

## STRATFORD ON AVON SITE ALLOCATIONS PLAN

### PREFERRED OPTIONS CONSULTATION

#### COTSWOLDS CONSERVATION BOARD RESPONSE, 18 DECEMBER 2020



N.B. The Conservation Board's comments have been submitted via Stratford on Avon District Council's interactive version of their consultation document. This document compiles those individual responses together.

## 1. INTRODUCTION

### 1.3 Cross Boundary Issues

#### Paragraph 1.3.5

The Cotswolds Conservation Board ('the Board') strongly supports the new text at paragraph 1.3.5, which states that:

- Part of the District is also designated as the Cotswolds Area of Outstanding Natural Beauty (AONB). In accordance with the NPPF, development should be restricted to meeting local needs only. Given that reserve sites are to meet District-wide housing needs, reserve sites have not been identified within the AONB area. As such, it is considered that there are no strategic cross-boundary issues in this regard.

This principle - that development in the AONB should be restricted to meeting local needs only – reflects the Board's consultation response to the previous iteration of the Site Allocations Plan (SAP). It also reflects national and local planning policy and guidance, including:

- **National Planning Policy Framework, paragraph 172:** The scale and extent of development [in AONBs] should be limited.
- **National Planning Practice Guidance – Natural Environment, paragraph 041 (21 July 2019):** AONBs 'are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas'.
- **Cotswolds AONB Management Plan 2018-2023, Policy CE12 (Development Priorities and Evidence of Need):** Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.

The removal of the reserve housing sites allocations that were proposed in the Cotswolds AONB in the previous iteration of the SAP, together with the removal of some allocations that had previously been proposed in the setting of the AONB, is consistent with the statutory purpose of conserving and enhancing the natural beauty of the AONB.

By the Board's estimations, the removal of these reserve housing sites means that the reduction in the number of proposed dwellings associated with reserve housing sites will be as follows:

- Within the Cotswolds AONB – reduced from 85 dwellings across six sites in three settlements to zero (except for the Ilmington Neighbourhood Plan reserve housing site allocation).
- In the setting of the Cotswolds AONB:
  - Quinton – reduced from 158 dwellings across six sites to 81 dwellings across four sites.
  - Tysoe – reduced from 112 dwellings across five sites to 24 dwellings at two sites.

To ensure that this principle of *'development in the AONB being restricted to meeting local needs only'* is given appropriate weight, the Board recommends that this principle should be incorporated into relevant policies in the SAP, including Policy SAP.2 and Policy SAP.7. The wording used in Policy CE12 of the Cotswolds AONB Management Plan (outlined above) could potentially form the basis of this new policy wording.

## **2. RESERVE HOUSING SITES**

### **Policy SAP.1 Identifying Reserve Housing Sites**

As outlined in our comments relating to Section 1.3 (Cross Boundary Issues), the Cotswolds Conservation Board recommends that a sentence should be added to Policy SAP.1 to the effect that:

- Reserve sites are not being allocated in the Cotswolds AONB. This is because reserve sites are to meet district-wide need whereas, in accordance with the National Planning Policy Framework (NPPF), development in AONBs should be limited to meeting local needs only.

Please refer to our comments relating to Section 1.3 for further context and supporting information in relation to this recommendation.

### **Paragraphs 2.1.5-2.1.7**

These paragraphs relate to 'windfall sites' and additional provision. The Board recommends that this section should make reference to the principle that development in the Cotswolds AONB should be limited to meeting local needs only.

Please refer to our comments relating to Section 1.3 for further context and supporting information in relation to this recommendation.

### **Paragraph 2.1.22**

The Board strongly supports the new text at paragraph 2.1.22, which states that:

- It should be noted that a number of other sites are identified in the SHLAA as being potentially deliverable. However, they have not been identified as such for at least one of the following reasons: ... Within the Cotswolds AONB – the purpose of reserve sites is to meet a District-wide housing need if required, whereas housing development in the AONB should be restricted to meeting local housing needs.

Please see our comments relating to Section 1.3 for further context, supporting information and recommendations relating to this issue.

## **SECTION 4. BUILT-UP AREA BOUNDARIES**

### **Policy SAP.7 (Built-up Area Boundaries)**

Paragraphs 1.3.5 and 2.1.22 of the Site Allocations Plan (SAP) recognise that development in the Cotswolds AONB should be restricted to meeting local needs only. As indicated in our comments on Section 1.3 (paragraph 1.3.5) of the draft SAP, the Cotswolds Conservation Board strongly supports this principle.

To give this principle appropriate weight, the Board recommends that it should be incorporated into Policy SAP.7. The wording used in Policy CE12 of the Cotswolds AONB Management Plan 2018-2023 might be appropriate in this context:

- Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.

Please refer to our comments on Section 1.3 (paragraph 1.3.5) for further context, supporting information and recommendations relating to this issue.

## **SECTION 7 SPECIFIC SITE PROPOSALS**

### **7.12 / Proposal RURAL.3: Quinton Rail Technology Centre**

This site is located within the setting of the Cotswolds AONB. As such, the Cotswolds Conservation Board ('the Board') recommends that an additional 'specific requirement' for this site should be included:

- Avoid / minimise adverse effects on views from the Cotswolds AONB (in particular, views from public rights of way on Meon Hill).

Please refer to the Board's Position Statement on Development in the Setting of the Cotswolds AONB and to the Cotswolds Landscape Strategy & Guidelines relating to Landscape Character Type 1 (Escarpment Outliers) for further information on this issue.

### **7.13 / Proposal RURAL.4: Meon Vale (Former Engineer Resource Depot)**

Please refer to the Cotswolds Conservation Board's comments relating to Proposal RURAL.3.

### **7.14 / Proposal RURAL.5: Long Marston Airfield**

Please refer to the Cotswolds Conservation Board's comments relating to Proposal RURAL.3.

## **SECTION 8. POLICIES MAP – PART A: RESERVE HOUSING SITES**

The following allocations are all located within the setting of the Cotswolds AONB.

### **Quinton C**

The Cotswolds Conservation Board has some concerns regarding the new allocation at Quinton C. This is because it could potentially contribute to the coalescence of Lower Quinton and Upper Quinton. This would conflict with the Cotswolds AONB Landscape Strategy and Guidelines relating to Landscape Character Type 1 (Escarpment). By extension, it would also conflict with the Cotswolds AONB Management Plan and the Stratford on Avon Local Plan Core Strategy.

To address this issue, we recommend that the 'hatched' area should be reduced and that development should not be permitted to extend further south than the access road to Meon Medical Centre.

### **Quinton D**

Quinton D sits in a relatively isolated position, with undeveloped land on three sides. It is also closer to the Cotswolds AONB than it potentially needs to be. A more logical location, both in terms of settlement form and views from the AONB, would seem to be in the field to the north of Quinton D, with the main road through Lower Quinton as its northern boundary.

**Quinton A&B**

Assuming that development will be limited to the hatched area, the Board does not have any concerns regarding Quinton A and Quinton B.

**Tysoe A&B**

Assuming that development will be limited to the hatched area, the Board does not have any concerns regarding Tysoe A and Tysoe B.