

SOUTH WARWICKSHIRE LOCAL PLAN ISSUES & OPTIONS: PART 1

on behalf of Redrow Homes (Land at Goose Lane, Lower Quinton).

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REPORT

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Contents

1	INTRODUCTION	1
2	CHAPTER 3 – VISION AND OBJECTIVES	3
	Issue V3: Strategic Objectives	3
3	CHAPTER 4 – DEVELOPMENT DISTRIBUTION STRATEGY FOR SOUTH WARWICKSHIRE	4
	Issue I2: Infrastructure Requirements and delivery	4
	Issue I5: Viability and Deliverability	4
	Issue S2: Intensification	4
	Issue S3: Using Brownfield Land for development	5
	Issue S4: Growth of existing settlements	7
	Issue S5: The potential for new settlement(s).....	10
	Issue S6: A review of Green Belt boundaries	12
	Issue S7: Refined Spatial Growth Options.....	12
	Issue S8: Development coming forward outside of the spatial growth strategy	16
	Issue S9: Settlement Boundaries and infill development.....	16
	Issue S10: Any other development strategy issues	17
4	CHAPTER 6 - DELIVERING HOMES THAT MEET THE NEEDS OF ALL OUR COMMUNITIES	19
	Issue H1: Providing the right number of homes.....	19
	Issue H2: Affordable Housing	21
	Issue H7: Other Comments.....	23
5	CHAPTER 10: A WELL CONNECTED SOUTH WARWICKSHIRE	24
	Issue T1: 20 Minute Neighbourhoods	24
6	SUSTAINABILITY APPRAISAL (ISSUE I1)	25
	General Comments	25
	SA of housing number options	27
	SA of New Settlement options	29
	SA of Spatial Options	29
7	EVIDENCE BASE: HERITAGE ASSESSMENT (ISSUE D5)	31
8	GROWTH AT LOWER QUINTON	32
	Lower Quinton	32
	APPENDIX 1 GOOSE LANE VISION DOCUMENT	33

1 INTRODUCTION

- 1.1 RPS Consulting Service Ltd ('RPS') has prepared this submission in response to the South Warwickshire Local Plan ('SWLP') Issues and Options consultation January-March 2023, referred to hereafter as 'IO document'. It has been prepared on behalf of Redrow Homes ('RH') who has land interests across the Plan area.
- 1.2 The comments set out in this submission seek to address issues of a plan-wide nature, but have also been prepared in the context of RH's interests in land to the South of Lower Quinton; described as 'Goose Lane, Lower Quinton'. RH has promoted this land parcel as part of consultations on various emerging plans in Stratford-on-Avon, the latest being the SWLP Scoping consultation in June 2021. That consultation response was supported by a call for sites submission, which the Council should also be taken into account as the SWLP moves forward.
- 1.3 As part of previous submissions, RH prepared a vision document to support Goose Lane, Lower Quinton. This is appended to this submission for the record (**Appendix A**). The document shows that the Goose Lane, Lower Quinton site is a suitable location for residential development and therefore should be considered as part of the site selection process for the SWLP.
- 1.4 For completeness, a copy of the call for sites proforma response submitted at the Scoping consultation stage is also appended (Appendix B).
- 1.5 As explained in Appendix A, the vision of the Goose Lane, Lower Quinton site is to deliver an attractive residential development of around 150 dwellings offering a range of new homes and extensive public open space for the Lower Quinton community, a development that seeks to use best practice urban design principles to promote a high-quality living environment that is responsive to its natural and built context as well as being sustainable and environmentally responsible. This will be achieved by delivering a range of development benefits for new and existing residents:
- The delivery of new homes within a high-quality living environment.
 - The creation of new public open space and recreational routes.
 - A development which safeguards and enhances the urban and countryside boundary.
 - A sustainable development which maximises connectivity, permeability and accessibility
 - Facilitating the expansion of the local medical centre.
 - A responsible development which maximises environmental sensitivity throughout
- 1.6 The Site is located at Lower Quinton, one of Stratford's current 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.

- 1.7 The Site contains no restrictive covenants that limit the delivery prospects for the site. Furthermore, the site is physically constraint free and so would not preclude development from coming forward on the site. The site is entirely available and is under the control of a single house builder. Consequently, RPS considers the site to be entirely deliverable for the purposes of the NPPF.
- 1.8 On this basis, Redrow Homes and RPS respectfully request that the site be considered favourably for allocation in the South Warwickshire Local Plan.

2 CHAPTER 3 – VISION AND OBJECTIVES

Issue V3: Strategic Objectives

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

- 2.1 No.
- 2.2 It is noted that under the heading ‘Meeting South Warwickshire’s Sustainable Development Needs’ there is an objective relating to ‘delivering homes that meet the needs of all our communities’. However, this objective only relates to addressing local housing need but does not include any reference to addressing development needs from neighbouring areas. This is despite the accepted position that South Warwickshire straddles two market areas; Greater Birmingham and the Black Country, and Coventry & Warwickshire. Both of these market areas have a history of unmet need which, in Birmingham’s case, has never been fully addressed and which is now worse (c. 78,000 dwellings) compared to the shortfall in the adopted Birmingham Development Plan (37,500). This is in addition to the unmet need arising from the Black Country, which currently stands at 28,239 dwellings up to 2039¹.
- 2.3 On this basis, RPS recommends that the objectives of the SWLP should be updated to reflect the emerging position regarding future (unmet) need across the wider market areas within which South Warwickshire is located and which make a clear commitment to assisting in addressing those needs.
- 2.4 In addition, the SWLP draft vision runs up to 2050. However, the base year date is not defined in the IO document. Paragraph 22 of the NPPF makes clear that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. In this case, the SWLP includes options for new settlements and significant extensions to existing urban areas, which fall into the paragraph 22 development categories. Assuming adoption of the SWLP is likely during 2025 at the earliest, 30 years from adoption would extend the plan period to 2055. Accordingly, RPS recommend that in line with the NPPF, the SWLP should look ahead to 2055 at the earliest).

¹ Draft Black Country Plan 2020-2039, July 2021, Table 2

3 CHAPTER 4 – DEVELOPMENT DISTRIBUTION STRATEGY FOR SOUTH WARWICKSHIRE

Issue I2: Infrastructure Requirements and delivery

Q-I2: Please select the option which is most appropriate for South Warwickshire

Option I2a: Set out infrastructure requirements for all scales, types and location of development

Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy

3.1 In response to this question, RPS would point out that the over-arching approach in the SWLP is to take a two-part approach; Part 1 dealing with strategic policies and proposals; and part 2 addressing non-strategic policies and site allocations.

3.2 RPS is broadly supportive of a two-part approach, which decant non-strategic site to the part 2 stage. The site at Goose Lane would fall into this later stage. On this basis, any infrastructure requirements relating to this site were it to be allocated in the SWLP should be addressed at the part 2 stage. RPS supports option I2b.

Issue I5: Viability and Deliverability

Q-I5: Please add any comments you wish to make about infrastructure, viability and deliverability

3.3 RPS would recommend that when considering individual site preferences, the Council should support sites that can be brought forward relatively quickly, and in locations which are already served by existing infrastructure, including the Goose Lane, Lower Quinton site. This reflects circumstances for example where sites that rely on funding for strategic infrastructure projects could be substantially delayed (i.e. South Western Relief Road and delivery of Long Marston Airfield).

Issue S2: Intensification

Q-S2: Please select all options which are appropriate for South Warwickshire

3.4 Under this issue, the IO document does not pose any specific questions, but instead identifies three options for developing a policy to support the intensification of existing areas.

3.5 National policy provides advice on achieving appropriate densities as part of the overall objective to make efficient use of land² or for optimising the density of development in city and town centres and other locations that are well served by public transport³. This includes taking into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change⁴, as well maintaining the viability of

² NPPF2021, paragraph 124

³ Paragraph 108

⁴ Paragraph 124d

development⁵. It is also advised that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range⁶.

- 3.6 In this context, it is clearly the case that some localities more central to existing built-up areas may be more predisposed to accommodate more intensive development than other locations. Nonetheless, delivering development at increasingly higher densities will inevitably lead to potential impacts on the prevailing character and setting of existing settlements. Therefore, whilst increasing densities could increase the supply of housing, this should not be seen as the only option. In this context, there is clearly a role for development that is brought forward on the edge of existing settlements that can be designed in order to integrate with existing areas but also help to create distinctive places in their own right.
- 3.7 Consequently, RPS recommends a design-led approach to establishing strategies on density. Density is a function of good design and there is no reason to take an alternative approach when devising local policy through the SWLP. On this basis, any policy approach should be informed by an assessment of the character of different areas because character is not uniform across the plan area. This is in preference to any blanket or an 'in-principle' approach. Similarly, there should not be any overarching priority to intensify or densify existing urban areas because other evidence, principally the Urban Capacity Study, shows that the development needs of the SW area will not be met through urban-focused / brownfield growth alone. This is discussed in the response to Issue S3 below.
- 3.8 **RPS therefore would favour Option S2a, which would direct any policy response to localities where intensification is considered to be appropriate, but which recognises that density should be design-led informed by the local context.**

Issue S3: Using Brownfield Land for development

Q-S3.1: Please add any comments you wish to make about the Urban Capacity Study

- 3.9 An Urban Capacity Study for South Warwickshire dated October 2022 has recently been undertaken to inform the SWLP. Its purpose is to identify the potential for residential development on brownfield land within existing settlements across South Warwickshire. As pointed out in section 1.1 of the study report, a review of housing capacity has been undertaken in order to minimise the amount of development required outside existing urban areas.
- 3.10 The IO document goes on to state that the study has been undertaken as a theoretical exercise and is not intended to conclusively establish the urban capacity of South Warwickshire over the period to 2050, but rather to indicate potential untapped urban capacity within these identified settlements, subject to the application of policy and the conclusions of more detailed subsequent evidence work. That said, there are some important conclusions in the study that need to be

⁵ Paragraph 124b

⁶ Paragraph 125b

emphasised at this stage as the study will form part of the evidence to underpin the development strategy in the SWLP.

3.11 The study has applied a number of important assumptions, as listed here:

- The base date for the study and the conclusions around potential urban housing capacity is 1 April 2021
- The study assumes that all of the sites considered will be developed as 'conventional' dwellinghouses in Use Class C3 (not specialist housing i.e. student accommodation or older persons housing).
- Capacity was measured on sites located in 23 settlements across the SW area, including Main Rural Centres defined in the Stratford-upon-Avon Core Strategy, and Growth Villages as defined in the Warwick Local Plan. This includes sites located in Southam.
- The Urban Capacity Study does not represent a HELAA-level consideration of suitability, availability and achievability, it is important to note that it will be for the forthcoming HELAA to establish whether these sites are actually deliverable or developable in practice.

3.12 Section 4.6 of the study provides a summary of the overall potential urban housing capacity across South Warwickshire:

- Total housing assumed over SW area for the 2025-2050 plan period is **30,750** dwellings, using the baseline figures based on the standard method
- Total potential baseline housing supply for this period is **19,950** dwellings
- Only **6,145** (31%) dwellings would be located within existing urban areas, the rest is located elsewhere
- Reliance in the supply (24%) predicted on sites not yet identified (windfall sites) totalling **4,840** dwellings
- Suggested there some potential to increase densities on some sites
- Potential yield of 3,400 dwellings by redeveloping public car parks, but this would necessitate a significant programme of intervention and management in order to be realised.

3.13 The study therefore identifies a significant shortfall in the potential for new housing to be accommodated on previously-developed land. The shortfall is currently 10,800 dwellings. This should be taken as a minimum shortfall, as not all sites with potential will actually be deliverable or developable once a full assessment has been carried out.

3.14 Based on these findings, the study concludes that:

“whilst the measures considered through this study could allow the SWLP to get a reasonable way towards meeting housing needs through urban sites and existing commitments, we

consider it impossible to meet development needs without significant greenfield development.”
(RPS emphasis)

- 3.15 Furthermore, the shortfall is set against the standard method housing need figures (1,230 dpa across the whole area over 25 years). However, the IO document advocates for the use of an alternative ‘trend-based need for South Warwickshire, which gives a need for 1,679 dpa. Against this figure, the total need between 2025-2050 increases to **41,975** dwellings, thus increasing the shortfall to **22,025** dwellings. **This clearly demonstrates that the focusing policy objectives on previously-developed land will not deliver anywhere close to the projected needs of the SW area, and therefore planning for development on greenfield land in sustainable locations must form part of development strategy for the SWLP.**
- 3.16 The existing 2016 Stratford-upon-Avon Core Strategy identifies Lower Quinton as a Local Service Village under Policy CS15, which is also mirrored on the corresponding Key Diagram. This reflects the Council’s view of the settlement as a location for growth and development, and there is no logical reason why the settlement would be excluded from the nascent stages of plan making for the South Warwickshire Plan, as a spatial strategy has yet to be defined. RPS is unclear why Lower Quinton has been excluded both from the Plan and the supporting evidence base such as the Urban Capacity Study, a perverse position taken.
- 3.17 In terms of the evidence and the IO document, three options under this issue are presented. On the basis of the current evidence provided on housing capacity, RPS would recommend that development on previously-developed land is supported only where sites are shown to be viable and deliverable, as well as being sustainably located. Nonetheless, **given the paucity of the overall supply from sites within urban areas, it is not considered reasonable to prioritise brownfield development ahead of other, greenfield locations as a matter of principle as this would put at grave risk the ability of the SWLP to meet the identified needs of the area up to 2050. Nonetheless, RPS would direct the Council to its response to Q-V3.1 above regarding the extension of the plan period.**
- 3.18 **On this basis, RPS supports Option S3.2c. In addition, given the fact the IO document and Urban Capacity Study has not reflected properly on the true scale of housing needed to be planned for across South Warwickshire or the current settlement hierarchy, Lower Quinton should be incorporated into a revised urban capacity study, and conclusions drawn on the ability of the settlement to accommodate additional growth within its built-up area.**

Issue S4: Growth of existing settlements

Q-S4.1: Do you think that growth of some of our existing settlements should be part of the overall strategy?

- 3.19 Yes.
- 3.20 There are a number of national and local factors that clearly demonstrate the appropriateness of a strategy which directs future growth to existing settlements within South Warwickshire.

- 3.21 Paragraph 69 of the NPPF recognises the important contribution that small and medium-sized sites can make to meeting the housing requirements of an area, which can be built out relatively quickly. This provides clear support for directing future growth to appropriately-sized sites on the edge of existing settlements and which can deliver sustainable development. And paragraph 85 also provides support for sites and locations that can meet the community (and business) needs of rural areas adjacent to or beyond existing settlements, and where sites are physically well-related to settlements such opportunities should be encouraged where suitable. Consequently, national policy clearly provides sufficient support and policy direction for focusing growth at or around existing settlements.
- 3.22 The IO document hints at what the emerging development strategy might comprise based on commentary set out in the second paragraph under this issue (on page 43). This states that the SWLP will seek to:
- “...maximise the capacity of its existing urban areas in order to meet our development needs to 2050 (see Issue S2). However, in deciding upon the best distribution strategy for new development within South Warwickshire it is important for the Local Plan to consider the potential for growth around the edges of the existing settlements, potentially alongside and in combination with other options such as new settlements (see Issue S5).”* (RPS emphasis)
- 3.23 In light of the findings of the Urban Capacity Study as discussed under Issue S3 of this submission, even when the capacity within existing urban areas on previously-developed land has been assessed it is clear that this will not be sufficient to meet the needs of the South Warwickshire in the long term. It is therefore inevitable that development around the edges of existing settlements will be required, given these provide opportunities to deliver sustainable development on largely unconstrained land which can be built out quickly, or where larger sites can deliver a steady quantum of development over a period of time in order to help maintain delivery against identified housing targets. This can be achieved at lower Quinton, including on Goose Lane, Lower Quinton site.
- 3.24 Based on the foregoing analysis, **RPS contends that focusing growth as part of the emerging development strategy on existing settlements, aligns with national policy and offers clear potential to meet the development needs of the area, in light of the acknowledged constraints on land supply within settlements. The strategy should therefore incorporate locations for growth around and on the edge of existing settlements where local services and facilities are already available in close proximity to communities in order to achieve wider sustainable development objectives.**
- 3.25 RPS also highlights that the growth that is required cannot be met solely within existing settlements identified in the IO document, as evidenced in the Urban Capacity Study. **In this context, any 20-min neighbourhood policy should be worded with sufficient flexibility to consider the potential that sites can bring to create 20-min neighbourhoods, rather than only considering the existing situation as a constraint on the distribution of growth.**

3.26 **Consequently, the SWLP should extend its search to include other settlements which are currently acknowledged as being sustainable locations, notably Lower Quinton, that can create 20-minute neighbourhoods. On this basis, Lower Quinton should be incorporated into a revised version of the Settlement Analysis document.**

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

3.27 Alongside the IO document, a 'Settlement Analysis' evidence base report (referred to here as 'the report') has been prepared to help identify opportunities and constraints to growth in and around the edges of a number of settlements and locations across South Warwickshire. The analysis in the report focuses on three factors; Connectivity, Accessibility, and Density. A primary purpose of the report, as stated at paragraph 2.1 of the report, is to aid understanding of the potential to achieve the '20-minute neighbourhood' concept in those settlements identified, and is designed to support the development of the spatial strategy for South Warwickshire. **Page 44 of the IO document also points to 'other factors' outside the scope of this analysis relating to the potential for growth. However, the report does not identify those here or explain how these will be taken into account in determining where growth will be directed. RPS seeks further clarification on this as the SWLP moves forward.**

3.28 The settlements included in the analysis are listed in Table 2 of the IO document. These, the IO document claims, have been selected based on their status in the existing Local Plans and those that fall within certain growth options. Section 3 of the report provides some commentary on the reasoning behind the selection process.

3.29 RPS would highlight the methodology used to select the sites within the Settlement Analysis has not been provided comprehensively. Where methodology has been provided, it has been unclear as to how to follow. In particular, RPS note in particular that the Lower Quinton along with other sustainable locations such as Local Service Villages have been omitted from the study. Whilst a number of these settlements conform to spatial options identified in the IO Plan, an assessment of character and capacity has not been undertaken, a notable flaw of the evidence base.

3.30 The current omission indicates that the Councils are not concerned with the growth of settlements beyond those tier 1 and tier 2 settlements. Whilst these higher order settlements are the most service rich, there remains a need to continue to allow all sustainable locations in the plan area to grow, and as currently drafted, the evidence base provides little certainty that these areas have been properly considered.

3.31 RPS expects that the Settlement Analysis should be updated through the development of the South Warwickshire Plan, to include a fuller list of settlements that can accommodate growth as part of the plan, making allocations where consistent with the spatial option progressed.

3.32 **Consequently, the SWLP should extend its search to include other settlements which are currently acknowledged as being sustainable locations, notably Lower Quinton, that can create 20-minute neighbourhoods. On this basis, Lower Quinton should be incorporated into a revised version of the Settlement Analysis document.**

Issue S5: The potential for new settlement(s)

- 3.33 The IO document now identifies a number of potential locations for new settlements across South Warwickshire. These have been derived from a two-part process; part 1 seeks to identify 'areas of search' based on existing or potential access to rail services outside existing urban areas. Based on the approach, seven areas (A-G) have been identified, illustrated on Figure 12 of the document. These comprise broad areas that do not specific sites or specific locations; part 2 applies a 'very high-level assessment' of the areas of search, from which seven potential new settlement locations have been identified. A summary of the assessment of each location is shown in Table 6 of the IO document. Each of these seven locations has also been subjected to Sustainability Appraisal (to RPS responses under Issue I1) and Climate Change Emissions Estimation modelling.
- 3.34 Whilst some assessment work has been undertaken to date, the IO document acknowledges that further detailed work is required before any preferences for any particular new settlement location can be made, or whether a new settlement is suitable, viable and deliverable in principle. RPS broadly agrees with this point.
- Q-S5.1: Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options*
- 3.35 As part of the evidence to inform the Local Plan, an operational carbon model has been developed to assess carbon emissions at a strategic level and test how the development of the seven potential new settlement locations. RPS notes the model is based on current Government and existing Local Plan policies. Further information on the modelling work is set out in *Estimation of emissions for proposed growth options and new settlements* study dated November 2022. RPS has reviewed this study and wishes to raise a number of points on the approach.
- 3.36 **Firstly**, paragraph 1.1 of the study states that the options tested in the modelling all assume **35,000** dwellings will be delivered between 2025 to 2050. This differs from the level of growth assumed under the 'trend-based' projected need for South Warwickshire, which RPS calculates at **41,975** dwellings over this period (applying the 1,679 dpa taken from Table 9 of the IO document). It should, also be noted that if the plan period extended to 2055, this would further increase the scale of housing need across the Plan area. However, the study does not include any testing against the preferred housing need scenario, or the potentially higher growth based on a longer plan period. Whilst the projected emissions are likely to be sensitive to higher levels of growth, it is nevertheless important that there is consistency across the analysis to ensure the policy choices are properly informed.
- 3.37 And **secondly**, chapter 5 of the study provides some commentary on the methodology underpinning the modelling of the options. Sub-section 5.3.2 lists a number of 'key inputs' for the site related modelling. This includes specific reference to '*Energy efficiency benchmarks such as Part L 2013, Interim Future Homes Standard 2021*' (RPS emphasis). However, as outlined by the

Government⁷, from 2025 new homes built to the Future Homes Standard will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards, and all homes will be 'zero carbon ready', becoming zero carbon homes over time as the electricity grid decarbonises, without the need for further costly retrofitting work. Whilst the study refers to current building regulations standards under interim changes to Part L introduced in 2021, the study will need to reflect on the further tightening of the regulations and the move to the full Future Homes and Future Buildings Standards that are expected in 2025.

3.38 The introduction of the 2025 Future Homes Standards is expected to improve energy efficiency, reducing the demand for energy and so reduce carbon emissions in residential buildings. RPS recommends that the study is updated to reflect projected reduction of emission by 75% compared to current (2012) regulations.

3.39 For these reasons, **RPS recommends that the Climate Change Emissions study should be updated to properly reflect the growth aspirations for South Warwickshire as well as reflect the broad direction of travel on tackling carbon emissions regarding future changes to building regulations and the impending implementation of the Future Homes and Buildings standards.**

Q-S5.2: Do you think new settlements should be part of the overall strategy?

3.40 RPS wishes to reiterate its position that it does not object to new settlements forming part of the development strategy in principle. Nonetheless, RPS suggests that caution should be applied in considering new settlements as part of a broader strategy for distributing growth in South Warwickshire. This is because unforeseen issues can occur that can delay progress on new settlement / strategic allocations, for example in Stratford-upon-Avon. In this case, the Core Strategy allocated two new settlements at Gaydon/Lighthorne Heath (2,300 homes) and Long Marston (2,100 homes), 30% of the adopted housing requirement of 14,600 dwellings. However, since 2011 (the base date of the current plan) these two new settlements have only delivered 343 dwellings, just 3.4% of the total housing delivered in the district up to April 2022⁸. This is reflective of the lead-in time needed to bring forward larger, strategic sites that is often under-estimated at the forward planning stage. Alternatively, smaller sites which can harness infrastructure already available are not as dependent on the delivery of strategic infrastructure.

3.41 **The distribution strategy should therefore also ensure that the needs of local communities can be met through smaller development directed and brought forward at established sustainable settlements that can be delivered relatively quickly, and thus a greater mix of different sized sites should be encouraged to deliver a significant proportion of the required growth in the SW area over the plan period. This includes the Goose Lane, Lower**

⁷ The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings Summary of responses received and Government response, January 2021

⁸ Stratford-upon-Avon Authority Monitoring Report 2021-22, Table 13

Quinton sites being promoted by Redrow Homes, a national house builder with extensive experience of delivering housing across the Midlands and South Warwickshire.

Issue S6: A review of Green Belt boundaries

- 3.42 RPS notes that the IO document does not include any specific question regarding potential for changes to the Green Belt in South Warwickshire. Nevertheless, national policy⁹ makes provision for alterations to existing Green Belt boundaries through the updating of plans where the need for changes to Green Belt boundaries is established in the strategic policies. This is normally done through a Green Belt review to inform the development of the spatial strategy and identification of site allocations.
- 3.43 In this respect, the IO document makes clear that to achieve a growth strategy that addresses the vision and strategic objectives for the Plan, a Green Belt study to review the existing Green Belt boundaries would inform and help to refine the growth options that are set out within the issues and options consultation to enable a preferred approach for South Warwickshire to be established.
- 3.44 Nevertheless, regardless of whether any Green Belt is released is taken forward, there are opportunities outside the Green Belt where growth can be directed. RPS considers that Lower Quinton would be an acceptable settlement for growth that should be taken forward in the SWLP.

Issue S7: Refined Spatial Growth Options

- 3.45 The IO document now proposes five 'spatial growth' options, which are as follows:
- Option 1: Rail Corridors
 - Option 2: Sustainable Travel
 - Option 3: Economy
 - Option 4: Sustainable Travel and Economy
 - Option 5: Dispersed
- 3.46 RPS notes that 38% of respondents to the previous Scoping stage consultation in 2021 indicated a preference for a 'hybrid' approach, which broadly correlates with the preference set out by RPS in submissions made as part of that consultation. This has resulted in a reduction in spatial options down from seven to five. The move to five spatial options is supported by Sustainability Appraisal and analysis set out in the Climate Change Emissions Estimation (CCEE) study.

Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options

⁹ NPPF 2021 paragraph 140

3.47 RPS has highlighted a number of issues with the CCEE study at a broad level in responses to Issue S5, which are applicable to the assessment of emission estimates for each spatial growth option. That said, the IO document makes specific reference to the CCEE study findings which predicts Option 4 as having the lowest final annual emissions in 2050 and in the preceding years compared with the alternative options, whilst the Dispersed option (Option 5) having the highest emissions.

3.48 On this basis, **the CCEE would point to Option 4 as offering a good option for reducing carbon emissions over the longer-term which would fit with the longer plan period to 2050 (or 2055).**

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

3.49 Before RPS offers their views on the different options presented, RPS would like to make it known that there is some discrepancy with the methodology for settlement selection. RPS would consider that Quinton is also suitable for Options 1, 2 and 3 – for reasons demonstrated below- not just option 5, which it has been outlined for in the IO document.

Option 1: Rail Corridors

3.50 Under this option, the IO document identifies the former Honeybourne to Stratford railway line, which runs past Long Marston Airfield site. However, as of June 2022 this proposal was rejected by Government Transport Minister Wendy Morton¹⁰. On this basis, RPS suggests that a spatial growth strategy based on rail corridors is unlikely to be deliverable in this location. Consequently, given its recognised sustainability as a named settlement, preference should be given to distributing growth to Lower Quinton. Lower Quinton clearly offers a suitable location that should be considered in the SWLP as a potential focus for some growth to meet locally-derived need as part of the development of preferred growth distribution options.

Option 2: Sustainable Travel

3.51 The IO document presents the ‘sustainable travel’ option as a ‘hybrid’ of two options (‘rail corridor’ and ‘bus corridor’) previously consulted on at the scoping stage. RPS notes that the settlement of Southam ais identified as potential growth locations under this option.

3.52 The reasons given for creating a sustainable travel hybrid approach is briefly referenced in Appendix 2 of the ‘Evolving the Spatial Growth Options – the story so far’ topic paper. These point towards taking a ‘more holistic view’ regarding sustainable travel as part of the evolving strategy as being a ‘logical route’ forward. On this basis, this hybrid approach would aim to focus strategic growth to support existing sustainable transport provision and potentially expand the services where appropriate.

¹⁰ <https://www.stratford-herald.com/news/government-rejects-case-for-reopening-stratford-honeybourne-9259875/>

- 3.53 RPS would broadly support the overarching intentions of this approach which offers the opportunity to integrate the provision of homes and transport by directing growth to locations that are or can be made sustainable, which accords with national policy¹¹. This is reflective of the predominantly rural nature of South Warwickshire where bus travel is the only viable public transport option available to local communities. In this context, RPS would recommend that the distribution of growth should be, as part of the overall spatial strategy, directed to settlements that already support relatively higher frequency bus services; these being routes served by daytime hourly services or better. Promoting additional growth in these locations can be an effective means to help support the viability of existing public transport services.
- 3.54 The Warwickshire County Bus Route Map, published in February 2023¹², identifies that the road connecting Lower Quinton to Stratford-Upon-Avon is served by bus services at an approximately hourly service or better from Monday-Saturday daytimes, with surrounding roads being served by one return journey or more daily from Monday – Friday. Lower Quinton is well served currently with bus infrastructure and therefore should be considered as area foci for growth to address locally-derived need.
- 3.55 On this basis, **Option 2 is considered to be appropriate as part of the overall spatial development strategy for South Warwickshire**, but RPS would urge the methodology of settlement selection to be revisited and to be updated and consulted on again at the next stage of the SWLP for clarity.
- Option 3: Economy*
- 3.56 The Economy Option is another hybrid; this time the ‘socio-economic’ and ‘enterprise’ hubs growth options presented in the Scoping Consultation. The reasons given in the evolving topic paper suggest that neither option, in isolation, will be able to accommodate the quantum of growth needed in South Warwickshire by 2050 and so are not considered to be realistic options alone, but are realistic in combination. This hybrid option is also most focussed on economic drivers, and aims to locate homes close to existing jobs and potential new job locations; and to tackle socio-economic disadvantage through the benefits development can bring.
- 3.57 RPS notes that Lower Quinton, and indeed Quinton as a whole, has not been included under this option, but acknowledges that the main criteria is to place new settlement close to existing motorway junctions. RPS also notes that this is only an indicative list and does not exclude other settlements. Moving forward, RPS would contest that Quinton, specifically Lower Quinton be included in the assessment of suitable settlement options due to in part to its acknowledged status as an existing named settlement offering a suitable location to accommodate some sustainable growth, and in response to the expected level of growth to be planned for in South Warwickshire. Figure 3 of the IO document illustrating Option 3 highlights that the broader area of Quinton is

¹¹ NPPF 2021 paragraph 105

¹² <https://api.warwickshire.gov.uk/documents/WCCC-222510381-300>

benefitting from Quinton Rail Technology Centre as a Major Investment Site as well as new and improved service provision at the Long Marston Airfield site and Meon Vale. Whilst acknowledging that there is already planned growth in the surrounding areas, RPS contends that Lower Quinton be in a good location for housing that would contribute to the creation of Socio-Economic Hubs.

- 3.58 Consequently, **RPS would suggest that Option 3 (Economy) should be considered alongside other options in order to ensure that a balanced distribution of growth is achieved that will help stimulate these areas, and Lower Quinton is consistent with this option.**

Option 4: Sustainable Travel and Economy

- 3.59 The 'Sustainable Travel and Economy' is a hybrid of options 2 and 3 set out in the IO document. The evolving strategy topic paper describes this option as a 'super-hybrid', assumed to be because it responds to the preference for hybrids in general, and specifically includes original options A (rail), B (bus), and D (Enterprise) consulted on at the Scoping stage, according to the Officer conclusions.
- 3.60 The IO document states this option provides a balance of growth at existing main settlements, some growth at new settlement scale on the rail lines, and more modest growth in smaller settlements, including Lower Quinton, which can contribute to enhancing the viability of local services and provide much-needed affordable housing. Similarly, the document makes clear that the growth assigned under this option is balanced between Green Belt and non-Green Belt locations, but even so it should be recognised that it relies on the release of significant amounts of Green Belt land.
- 3.61 **RPS supports this option as being appropriate as part of the mix of options that should inform the preferred spatial development strategy.**
- Option 5: Dispersed*
- 3.62 The IO document has brought forward this option from the Scoping Consultation essentially unchanged.
- 3.63 Under this option, growth would be focused in and around all those settlements identified in the existing Local Plans as being suitable locations for development because it could help sustain and revitalise a number of rural communities. RPS notes that Lower Quinton has not been identified as a potential area for growth, but Quinton as a whole has been identified. RPS broadly supports this option as being appropriate as part of the mix of options that should inform the preferred spatial development strategy.
- 3.64 Whilst not reflected in the commentary which supports this option in the SWLPS, the inclusion of a 'dispersal' strategy is broadly consistent with the 'managed dispersal' approach that underpins the adopted Stratford Core Strategy. This option reflects the number and range of sustainable settlements that exists across South Warwickshire and which recognises that the area is a semi-rural but nonetheless accessible location.

- 3.65 Consequently, it is entirely appropriate to direct a proportion of the area's overall growth needs to rural settlements, consistent with local and national policy¹³ that seek to promote sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and support local services.
- 3.66 Similarly, it is worth pointing out that whilst progressing this option would assist in directing growth to locations that would support rural communities, Option 5 has clear links with other options that would focus growth on or along transport corridors (Option 1). Therefore, progressing this option presents the opportunity to bring together a wide range of options and thus increase the overall sustainability of the strategy. **RPS therefore supports the inclusion of this Option 5 as part of the preferred spatial development strategy for the SWLP, in particular the identification of Quinton under this option.**

Issue S8: Development coming forward outside of the spatial growth strategy

Q-S8.1: For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?

- 3.67 In response to this question, RPS does not support any maximum threshold as this could potentially limit the provision of much needed affordable housing and also limits potential to deliver wider benefits from large scale development resulting in better sustainable outcomes.

Issue S9: Settlement Boundaries and infill development

- 3.68 Under this issue, the IO document indicates that there may be a need to alter existing settlement boundaries to take account of a new growth strategy up to 2050. National policy provides limited assistance to local planning authorities or stakeholders in how to deal with setting or amending settlement boundaries.
- 3.69 The IO document presents two options. Option S9a would save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP. Option S9b would review, within this Part 1 Plan, which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.
- 3.70 The IO document makes clear that this plan review relates to part 1 strategic policies only, including strategic allocations and / or new settlement locations, and not non-strategic policies and allocations. On this basis, RPS would favour Option S9a – settlement boundaries should be reviewed at the Part 2 review stage. Given this option refers to the 'emerging SAP' RPS assumes that the SAP is still likely to be progressed and adopted including alterations to some settlement boundaries, prior to an immediate review of those boundaries in short order in the Part 2 SWLP. This is logical as the Part 2 SWLP will need to ensure the settlement boundaries are suitably

¹³ NPPF 2021 paragraph 79

robust to allow growth to be accommodated up to 2050, as opposed to the SAP which only addresses development needs up to 2031 (and only for Stratford-upon-Avon district).

- 3.71 Furthermore, in order **to provide sufficient clarity and to reduce the risk of ambiguity in the Part 1 version, the next iteration of the SWLP (the preferred option draft plan) should make clear which settlement boundaries will need to be reviewed in light of the quantum of growth to be directed to each respective settlement (to deliver the spatial development strategy) and the capacity of those settlements to suitably accommodate that growth within the existing boundaries.** RPS prefers option S9b.

Issue S10: Any other development strategy issues

Q-S10: Please add any comments you wish to make about the development distribution strategy for South Warwickshire:

- 3.72 The preamble states that Chapter 4 of the IO document sets out various options as to how the development needs to 2050 (e.g. infrastructure, jobs and housing) might be met. The approach to doing this is split into two sub-sections covering 15 'issues' across both topics; on relating to 'Development Requirements' and the other 'Development distribution strategy' for the area.
- 3.73 Paragraph 16 of the National Planning Policy Framework (NPPF) requires that plans contain policies that are 'clearly written and unambiguous'. In order to establish a clear and unambiguous plan it is critical that the approach to strategic policies follow a logical process. Whilst the title of this chapter may refer to 'needs' scant reference is made here to the nature or scale of development needs that should be addressed in the SWLP. Specifically, there is very little, if any, consideration at the top of the document to the growth needs of the area in terms of the level or scale of growth to be planned for in the SWLP. Instead, after setting out the draft vision and objectives in chapter 3, the IO document moves straight into considering issues that have a very limited relationship to the growth needs of the area. RPS would suggest that the five issues identified under 'Development Requirements' are generic topic-based factors that do not inform the identification of the growth needs for the area or the requirements or targets that might be necessary to address those needs. It is therefore unclear why these considerations have been given such elevated status at the beginning of the document.
- 3.74 RPS notes that issues relating to the number of homes and jobs that might be required, and the evidence base to justify the approach, is set out in chapter 5 of the IO document (RPS responds to this under separate questions). Whilst providing some clarity, RPS would suggest that given the importance of setting out the growth strategy (or options at this stage) a more sensible and logical approach would be to consider the issues relating to the overall development needs of the area in quantum terms first, before then moving on to consider what the requirement should be in light of the various 'issues' i.e. constraints, as identified here. This then provides a clearer and more logical basis for considering the spatial distribution of growth (and options) considered later on (Issue S7).

- 3.75 At present, therefore, the way the IO is structured is illogical and confusing and does not help the reader to understand the approach being proposed. RPS therefore recommends that the next iteration of the SWLP is reorganised to provide a clear position on the growth strategy at the outset, including the scale of need and the requirements defined to meet that need and which respond to the needs of both market areas covering the two Districts. This will provide a coherent basis for the spatial distribution strategy, taking into account the various issues identified.
- 3.76 RPS would also reiterate its previous comments regarding the methodology used for analysing the selected settlements and that moving forward, the next stage of plan-making must be more transparent regarding the choice of settlement and site option.

4 CHAPTER 6 - DELIVERING HOMES THAT MEET THE NEEDS OF ALL OUR COMMUNITIES

Issue H1: Providing the right number of homes

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

Local Housing Need

- 4.1 As part of the emerging evidence, the IO document refers to an updated Housing and Economic Development Needs Assessment (HEDNA) that has been produced for the whole of Coventry and Warwickshire Housing Market Area (C&WHMA) using the latest information from the 2021 Census. As rightly stated, the HEDNA uses as the starting point for assessing housing need the standard method set out in Planning Practice Guidance (PPG).
- 4.2 The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire. Nonetheless, the HEDNA has modelled an alternative approach based on the Census 2021 early data releases from June 2022, based on apparent issues with estimating and projecting the population in Coventry, particularly relating to potential discrepancies in the estimates of the population that have informed the 2014-based household projections. The alternative need figure is 4,906 dwellings annually across the sub-region.
- 4.3 Table 9 of the IO document (and Table 15.1 of the HEDNA) shows a breakdown of the overall housing need for each constituent local authority. This is reproduced below for reference.

Table 4-1 Local Housing Need – Coventry & Warwickshire

LPA	2014-based projection	Trend-based projection
Coventry	3,188	1,964
North Warwickshire	176	119
Nuneaton & Bedworth	435	409
Rugby	516	735
Stratford-on-Avon 868	564	868
Warwick	675	811
Housing Market Area	5,554	4,906

Source: C&W HEDNA 2022

- 4.4 RPS notes that under the alternative ‘trend-based’ (‘revised standard method’) projection the need is higher for both SW authorities compared to the standard method need figures (1,679 dpa under the alternative projection, versus 1,239 dpa using the standard method), an extra 440 homes per annum across the SW area. The trend-based projection is also higher in Rugby, but lower in North Warwickshire and Nuneaton & Bedworth, and substantially lower in Coventry.
- 4.5 The HEDNA goes to great lengths to explain why an alternative approach to the standard method for estimating local housing need across the sub-region is justified on the basis of ‘exceptional circumstances’, which is required to meet the policy test set out the paragraph 61 of the NPPF. In a nutshell, when looking at population change over the preceding period (2011-2021) the HEDNA claims that a discrepancy exists between the population (mid-year) estimates devised by ONS, and those derived from the Census 2021 population count.
- 4.6 Table 5.2 and 5.3 of the HEDNA seeks to illustrate this discrepancy. These tables show that population across the sub-region was substantially lower in the Census (942,100) compared to the mid-year estimates (963,173), largely as a result of an over-estimate in the population for Coventry. However, it is also notable that the Census output shows a higher population for both Stratford-upon-Avon and Warwick districts, a total difference of 6,316 extra people residing in South Warwickshire in 2021. This additional number of people will clearly have an impact on future population estimates for the SW area when properly accounted for in future projections.
- 4.7 On this basis, paragraph 5.105 explains the HEDNA proposes a trend-based projection taking account of the 2021 Census, more recent data around fertility and mortality, analysis of recent migration trends, from which household estimates are then derived (using the 2014-based household formation rates). The remodelled household projections are then fed back into the standard method through the application of the affordability adjustment, to generate the overall housing need figures for each area.
- 4.8 The local housing need derived from the trend-based projections is provided at Table 5.33 of the HEDNA. Whilst the overall approach is broadly understood, reference is made at paragraphs 5.149-5.150 of the HEDNA to a ‘further adjustment to deal with any suppression of household formation within the projections’ and ‘part return to trend’ analysis based on a refinement of the 2014-based household representative rates (HRRs). The results from the adjusted HRRs is shown in Table 5.34. The figures show a further increase in household growth across the sub-region (by +3,000) compared to alternative trend-based projection, which includes an increase household growth for Stratford-upon-Avon and Warwick districts. However, the HEDNA does not consider the implications this adjustment might have for the estimate of overall housing need across the sub-region, or for the South Warwickshire specifically.
- 4.9 **RPS recommends that the adjustment for household suppression presented in the HEDNA is reasonable and consistent with national policy and guidance and so should be taken into account in determining the scale of housing need in south Warwickshire.**

Issue H2: Affordable Housing

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

4.10 Chapter 8 of the HEDNA includes an analysis of affordable housing need in Coventry & Warwickshire, which is claimed to follow the methodology set out in the PPG¹⁴. Table 10 of IO document summarises the assessment of need for the SW authorities (drawn from Table 8.45 of the HEDNA) which is presented below.

Table 4-2 Net Affordable Housing Need (per annum) – South Warwickshire only

	Rented Affordable Need	Affordable Home Ownership Need	Total Affordable Need
Stratford-upon Avon	419	129	547
Warwick	582	258	839
SW area	1,007	378	1,385

Source: SWLP IO Jan 2023, Table 10; HEDNA Table 8.45; RPS

4.11 It is recognised in the published evidence base that affordable housing need is ‘high’ relative to the overall housing need across the C&WHMA (paragraph 4.4 of the HEDNA). RPS agrees. Table 8.14 of the HEDNA illustrates this point when comparing affordable need (rented need only) to the trend-based projections for each authority, including Stratford-upon-Avon and Warwick. The table showing the need across all C&WHMA authorities is represented below.

Table 4-3 Net Affordable Housing Need (per annum) – C&W HMA

	Net Rented Need	Adjusted Standard Method	Affordable % Standard Method	Affordable Housing Policy Requirement	Notional Provision to Meet Rented Affordable Need in Full
Coventry	1,887	1,964	96%	25%	7,548
North Warwickshire	131	119	110%	30-40%	374
Nuneaton & Bedworth	407	409	100%	25%	1,628
Rugby	407	735	55%	20-30%	1,628
Stratford-on-Avon	419	868	48%	35%	1,197
Warwick	582	811	72%	40%	1,455
Warwickshire	1,946	2,942	66%		6,282
C & W	3,833	4,906	78%		13,830

Source: C&W HEDNA Table 8.14

¹⁴ PPG ID-2a-018 to 2a-024

- 4.12 The figures show that the rented affordable need as a proportion of the overall need for housing in the SW authorities is between 48-72% (or 60% across the two combined). Across the C&WHMA as whole, the proportion is 78%. When adding in the affordable home ownership need, the proportions increase from 60 to 82% for the SW area, and from 78 to 91% for the C&WHMA. It is clear that the proposed policy targets will only deliver a fraction of the homes needed even if the policy requirements are met in full (which is unlikely). Affordable housing need therefore represents a significant proportion of overall need which needs to be addressed in the SWLP, and across the HMA as a whole, when considering future housing targets for the area. This is particularly the case in Warwick, but is nonetheless still an important factor in Stratford also.
- 4.13 In addition, the scale of affordable need as a proportion of total need shown above is, to a large extent, due to the need emanating from Coventry, which is 96%. The HEDNA (at paragraph 8.72) recognises that, in setting overall housing targets, the viability of development and the availability of funding are realistically constraints on the level of provision which can be achieved. If Coventry is to make any significant contribution towards meeting its own housing needs, of all tenures, then additional allocations will be needed. This will require a considerable focus on delivering more housing on previously-developed sites within the city's boundaries and the push for higher policy targets. However, the focus on brownfield land and higher policy standards will inevitably raise concerns with the viability and deliverability of lower value housing. This is evident because Coventry has failed to deliver its affordable housing policy targets since 2011, achieving 2,562 affordable homes against a policy target of 3,828 (2011-2022)¹⁵, or 232 homes per annum.
- 4.14 **On this basis, in devising an overall housing requirement in the SWLP, if the SW authorities are serious about addressing affordable housing delivery then consideration should be given to how the delivery of affordable can be maximised across the C&WHMA in order to deliver sufficient affordable homes to meet local needs, in line with national policy¹⁶. The best way to increase the supply of affordable housing across South Warwickshire is therefore simply to allocate more land in sustainable locations within the area. This is best achieved through the development of mixed-tenure private sector-led development in areas where viability is less of a problem, notably in South Warwickshire, relative to metropolitan areas such as Coventry.**

¹⁵ Coventry City Authority Monitoring Report 2021/22 Published 21st November 2022, Figure 9

¹⁶ NPPF 2021, paragraph 20

Issue H7: Other Comments

Q-H7 Response to Issue H7: Please add any comments you wish to make about delivering homes in South Warwickshire

- 4.15 This chapter of the IO document provides a commentary on a range of factors relating to policies for the provision of housing, including the scale (or need), type, size, and tenure of new homes to meet the needs of local communities.
- 4.16 As a general comment, this chapter is the first point at which the overall growth strategy for housing is considered in any detail in the IO document. This is after the IO document has already considered the spatial options for growth in chapter 4 (under Issue S7). This approach runs the risk of predetermining the distribution of growth before establishing the level or scale of growth that should be planned for. **As highlighted in response to Issue S10, RPS recommends that the SWLP considers a different approach to devising the strategic policies relating to planning for the growth needs of the area by presenting the case for growth before considering distribution, rather than the other way round. This will ensure the SWLP is presented in a logical and coherent manner where distribution of development is properly considered in light of the scale of growth needed in the area.**

5 CHAPTER 10: A WELL CONNECTED SOUTH WARWICKSHIRE

Issue T1: 20 Minute Neighbourhoods

- 5.1 At the local level, RPS notes Table 2 of the IO document which lists a number of existing settlements that have been identified that have been subjected to connectivity, accessibility and density analysis, in order to assess whether there is the potential to deliver 20-minute neighbourhoods. RPS notes that Quinton (and Lower Quinton) has been excluded from the settlement analysis. As explained in this submission, the exclusion of Lower Quinton from consideration in the IO document has not been adequately justified and is premature.
- 5.2 Furthermore, the rejection of sites and settlements on the grounds that they would not deliver the 20-minute neighbourhood principle could result in limited growth and isolation of these areas. RPS considers this to be an unsustainable approach to development and would invite the Council to consider this principle moving forward.
- 5.3 Following this, RPS considers the omission of Quinton from the IO settlements to be ill founded. The methodology for determining these sites have been founded on Connectivity, Accessibility and Density. Without discounting the selected sites, RPS has considered that there is some inconsistency with the settlement selection and has applied the three categories in order to demonstrate that Quinton should be included within this assessment:

6 SUSTAINABILITY APPRAISAL (ISSUE I1)

- 6.1 The Planning and Compulsory Purchase Act requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations¹⁷ (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.
- 6.2 It should also be noted that SA is an iterative process and, as such, should be undertaken alongside development of the SWLP as it moves forward through the various stages in order to maximise its sustainability credentials. This includes taking into account responses made by stakeholders to the SA and SWLP consultations as part of the plan-making process, including those submitted by local and national house builders. In this context, the IO document explains (page 26) that the SA process will take on board any comments on the SA and use them to furnish the next report with greater detail and accuracy.
- 6.3 RPS has reviewed the Sustainability Appraisal of the South Warwickshire Local Plan Regulation 18: Issues and Options Stage ('IO SA') has provided a response to the question below.

Q-11: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

General Comments

- 6.4 The IO document explains under Issue I1 that the IO SA has been prepared to support the Issues and Options Consultation which explores the following reasonable alternatives as part of the plan making process:
- 5 Growth Options which provide details about where development should be distributed at a strategic scale across the South Warwickshire area
 - 7 New Settlement Locations for large-scale development of not less than 6,000 new homes and associated infrastructure
 - 32 Broad Locations which represents options for up to 2,000 homes located around the main settlements for medium scale development and associated infrastructure in any one Broad Location
 - 22 Small Settlement locations for intermediate scale development for between 50-500 homes in any one location, typically associated with smaller settlements and villages; and
 - 88 Policy alternative options for shaping the relevant policies. Subjects include for example climate change, tourism and health.
- 6.5 The IO SA also includes an 'assessment' of two housing number options, presented at Chapter 9 (Volume 2), but these are not listed in the IO document alongside the alternatives shown above.

¹⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (No. 1633)

- 6.6 The Sustainability Appraisal Framework and methodology is set out in Appendix A of the IOSA. The SA Framework comprises 13 SA Objectives, decision-making criteria (in the form of specific questions) and indicators used to appraise the sustainability performance of the reasonable alternatives as identified in the IO document.
- 6.7 Further detailed guidance is then provided in the form of ‘topic-specific methodologies’ for each SA Objective in sections 2.4-2.16 of the IO SA. The IO SA states (at para 2.3.3, volume 2) that these have been established which reflect the differences between the SA Objectives and how each receptor should be considered in the appraisal process. Having reviewed the detailed appraisals in the appendices, it appears that the topic-specific methodologies form the basis for the detailed appraisals of each option. However, none of these methodologies are referred to specifically in the SA Framework. **It is therefore unclear how the SA Framework has been devised or how it has been applied in appraising each option, given there is scant reference to it in the evaluation of options or the detailed commentary in the supporting appendices.**
- 6.8 Similarly, the SA Framework is highlighted in some chapters as being used to appraise the options, but not others. This lack of consistency suggests an arbitrary approach has been taken as a basis for the IO consultation and which adds further to the confusion as to how the SA Framework has been devised and then applied in the appraisal of options at this stage. **This lack of clarity and consistency in how the SA Framework has been applied undermines the transparency in the SA process, which is critical to ensure the appraisal is both robust and credible.**
- 6.9 This is evident when considering the approach to SA applied across different categories of options. Notably, this is of concern regarding how the housing number options have been assessed and presented in the IO SA, which is explained further in the next section.
- 6.10 In addition, Schedule 2, paragraph 7 of the SEA Regulations specifies that the Environmental Report (effectively the IO SA report at this stage) must include ‘*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*’ Section 2.17 of the IO SA provides a brief commentary on how potential offsetting (or ‘mitigation’) of significant effects has been considered at this stage based on a mitigation hierarchy (see Table 22.15 of the IO SA for details). **However, whilst some initial mitigations have been suggested for some categories of options, none have been identified for the generic policy options nor, importantly, for the housing number options (in Chapter 9). There are no reasons given in the IO SA for why potential mitigation hasn’t been identified for these options. This again points to a lack of clarity and consistency in how the options have been appraised which further undermines the transparency in the process.**
- 6.11 Lastly, the IO document provides a commentary on the potential of the SWLP to accommodate unmet needs from the wider Birmingham and Black Country HMA, under Issue H4. Page 112 of the IO document states that ‘*For the purposes of the accompanying Sustainability Appraisal we have tested the effects of an additional 5,000 and 10,000 homes*’ as possible contributions

towards any unmet need. However, the IO SA as not appraised any such contribution, or undertaken any appraisal of possible locations where such unmet could be accommodated. Consequently, **the potential contributions of 5000 or 10,000 dwellings to address unmet need as outlined in the IO document, and the spatial options to accommodate this need, represent reasonable alternatives that should be considered through the SA process for the SWLP. This should be undertaken and presented in the next iteration of SA, and suitable a policy response should also be presented in the draft (preferred options) version of the SWLP.**

SA of housing number options

- 6.12 Figure 3.2 of the IO SA identifies two housing number options. These options are derived from the updated Coventry & Warwickshire Housing and Economic Needs Assessment (HEDNA) 'trend-based' projection (Option I); and the Government's standard methodology for calculating housing need in South Warwickshire as set out in the Planning Practice Guidance (Option II).
- 6.13 The two housing number options are as follows:
- **Option I:** The HEDNA trend-based projections point to a need for 4,906 dwellings annually across the whole sub-region with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of 1,679 per annum.
 - **Option II:** The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, but with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of 1,239 per annum.
- 6.14 The extent of the appraisal of these two options is set out in Chapter 9 of the IO SA. RPS raises two broad concerns regarding the approach taken in the IO SA. **Firstly**, it is clear that the appraisal of the housing numbers has been carried out differently to the appraisal of the other options. For example, the appraisal of the housing numbers has been described as an 'option assessment', whereas the appraisal of the other options is described as an 'evaluation'. This suggests a separate approach has been taken in the appraisal of the housing number options. Similarly, there is also a distinct lack of detail underpinning the specific scoring of each housing number option against the SA Objectives (summarised in section 9.1 of the IO SA) with only a very brief commentary in Chapter 9 stretching to just one and a half pages; whereas the appraisal of other options is presented in considerably more detail in individual appendices (B to E) alongside specific chapters for each category of options in the main report (Ch 4 to 8). In contrast, there is no separate appendix which fully explains the scoring for the housing number options.
- 6.15 Determining the overall scale of housing growth to be planned for in South Warwickshire is a key requirement of local plan process, a process that should be underpinned by a rigorous testing of all reasonable alternatives. However, no explanation is provided for why a different approach is merited for the housing number options. This again points a lack of consistency and transparency in approach across the various options appraisals, which risks undermining the SA process.

- 6.16 **Secondly**, as explained the IO SA has identified and appraised two housing number options. Nonetheless, there is at least one other option for the housing requirement that has not been considered in the IO SA. This additional alternative option relates to a ‘part-return-to-trend’ analysis of projected household change set out in the HEDNA (see paras 5.149 to 5.152) and which is summarised for the Coventry & Warwickshire authorities in Table 5.34 of that document. This is a matter RPS has raised in separate submissions under Issue H1.
- 6.17 The HEDNA analysis points to different, higher household growth projection for the South Warwickshire authorities which takes into past suppression in household formation and which should be addressed in the SWLP and, as such, supports the wider SA Objective for housing (SA Objective 9). However, these alternative growth projections have not been included in the IO SA report. **In RPS’ view, the ‘part return to trend’ projections for the South Warwickshire authorities constitute reasonable alternatives that should be tested through the SA process. RPS recommends that the alternative household growth projections set out in Table 5.34 of the updated HEDNA should be incorporated into the appraisal of reasonable options as part of the next iteration of the SA.**
- 6.18 In terms of the actual assessment of the two housing number options, the IO SA (paragraph 9.1.3) acknowledges that ‘...using the HEDNA figure should more accurately represent local housing needs than the Standard Method and therefore Option I should meet the accommodation needs of the various members of the community more successfully’. RPS broadly agrees with this position.
- 6.19 Nonetheless, the IO SA claims (at paragraph 9.1.4) that the housing number options could have negative impacts on SA Objectives 1, 3, 6 and 7 including ‘major negative impacts’ on climate change and on biodiversity. However, no account is taken here of the likely positive climate impacts expected once the Government introduces changes to building regulations on carbon emissions from new residential buildings through the Future Homes and Buildings programme by 2025. Nor does the appraisal reflect the implementation of Biodiversity Net Gain (BNG), which will become increasingly important in delivering well-designed and environmentally sensitive housing development over the coming years and decades in South Warwickshire, and across the country. **The measures introduced through Future Homes and BNG are likely to place a downward pressure on climate impacts from new development during the plan period to 2050. The SA of housing number options should be adjusted to take these factors into account.**
- 6.20 In addition, the IO SA (at paragraph 9.1.4) does acknowledge that the loss of agricultural land cannot be avoided in addressing future housing growth needs. This is evidenced in the Urban Capacity Study addressed elsewhere in this submission (under Issue S4) however this shows a significant shortfall in land availability within existing urban areas across South Warwickshire. RPS broadly agree with this position.

SA of New Settlement options

- 6.21 RPS has made separate submissions on the seven potential new settlement location options identified in the IO document under Issue S5. Details of the SA assessments of these locations are set out in Chapter 6 and Appendix D of the IO SA.
- 6.22 Paragraph 3.8.1 of the IO SA states that the seven new settlements locations have been identified by the two Councils. The commentary in the IO document under Issue S5 (on page 49) points to these seven locations being drawn from seven larger areas that are simply based on the rail corridors outside of existing urban areas. These areas and locations are shown in Figure 12 of the IO document. The IO SA (3.8.1) then clarifies that the SA Team has prepared a 'spatial expression' of each New Settlement using a 'crude 250ha area of search in a circular search area' around the approximate location provided by the Councils in the IO document (which RPS assumes to be taken from the elements shown in Figure 12).
- 6.23 This appears to be the sum total of information and evidence that has informed the identification and selection of these locations as potential new settlements up to this point. Significant uncertainty remains as to where these locations might be located or their full extent. In this regard, RPS notes a significant lack of progress in developing the evidence base required since the Scoping Consultation in 2021. Therefore, there remain substantial doubts as to the suitability or deliverability of any of these potential locations as being able to deliver a new settlement. Consequently, **a significant measure of caution must therefore apply to any of the outputs from the SA process at this stage, until the vacuum in the evidence base to support these new settlement locations is prepared and made available to the public.**
- 6.24 That said, the findings summarised in Table 6.1 of the IO SA indicate that all seven new settlement options would have significant negative effects across a range of sustainability criteria. Added to this the need for a considerable amount of work required to inform a suitable policy framework to guide their development, **there is no confidence that any of these locations are capable of being delivered as new settlements based on the current position.**

SA of Spatial Options

- 6.25 Details of the SA assessments of the five spatial growth options are set out in Chapter 7 of the IO SA.
- 6.26 Table 7.1 of the IO SA (and Table 7 of the IO document) provides a summary of the appraisal findings for each option. As stated on page 59 of the IO document, the various growth options are not materially different from one another, with the exception of 'Dispersal' option, which scores slightly lower in terms of sustainability performance against some SA Objectives. The IO document also points out detailed locational information has not been taken into account at this stage, which means there is uncertainty regarding the nature and significance of the effects at this stage. It is therefore important that the findings from the SA are considered in the round alongside other

relevant evidence regarding the suitability of specific locations and settlements in supporting the delivery of the spatial development strategy.

- 6.27 As highlighted earlier in this submission, the IO document only considers Quinton (and not even Lower Quinton specifically) under Growth Option 5 – Dispersal. RPS argue that Lower Quinton should be included in a number of other spatial growth options (options 1, 2,3 and 5) and so, on this basis, Lower Quinton represents a reasonable option for consideration through the SA process, in accordance with the Regulation 12 of the SEA Regulations dealing with reasonable alternatives.

7 EVIDENCE BASE: HERITAGE ASSESSMENT (ISSUE D5)

Q-D5: Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?

- 7.1 The IO document highlights that a heritage evidence base is being prepared to support the SWLP, titled '*Heritage and Settlement Sensitivity Assessment for Warwick and Stratford-on-Avon Local Plan (SWLP)*' dated September 2022 ('HSSA'). This is one of a number of technical documents that will help inform the choice of a single spatial option (or 'preferred option') to be consulted on at the next stage.
- 7.2 The IO document states that the HSSA has been prepared to determine the impact development may have on the heritage assets within various settlements, and will be used when determining the growth strategy (for the draft plan). Section 3 of the HSSA also states that the assessment will inform strategic site allocations and broad locations for growth within the development strategy for the Local Plan, but initially supporting the Issues and Options stage.

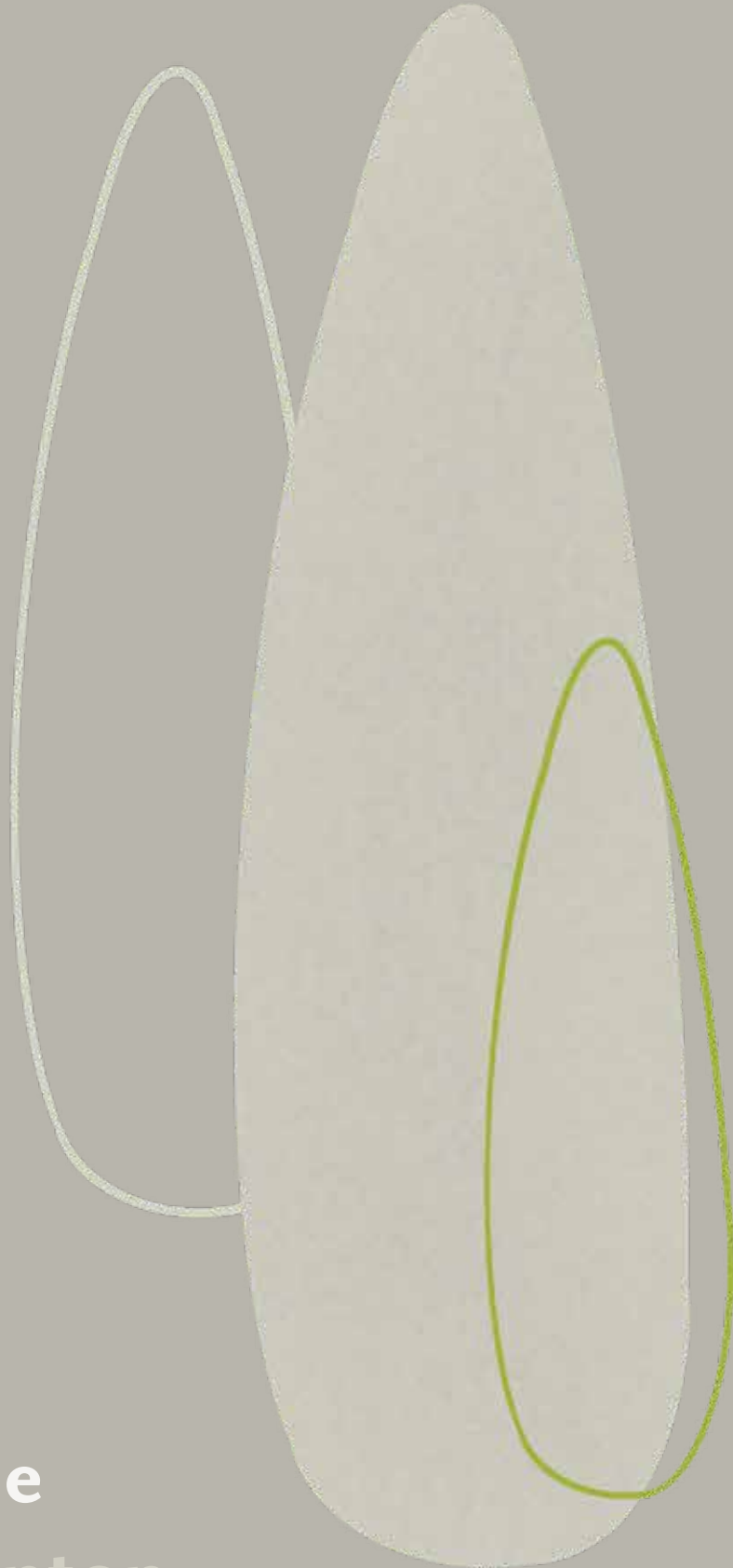
8 GROWTH AT LOWER QUINTON

8.1 This section explores Lower Quinton as a whole, as well as providing more details about the proposals RPS and RH will be providing through the masterplanning process.

Lower Quinton

- 8.2 Lower Quinton is a civil parish in Stratford-on-Avon and resides in close proximity to settlements named throughout the document such as Meon Vale and Long Marston. For the purpose of this plan, Lower Quinton has been paired with the smaller hamlet of Upper Quinton, recognised under the collective title of 'Quinton'. As we have noted, Quinton has been outlined as an Option for Dispersal in Chapter 4 of the Issues and Options Document.
- 8.3 Lower Quinton is well served by local facilities including a village hall, public house, medical practice, a primary school and a post office. As well as hospitality services such as a hotel and a bed and breakfast. Beyond the settlement, the village is close by to the neighbouring settlement of Meon Vale. This recently expanded settlement contains further services, including a convenience store, education and a leisure centre. Importantly, Meon Vale also supports an area of substantial employment through the Business Park, and is also adjacent to the Quinton Rail Technology Centre.
- 8.4 Getting beyond the village, Lower Quinton is well served by Bus Routes. Main Road running west in Lower Quinton connects to the B4632 which provides a direct link into Stratford-on-Avon. These roads are served by a bus service that runs approx. every hour, Monday to Saturday daytime. As well as this, the B4632 to the south and the Main Road to the west are served by a bus service that completes one return journey or more daily Monday to Friday. Collectively, RPS considers that Lower Quinton supports a number of day to day services, but also benefits from a number of overlapping features which highlight the sustainability of the settlement for growth.
- 8.5 As previously mentioned in Chapter 4, the settlement would be justified in a number of spatial development options. Going forward, RPS considers that the Councils should reconsider the role of Lower Quinton in relation to the spatial development options 1, 2, 3 and 5, and consider the role that the settlement can make as part of the emerging Local Plan.

APPENDIX 1 GOOSE LANE VISION DOCUMENT



Goose Lane
Lower Quinton

September 2019

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Authors: DW Checked by: LH Approved by: LH

Contents

1. Vision	4
2. Introduction	6
3. Planning Context	10
4. Wider Site Context	12
5. The Opportunities	16
6. The Proposals	20
7. Development Benefits Summary	22
8. Deliverability	24





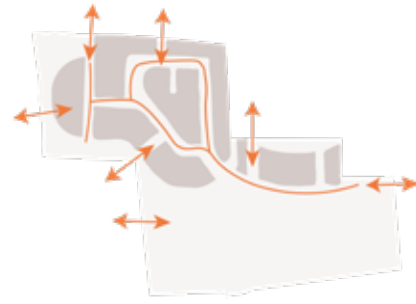
1. Vision

An attractive residential development of around 150 dwellings offering a range of new homes and extensive public open space for the Lower Quinton community - a development that seeks to use best practice urban design principles to promote a high-quality living environment that is responsive to its natural and built context.



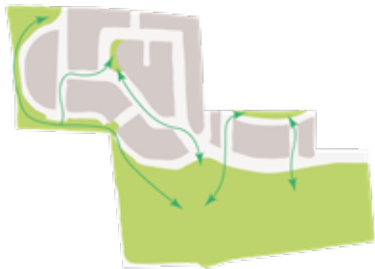
The delivery of new homes within a high-quality living environment

A design approach that is both responsive to its local context and promotes high quality standards, practices and procedures to help to create a vibrant living environment; for living, working and recreation with a wide range of housing choice of both types and tenures.



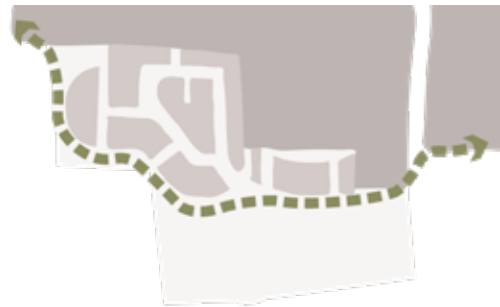
A sustainable development which maximises connectivity, permeability and accessibility

Where possible, the development will link into existing nearby public rights of way and routes to enhance connectivity whilst providing new links for cyclists and pedestrians into the adjacent residential area and increase accessibility to local facilities.



The creation of new public open space and recreational routes

As part of the proposals, the development could provide new public open spaces to benefit both the new and existing community. This may include formal sports provision and play areas, as well as landscaped open space for recreational use.



A development which safeguards and enhances the urban and countryside boundary

The site will form a new defined boundary edge to Lower Quinton. The carefully considered development edge and transitional space on the south of the development will safeguard the separate identities of the two Quintons.



The expansion of the local medical centre

As part of the proposals, the development will incorporate potential for the expansion of the existing Meon Medical Centre adjacent to the site to safeguard the provision of local medical facilities for the future.

2. Introduction

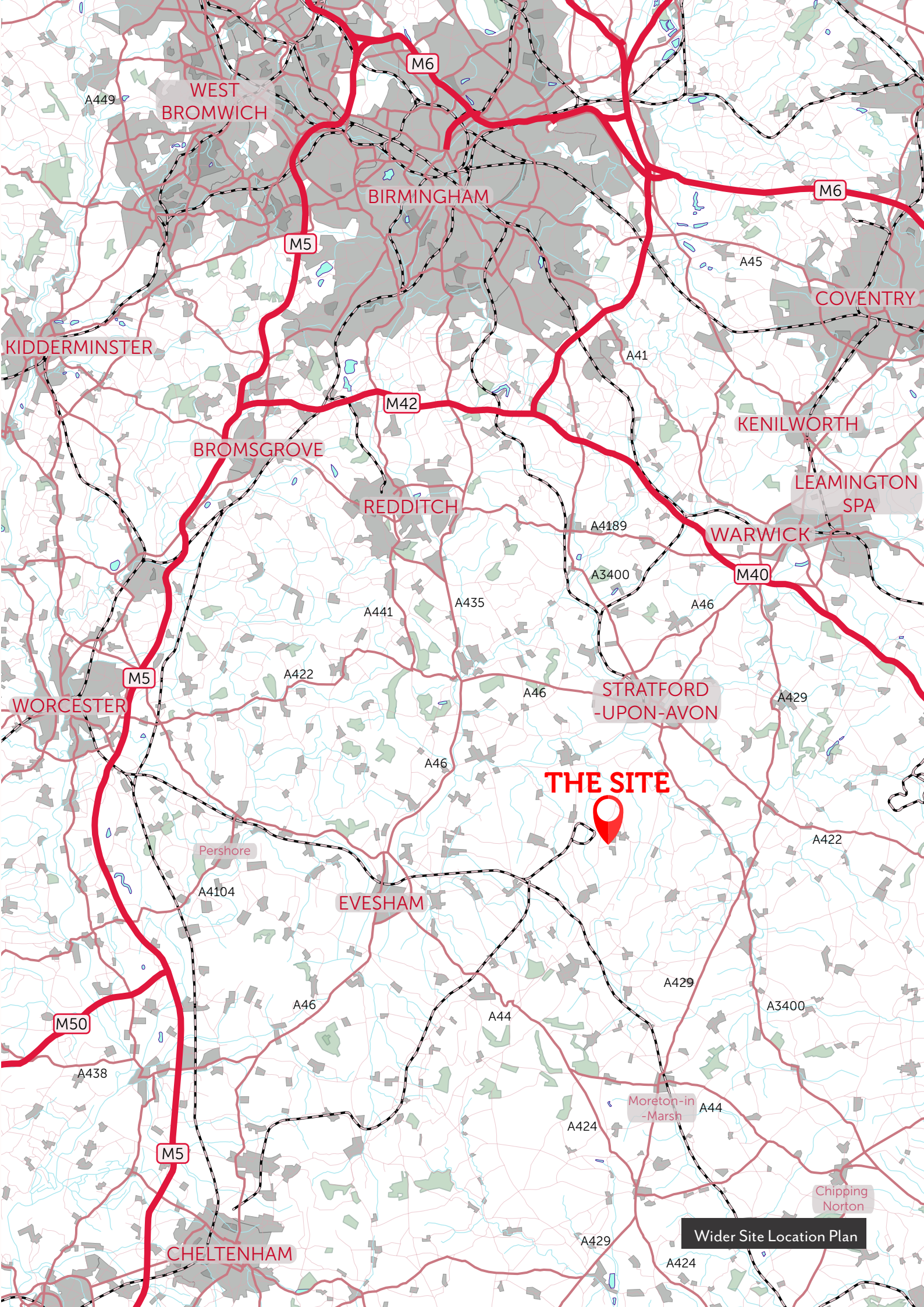
Redrow Homes is working to support the promotion of residential development at Lower Quinton, Stratford on Avon District.

Key aims and objectives of the document are to review and present:

- **A vision** to guide and shape the proposals,
- The site in the context of current **Planning Policy**,
- An initial understanding of the **site and the local context**,
- A summary of known **opportunities and constraints**,
- The emerging **concept plan**, supported by an explanation of the **key design principles** that have informed it.

Site Location

- The 9.0ha site is located on the southern edge of the village of Lower Quinton. It is in Warwickshire, 0.6 miles (1.0km) east of the boundary with Worcestershire and 1.1 miles (1.7km) north east of the boundary with Gloucestershire.
- Lower Quinton is located approximately 25 miles south (41km) of Birmingham city centre and 5 miles (8km) south of Stratford-upon-Avon. The site is close to the B4632 leading to Stratford-upon-Avon with the nearest motorway, the M40, just under a half an hour drive away and the M5 approximately a 40 minute drive away.



THE SITE

The Site

The site measures approximately 9.0 hectares (ha) and comprises two irregularly shaped arable fields, defined by hedgerows and occasional mature canopy trees.

The site is relatively flat, sloping gradually downwards to the north. The site is also adjacent to Public Rights of Way (PRoW) which provide excellent links to the Cotswolds and wider countryside.

The site is accessed from Goose Lane, Lower Quinton and is bounded as follows:

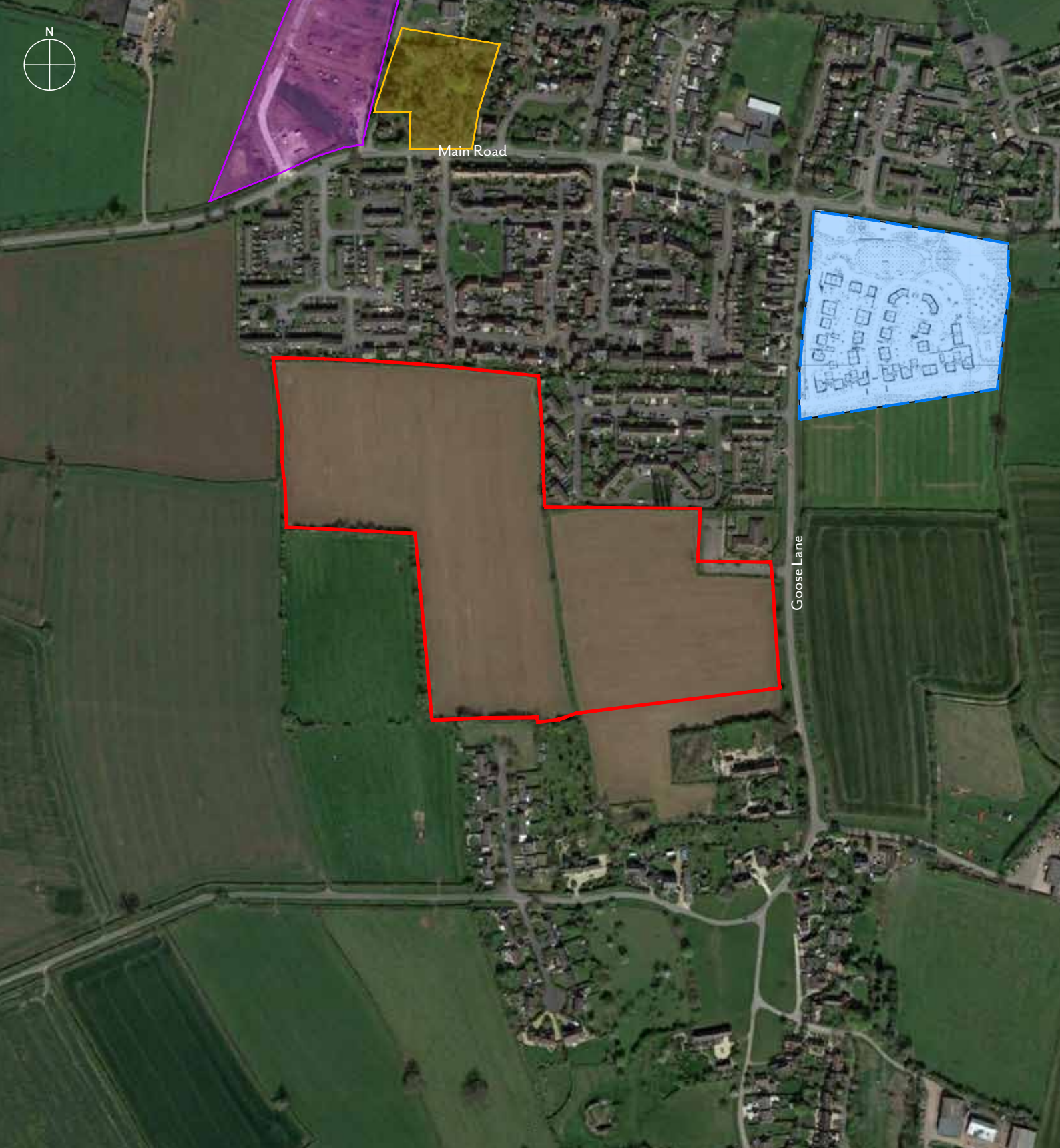
- **Northern Boundary:** Existing residential development in Lower Quinton with Meon Medical Centre on the north east corner.
- **Eastern Boundary:** Goose Lane with agricultural fields and a new residential development under construction beyond.
- **Southern Boundary:** Existing agricultural use with a combination of farmhouse and residential development beyond leading into Upper Quinton.
- **Western Boundary:** Open countryside and agricultural fields.







Looking north across the site



Looking west across the site



Location Plan

-  Site Boundary
-  Approved Development Under Construction
-  Completed New Development
-  Approved Residential Development

3. Planning Context

Stratford-on-Avon Planning Policy: Core Strategy

The Development Plan for the District is the Stratford-on-Avon District Core Strategy that was adopted in July 2016 and covers the period from 2011 to 2031. This establishes the overall spatial vision for the District. Stratford-on-Avon District Council is currently preparing a Site Allocations Plan that will form part of the Development Plan for the District alongside the adopted Core Strategy. Whilst the Core Strategy allocated strategic sites (above 500 dwellings) none were allocated at Lower Quinton.

Policy CS15 of the Core Strategy outlines the distribution of development, indicating a hierarchy of settlements. Within this hierarchy, the Council include Quinton as a single area under the classification of a Local Service Village. The Council indicates that a wide range of villages fall under this category, and based on the size and function of Quinton, the Council identify it as a Category 1 settlement representing the highest grouping of the Local Service Villages. Quinton is therefore considered a sustainable settlement for proportionate growth, that would enable the village to continue to grow, whilst continuing to sustain existing services.

Core Strategy Policy AS.10 relates to the consideration of settlements such as Quinton, which fall outside Stratford

town and the Main Rural Centres. This policy outlines what the Council expects from future developments in order to maintain the vitality of communities and a strong rural economy, which includes principles that minimise the impact on the character of the local landscape, avoid harmful levels of traffic on rural roads, make provision for sustainable transport where possible and seek to avoid areas of higher quality agricultural land. Covering all forms of villages large and small, this policy indicates a preference for housing to be of small-scale within defined settlement boundaries, or within the physical confines in accordance with growth policy CS16.

Stratford-on-Avon Planning Policy: Site Allocation Plan

The Council is currently preparing a Site Allocations Plan, a commitment within the Core Strategy, to identify reserve housing sites to provide housing delivery flexibility to ensure that the District can meet its full housing requirement. The Proposed Submission Consultation Version of the Site Allocations Plan was published in August 2019. The site proposed by Redrow Homes was not included within this Plan, favouring instead a selection of five smaller allocations to the north of Lower Quinton.

The Site Allocations Plan indicates that these five smaller allocations could have the potential to deliver between 135 to 158 dwellings, depending on the overall density, which provides an indication of what the Council expect Lower

Quinton to be capable of, in terms of delivery through the Site Allocations Plan. As indicated in this document, Redrow Homes considers that there are demonstrable benefits for the inclusion of land at Goose Lane, which is capable of delivering wider benefits beyond the housing package that often smaller schemes cannot.

Quinton Neighbourhood Plan

Quinton does not currently have a Neighbourhood Development Plan (NDP) in place for the village, however, a Plan Designation Area was agreed in January 2015, giving the local qualifying body the appropriate powers to develop a plan.

It is understood that local residents are in the process of drawing together the evidence base for a Plan and local household surveys have been undertaken.

National planning policy

National Planning Policy is set out in the National Planning Policy Framework (NPPF) and the associated on-line Planning Practice Guidance (PPG). Paragraph 59 of the NPPF states that it is important that a sufficient amount and variety of land can come forward in order to support the Government's objective of significantly boosting the supply of housing. Local Planning Authorities are

required to identify a sufficient supply and mix of housing sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for the first five years of the plan period. Specific developable sites, or broad locations for growth for years six to ten and, where possible, for years eleven to fifteen (NPPF Paragraph 67). The purpose of the Site Allocations Plan is to ensure that the Council can identify sufficient housing land for the medium to longer term and the Redrow Homes site represents an appropriate opportunity for further residential development in one of the more sustainable villages in the District, that is also suitable to accommodate local community gains.

4. Wider Site Context

The site is located on the southern edge of Lower Quinton Village, approximately five miles south of Stratford-upon-Avon, Warwickshire. The site can be accessed from Goose Lane and is located within walking distance of Upper and Lower Quinton with Meon Medical Centre directly adjacent to the site.

Access and Movement

The site is accessed from and bounded by Goose Lane to the east.

Goose Lane is a secondary road with a pavement on one (west) side. Heading north it meets Lower Quinton's Main Road. Heading south it becomes Tailor's Lane upon entering Upper Quinton and then meets the B4632, Campden Road.

Local Amenities and Walking Distances

Type	Description	Walking Distance (from site access onto Goose Lane)	Walk / Cycle Time
Education	Quinton Primary School	0.5km / 0.3 miles	5 minutes / 2 minutes
Healthcare	Meon Medical Centre	n/a (at site entrance)	n/a (at site entrance)
Post Office	Lower Quinton Post Office	0.5km / 0.3 miles	5 minutes / 2 minutes
Food Retail	Premier Supermarket	0.5km / 0.3 miles	5 minutes / 2 minutes
Takeaway	Seaspray Fish & Chips	0.5km / 0.3 miles	6 minutes / 2 minutes
Village Hall	Quinton & Admington Village Hall	0.8km / 0.5 miles	9 minutes / 3 minutes
Pub	College Arms	0.9km / 0.5 miles	10 minutes / 3 minutes

Pedestrians and Cycles

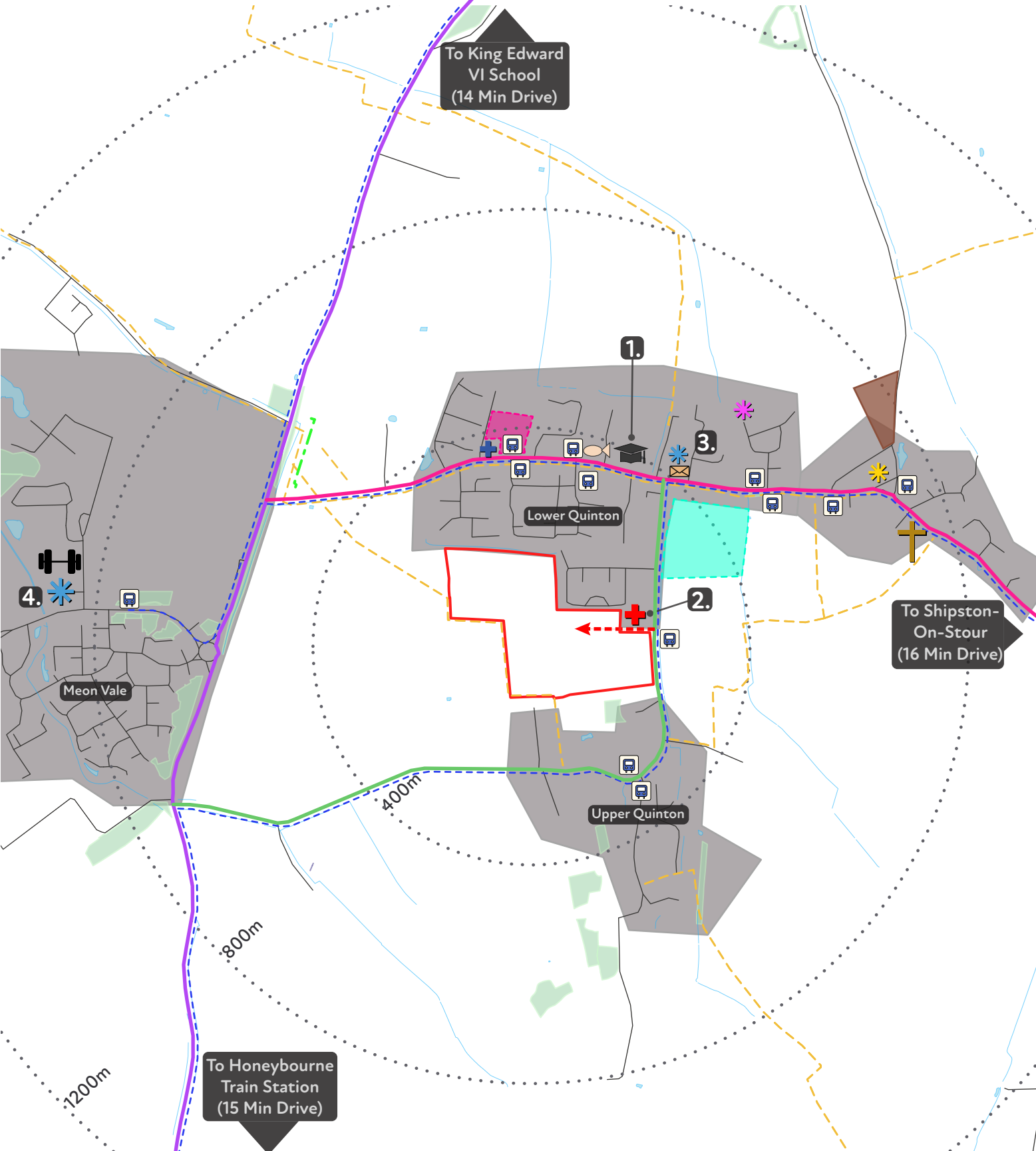
The site is located within walking and cycling distance (0.5km) of Lower Quinton Village facilities and services. Goose Lane has a footpath along its western edge (on the same side of the road as the site).

A network of footpaths and bridleways are located within close proximity to the site, including a public right of way which runs along the west and south-west boundaries of the site.

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.

Local Facilities and Services

The village has a range of facilities and services, located 0.5km / 5-10 mins walking distance from the site, including a shop, medical centre, post office, pub, village hall, takeaway, primary school and B&B.



Facilities and Services Plan

- | | | | |
|---|---------------------------|--------------------------|--|
| Site Boundary | Allotments | Village Hall | Schools |
| Primary Access | Public Rights of Way | Public House | Medical Centre / Pharmacy |
| Urban Areas | Bus Route (Route 2) | Bus Stops | Mini Supermarket |
| Green Space and Woodland | Goose Lane | Church | 1. Quinton Primary School (5 Min Walk) |
| Lakes, Rivers and Ponds | Main Road | Meon Vale Leisure Centre | 2. Meon Medical Centre (1 Min Walk) |
| Approved Development Under Construction | Campden Road (B4532) | Fish and Chip Shop | 3. Premier (5 Min Walk) |
| Approved Residential Development | Lower Quinton Post Office | Nursing Home | 4. Londis (23 Min Walk) |

Public Transport

The closest bus stops to the site are located:

- Adjacent to the site entrance on Goose Lane serving the 1 and 2 routes;
- 400m north of the site on Main Road serving the 1, 2, 3 and 10 routes.

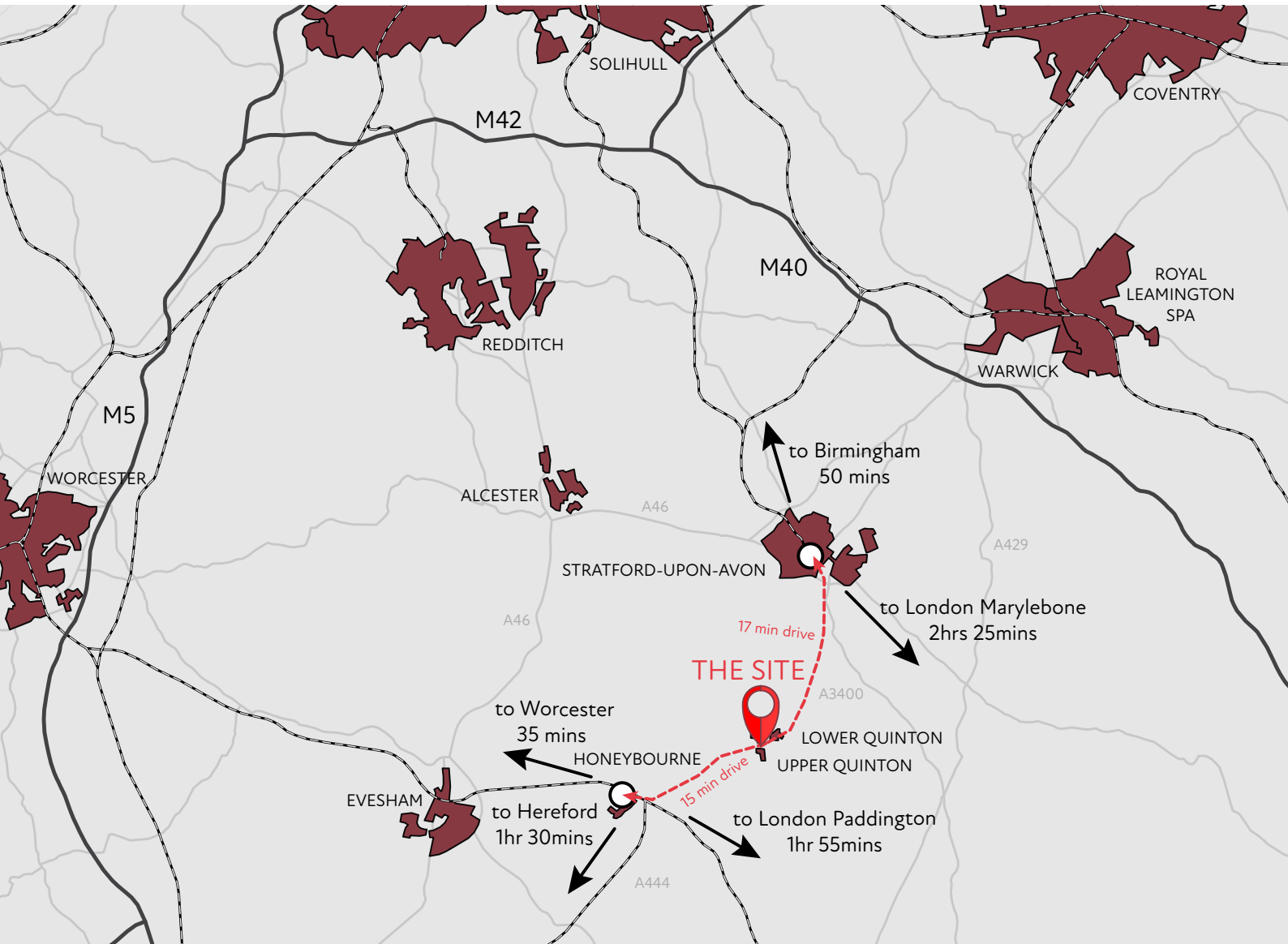
Across all services there are buses running to/from Stratford-upon-Avon approximately every half an hour during the day.

Summary of Existing Bus Services

Service	Route	Daytime Frequency
1	Stratford-upon-Avon – Moreton-in-Marsh via Mickleton and Chipping Camden	4 hours
2	Stratford-upon-Avon – Moreton-in-Marsh via Chipping Camden and Blockley	2-3 hours
3	Stratford-upon-Avon – Lower Brailes via Shipston on Stour	Hourly
10	Stratford-upon-Avon – Whichford	Once a day (Saturdays)

Train Services

The closest train stations to the site are Honeybourne and Stratford-upon-Avon, approximately a 15 and 17 minute drive away respectively with services available via Great Western Railway from Honeybourne to London Paddington, Hereford and Worcester whilst Stratford-upon-Avon offers services via Chiltern and West Midlands trains to Birmingham, Kidderminster and London Marylebone.



Railway Network Accessibility and rail travel times to key destinations

5. The Opportunities

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

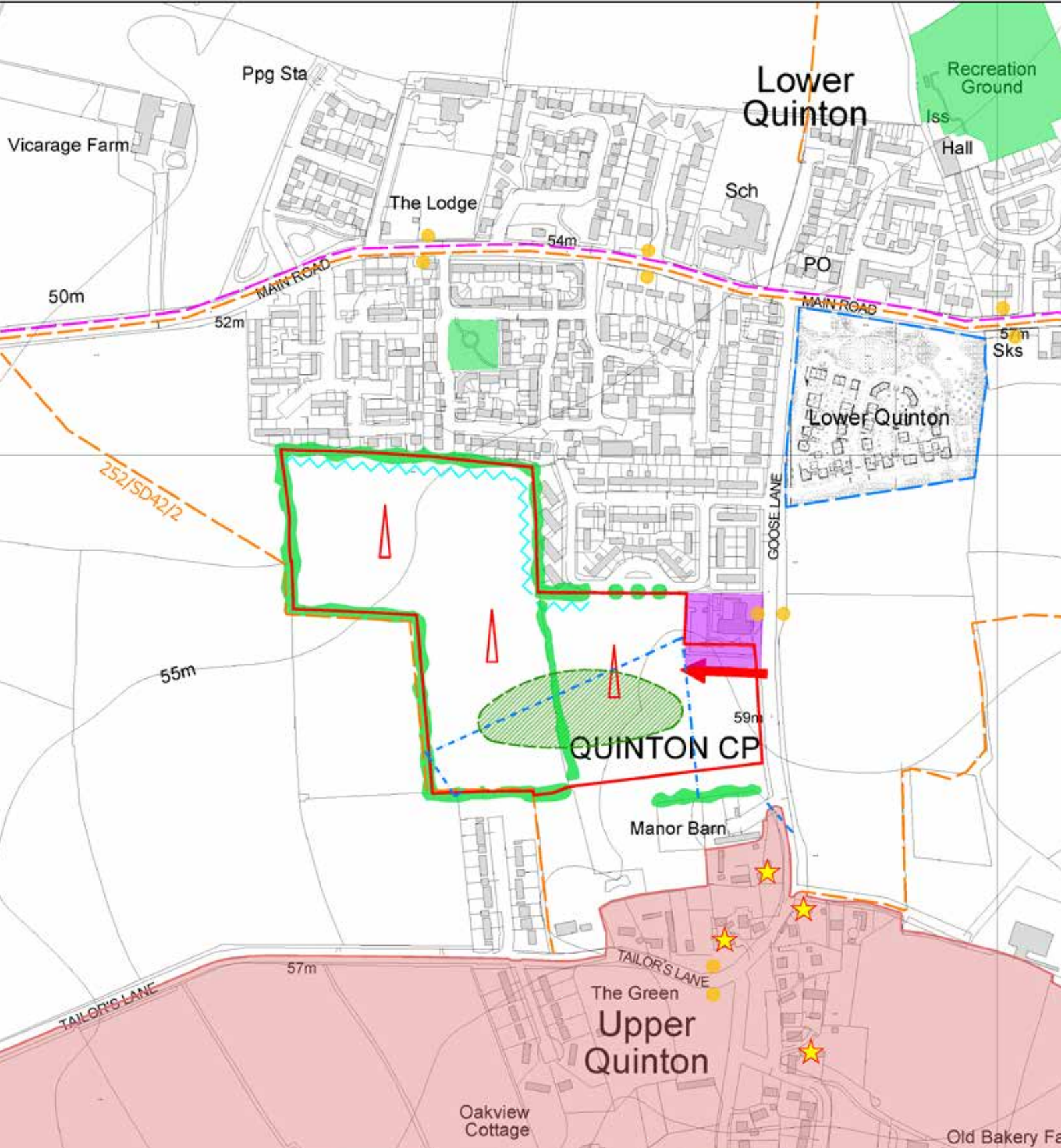
The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible, to strengthen local distinctiveness.

Key Opportunities
















- The proposal should create a gap in perpetuity to separate the development from Upper Quinton to the south in order to protect the character of the two settlements.
- The topography of the site falling towards the north can be used to reduce the visual impact of the development.
- The topography of the site can also be utilised for the attenuation on site.
- There is an opportunity to link into existing PRoWs running along the western boundary of the site, enhancing connections for pedestrians through the development.
- Existing vegetation, particularly trees and hedgerow to the south and western boundaries can be retained to maintain a visual and physical boundary.
- Utilise the three Leyland Cypress trees to the north of the boundary as a distinctive landmark and considered as a focal point in the design stage to enhance the character of the site.
- There are a number of facilities and services easily accessible and walkable from the site including the local Primary school, a convenience shop, post office, pub and a variety of bus services.
- There is an opportunity to create new public open space for the existing and proposed residential communities.
- There is the opportunity to expand the existing medical centre to ensure its long term future for the benefit of the whole community.
- The site presents the opportunity to provide high-quality homes to meet current and future local housing requirements, including affordable housing.

Key Constraints

- Existing nearby rear gardens will need to be backed onto.
- Existing adjacent fronts of dwellings will need to be fronted onto.
- The setting of listed buildings further south will need to be considered and responded to sensitively.
- The AONB located in proximity of the site to the south is a consideration which will be factored into the design from the outset, and sensitively responded to.
- Built form should be sensitive to existing views towards Meon Hill.



Constraints and Opportunities Plan

	Site Boundary		National Cycle Route 5		Slope
	Site Access		Listed Buildings		Overhead Power Cables
	Approved Development Under Construction		Backs of Adjacent Properties		Existing Green Spaces
	Area of Outstanding Natural Beauty		Existing Trees and Hedgerows		Potential Accessible Green Space
	Public Rights of Way		Bus Stops		Meon Medical Centre and Potential Expansion

Landscape Context

The site is situated on the southern edge of Lower Quinton. It equates to 9.0 hectares (ha) in total and currently comprises two medium-sized arable fields bounded by hedgerow vegetation to the east, south and west, with rear gardens of properties to the north with Meon Medical Centre on the north east corner.

Coalescence

The site is bounded to the east, south and west by low hedgerow vegetation with occasional mature canopy trees, which allows inter-visibility between the site and the surrounding landscape. This makes the separation between Lower Quinton and Upper Quinton apparent from within the site and the surrounding area, meaning that the area plays an important role in the separation between these distinct settlements.

Close Views

The site is bounded to the north by the rear gardens of properties on Goose Lane, The Fordway, Stileman Close and Thackeray Close. Vegetation separates the site from these properties, however they are apparent from the site in places. This, along with the gardens and other domestic paraphernalia associated with the residential properties, gives rise to a settlement-fringe character within the site which diminishes the sense of rurality.

Views towards the site are not generally obtained from the surrounding landscape due to the predominantly flat to gently undulating landform and presence of intervening vegetation and built forms. However, less restricted views are obtained towards the site from the properties adjoining the site to the north, from where the site is visible across the foreground, with filtered views of properties in Upper Quinton available within the middle ground beyond and the raised topography of Meon Hill forming a distinctive landmark on the skyline.

Near-distance views are also obtained from Goose Lane and Meon Medical Centre to the east and from PRow 252/SD42/2 as it extends through the adjacent arable field to the west, although views from these locations are generally filtered through the hedgerow vegetation bounding the site. Despite this, the existing two-storey built forms adjoining the site to the north are visible above the vegetation and give rise to a settlement-fringe character to the views.

Long Views

In addition, long-distance views are obtained from elevated areas of the Cotswold AONB (in the vicinity of Meon Hill) to the south, from where expansive panoramic views are available north across a lower lying vale landscape. In these views the site is visible immediately in front of the built-up edge of Lower Quinton, albeit with intervening built form (in Upper Quinton) and vegetation bounding the site generally restricting views of internal areas.

It is considered that residential development could be successfully integrated into its landscape setting in the context of planning policies and landscape character assessment recommendations. As a result of the above considerations, it is concluded that potential development could be acceptable in landscape and visual terms and could respond appropriately to relevant landscape planning policy and landscape character guidelines at national and local levels, including potential for landscape enhancement.

Heritage

The site is not covered by any landscape or landscape-related designations, although the Cotswolds AONB is located approximately 160m to the south of the site at its closest point, with Tailor's Lane delineating its northern boundary. In addition a cluster of four listed buildings mark the historic part of Upper Quinton to the south of the site, including the Grade II* Manor House located approximately 85m to the south of the site; and a scheduled monument is located at the summit of Meon Hill, approximately 950m to the south, ('Multivallate hillfort on Meon Hill').

Ecology

Harris Lamb carried out an Extended Phase 1 Habitat Survey of the site in June 2019 by a suitably experienced ecologist. Desk based consultation was undertaken with Warwickshire Biological Records Centre (WBRC) for records of protected species and designated sites within 2km of the site.

The site comprises two large arable fields with species-poor hedgerows and scattered trees established along the perimeters. North and south of the site are residential areas, east and west of the site are similar arable fields.

The site has some potential to support reptiles, amphibians, nesting birds, foraging/roosting bats, badgers and hedgehogs. Further surveys will be required, but it is not anticipated that there will be any constraints which cannot be mitigated against.

Mitigation and enhancement measures could be included within the masterplan and it is anticipated that an illustrative masterplan could be brought forward for this site that would be compliant with current local and national biodiversity planning policy.






6. The Proposals

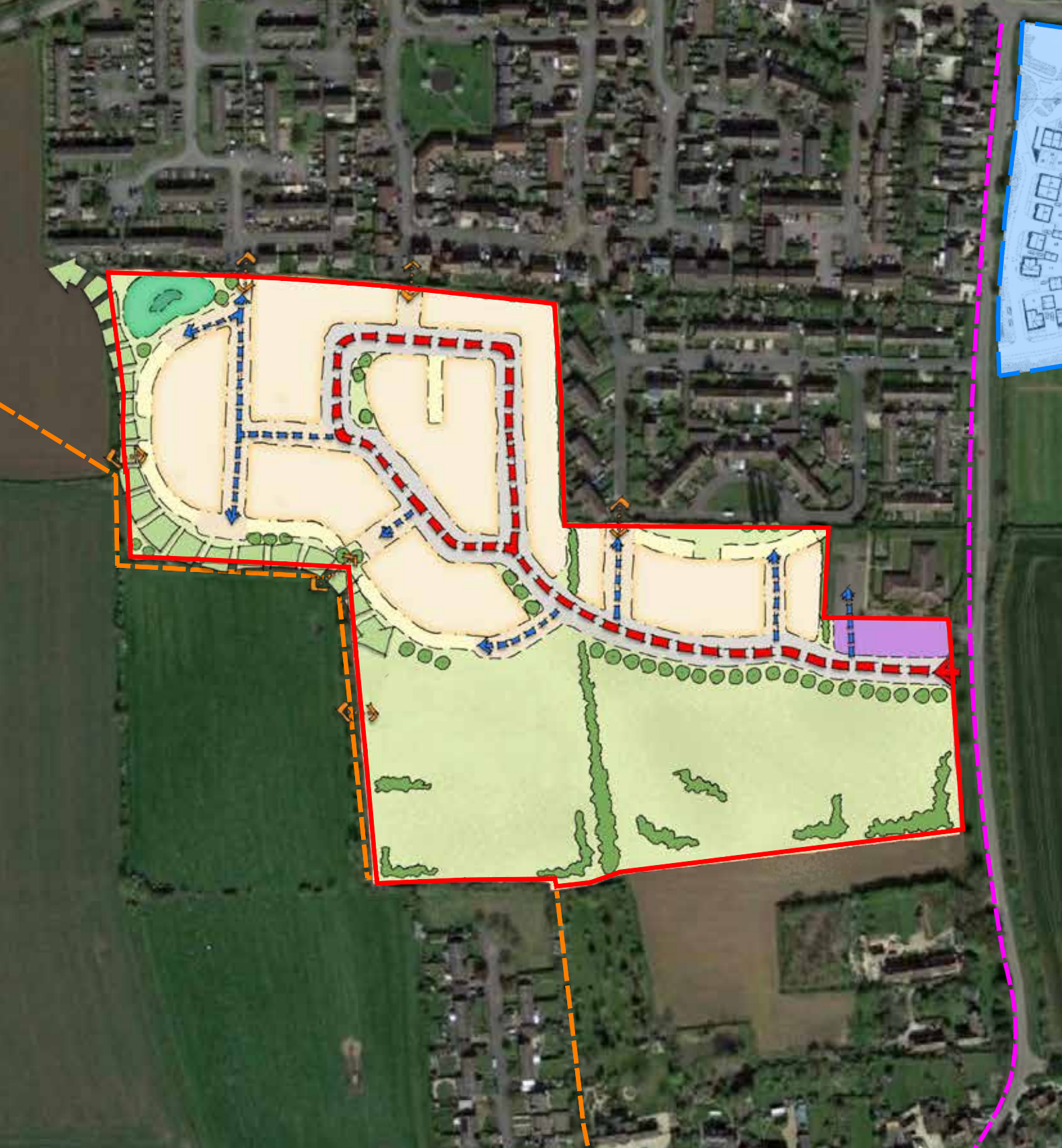
In response to the vision and design principles, the proposal provides for:

- Delivery of around 150 new homes.
- An extensive area of public space and recreational area on the southern portion of the site, forming a clearly defined defensible boundary, ensuring separation between the Quintons.
- Provision of land for the future expansion of the medical centre.
- Vehicular access from Goose Lane, providing access to a well-connected local movement network serving the development.
- Access to bus stops on Goose Lane and Main Road, Lower Quinton.
- Integrated streets, spaces, movement and links to destinations throughout the development and local area.
- A design that utilises the existing landscape and topography and promotes strong green infrastructure through the site.
- A series of pedestrian routes, linking public open space and the existing footpath network to the open countryside and adjacent development where possible.
- A hierarchy of open space for ecology, recreation and movement, enhancing the existing landscape setting.
- Extensive open space for recreation and play areas.















Public Open Space, Wildflower Meadow and Recreational Areas

	Site Boundary (9.0Ha)
	Residential Development Area
	Public Open Space, Wildflower Meadow and Recreation Areas
	Attenuation Area
	Meon Medical Centre Expansion



Concept Plan

- | | | |
|---|---|---|
|  Site Boundary |  Green Corridor |  Meon Medical Centre Expansion Area |
|  Primary Access Route |  Proposed Residential Area |  Approved Development Under Construction |
|  Secondary Access Route |  Proposed Open Space |  Public Rights of Way |
|  Potential Pedestrian / Cycle Access |  Proposed SUDS |  Goose Lane Footpath |

7. Development Benefits Summary

These proposals will deliver an attractive residential development and extensive public open space for the Quinton community. The development will use best practice urban design principles to promote a high quality living environment that is responsive to its natural and built context. We will continue to engage with the local authority, local community and key stakeholders throughout the design development process; in line with the first key principle of the Redrow 8, our guiding design principles document, to achieve thriving communities.

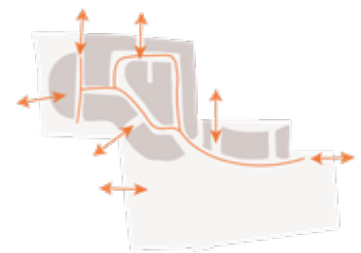
The delivery of new homes within a high-quality living environment

The development creates a high-quality living environment; for living, working and recreation whilst responding to local site context. This will include the delivery of approximately 150 homes plus extensive public open space, sports and recreational areas for the community. This responds to key principles within the Redrow 8 including 'Built to Impress', 'Homes for All' and 'Keeping it Local'.



A sustainable development which maximises connectivity, permeability and accessibility

The proposed development creates a high-quality living environment; for living, working and recreation whilst responding to local site context. This will include the delivery of approximately 150 homes plus extensive public open space, sports and recreational areas for the community. This responds to key principles within the Redrow 8 including 'Built to Impress' and 'Homes for All'.



The creation of new public open space and recreation routes

New public open spaces to benefit both the new and existing community. Including formal sports provision and play areas, as well as landscaped open space for recreational use. This responds to key principles within the Redrow 8 including 'Places to go & Things to do' and 'Nature for People'.



The Redrow 8

Key design principles to deliver great places.



A development which safeguards and enhances the urban and countryside boundary

A new defined boundary edge to Lower Quinton. The carefully considered development edge and proposed public open space on the south of the development will safeguard the separate identities of the Quintons. This response to the key principle within the Redrow 8 of 'Keeping it Local'.



The extension of the local medical centre

As part of the proposals, the development will incorporate the extension of the existing Meon Medical Centre adjacent to the site for the benefit and long term future-proofing of the whole community.



8. Deliverability

Redrow Experience and Expertise

Redrow are a 5 star housebuilder (HBF accredited) who are committed to delivering great places. We have delivered hundreds of developments over the past 40 years, instantly recognisable as 'Redrow places'. Our 'Redrow 8' guiding design principles, informed by a series of placemaking workshops, ensure that we create high quality, responsive places for all. Our quality starts from this early inception stage where we carefully consider our responses to the existing neighbourhood, built form and landscape context and sensitively shape appropriate proposals which will reinforce the character of the area and knit in with the local fabric.

At Redrow, we believe in building better places to live. Our passion for design, sustainability, innovation and people ensures we bring this vision to life in each and every one of our developments across the UK.

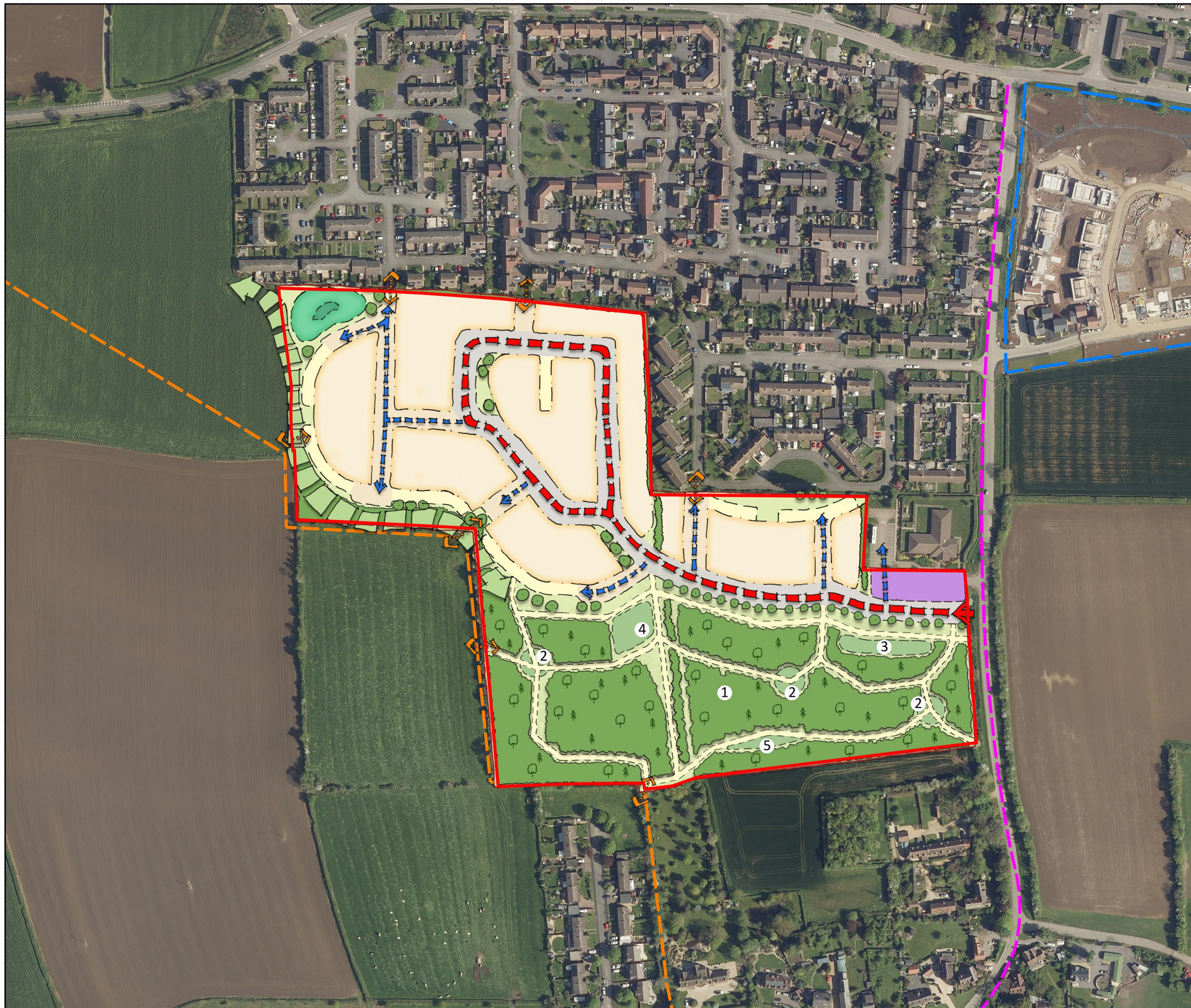
Our extensive experience helps us to understand the wants and needs of growing communities and we use this unique insight to ensure we're always improving what we do.

Our distinctive high-quality homes are woven within a fabric of community amenities and within stunning natural settings to form a whole new place for people to live – a place that people feel proud of.

We are incredibly passionate about what we do and we have an outstanding track-record in the delivery of great places and homes to meet the needs of local people. We are committed to the delivery of a high-quality development here in Lower Quinton.



Images of recent Redrow developments



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
B	20.09.19	SM	LH
C	11.11.20	SM	LH

Legend Updated, Draft Removed
Concept Plan Updated and Numerical Key Added

LEGEND

- Site Boundary
- Primary Access Route
- Secondary Access Route
- Potential Pedestrian / Cycle Access
- Green Corridor
- Proposed Residential Area
- Proposed Open Space
- Proposed SUDS
- Woodland Pathways
- Formal Outdoor Space and Play Areas
- Meon Medical Centre Expansion Area
- Approved Development Under Construction
- Public Rights of Way
- Goose Lane Footpath

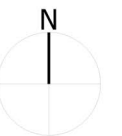
Numerical Key

- 1 Proposed Quinton Woods (3.6ha)
- 2 Woodland Play Areas
- 3 Trim Trail
- 4 Community Garden
- 5 Arts Trail

Project
**Goose Lane,
Lower Quinton**

Drawing Title
Indicative Concept Plan

Date 29.08.19	Scale 1:2,500@A3	Drawn by DW	Check by LH
Project No 30714	Drawing No BM-M-05	Revision C	



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