

H HAYFIELD

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Sent by email only

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Our Ref: HC004/REPS/KC

**RE: HAYFIELD REPRESENTATIONS ON SOUTH WARWICKSHIRE LOCAL PLAN:
ISSUES & OPTIONS CONSULTATION – Land north of Tailor’s Lane, Upper Quinton**

Dear Planning Policy Team,

These representations are made by Hayfield Homes in relation to the South Warwickshire Local Plan Part 1: Issues and Options consultation 2023, in relation to our land interest at land to the north of Tailor’s Lane, in Upper Quinton.

To support this response, the following information is also submitted for consideration:

- Location Plan (Ref: 1207-23-011)
- Draft Framework Plan (Ref: 1207-23-010)
- Land north of Tailor’s Lane, Upper Quinton: Vision Document

Introduction to Hayfield Homes

Hayfield is a rapidly growing multi-award winning housebuilder. The company is currently on-site delivering over 400 homes at nine developments across Bedfordshire, Buckinghamshire, Wiltshire and Worcestershire. Hayfield was named ‘Housebuilder of the Year’ at the WhatHouse? Awards 2021 and awarded Gold in the ‘Best Public Realm category, due to the quality of placemaking at its Stanton Harcourt development. Quality placemaking is embedded deeply into Hayfield’s approach to all developments, as set out further within the enclosed Vision Document.

As demonstrated by previous projects within the enclosed Vision Document, Hayfield is committed to investing in the County of Warwickshire, and delivering high-quality homes which support local investment, and provide a lasting legacy. Hayfield’s development in Tiddington comprises of 32 new homes and facilitated the delivery of a new Sports Club and facilities at the Home Guard Club. Hayfield have also delivered 51 new homes in the heart of Southam. The commencement of both sites occurred within three months of either site acquisition or the grant of detailed planning permission, demonstrating the ability to facilitate early delivery of housing.

In addition, Hayfield’s homes are designed to be environmentally sustainable with Air Source Heat Pumps, underfloor heating, electric vehicle fast-charging points and ultra-fast broadband, fitted as standard.

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The Site – Land north of Tailor’s Lane, Upper Quinton

The site comprises of 4.1 hectares of agricultural land to the western edge of Upper Quinton, located immediately adjacent to the existing built-up area of Quinton, which comprises of both Lower Quinton and Upper Quinton. The site is level and well screened by existing boundary hedgerows interspersed with trees. Existing access into the site is provided by an agricultural field gate off Tailor’s Lane. The site is not located within the Green Belt, nor is it in any Conservation Area. There are no listed buildings on the site or nearby and the site is not within an Area of Outstanding Natural Beauty (AONB).

The site is located within walking distance (approximately a ten minutes’ walk) of facilities within Lower Quinton. These facilities include a primary school (Quinton Primary School), a village hall, a public house, and a Post Office and convenience store, to serve daily needs. Further facilities are available in Stratford-upon-Avon and Moreton-in-Marsh, which are accessible by public transport, from bus stops along Main Road in Lower Quinton.

The site has capacity to deliver around 40 residential dwellings with supporting landscaping and open space provision. Hayfield Homes would bring forward delivery of residential dwellings on the site within the first five years of the Plan period. The development could come forward as early as 2026.

Representations were previously made in relation to the site, identifying the site as a suitable and deliverable residential allocation as part of Stratford-on-Avon District Council’s (SDC) Revised Preferred Options version of the Site Allocations Plan (SAP) in July 2022, and the Scoping and Call for Sites consultation for the South Warwickshire Local Plan (SWLP) in June 2021 (Site Ref: 151).

Site Assessment

Strategic Housing Land Availability Assessment (SHLAA) 2019

The site was considered as part of SDC’s SHLAA 2019, under site reference QUIN.17. Whilst the site is not proposed as a reserve housing site in the SAP, there are no major planning considerations that have been identified within the assessment, that would result in the site not being considered deliverable. Furthermore, it is considered that the limited planning considerations identified as ‘red’, can be readily overcome.

The site is assessed as only providing access to a minor road (‘Relationship to Highway Network’). However, vehicular access to the site is available from Tailor’s Lane, which heading eastwards forms Goose Lane, which provides vehicular access to existing properties within Upper Quinton as well as the identified reserve housing site ‘QUIN.A’ within the Preferred Options version of the SAP. This indicates that SDC consider Tailor’s Lane suitable to accommodate new development. Therefore, in principle SDC consider that Tailor’s Lane provides a suitable point of access to the wider highway network. As evidenced in **Figure I** below, the verge either side of Tailor’s Lane is maintained by the Highways Authority. The verge is therefore capable of accommodating any necessary upgrades. Suitable access to the highway network can therefore be provided to the site.

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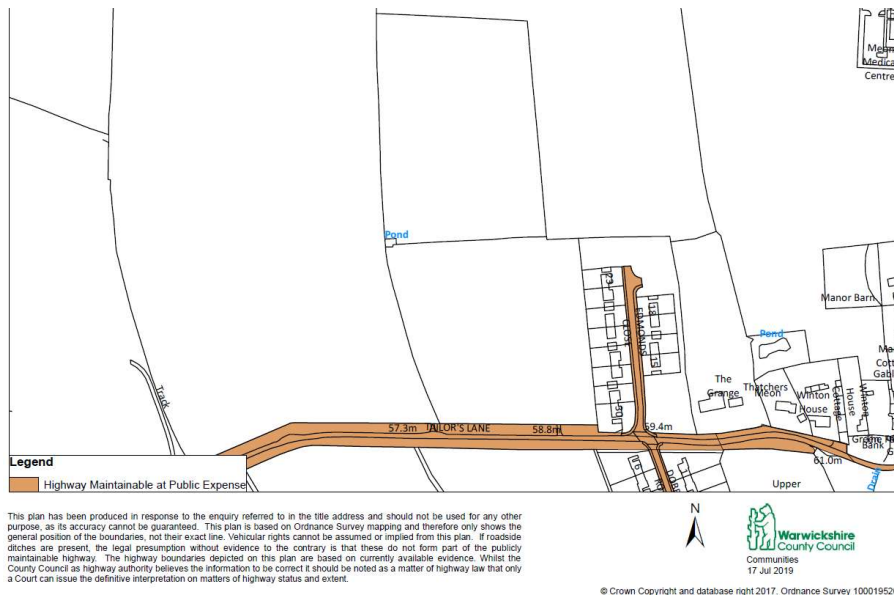


Figure 1,
Highway maintainable
by Warwickshire
County Council

The SHLAA assesses the site as presenting a poor relationship to existing built form ('Settlement Form'). However, existing residential properties are located immediately to the east and south-east, with Public Rights of Way (PRoWs) providing connectivity between Upper Quinton and Lower Quinton to the north/north-east. It cannot therefore be said that new housing on the site would be isolated and remote from the existing built-up settlement of Quinton. On the contrary, development of the site is capable of forming a logical extension to the existing settlement boundary.

In relation to 'Settlement Character', the SHLAA considers the site makes a significant contribution to the character of the settlement. However, the site is well screened by existing boundary hedgerows and trees from the road and PRoW network, and therefore it cannot be said that this enclosed site contributes in any meaningful way to the wider settlement character of Quinton. The site is located on lower-lying ground to the surrounding landscape, which further demonstrates that the site is not a prominent feature, contributing little to the wider character of the settlement. Whereas, the provision of integrated public open space and landscaping as part of the proposed development would enhance the site's contribution to the character of and value to Quinton. Further details are contained within the enclosed Vision Document.

SHLAA 2020

The site was further considered as part of SDC's SHLAA 2020, under site reference QUIN.17. This identified a 'Non-designated Heritage Asset' within the site, which is understood to relate to the presence of ridge of furrow. However, this in itself is not an insurmountable reason preventing development of the site. Subject to a Heritage Assessment being undertaken and agreeing a Written Scheme of Investigation (WSI) with the Council's Planning Archaeologist, it is considered that suitable assessment, mitigation and recording could be undertaken and agreed, prior to the commencement of the development.

As outlined above, each of the planning considerations can be suitably managed through good design and appropriate management. There are therefore no substantial reasons preventing future development of the site.

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Development Vision

A 'Vision Document' has been prepared by Hayfield (as enclosed with this submission) which sets out our vision for land north of Tailor's Lane in Upper Quinton. This document contains a draft Framework Plan which demonstrates how residential development would form a logical extension to the existing built-up area of Upper Quinton, connected by an enhanced PRow network. The Framework Plan has been informed by the site's existing trees and hedgerows which would be retained and integrated as part of the development, to benefit existing wildlife habitats and biodiversity.

The integration of generous public open space provision and land for biodiversity enhancements as part of the proposals, constitutes both environmental sustainability through its ecological value, and social sustainability through its use as a public resource for existing and future residents. The development would provide improved access to the Public Rights of Way network between Upper Quinton and Lower Quinton, through new footpath connections within the site and connected to the public footpath to the north/ north-east.

In terms of social benefits, our proposals would deliver an inclusive range of new affordable and private housing of a mix of types and tenures to reflect local need and to contribute towards the creation of a more balanced and mixed community. The development would also incorporate energy efficient, modern technology such as Air Source Heat Pumps, Photovoltaic Panels and electric car charging points, reducing running costs and environmental impacts.

The development would employ a number of construction workers, and will attract residents who will contribute to the neighbourhood's economy and support its services. The delivery of new housing in proximity to employment opportunities would provide a social as well as an economic benefit.

Furthermore, the proposed development can readily deliver upon the strategic objectives of the SWLP, as detailed further below.

SWLP: Issues & Options Consultation Questions

Strategic Objectives

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

Yes | No | Don't Know

Q-V3.2:

If no, please indicate why.

Yes, Hayfield consider the Vision and Strategic Objectives for the SWLP to be appropriate, in principle.

Delivering homes that meet the needs of all our communities

Hayfield support the ambition to deliver housing of a mixture of types, sizes and tenures, to cater for a range of needs. The proposed development at land North of Tailor's Lane, Upper Quinton would deliver an inclusive range of affordable and private housing, as part of a landscape-led high-quality development. The allocation of the site for housing in the SWLP would also help to support the wider ambitions of the JLP to deliver attractive places which contribute towards reducing carbon emissions.

Hayfield consider that caution should be taken in promoting self-build and custom-build housing on general housing sites, as such housing can complicate and delay the delivery of much needed market and affordable housing. There should be flexibility as to whether self-build or custom-build housing is provided on qualifying sites and should be a matter for detailed consideration between applicants and the Councils at the planning application stage.

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Contributing towards Net Zero Carbon targets

Hayfield strongly support the Objective of ‘contributing towards Net Zero Carbon targets’ and is demonstrated by Hayfield’s commitment of providing betterment to current Building Regulations as part of the proposed development at the site, in facilitating an EPC ‘A’ Energy Efficiency Rating – something which only 2% of all new homes in the UK currently achieve.

Creating attractive places

Strong support is provided for creating attractive places. Quality placemaking is embedded deeply into Hayfield’s approach to all developments, as set out further within the enclosed Vision Document and as evidenced in by our previous award-winning developments.

A healthy, safe and inclusive South Warwickshire

Hayfield support the promotion of healthy, safe and inclusive places and promotes active travel through the provision of enhancements to footpaths and cycle networks within high-quality public open space, which can provide for a range of health and well-being benefits.

Hayfield consider that the integration of Sustainable Urban Drainage Systems (SuDS) within areas of public open space, including as part of new residential developments, can provide a range of benefits to both wildlife and people. Multi-functional areas of open space can provide opportunities for play and recreation to support healthy lifestyles. These areas can also support new and enhanced wildlife habitats to promote biodiversity and access to nature and contribute towards the positive well-being of new and existing residents.

This approach has been taken in the development of the draft Framework Plan for the proposed development at Land North of Tailor’s Lane in Upper Quinton (see enclosed Vision Document). We propose a generous allocation of greenspace to encourage play and recreation and social interaction of all residents, both existing and new. We propose to retain and integrate existing trees and hedgerows along the boundaries, to provide a landscape setting to the development, whilst also enhancing biodiversity. New pedestrian links will connect with the public footpath to the north/ north-east, integrating the development with the wider built-up area of Quinton.

Protecting and enhancing our heritage and cultural assets

We support the general principle of protecting and enhancing heritage assets. However, it should be recognised that the suitable approach for achieving this will vary dependent on the specifics of each case. In relation to land north of Tailor’s Lane in Upper Quinton, and as identified above, an appropriate level of assessment, mitigation and recording would be undertaken in liaison with the Council’s Planning Archaeologist to enhance collective understanding of the identified on-site ‘Non-designated Heritage Asset’. This would be proportionate to its level of significance.

Providing infrastructure in the right place at the right time

Hayfield support the timely provision of infrastructure to support new homes. This would be secured for the proposed development at Tailor’s Lane in Upper Quinton, through a Section 106 Agreement providing proportionate financial contributions towards relevant existing and new infrastructure, such as highway improvements and contributions towards local health and education provision.

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Issues I3: Community Infrastructure Levy (CIL)

Q-I3: Please select the option which is most appropriate for South Warwickshire

Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan

Hayfield consider that Option I3a is the correct approach, with different rates of CIL applicable in different parts of the South Warwickshire area, to reflect the varying market and viability conditions of each area.

Issue I5: Viability and Deliverability

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

Hayfield consider it imperative that the South Warwickshire Housing and Economic Land Availability Assessment (HELAA) takes into account the evidence submitted as part of these representations in relation to land north of Tailor's Lane in Upper Quinton, with regards to the deliverability of the site. This evidence demonstrates that there are no substantial reasons preventing future development and allocation of the site (see Site Assessment section above).

Issue S7: Refined Spatial Growth Options

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

Option 5: Dispersed
Appropriate Strategy | Neutral | Inappropriate Strategy

It is Hayfield's view that Growth Option 5 'Dispersed' is an appropriate strategy to be taken forward for South Warwickshire, alone or in combination with the growth of settlements served by public transport. As identified above, South Warwickshire is predominantly rural in character, as acknowledged within the SWLP. The Spatial Growth Options should therefore respond to this, by supporting the growth of rural settlements, and in particular identified Local Service Villages (LSV) within SDC's Core Strategy and Growth Villages within the Warwick District Local Plan. This will ensure that the sustainability and vitality of rural settlements is maintained and enhanced going forward, by increasing the resident population which can support the satellite of villages and their existing facilities and services, which serve the daily needs of its residents.

As a LSV, Quinton is well located to the existing Business Park at Meon Vale as well as the Quinton Rail Technology Centre (QRTC) (allocated within the SAP as RURAL.3). Quinton's access to existing and future employment opportunities demonstrates that it is a highly sustainable settlement which is capable of taking more growth. Hayfield consider that the SWLP should actively plan for growth within sustainable villages such as Quinton, by pursuing Growth Option 5. Land North of Tailor's Lane is available, suitable and achievable for the delivery of housing within Quinton.

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Issue S9: Settlement Boundaries and Infill Development

Q-S9: Please select the option which is most appropriate for South Warwickshire

Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.

Hayfield consider that in identifying the appropriate Spatial Strategy for South Warwickshire, it will become apparent which settlement boundaries will require review. For the reasons outlined above in relation to Issue S7, it is Hayfield's strong view that Growth Option 5 should be pursued, to support the vitality of South Warwickshire's rural communities. The Part 1 SWLP should therefore identify the relevant growth villages which will require a boundary review through the Part 2 SWLP, including Quinton.

To prevent delay to the delivery of housing within sustainable growth villages such as Quinton, Hayfield consider that the Part 2 SWLP should be progressed without delay. A mechanism should be secured within the Part 1 SWLP, to trigger the preparation of the Part 2 document immediately following the adoption of the Part 1 document. The submission of suitable deliverable sites through this consultation and the Call for Sites exercises, will facilitate the early identification of sites within the Part 2 SWLP, and will support the review of settlement boundaries, as well as the consideration of sites through the planning application process.

Issue T1: 20-minute neighbourhoods

Q-T1: Please select all options which are appropriate for South Warwickshire

Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.

South Warwickshire is predominantly rural in character and as identified within the SWLP, the predominant form of transport is the private car. It would therefore be unrealistic to expect that all development will function as 20 minute neighbourhoods, as is more commonly seen in urban areas within other parts of the UK which benefit from significant public transport infrastructure. As recognised within the SWLP, in rural areas, a network of villages could collectively provide for the day-to-day needs of its residents, rather than a 20-minute neighbourhood approach.

The SWLP should seek to identify sites for housing across the Plan area including in the rural areas, such as the site to the north of Tailor's Lane in Upper Quinton. Policies should be developed which support new development in these areas which also enhance pedestrian and cycle connectivity and the provision of electric vehicle charging, to encourage more sustainable modes of travel. The proposed development at Tailor's Lane would provide improved access to the PRoW network within Quinton, through new footpath connections within the site and connected to the public footpath to the north/ north-east. 'Fast-charge' electric vehicle charging points would also be provided to all new homes as standard, to promote more sustainable alternatives for private travel, to access facilities within the local villages to serve the daily needs of residents.

Issue B3: Special Landscape Areas

Q-B3: Please select the option which is most appropriate for South Warwickshire

Option B3c: Discard Special Landscape Areas and bolster general landscape policy

It is Hayfield's strong view that Special Landscape Areas should be discarded within the SWLP, to bring it in line with the approach of the existing Warwick Local Plan.

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Issue B4: Protecting the Cotswold Area of Outstanding Natural Beauty (AONB) and its surrounding areas

Q-B4: Please select the option which is most appropriate for South Warwickshire

Option B4a: Maintain the current policy approach, without the use of a buffer

Hayfield strongly consider that the current policy approach with regards to the Cotswold AONB should be maintained, without the use of a buffer. The inclusion of a buffer around the periphery of the Cotswold AONB would not be consistent with the National Planning Policy Framework (NPPF), as is required of Local Plans. An AONB relates to land that is protected to conserve and enhance its natural beauty. It would therefore not be appropriate or justified for undesignated land to be afforded the same level of protection as an AONB.

Issue B5: Environmental Net Gain

Q-B5: Please select the option which is most appropriate for South Warwickshire

Option B5c: None of these

Hayfield consider that there is no justification for an Environmental Net Gain Policy requiring more onerous obligations to the minimum 10% net gain which will be required under the Environment Act. The delivery of a biodiversity net gain needs to be considered on a site-by-site basis, as the ability to deliver a net gain of greater than 10% will be dependent on the baseline habitat conditions. Pursuing more onerous environmental net gain requirements at the local level could jeopardise the delivery of South Warwickshire's growth strategy and should therefore not be pursued.

Issue B6: Wildbelt Designations

Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations?

Yes | No | Don't Know

No, Hayfield consider that it would not be justified to designate areas of Wildbelt across the Local Plan Area. Wildbelt does not constitute a 'protected area' where development should be restricted within a plan area, as defined within the NPPF footnote 7. The Environment Act will in any event require all developments to deliver a minimum 10% net gain as of November 2023, which can be used to enhance wildlife habitats. The intentions of the Wildbelt designation can therefore be delivered through other means.

Issue B8: Agricultural Land

Q-B8.1: Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?

Yes | No | Don't Know

No, Hayfield consider that a local policy relating to agricultural land is not necessary, as this is already provided for within the NPPF, and would result in repetition of national policy.

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Conclusion

We request that the above responses to the SWLP Issues and Options consultation are taken into consideration in progressing the Joint Local Plan. The site to the north of Tailor's Lane, in Upper Quinton is highly sustainable, being adjacent to an existing built-up area and within walking distance of local facilities and services. Land north of Tailor's Lane in Upper Quinton is available, suitable and achievable for immediate development. We respectfully request that the site be allocated for residential development.

Please do not hesitate to contact me should you have any queries relating to the above or attached.

Yours faithfully,

K Christou

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Encl. Location Plan (Ref: 1207-23-011)
Draft Framework Plan (Ref: 1207-23-010)
Land north of Tailor's Lane, Upper Quinton: Vision Document, February 2023