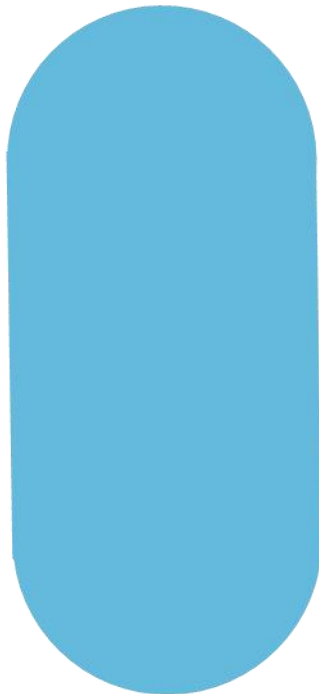


## Representations

South Warwickshire Local Plan Part 1 –  
Issues and Options Consultation

**HALLAM LAND MANAGEMENT LIMITED (SOUTHAM  
SOUTHEAST)**

March 2023





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Hallam Land Management Limited (HLM), in respect of their land interest at Southam Southeast (the site). The site forms part of Broad Location 22, and has been identified as Site 383 on the Interactive Map.
2. HLM are part of Henry Boot PLC who are a member of the UK Green Building Council. HLM aspire to delivery policy compliant development and are committed to helping to facilitate lower carbon developments and energy efficient solutions.
3. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the supporting documents namely:
  - a. Masterplanning Technical Note - this describes how the Southam Southeast Area (which includes Site 383) could be developed having regard to its scale, characteristics, and opportunities;
  - b. Southam Strategic Environmental Constraints Plan - this plan shows the environmental constraints around Southam, and how the land to the Southeast is the least constrained;
  - c. Southam Wider Connectivity Plan - this plan shows the various connections possible between Southam Southeast and the existing built-up area;
  - d. Landscape and Visual Overview - this provides an assessment of the landscape and visual effects of development of the HLM site 383, and its ability to accommodate development without causing significant harm, which supports the Councils LSA (2011) which concluded this flank of Southam as being the least landscape sensitive;
  - e. Biodiversity Net Gain Feasibility Study - this demonstrates how the HLM site can achieve a net gain in biodiversity on site both in terms of Habitats (24.8% increase in units) and Hedgerows (11.5% increase in units); and,



- f. Southam Education Technical Note - this has been prepared in discussion with Southam College and Warwickshire County Council, and demonstrates how Southam Southeast would improve education provision in the town through delivery of a new combined Primary School and Sixth Form Centre.
- g. South Warwickshire Housing Need Evidence Base Review Technical Report - this has been prepared to consider the evidence base relating to housing need in South Warwickshire, namely the HEDNA, and provides commentary and guidance on how this issue should be considered as the SWLP evolves.

### Chapter 3 - Vision and Strategic Objectives

#### Q-V3.1: Vision for the Local Plan

4. HLM consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and HLM consider it would be more appropriate to reference meeting unmet need from the wider Housing Market Areas.
5. Whilst Birmingham and the Black Country authorities are not neighbouring authorities of South Warwickshire, they do form part of the same Housing Market Area and therefore should not be excluded.

### Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

#### Q-I1: Sustainability Appraisal

6. The following comments are made in respect of the SA for Southam.
7. The Site promoted by HLM forms part of Southam Southeast (Broad Location 22). In assessing the four Broad Locations identified in Southam against the SA Objectives, the SA concludes that Southam Southwest is the best performing. That is not the



correct conclusion to draw from the Appraisal based on its findings as evidenced below, moreover Southam Southwest is heavily constrained by HS2 which splits the area into two, separating the majority of the Broad Location from the town itself. This site is not therefore a 'reasonable alternative' for up to 2,000 homes as part of a single strategic allocation as any new community would be divided by HS2, and therefore the site should not be carried forward in the SA process. Indeed, it is obvious from the assessment of Broad Locations against the SA Objectives at Table 4.1 of the SA that Southam Southeast is the strongest performing Broad Location in the town.

8. The following specific comments are made in relation to the SA and Southam Southeast.
9. SA Objective 2: Flood Risk identifies Southam Northeast as the best performing Broad Location in Southam as it has the smallest proportion of land coinciding with Flood Zone 3. However, and as set out in the SA, Southam Southeast has only a small proportion of land within Flood Zone 3 and indeed this is negligible given it can be easily avoided and mitigated through masterplanning. As such, HLM consider Southam Southeast should be considered equal best performing with regard to SA Objective 2.
10. SA Objective 4: Landscape incorrectly concludes that Southam Southwest is the best performing Broad Location in Southam. The commentary in the SA (at Paragraph 4.11.9) concludes that Southam Southeast is the best performing parcel in terms of landscape sensitivity as it falls within an area of medium landscape sensitivity. The other three Broad Locations contain substantial quantities of high/medium and high sensitivity land parcels which will be more challenging to mitigate, with major adverse effects anticipated. This error should be remedied in the next iteration of the SA.
11. Further, HLM endorse the evidence base that has informed the SA within the Landscape Sensitivity Assessment of Main Settlements including Areas of Restraint Assessment (White Consultants) - July 2011. HLM have supplemented this work with a more up-to-date Landscape and Visual Overview of the town which is appended to these representations. HLM would request the Council take this work into account if it chooses to update its Landscape Character Assessments.



12. SA Objective 5: Cultural Heritage states that Southam Northeast and Southam Southeast are the best performing Broad Locations in Southam. However, in the conclusion Southam Northeast is singled out as the best performing Broad Location without further explanation. This error should be remedied in the next iteration of the SA.
13. With regard to SA Objective 11: Accessibility, HLM acknowledge that connectivity of Southam Southeast would benefit from enhancement through investment in infrastructure and safe pedestrian/cycle crossings of the A423. HLM have submitted with these representations a Wider Connectivity Plan to demonstrate how it would improve and enable connections to the existing built-up area. These include links to the existing underpass under the A423 to the north, a new controlled toucan crossing of the A423 at grade connecting into Stowe Drive, links to the existing signalised crossing point adjacent to the junction of the A423 and A425, and proposed links across Banbury Road.
14. We consider that insufficient account has been taken of accessibility issues elsewhere in Southam, for example school congestion concerns at Southam Northwest and Southam Southeast being effectively cut off from the main settlement because of HS2; this is should rectified in the next iteration of the SA. Given Southam Southeast is free from such accessibility issues, and considering the accessibility enhancements described above, HLM argue that Southam Southeast is the best performing Broad Location when assessed against SA Objective 11.
15. With regard to SA Objective 12: Education, the SA summary suggests that Southam Northeast is the best performing Broad Location in Southam on the basis of having the largest proportion of land within 800m of an existing primary school. However, any strategic development of this scale will include on-site provision of primary education facilities. Therefore at the very least, the Broad Locations should be considered to perform equally in relation to this SA Objective.
16. Southam Southeast also has advantage in education terms due to the willingness of HLM to accommodate a new sixth form centre within this area (as described within the Education Technical Note). This new facility would relieve pressure on the Southam College site, remove traffic generated by sixth form students from Welsh



Road West, and improve facilities for students and staff. The new sixth form centre is proposed to form part of a wider Education hub which is to include a primary school, supporting the combination of administration and other facilities which will reduce running costs. As such, it is contended that Southam Southeast performs strongest in relation to Education and this should be reflected in the SA.

17. Taking all of the above into account, it is clear that Southam Southeast does in fact perform best when assessed against the SA Objectives, as set out in our assessment below:

| <b>SOUTHAM</b>                | Northeast | Northwest | Southeast | Southwest |
|-------------------------------|-----------|-----------|-----------|-----------|
| Climate Change                |           |           |           |           |
| Flood Risk                    | =BEST     |           | =BEST     |           |
| Biodiversity and Geodiversity |           |           | BEST      |           |
| Landscape                     |           |           | BEST      |           |
| Cultural Heritage             | =BEST     |           | =BEST     |           |
| Environmental Pollution       |           |           |           |           |
| Natural Resources             |           |           | BEST      |           |
| Waste                         |           |           |           |           |
| Housing                       |           |           |           |           |
| Human Health                  | =BEST     | =BEST     |           |           |
| Accessibility                 |           |           | BEST      |           |
| Education                     | =BEST     | =BEST     | =BEST     | =BEST     |
| Economy                       |           |           |           | BEST      |
| Score                         | 4         | 2         | 7         | 2         |

18. Southam Southeast performs strongest compared to other Southam Broad Locations and this should be recognised in the next iteration of the SA.

Option S2-C: Intensification

19. Intensification is a way to optimise brownfield land and realise its effectiveness. However, HLM consider that this matter should be dealt with by the SWLP Part 2 Local Plan or Neighbourhood Plans if relevant, so that the implications of applying an



intensification policy to a particular area can be assessed in terms of character and deliverability, which are key factors to consider.

20. Intensification is challenging and requires evidence around viability and deliverability before it can be considered to form part of the supply, and as such any intensification potential in the windfall allowance should be avoided.

Q-S3.1: Urban Capacity Study

21. The production of an Urban Capacity Study (UCS, October 2022) to support identification of brownfield land to help deliver the growth needs of South Warwickshire is in accordance with the NPPF<sup>1</sup>. The following points are made in relation to how the UCS considers housing supply in the urban areas. However, it should be noted that the UCS also discusses the SWLP housing requirement and representations are made on those points under Q-H1-1 & 2.
22. In relation to housing allocations from the adopted Local Plans, HLM consider that a comprehensive review of all outstanding allocations without planning permission is required to ensure that such sites still meet the definition of developable as set out in the NPPF<sup>2</sup>. In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will increase beyond what is included within the adopted Local Plan, in particular as development proposals will need to show at least a 10% Biodiversity Net Gain from November 2023. That review and evidence must be published prior to the next iteration of the Plan to demonstrate the capacity from the allocations can be relied upon to meet the housing need.
23. The UCS also includes within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas, and are considered to be potentially suitable. As no formal assessment of these submissions has taken place, their inclusion will need to be reviewed once the Housing and Economic Land Availability Assessment (HELAA) is published. Any allowance for such sites must be deducted from the windfall allowance.

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<sup>1</sup> Paragraph 119 of the National Planning Policy Framework (July 2021)

<sup>2</sup> Glossary of the National Planning Policy Framework (July 2021)



24. The UCS identifies an additional five sites on vacant land in the urban areas which have not yet been submitted to the Call for Sites process, but are considered potentially suitable for 328 dwellings. There is no certainty around the availability and deliverability of these sites to include them at this stage. Further, on assessment of these sites there are some serious concerns around their suitability in any case. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39 dwellings). As above, these sites have not yet been submitted to the Call for Sites process and so there is no certainty around delivery.
25. Finally, the UCS includes an assessment of the potential windfall supply with reference to the level of windfall delivery across South Warwickshire in the period 2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the sources of windfall supply, nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence as required by the NPPF<sup>3</sup>.

#### Q-S4.1: Growth of Existing Settlements

26. Yes, growth of existing settlements in South Warwickshire (and on the edge of South Warwickshire) is imperative to deliver the overall growth targets, and achieve the Vision and overarching principles. The need for housing, affordable and specialist housing, jobs, green infrastructure, improved facilities and infrastructure is within the towns and villages. Those needs are best met sustainably adjacent to the larger sustainable settlements.

#### Q-S4.2: Settlement Analysis

27. The following comments are made in respect of HLM's site, which is referenced as Area 4 within the Southam Area.

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<sup>3</sup> Paragraph 71 of the National Planning Policy Framework (July 2021)





28. In respect of Connectivity, it is noted reference is made to the A423 as a barrier to the western edge. This is acknowledged however there are several points at which crossings can be safely made for pedestrians and cyclists.
29. Firstly, the existing underpass which serves the Flying Fields development to the north of Area 4. This underpass provides a safe, secure, and direct route for pedestrians and cyclists into the town centre from Welsh Road East. The HLM site can access the underpass via Welsh Road East.
30. Secondly, there is an existing public right of way for pedestrians that runs through the middle of Area 4 before crossing the A423 at grade and then connecting onto Stowe Drive and then along residential streets towards the town centre. This route can be improved through the provision of a controlled toucan crossing.
31. Thirdly, there is an existing bridleway that runs through Area 4 and connects to an existing traffic light controlled pedestrian crossing adjacent to the junction with the A425. This route provides a safe and direct route to the Banbury Road and Sustrans National Cycle Route 48 which connects to the town centre and employment areas.
32. Finally, there is the ability to connect with and across Banbury Road to the south of the A423/A425 junction to provide an alternative means of accessing the town from the southern end of Area 4.
33. It is therefore considered that active and sustainable modes of travel from Area 4 to the town can be made across the A423 at four separate crossing points, and that connectivity is not a barrier that would prevent the area from being a strategic allocation. Further, enhanced connectivity between Southam Southeast and the main town will benefit existing residents east of the A423.
34. In respect of Landforms, it is noted there are no physical constraints on Area 4. It is also noted that Area 4 has all local facilities within 800m.
35. When taking account of this evidence, the comments above in relation to connectivity, and the evidence of the SA, it is clear that Area 4 performs best. This area is the most suitable location to accommodate a broad location of up to 2,000 dwellings, as it is



the least environmentally constrained and yet the most accessible to the town and its facilities.

Q-S7.2: Refined Spatial Growth Options

36. HLM consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.
37. Firstly, the results of the high level testing of the five growth options in the supporting Sustainability Appraisal demonstrates that the options perform differently in different areas, with no one option standing out as the best performing option across all areas.
38. Secondly, it is important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.
39. Finally, given the significant level of growth the SWLP will need to accommodate (see response to Issues H1 and H4 below), this is unlikely to be met sustainably or efficiently through a single growth strategy.
40. HLM also have the following comments on the Options.
41. HLM query why growth at Southam does not appear in the Sustainable Travel (2) Option. As a town with a population of over 8,000, and a sizeable employment area, the town should continue to receive investment in high quality public transport connections to Royal Leamington Spa, Coventry, Rugby, and Daventry. The frequency and quality of services can be improved with investment and increased patronage that strategic growth can deliver.
42. If the aim for the Plan is to deliver a well-connected South Warwickshire, then a town the size of Southam needs to have investment in its public transport connections to 2050.

Q-S10: Other Development Strategy Issues



43. More generally, Southam was identified in the Sustainability Appraisal to the adopted Core Strategy as the most appropriate location for additional strategic growth amongst the Main Rural Centres based on the availability of suitable sites, lack of overriding infrastructure constraints, and the opportunity to support the existing facilities provided in the town. To deny any further growth of Southam in the SWLP to 2050, would not be consistent with the adopted Core Strategy or provisions of the NPPF.
44. HLM have set out a Vision for its site which shows how development could help achieve the five overarching principles of the Plan. This includes a commitment to designing the development to drive down emissions and be more climate responsive. This Vision can sit within and inform a wider Vision for the area, and HLM would be happy to meet to discuss this further with the Councils.

## Chapter 5 - Delivering South Warwickshire's Economic Needs

### Q-E7.1: Core Opportunity Areas

45. HLM support option E7.1a and directing employment growth to the Core Opportunity Area.

## Chapter 6 - Delivering Homes that meet the needs of all our Communities

### Q-H1-1 & 2: Providing the Right Number of New Homes

46. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, HLM reserve its position in respect of whether this approach is reasonable for other authorities in Coventry and Warwickshire.
47. The NPPF sets out that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”<sup>4</sup>. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as

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<sup>4</sup> Paragraph 61 of the National Planning Policy Framework (July 2021)



such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.

48. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.

49. As set out in the appended South Warwickshire Housing Need Evidence Base Review Technical Report commissioned by HLM, whilst HLM support the housing need figures for South Warwickshire set out in the HEDNA, HLM have some concerns with the approach taken in the HEDNA to economic growth and affordable housing need.

50. On economic growth, whilst HLM agree with the demographic modelling assumptions used to calculate economic-led housing need in the HEDNA, the job growth assumptions require updating for the following reasons:

- The 2022 HEDNA's Cambridge Econometrics (CE) job forecast is outdated (March 2021) and was generated during strict Covid-19 measures in the UK;
- CE are a robust source of job forecasts but a more recent forecast should be used;
- Assumed GDP informing the HEDNA's job growth forecasts has now been shown to be an underestimate of growth by the Office for National Statistics;
- The higher GDP for 2021 and 2022 indicates job growth forecasts would be higher than those used by the HEDNA;
- Furthermore, job growth experienced in Warwick District and Stratford-on-Avon District during 2011 to 2019 significantly exceeded the CE forecast used to calculate economic-led housing need for the 2022-2043 period;
- It is unclear from the HEDNA whether economic growth on a number of sites within South Warwickshire are taken account of by the CE baseline projections. If not, these developments should be taken account of;
- The Council should consider job growth forecasts from Oxford Economics and Experian Economics alongside those from the CE.

51. HLM also consider that the significant level of unmet affordable housing needs across South Warwickshire should be taken into account in determining the housing requirement. The submitted analysis finds that the minimum housing need would be



1,609 dwellings per annum in Stratford-on-Avon District and 2,872 dwellings per annum to meet affordable housing needs based on past net delivery. Whilst it is recognised that this is significantly greater than the level of housing need set out in the HEDNA and is possibly unsustainable to deliver, this should influence the housing requirement through an appropriate uplift.

52. The enclosed analysis should be given consideration as the SWLP emerges, to ensure a sufficient level of housing is planned for across South Warwickshire.
53. The UCS suggests that the SWLP housing need equates to 30,750 dwellings, however this figure does not reflect the latest evidence within the HEDNA and needs updating. In addition, the UCS assumes a Plan period which commences in 2025, however this does not align with the base date of the HEDNA and as such a Plan period from 2022 is considered more appropriate to align with the evidence base.
54. On the basis of the above, we consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period.
55. In line with the NPPF<sup>5</sup>, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to set a higher housing requirement in line with national guidance<sup>6</sup>; for example in order to address a significant affordable housing shortfall, support economic development, or address strategic infrastructure requirements which are likely to increase the number of homes needed.
56. Further consideration will also need to be given to unmet needs within the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness<sup>7</sup>, which is explored in further detail in response to Issue H4 below.
57. Bringing together comments on the UCS and Unmet Needs under Q-H4.2, HLM consider that the SWLP will need to plan for a level of housing growth as set out in the below Table in the order of at least 43,000 dwellings.

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<sup>5</sup> Paragraph 61 of the National Planning Policy Framework (July 2021)

<sup>6</sup> Paragraph 010 Reference ID 2a-010-20201216 of National Guidance

<sup>7</sup> Paragraph 35 a) of the National Planning Policy Framework (July 2021)



**Table – SWLP Housing Requirement and Supply Calculation**

| <u>Housing Requirement</u>                                                                   |                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| South Warwickshire Minimum Housing Need<br>Derived from the HEDNA (1,679 x 28 Years)         | 47,012 dwellings                                                                                                                                                                                       |
| Uplift to Minimum Housing Need                                                               | TBC – further work required to determine whether an uplift is appropriate                                                                                                                              |
| Contribution Towards Unmet Needs of<br>Coventry and Birmingham & Black Country               | TBC – engagement with Birmingham/Black Country and Coventry required but suggest increase of at least 21,000 dwellings possible (circa 11,000 towards Coventry and at least 10,000 towards Birmingham) |
| <b>Total Housing Requirement</b>                                                             | <b>68,000 dwellings +</b>                                                                                                                                                                              |
| <u>Housing Supply</u>                                                                        |                                                                                                                                                                                                        |
| Sites with Planning Permission at 1 <sup>st</sup> April 2022<br>(with 5% lapse rate applied) | 14,360 dwellings                                                                                                                                                                                       |
| Outstanding Local Plan Allocations at 1 <sup>st</sup> April<br>2022                          | 5,579 dwellings                                                                                                                                                                                        |
| Windfall Allowance                                                                           | TBC – 4,840 dwellings assumed in line with UCS however this requires further justification / compelling evidence                                                                                       |
| <b>Total Housing Supply</b>                                                                  | <b>24,779 dwellings</b>                                                                                                                                                                                |
| <b>Indicative Housing Requirement to be found by the Plan</b>                                | <b>43,000 dwellings +</b>                                                                                                                                                                              |

Q-H4.2: Accommodating Housing Needs Arising from outside of South Warwickshire

58. It is imperative that that SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire, to ensure compliance with the Duty to Cooperate and so the SWLP can demonstrate adherence with the



positively prepared test of soundness set out in the NPPF<sup>8</sup>. It is recognised that national planning policy and law has the potential to change during the course of the preparation of the SWLP, including in relation to the Duty to Cooperate and replacement with an ‘alignment policy’, however there is no suggestion the requirement for local authorities to address unmet needs arising from within their Housing Market Areas will be removed.

59. We consider that there are two likely sources of unmet housing needs which require consideration in the development of the SWLP: Birmingham and Black Country and Coventry and Warwickshire.

*Birmingham and Black Country*

60. There are clearly significant unmet housing needs arising from the Birmingham and Black Country Housing Market Area which require addressing by this Plan.
61. Birmingham published a New Local Plan Issues and Options consultation document in October 2022. This identifies an overall housing need in Birmingham to 2042 (derived from the Standard Method) of some 149,286 dwellings, with total housing supply equating to just 70,871 – leaving a shortfall of some 78,415 dwellings.
62. There are significant limitations to the potential for such substantial unmet needs to be met by Birmingham’s neighbouring authorities due to lack of available land in the Black Country and significant Green Belt coverage in the Black Country and elsewhere (Bromsgrove, Solihull, North Warwickshire, and Lichfield). This was evident in the work undertaken in the now abandoned Black Country Local Plan Review, which was subject to Regulation 18 consultation in 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.
63. There are strong functional relationships between Birmingham and South Warwickshire, in terms of transport connections and commuting patterns, and development in South Warwickshire can contribute towards meeting unmet needs.

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<sup>8</sup> Paragraph 35 a) of the National Planning Policy Framework (July 2021)



64. The Councils clearly need to engage with Birmingham and the Black Country authorities and others to determine an appropriate level of unmet needs to be directed to South Warwickshire. That process needs to be transparent in accordance with paragraph 27 of the NPPF, and effective in accordance with paragraph 35 c) of the NPPF. The lack of any published Statement of Common Ground showing progress made so far by the Councils is a concern that needs to be addressed before the next round of consultation. The Councils need to properly grapple with this issue, and not allow the failings of the last round of Local Plans to be repeated.
65. It is noted that the SA has tested the effects of an additional 5,000 to 10,000 dwellings to accommodate Birmingham's unmet needs, however given the numbers discussed above HLM consider 5,000 dwellings to be at the lower end of what could be expected to be accommodated in South Warwickshire. At this stage of the process and in advance of those discussions, as a working assumption for the level of unmet need to be accommodated, the figure should be an additional 10,000 dwellings.

*Coventry and Warwickshire*

66. Although the question does not address Coventry's unmet needs, this cannot be ignored. Coventry has by far the greatest level of housing need across Coventry and Warwickshire as set out in the HEDNA, with a housing need calculation derived from the Standard Method of some 3,188 dwellings per annum, adjusted in the HEDNA trend-based approach to 1,964 dwellings per annum. Applying the housing need calculated in the HEDNA to the proposed SWLP Plan period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.
67. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development. This was reflected in the adopted Coventry Local Plan (December 2017), where the local housing need in Coventry in the period 2011 to 2031 was calculated at 42,400. The Coventry Local Plan set a housing requirement of just 24,600 (some 60% of its local housing need), leaving a shortfall of some 17,800 dwellings to be met elsewhere.





68. It is therefore highly unlikely that Coventry will be able to meet its local housing need identified in the HEDNA of 54,992 dwellings to 2050. Even assuming that Coventry can accommodate a proportion of its local housing need consistent with that set out in the adopted Coventry Local Plan (i.e. 60%), which is itself a challenge, Coventry could only accommodate 33,000 dwellings to 2050 leaving a shortfall of some 22,000 dwellings to be met elsewhere.
69. Given South Warwickshire's functional relationship with Coventry, and as South Warwickshire makes up around half of the population of Warwickshire according to the 2021 Census data early releases<sup>9</sup>, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This equates to approximately 11,000 dwellings and should be taken into consideration at this stage of the process as a working assumption for the level of unmet need to be accommodated.

Q-H4.3: Accommodating Housing Needs Arising from outside of South Warwickshire

70. With regard to how and where best housing shortfalls should be accommodated in South Warwickshire, HLM consider that settlements or areas with the strongest sustainable transport connections to the conurbations where unmet housing needs are arising should be prioritised. In the case of Coventry's unmet needs, this should include Southam.

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<sup>9</sup> [How the population changed where you live, Census 2021 - ONS](#)