents the Illustrative Concept Plan for the site.

*Figure 6.1 Land West of Goose Lane – Concept Plan*



Concept Plan

Site Boundary	Proposed Open Space	Public Rights of Way
Primary Access Route	Proposed SUGS	Goose Lane Footpath
Secondary Access Route	Woodland Pathways	<b>Numerical Key</b>
Potential Pedestrian / Cycle Access	Formal Outdoor Space and Play Areas	1. Proposed Quinton Woods (2.6ha)
Green Corridor	Mason Medical Centre Expansion Area	2. Woodland Play Area
Proposed Residential Area	Approved Development Under Construction	3. Tote Trail
		4. Community Garden
		5. Arts Trail

6.4 The main proposals are summarised below:

- provision for around 150 dwellings, of a mix of type and tenure including affordable housing.

## REPORT

---

- A substantial proportion of the Site to be laid out as open space/park for play and informal recreation for use by the local community.
  - This would include the laying out of a new woodland park (initially titled 'Quinton Wood'), woodland play area, trails, and a Community Garden.
  - Incorporating appropriate on-site sustainable drainage systems to limit stormwater run-off.
  - Potential for dedicated pedestrian and cycle access routes throughout the Site, providing safe and convenient routes into the village and out into the countryside.
  - Potential for provision on site for the expansion of the adjacent health facility (Meon Medical Centre).
  - Primary access would be achieved via Goose Lane.
- 6.5 Further detailed master planning and discussions with stakeholders will help to refine the proposals and the layout of the Site.

### Site Deliverability

- 6.6 NPPF 2019 paragraph 67 advises LPAs that they should have a clear understanding of land available in their area and that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. In relation to the Site, these three components are addressed below, to aid the LPAs considerations of the Site.
- 6.7 Set out below is a brief summary highlighting the key information regarding the overall deliverability of the site.

### Site Suitability

- 6.8 The Site is located at Lower Quinton, one of Stratford's Category 1 Villages identified in the Core Strategy, within walking and cycling distance (0.5km) of village facilities and services. The village has a range of facilities and services, including a shop, medical centre, church, post office, pub, village hall, takeaway, butcher, primary school, and B&B. The Site is also within walking distance of regular bus services to Stratford-upon-Avon, the nearest bus stop being right next to the medical centre at the Site entrance.
- 6.9 It is therefore recognised in sustainability terms that Lower Quinton is suitable to accommodate a certain level of growth to meet the future needs of the Stratford-on-Avon area. By directing growth to the village, this will also help to maintain and enhance the vitality of the rural community, in accordance with national policy (NPPF 2019, para 55).
- 6.10 Furthermore, based on available evidence the Site has limited designated value in biodiversity, geological or historic terms. There are also no specific policy-related designations that would preclude development of the Site.

## REPORT

---

6.11 In addition to the Site being located sustainably, Redrow are also committed to delivering wider sustainability and climate change benefits as part the proposed development. This could include:

- pursuing opportunities to reduce carbon emissions from new homes;
- pursuing low-embodied carbon in construction materials;
- only using responsibly-sourced timber;
- carbon-sequestration through the planting of the proposed woodland; and,
- reducing construction waste and promoting higher standards water management.

6.12 Therefore, the site is considered suitable for allocation in the QNDP.

### **Site Achievability**

6.13 The site is currently under the control a single house builder who is committed to delivering the Site. The Site contains no restrictive covenants that limit the delivery prospects for the site. Furthermore, the site is physically constraint free, subject to addressing certain issues that would not preclude development from coming forward on the site i.e. undergrounding of overhead cables. It is a greenfield site that contains no significant constraints to delivering housing early in the plan period.

6.14 Therefore, the site is considered achievable under the NPPF definition.

### **Site Availability**

6.15 The site is entirely available and is under the control of a single house builder. The position in relation to availability remains unchanged from that information submitted to the SAP process. The site is available for development now and is not constrained by any legal restrictions or covenants preventing development. The landowner is keen to constructively engage with the Council to bring this site forward.

6.16 Consequently, Redrow consider the site to be entirely deliverable for the purposes of the NPPF.

## 7 SUMMARY AND CONCLUSIONS

7.1 The representations set out in this submission have been prepared in response to the draft Quinton Neighbourhood Development Plan (QNDP) ('Regulation 14').

7.2 A review of relevant policy and guidance at the national and local level has highlighted that:

- Quinton Parish Council is promoting its own neighbourhood plan for the parish, including site allocations (reserve site) and may come forward in advance of the adoption of the emerging SAP for Stratford (currently at Preferred Options stage), which also proposes to allocate reserve sites for housing at Quinton.
- In light of this, integration and co-operation between the two plan-making processes is of paramount importance, in order to prevent the potential for duplication and conflict, thus ensuring that the neighbourhood plan and the emerging local plan are complimentary with each other, in accordance with national policy and guidance. This is particularly relevant with regards to the sharing of the evidence base which support the policies of the emerging SAP relating to proposed reserve housing sites at Quinton.
- It is therefore important that there is a cogent evidence base at a strategic and local level and that the QNDP also has regard to relevant evidence gathered by the LPA. It is clearly the intention of the PPG that conflicts between emerging plans are to be avoided.
- In relation to potential site allocations, national guidance anticipates that where there are likely to be significant effects this would then trigger the need for Strategic Environmental Assessment (or 'SEA'). Such SEA would therefore be an integral part of the evidence base required to justify the plan proposals and, in particular, the choice of sites identified in the QNDP. This process would also require an assessment of the proposal in light of reasonable alternative site options in accordance with the EU Directive and in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. If this is not done, then the QNDP might be considered unlawful.

7.3 However, a number of deficiencies have been identified with the approach taken by the Qualifying Body (QPC) and, to their part, by the Competent Authority (SADC), which are summarised below.

7.4 In relation to the preference for a single reserve site ('East of Goose Lane') identified under Policy HO.2, RPS concludes that:

- QPC has given undue weight to non-planning considerations in its justification for the site. This relates to factors such as landownership and the operational farming practices of one landowner in particular (Magdalen College). Notably, the QNDP has only considered sites in the College's ownership as part of its deliberations on potential sites, without any reference to alternative sites in other ownerships, including the land under Redrow Home's control (Land West of Goose Lane). By applying weight in this manner therefore brings into question the fairness and transparency of the overall approach taken by the Parish, which has effectively excluded all other options on the basis of landownership.

## REPORT

---

- Where planning considerations have been identified to justify the preferred site (such as proximity to services and landscape considerations) these could be equally applicable to other reasonable alternatives at Lower Quinton, including Land West of Goose Lane.
- In seeking to allocate the East of Goose Lane site, the Parish has ignored part of its own evidence base (albeit utilising evidence from SADC) specifically relating to flood risk, which shows that the site is less sequentially-preferable than other sites at Lower Quinton, including Land West of Goose Lane. However, the QNDP presents no evidence to demonstrate that land East of Goose Lane should be preferred despite it being at greater risk of flooding.
- On this basis, RPS considers that the justification provided by QPC does not lead to the conclusion that only one site is appropriate for allocation as a reserve site in the QNDP. This is confirmed by the latest Site Allocation Plan (SAP), which identifies four proposed reserve sites at Lower Quinton. In fact, when a proper consideration is given to the available evidence, there are clear grounds to argue for the removal of the East of Goose Lane site from the QNDP and for the identification of alternative reserve sites, including the West of Goose Lane site under the control of Redrow.

7.5 In relation to the approach to site assessment and selection, RPS concludes that:

- There is clear inconsistency between the QNDP and the SAP plan-making processes with regards to the assessment and selection of reserve sites at Lower Quinton, resulting in a significant disparity between the two plans on the preferences for sites identified. This is based in no small part on the lack of any reference made in the QNDP to the latest SAP, which is currently at the preferred options stage and was consulted on during October-November 2020. Under these circumstances, RPS contends that the uncertainty caused by two plans progressing along similar timelines, but which differ so markedly on site allocations, undermines the achievement of sustainable development and thus would, as drafted, not meet the basic conditions (condition e).
- There is a clear inconsistency with regard to the evidential basis for site selection. This is because QPC has used information (based on the SHLAA 2019) that is not up to date. More recent updates to the SHLAA, published in April 2020, have re-appraised two land parcels (both under the control of Redrow), defined here as Sites 18 and 19 which, as 'amber' sites. Thus, when applying QPC's own methodology, a score of 'amber' would automatically trigger the assessment of Sites 18 and 19 as part of the QNDP process alongside all the other amber sites. However, the QNDP has ignored the latest SHLAA 2020 update and thus excludes both Site 18 and Site 19 from any consideration at this stage. For this reason the QNDP, as drafted, is contrary to national policy (paragraph 31) on the need for plans to be underpinned by relevant and up to date evidence and so, under these circumstances, it is argued that the QNDP would not, as drafted, meet the basic conditions test condition (a) (have regard to national policy).

## REPORT

---

- The QNDP fails to address the requirements for Strategic Environmental Assessment (SEA) in particular the consideration of the plan proposals in light of reasonable alternatives. This is because, at this point, no SEA has been issued as part of this consultation stage on the QNDP. Furthermore, no screening assessment has been published either in order to determine that SEA is not required in this case. Unless an assessment of significant effects of the proposal to allocate sites is prepared, and sufficient opportunity is made available for all stakeholders to comment on it, the QNDP cannot proceed in its current form. Under these circumstances, the QNDP does not accord with the SEA Regulations and so, as a consequence, would not meet the basic conditions test (f) (in breach of EU obligations as enshrined in UK law).

7.6 We would therefore recommend that the most appropriate course of action would be to delete Policy HO.2 from the QNDP in light of the flaws in the QNDP identified in the representations made here. It is clear that adequate policy coverage relating to reserve sites is emerging and will be put in place once the SAP is adopted in due course. Therefore, it is not necessary for the QNDP to consider reserve sites whilst the SAP is ongoing. Furthermore, deleting the policy would certainly resolve any potential conflicts between two plans emerging at the same time, which is a clear objective recommend by national guidance.

7.7 However, if the QNDP is to retain a reserve sites policy, then the process by which sites are assessed and selected should be revisited to take into account an assessment of all reasonable alternatives. This includes the Land West Of Goose Lane, which is currently being promoted by Redrow. Chapter 6 of this submission provides information that demonstrates the site is suitable, achievable and available for the proposed development and so, on that basis should be identified as a reserve site.

7.8 In doing so, QPC should also undertake to prepare the necessary assessments to support the proposals put forward and consult upon them prior to formal submission at the Regulation 15 stage, to ensure that the QNDP process fully accords with the regulations governing Strategic Environmental Assessment of plans.