

South Warwickshire Local Plan: Issues and Options

Representations on behalf of IM Land Limited
in respect of safeguarded land at Westwood
Heath Road, Coventry

March 2023

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Client

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Our reference

IMLQ3009

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1. Introduction

- 1.1 These representations are submitted in response to the 'South Warwickshire Local Plan: Issues and Options' and are made on behalf of IM Land Limited (IM) who are working with the landowner, in the context of 5.8ha of land at Westwood Heath Road, Coventry (the Site). A Site Location Plan is enclosed at (**Appendix 1**).
- 1.2 The Site forms part of a wider area removed from the Green Belt and 'safeguarded' by Policy DS21 and allocation S1 (land south of Westwood Heath Road) within the adopted WDC Local Plan (2017).
- 1.3 IM welcomes the progress made by Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC) to date towards the preparation of a joint Local Plan in order to develop a combined strategy for the south of Warwickshire, and intend to continue to take an active role in the Local Plan process.
- 1.4 These representations are structured as follows:
 - **Section 2:** Provides a summary of the Site and its surroundings, sets out the planning policy background, and demonstrates the sustainable residential development opportunity at Westwood Heath Road.
 - **Section 3:** Provides a response to the key questions raised through this consultation.
 - **Section 4:** Provides a conclusion to these representations.
- 1.5 Appendices are provided with this report, and include a Vision Document that demonstrates the Site's ability to deliver approximately 130 new homes in a sustainable location, within the early stages of the plan period. A Vision Document was provided previously to supplement the representations we submitted on behalf of IM in response to the 'South Warwickshire Local Plan: Scoping and Call for sites', and has now been updated to ensure it wholly aligns with the five overarching principles of the SWLP, as set out within the Issues and Options document.

2. The Site and the Opportunity

- 2.1 The Site is located within the administrative boundary of WDC on the border with Coventry City Council (CCC), which is formed by Westwood Heath Road.
- 2.2 The Site is situated immediately to the south of Westwood Heath Road, to the north of Westwood Heath Road is the Network Rail Training Centre and an existing residential area, beyond which is Westwood Business Park.
- 2.3 To the west is Bockenden Road (which becomes Crackley Lane and links to Kenilworth), beyond which is housing allocation H42 'Westwood Heath' which is subject of a hybrid Planning Permission (W/17/2357) dated October 2018 for a total of 425 dwellings, a convenience store of up to 400m² and associated infrastructure. The first phase of development (129 dwellings) formed the detailed aspect of that application, which Crest have now commenced. This was followed by the submission of a reserved matters application (ref. W/21/1280) in July 2021 for details of appearance, landscaping, layout and scale for the remaining phases 2, 3 and 4 (296 dwellings), which is currently awaiting determination.
- 2.4 Further west is the settlement of Burton Green, which has residential properties along Cromwell Lane. To the south is open countryside and the former railway line along which HS2 is to be constructed. To the east is open countryside, allotments, playing fields and further east, the University of Warwick campus.

Background

The Site and safeguarded land

- 2.5 The Site forms part of a wider area removed from the Green Belt and 'safeguarded' by Policy DS21 and allocation S1 (land south of Westwood Heath Road) in the adopted WDC Local Plan (September 2017).
- 2.6 Policy DS20 'Directions for Growth South of Coventry' states that:

"The area to which this policy relates will be subject to an early partial local plan review within five years of the date of adoption of the plan. This will allow the Council to address any additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need, should additional housing be required."

- 2.7 Appendix B "Vision for the Land South of Coventry" of the WDC Local Plan (2017) stated:

"This area will be a thriving, available and sustainable driver for economic growth, based around its excellent links to the strategic highways network, represented by a new link road from the A46 around the southern edge of the city, improved rail and other public transport connections serving the University of Warwick and the provision of significant opportunities for cycling and walking through and between the new areas of growth"

- 2.8 Specifically of relevance to any future housing development in this area, the vision states:

“New housing developments will have created flourishing communities with their own individual characters, catering to residents throughout their lives and providing a range of attractive and well-designed properties.

Residential development improves the quality of life of its inhabitants. It offers healthy and high quality living environments and provides a balanced mix of housing, community facilities, services and employment opportunities that have created a viable and sustainable community. Public perceptions of well-being and security are high, with residential areas designed to promote the safety of pedestrians, cyclists and residents of all ages and degrees of physical capacity.

Layouts have been designed to be easily accessible to emergency services and incorporate high degrees of natural surveillance.

Development respects and reflects a high quality natural environment. The landscape and biodiversity value of the area has been enhanced and protected, with precious woodland forming the heart of a system of conjoined and interlocking wildlife and habitat links bringing the countryside into the urban fringe. New habitats have been created and where existing resources were impacted by development, they have been replaced locally.

Access to the natural environment is easily and safely available, with the provision of parks, informal open space, play areas, leisure and sporting facilities an integral aspect of all forms of development.”

- 2.9 The Site is removed from the Green Belt and safeguarded, with the future allocation to be made in the context of the review of the Local Plan.
- 2.10 It is considered that the suitability of the Site for residential development has already been tested through the due process followed through the examination of the adopted WDC Local Plan (2017). We are envisaging that the Site will come forward for allocation within the South Warwickshire Local Plan (SWLP).
- 2.11 It is important to note that the Issues and Options document does not refer to the safeguarded land previously identified in the adopted WDC Local Plan. However, the table at Chapter 12 confirms that Policy DS21 “Safeguarded Land” will be addressed in the Part 1 plan due to it being considered a strategic policy for the SWLP. We discuss this further in section 3 of these representations.

South Coventry Masterplan

- 2.12 At WDC’s Cabinet Meeting on 20 April 2022, Members agreed to the Council progressing the masterplanning work, alongside key partner organisations (CCC, WCC, and University of Warwick), for the area to the north of the District and immediately to the south of Coventry, the plan enclosed at **Appendix 2** demonstrates the extent of the masterplan area. The South Coventry Masterplan would effectively see HS2 become the new Green Belt boundary.

- 2.13 The purpose of the masterplanning process will be kept under review by all the participants. However, as set out in the report to Cabinet, officers expect that it will continue to perform an important role as follows:
- To map and understand the various planned and emerging developments in the area;
 - To explore how to maximise community benefits including through improvements to green and blue infrastructure and connectivity;
 - To assist partner organisations in preparing their own masterplans for specific sites and to reflect their aspirations in the wider planning of the area;
 - To understand how the climate emergencies declared by WDC, Warwickshire County Council (WCC), the West Midlands Combined Authority and the University of Warwick should inform the future planning of this area;
 - To provide a focus for considering how best to engage with HS2 in terms of how this project can bring improvements to the area (including by linking with the HS2 Context Integration Study);
 - To provide a context for considering travel and transport improvements in the area, which should prioritise active and sustainable travel but also consider the purpose, justification and business case for the A46 Strategic Link Road;
 - To provide a framework and rationale for future business cases and bids to deliver transport infrastructure projects (e.g., road, VLR, South of Coventry/University of Warwick Railway Station);and
 - To enable, subject to wider work on growth options across South Warwickshire and any agreement within the SWLP as to the development strategy, consideration of whether, where and how this area may be suitable for further growth as part of the Local Plan.
- 2.14 Given that the Site forms part of the wider masterplan area IM Land support this exercise and have confirmed that they would be willing to partake in any discussions at a suitable stage.
- 2.15 The ongoing masterplanning work is a clear indication that growth to the south of Coventry is supported by the Councils. Furthermore, IM Land have prepared a Wider Masterplan working with CEG to illustrate how the safeguarded land at Westwood Heath can be delivered as an allocation as part of the South Coventry Masterplan proposals, which is included within the Vision Document at **Appendix 3** of these representations. We will continue to work with WDC and WCC, taking an active role as this workstream progresses.

A46 Strategic Link Road – Engagement with WCC

- 2.16 As described above, part of Policy DS20 (Directions for Growth South of Coventry) refers to *“proposals should take account of the potential for a new link road, which has*

been identified as an important means of mitigating increased traffic flows on the local and strategic road network; increasing existing strategic highway capacity; and providing an improved future strategic highway link to UK Central". It also features in the Vision for land south of Coventry in Appendix B of the adopted Local Plan.

- 2.17 The A46 Strategic Link Road is being promoted by WCC along with CCC; WDC; Coventry and Warwickshire Local Enterprise Partnership; and, Department for Transport (DfT).
- 2.18 The Strategic Link Road aims to improve accessibility to the University of Warwick and the surrounding Business Parks and other employment areas through the provision of a new road linking the A46 at Stoneleigh Junction with Westwood Heath. It will also help reduce the inappropriate use of minor roads such as Crackley Lane for traffic wishing to access the University and surrounding area.
- 2.19 WCC previously consulted on the three main options for the Strategic Link Road from 30 November 2020 to 14 February 2021. Turley submitted representations on behalf of IM to this consultation setting out concerns that the three potential options for access onto Westwood Heath Road were all located on the Site – rather than being dispersed across the wider frontage of Westwood Heath Road. A copy of these representations is enclosed at **Appendix 4**.
- 2.20 Since submission of representations in February 2021, IM and CEG, have been in discussions to agree the most appropriate access point for the link road onto the Westwood Heath Road. The current iteration of this is shown on the Wider Masterplan within the Vision Document (**Appendix 3**). This plan has been shared with WDC and WCC.
- 2.21 The responses to the A46 Strategic Link Road consultation were analysed and considered at WCC's Cabinet on 14 October 2021. The Cabinet report confirmed that feasibility works were ongoing and an Outline Business Case for the scheme was being compiled for submission to the DfT, which would make the case for the scheme and request continued support from the Government.
- 2.22 The Outline Business case was originally intended for submission to the DfT in Autumn 2021. However, CCC and WCC, in full consultation with Warwick and Stratford District Councils, took the decision to defer the application for the DfT's Major Road Network (MRM) / Large Local Major (LLM) programme funding by two years. We understand that the Councils consider that a future MRN / LLM funding submission will feature the submission of a business case for investment in a wider transport package of measures, including the A46 Link Road as appropriate. It is anticipated that the South Coventry Masterplan will incorporate the wider package of measures, and help support the future business case.

The Opportunity

- 2.23 A Vision Document for the Site is enclosed at **Appendix 3** of these representations, which demonstrates the Site's ability to deliver new homes in a sustainable location, within the early stages of the plan period, independent of the wider safeguarded site and wholly aligned to the five pillars of the SWLP.

2.24 The latest concept masterplan for the Site, included within the Vision Document, provides the following key design principles and development benefits:

- The proposed development comprises 3.7ha of residential development, amounting to approximately 130 dwellings at a density of 35 dwellings per hectare (dph).
- The development incorporates an area for the potential 2FE primary school site located predominantly within the adjacent land to the south forming part of the wider site area.
- The proposed development retains existing hedgerows along the north, west and east site boundaries and includes enhanced new public open space with new trees and landscape planting. New public open space within the development includes a central green space as well as a landscaped western green edge. This will aid social interaction and integration. In addition, this increases exposure to green spaces, enhancing health and wellbeing.
- The sustainable urban drainage strategy on the Site incorporates a new attenuation pond in the south west corner at the low point of the Site. This will also add an attractive feature to the public open space in this area.
- The development has been designed to be incorporated within the potential wider masterplan for the area, with potential to make appropriate connections and increase permeability and accessibility.
- The development includes a clear hierarchy of roads to create a legible street pattern, to assist in way finding.
- The Site will be planned comprehensively as part of the overall safeguarded area, which will include the new A46 Link Road route and an additional access to the Site from the south.
- There will be a 10% Biodiversity Net Gain provided across the safeguarded wider site area which the Site will contribute to.

Sustainability Credentials

2.25 The sustainability credentials of the Site and the proposed development have been assessed, with full details included within the Vision Document at **Appendix 3**, and the Site will assist with the following policy aspirations:

- **Climate emergency** – The development will endeavour to meet the Climate Emergency Action Programme released by WDC following the Council’s pledge to become net zero carbon by 2030.
- **Future Homes Standard** – The development will align, as appropriate, with the interim Future Homes Standard (FHS) requiring a 31% reduction in CO2 emissions over Part L 2013 or the full FHS from 2025 requiring homes to achieve a 75-80% reduction in CO2 emissions.

- **NPPF** – The development will meet the objectives of the NPPF:
 - Building a Strong and Competitive Economy;
 - Promoting Sustainable Transport;
 - Delivering a Wide Choice of High Quality Homes;
 - Requiring Good Design;
 - Promoting Healthy Communities;
 - Meeting the Challenge of Climate Change;
 - Conserving and Enhancing the Natural Environment; and
 - Sustainable Waste Management
- **SWLP** – The development will endeavour to:
 - Increase accessibility and reduce private car travel;
 - Increase energy efficiency;
 - Support renewable energy use;
 - Design for climate change mitigation and adaptation;
 - Mitigate flood risk; and
 - Mitigate biodiversity loss & maximise opportunities for enhancement.

3. Representations to Issues and Options

- 3.1 We respond to the relevant questions in respect of land at Westwood Heath Road, below.

Chapter 3: Vision and Strategic Objectives – South Warwickshire in 2050

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

- 3.2 IM agrees with and supports the overall vision and strategic objectives for the SWLP. In order to meet the ambitious vision set out in the Issues and Options document, it will be important to ensure growth is located in the most sustainable locations and aligns with the vision as closely as possible.
- 3.3 The priority for such growth should be those sites which were safeguarded in the adopted WDC Local Plan (2017). Such sites have been determined through large scale public consultation, and by an examination by an Inspector, to be suitable for development and removed from the Green Belt.

Chapter 4: Meeting South Warwickshire's Sustainable Development Needs

Question I1: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on

- 3.4 IM agree that the approach to the Sustainability Appraisal is reasonable at this stage of the proposal. However, there is now a need to progress with the wider evidence base to ensure that sufficient mitigation can be considered in the next round of the Sustainability Appraisal, which should in turn demonstrate which is the most appropriate growth option. With the absence of consideration of mitigation, the Sustainability Appraisal in its current form does not help identify the most appropriate options.
- 3.5 With regards to the Site, the findings of the Sustainability Appraisal prepared in support of the adopted WDC Local Plan (2017), which were supported and resulted in the allocation of the Site as a safeguarded site within the plan, should be recognised and referenced through the updated evidence-based documents.

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

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

- 3.6 IM agree that the Local Plan, where appropriate, should set out the requirements for strategic infrastructure where it specifically supports the growth strategy. However, it is important that the need for infrastructure identified within the Local Plan is fully supported by the underlying evidence-based documents.
- 3.7 The Site, along with others located to the south of Coventry (as part of the south Coventry Masterplan), can support the case of the proposed A46 Link Road (promoted by WDC, WCC and CCC). Furthermore, due to the overall quantum of development that could be delivered as a direct result of the proposed Link Road, any new homes within this area can assist in supporting the funding. The south Coventry Masterplan will also

form part of the outline business case in support of the link road, which will need to be submitted to the Department for Transport (DfT).

- 3.8 It should however be noted that the delivery of the Site is not reliant upon the Link Road coming forward. The Site remains a sustainable location for development adjacent to existing urban areas, where facilities and connections are already available. The emerging proposal for the Site, enclosed with the Vision Document at **Appendix 3**, demonstrate how the Site can be delivered ahead of the Link Road whilst not impeding its future delivery.

Question I4.1: Should we include a policy to safeguard specific infrastructure schemes within the SWLP?

- 3.9 See response to question I4.1, below.

Question I4.2: Please add any comments you wish to make about these specific safeguarding provisions

- 3.10 The delivery of the A46 Link Road should be safeguarded within the SWLP to ensure that, where reasonable, sufficient funding from the delivery of new homes can help support the overall costs of the road. It is anticipated that the Business Case will be submitted and approved by the DfT ahead of the adoption of the SWLP, therefore the SWLP should make sufficient provisions to ensure this key piece of infrastructure is safeguarded.
- 3.11 The Site will bring forward a new internal road as part of the development proposals, to support the delivery of new homes at this Site. The internal road will be designed to ensure it could be extended to connect to the A46 Link Road to support its delivery, as well as enhancing permeability.

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

- 3.12 It should be ensured that any policies set out within the SLWP in relation to infrastructure do not undermine the viability of development proposals.

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

- 3.13 IM support the growth of existing settlements as part of the overall strategy.
- 3.14 The area to the south of Coventry was identified as a location for growth through the adopted WDC Local Plan (2017). Therefore, safeguarded sites in this location should be amongst the first to come forward within the SWLP. Further growth to the south of Coventry is clearly supported through WCC and WDC's work to create a masterplan for this area.

Question 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

- 3.15 IM generally support the initial findings of the settlement analysis; however, it is considered that the analysis purely assesses the existing position. The maps for 'South Coventry Westwood Heath Road' at Appendix 3 of the Settlement Analysis confirm the following:

- **Connectivity:** Demonstrates that the Site currently has Grade B connectivity, with Grade A being 'best connectivity' and Grade E being 'poor connectivity'. This is due to the proximity of primary streets and existing footpaths.
- **Landform Analysis:** The 'South Coventry Westwood Heath Road Landform Analysis' confirms that there are no flooding, green infrastructure or topography constraints in delivering the Site.
- **Density Analysis:** The Density analysis confirms that the Site is immediately adjacent to an existing outer suburb (20-40 dph) and a business park, demonstrating that the development of the Site would align with the densities of the surrounding areas.

3.16 Through the masterplanning exercise set out in the Vision Document (at **Appendix 3** of these representations) IM have demonstrated that there will be opportunities to enhance the connectivity scoring to Grade A once suitable mitigation has been applied. It is considered that ahead of the Preferred Options stage of the SWLP, the settlement analysis should be reviewed to consider the impact on new development – with mitigation applied.

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

- **Option 1: Rail Corridors**
- **Option 2: Sustainable Travel**
- **Option 3: Economy**
- **Option 4: Sustainable Travel and Economy**
- **Option 5: Dispersed**

3.17 In relation to the growth options, IM consider that it would reasonable and logical to consider a range of growth options, specifically due to the quantum of development that is required throughout the plan period.

3.18 The Site that is the subject of these representations logically falls within Option 2 (Sustainable Travel) and Option 3 (Economy). It is considered that locating development adjacent to existing urban areas can ensure that growth is focused on the most sustainable locations, where facilities and connections are already available. Furthermore, such developments can then come forward within the early stages of the local plan to ensure a pipeline of housing sites.

3.19 As set out in our response to question S10, below, The Site has previously been determined by an inspector to be suitable for future sustainable development through the examination of the adopted WDC Local Plan (Adopted 2017), and subsequently removed from the Green Belt and safeguarded for development. Therefore, to support the growth options set out above, land that has been previously safeguarded for development should receive allocations within the SWLP, to be brought forward within the early stages of the plan period.

Question 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.**

3.20 IM consider that the Part 1 Plan should review and re-assess all settlement boundaries to consider the most sustainable pattern for housing growth, including the land south of Coventry. This will require the removal of land from the Green Belt, and is therefore a strategic matter for consideration within the Part 1 Plan.

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

3.21 IM generally support the broad vision and strategic objectives for the distribution of development set out in the Issues and Options document. However, to meet this vision, it is important to ensure that growth is distributed towards the most sustainable locations. When considering the proposed growth options 2 (Sustainable Travel) and 3 (Economy), the most appropriate locations for growth are those adjacent to existing urban areas, such as the land directly to the south of Coventry, where facilities and connections are already available, which includes the currently safeguarded land off Westwood Heath Road.

3.22 Sites which are safeguarded in the adopted WDC Local Plan (Adopted 2017) have already been determined by an inspector to be suitable for future sustainable development potential and therefore removed from the Green Belt. The safeguarded land at Westwood Heath Road, should be allocated through the SWLP to ensure a pipeline of housing sites and enable the delivery of new homes in the early stages of the plan period.

3.23 The findings of the Sustainability Appraisal prepared in support of the adopted WDC Local Plan (2017) supported and resulted in the allocation of the Site as a safeguarded site within the plan. This clearly supports the Site as a sustainable location for growth and should therefore be recognised and referenced through the updated evidence-based documents for the SWLP. It is also considered that the Sustainability Appraisal for the SWLP should account for sufficient mitigation, in order to accurately identify the most appropriate options.

3.24 Further growth to the south of Coventry is also clearly supported through WCC and WDC's work to create a masterplan for this area, as detailed in the introduction section of these representations. Therefore, to support the ongoing masterplanning work and ensure consistency between the Councils' workstreams, the allocation of the Site through the SWLP represents a sensible and logical approach.

Chapter 6: Delivering homes that meet the needs of all our communities

Question H1.1: 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? Yes | No | Don't Know

3.25 IM generally support the proposed trend-based approach using the 2021 census data, which has resulted in an increase of 440 homes per year in comparison with the 2014-based projections.

- 3.26 It will be important that the CWHMA authorities provide the adequate evidence and justification to support deviating from the current, and potentially future, standard method for calculating local housing need.

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

- 3.27 IM considers that there is an opportunity to increase the overall housing requirement for the plan period to help deliver a higher amount of affordable housing. Table 8.45 of the HEDNA states that WDC and SDC have a combined affordable annual need of 1,386 dwellings per year, this is a significant need and would justify a higher overall housing requirement to ensure that sufficient affordable homes are being provided throughout the plan period.
- 3.28 It is also relevant to note that constraints on the release of land for residential development, and in turn the provision of houses on that land (for sale or as affordable provision), can lead to increased house prices in an area. The Plan should therefore be focused on creating a policy environment that does not place undue constraints on sites that are allocated, thereby maintaining a supply that will in turn address issues of affordability.

Question H3a: Do not seek to include minimum space standards in a policy in the SWLP.

- 3.29 Space standards are not a strategic matter and should therefore be dealt with in any Part 2 Plan. As set out in Paragraph 002 of the NPPG Chapter 'Housing: optional technical standards', any proposed space standards will need to be sufficiently evidenced, to justify a local need for exceeding the minimum standards required by Building Regulations and an optional nationally described space standard.

Question H4.2: Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the SWLP

- 3.30 WDC and SOADC should accommodate an appropriate proportion of the emerging GBBCHMA housing shortfall to 2040 and, once established, also accommodate an appropriate proportion of the emerging CWHMA housing shortfall.
- 3.31 IM consider that that the approach to the previous CWHMA shortfall up to 2031 was dealt with successfully through the preparation of a Memorandum of Understanding (MoU) agreed upon by each of the authorities. The MoU agreed the housing need for each authority between 2011 and 2031 and that an unmet need of 17,800 homes arose from Coventry. The MoU agreed how this unmet need was to be split between the seven authorities based on functional relationships, commuting patterns and the balance of jobs. This approach enabled all the LPAs within the CWHMA to progress their Local Plans, with the last plan adopted in June 2019.
- 3.32 The CWHMA approach has been much more successful in ensuring the identified shortfall has been met, when compared to the Birmingham City Council (BCC) shortfall UP TO 2031 which was identified in the 2017 Birmingham Development Plan (BDP). The approach to date by the GBBCHMA authorities has resulted in a substantial amount of BCC's shortfall identified in the 2017 BDP, amounting to circa 6,000 homes remaining unaccounted for. The GBBCHMA approach has impacted timescales for plan making elsewhere in the MA. Since Birmingham's plan was adopted in 2017 only one authority

within the GBBCHMA has adopted a plan identifying any housing to meet Birmingham's unmet needs – North Warwickshire in September 2021. The certainty provided by a strategy agreed early on by all authorities will therefore ensure that plan making can continue without delay across the GBBCHMA and CWHMA.

- 3.33 This also needs to be considered in the context of unmet needs from other HMA authorities, including the Black Country. Although the Black Country Plan has now been abandoned, the most recent version of that plan established a shortfall of circa 28,000 homes up to 2039, this shortfall is robustly evidenced through the four councils' Urban Capacity Study Update (December 2019) and tested through the WMCA Brownfield Land Study.
- 3.34 IM consider that the Association of Black Country Authorities (ABCA) letter to the wider GBBCHMA authorities on 26 April 2022 sets out a very useful starting point for the GBBCHMA authorities in order to commence preparing a SoCG and it is considered that this approach would be suitable for the CWHMA too:
- **Reviewing the extent of the HMA** in order to understand if it represents the most appropriate geography for considering unmet needs – this is pertinent given plans from outside the HMA (i.e., Shropshire and Stafford Borough) are offering contributions to the GBBCHMA's unmet needs.
 - **Confirm the scale of the housing shortfall across the entire HMA over a period of at least 15 years** to inform the approach to be taken. This needs to consider the **remaining** unmet needs from other authorities, such as the Black Country, as it may be some of the unmet need has already been met by other GBBCHMA Councils.
 - **Reviewing the 2018 Growth Study** to understand if it remains appropriate and if there are new growth areas. This is likely to require a new study.
 - **Review of governance arrangements** between the GBBCHMA authorities in order to prepare a SoCG (an initial draft of which has been published as part of papers to Bromsgrove's Full Council).
- 3.35 Whilst reviewing the 2018 Growth Study would be a useful part of any SoCG evidence base, we are of the view this must be a fresh study that goes beyond the scope of the previous report and, similarly to the previous CWHMA approach, consider a model for distributing the unmet needs that goes beyond identifying growth areas. This must include detailed analysis and consideration of other models used by other HMA geographies for distributing unmet needs.

Question H4.3: If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?

- 3.36 The overall contribution to any shortfall should be based on functional relationships, for example with WDC and Coventry, and between Stratford and Birmingham. Once this principle has been determined, growth should then be located in the most sustainable locations within WDC and SDC. It is considered that by virtue of the functional relationships that exist at a strategic level, all key settlements and sustainable growth options will have strong links to the source of this shortfall.

Question H5: Please select all options which are appropriate for South Warwickshire

- 3.37 There are significant difficulties associated with setting a standard proportion of self and custom-build homes for all large-scale sites, due to the scale of housing development that is often required, and the diversity of housing needs and demographics between different local areas. IM considers that this approach would be more appropriate to smaller scales sites and could therefore be dealt with through the Part 2 Plans or neighbourhood planning.

Chapter 7: A climate resilient and net zero Carbon South Warwickshire

Question C10.2: Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire

- 3.38 IM supports the Council's overall goal of tackling climate change and achieving Net Zero Carbon. It is considered that directing growth to sustainable locations will assist the Councils in their endeavours to transition to a zero-carbon economy and would avoid the need for development to be brought forward in less sustainable locations elsewhere in the Districts.
- 3.39 The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Government hosted public consultations from October 2019 – February 2020 and January 2021 – April 2021 respectively on the changes to Part L, Part 6 and Part F of the Building Regulations, which subsequently came into effect in June 2022. Furthermore, Building Regulations now require housebuilders to build more resilient homes to assist the Council in achieving their targets. Any policies that are contained in the Local Plan should be sufficiently flexible to allow for a continued evolution of these policies during the Plan period.

Chapter 8: A well-designed and beautiful South Warwickshire

Question D1.1: Do you agree that this is an appropriate range of topics for a strategic design policy?

- 3.40 IM generally agree that the range of topics set out is appropriate for a strategic design policy. It is important to consider that a 'well-designed place' refers to the place as a whole, and should therefore include built form but also landscaping and planting.

Question D2:

- **Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change.**
 - **Option D2c: Develop design guides/codes for strategic development sites/locations.**
- 3.41 IM support the development of design guides for all allocated sites within the SWLP and will look to work with WDC and WCC to take an active role in producing them.
- 3.42 In relation to the safeguarded land at Westwood Heath Road, a development brief document should be developed which covers the whole of the Site area, setting out the

general parameters of design including the access connections between the land controlled by IM and CEG. This can then inform separate design guides for both the IM and CEG sites(as required) and the subsequent separate planning applications. There is also potential for the wider South Coventry Masterplan being prepared by the Councils to provide initial design parameters at a high level, to help inform the development brief and design guides.

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Question T1: Option T1b; Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy.

- 3.43 IM are generally supportive of the inclusion of guidance in respect of 20-minute neighbourhood principles in the SWLP. However, this should not be a policy requirement as the composition and functionality of a neighbourhood is in constant flux.

Chapter 12: Plan Content

Question P1.1: Do you agree with the proposed broad content of the Part 1 plan?

- 3.44 The document as drafted does not currently make any reference to the safeguarded land previously identified in the adopted WDC Local Plan. However, the table at chapter 12 confirms that Policy DS21 “Safeguarded Land” will be addressed in the Part 1 plan due to it being considered a strategic policy for the SWLP.
- 3.45 The safeguarded sites should be the first to come forward to deliver much needed housing development, as they have already been determined to be suitable for development and subsequently removed from the Green Belt. Therefore, the safeguarded land at Westwood Heath Road should receive an allocation to enable the Site to deliver new homes in the early stages of the plan period.

4. Summary and Conclusion

4.1 IM welcomes the opportunity to further engage with the development of the SWLP and their representations to the Issues and Options Consultations have the following overriding themes:

- In order to meet the ambitious vision set out in the Issues and Options document, it will be important to ensure growth is located in the most sustainable locations and aligns with the vision as closely as possible.
- The most sustainable locations for growth are those adjacent to existing urban areas, where facilities and connections are already available. This is important to consider in the context of proposed growth options 2 (Sustainable Travel) and 3 (Economy) set out within the Issues and Options document.
- Sites which were safeguarded in the adopted WDC Local Plan (Adopted 2017) have already been subject to significant public consultation, and determined by an inspector to be suitable for development and removed from the Green Belt. Therefore, the safeguarded sites, including the safeguarded land at Westwood Heath Road, should be allocated through the SWLP, to enable new homes to be delivered in the early stages of the plan period.
- The findings of the Sustainability Appraisal prepared in support of the adopted WDC Local Plan (2017), which were supported and resulted in the allocation of the Site as a safeguarded site within the plan, should be recognised and referenced through the updated evidence-based documents. It is also considered that the Sustainability Appraisal for the SWLP should account for sufficient mitigation, in order to accurately identify the most appropriate options.
- Further growth to the south of Coventry is also clearly supported through WCC and WDC's work to create a masterplan for this area. Therefore, to support the ongoing masterplanning work and ensure consistency between the Councils' workstreams, the allocation of the Site through the SWLP represents a sensible and logical approach.
- IM consider that WDC and SOADC should accommodate an appropriate proportion of the emerging GBBCHMA housing shortfall to 2040 and, once established, also accommodate an appropriate proportion of the emerging CWHMA housing shortfall.
- IM would welcome the opportunity to engage with the Councils in the development of design guides for the sites allocated within the SWLP. A development brief document should be developed which covers the whole of the safeguarded land at Westwood Heath Road, setting out the general parameters of design which can then inform separate design guides for the IM and CEG sites.

4.2 The Vision Document, enclosed at **Appendix 3**, presents the latest concept masterplan for the Site, which will provide the following key design principles and development benefits:

- The proposed development comprises 3.7ha of residential development, amounting to approximately 130 dwellings at a density of 35 dwellings per hectare (dph).
- The development incorporates an area for the potential 2FE primary school site located predominantly within the adjacent land to the south forming part of the wider site area.
- The proposed development retains existing hedgerows along the north, west and east site boundaries and includes enhanced new public open space with new trees and landscape planting. New public open space within the development includes a central green space as well as a landscaped western green edge. This will aid social interaction and integration. In addition, this increases exposure to green spaces, enhancing health and wellbeing.
- The sustainable urban drainage strategy on the Site incorporates a new attenuation pond in the south west corner at the low point of the Site. This will also add an attractive feature to the public open space in this area.
- The development has been designed to be incorporated within the potential wider masterplan for the area, with potential to make appropriate connections and increase permeability and accessibility.
- The development includes a clear hierarchy of roads to create a legible street pattern, to assist in way finding.
- The Site will be planned comprehensively as part of the overall safeguarded area, which will include the new A46 Link Road route and an additional access to the Site from the south.
- There will be a 10% Biodiversity Net Gain provided across the safeguarded wider site area which the Site will contribute to.

4.3 We trust that the information provided with these representations will be considered and we welcome the opportunity to promote the Site through the SWLP process.

Appendix 1: Site Location Plan

Appendix 2: South Coventry Masterplan Area

Appendix 3: Vision Document

**Appendix 4: Representations to A46 Strategic
Link Road Consultation (February
2021)**

Appendix 5: Heritage Statement

Appendix 6: Site Photographs

Appendix 7: Site Assessment Plans

Appendix 8: Extracts from Published Landscape Character Assessment

Appendix 9: Landscape Visual Appraisal

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