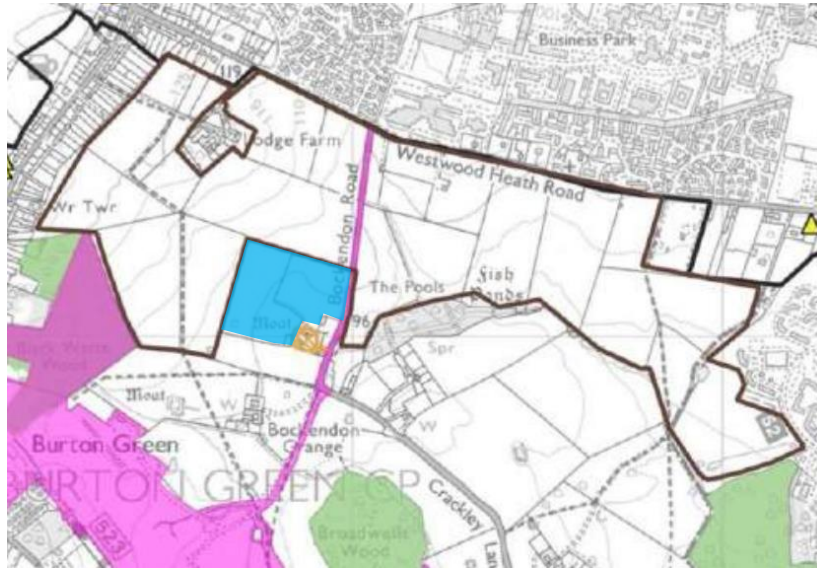


## South Warwickshire Issues and Options Consultation Crest Nicholson Response (March 2023)

Chapter 3	
Q-V3. 1	<p><b>Do you agree that the Vision and Strategic Objectives are appropriate?</b>  <b>Yes   No   Don't Know</b></p> <p>Crest Nicholson welcomes the focus in the Vision on the delivery of homes and jobs and that this will include, where appropriate, unmet need from neighbouring authorities.</p> <p>The inclusion of reference to a 'Net Zero Carbon South Warwickshire' is noted and, as set out in the accompanying Vision document for the 'Land South of Westwood Heath Road' site, Crest Nicholson is the first UK housebuilder to have its net-zero target validated by the Science Based Targets initiative (SBTi), reflecting its commitment to reducing greenhouse gas (GHG) emissions across its value chain and reaching net-zero GHG emissions by 2045. Crest Nicholson will engage with the Local Plan process as it progresses, in order to assist with ensuring that the policies relating to zero / low carbon development are deliverable.</p>
Q-11:	<p><b>Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.</b></p> <p>Having reviewed the sustainability appraisal, Crest Nicholson wish to make comments in relation to small settlement C.17 South Coventry. This area contains our client's existing committed development to the south of Westwood Heath Road and some of the proposed expansion area for this development (as set out in the Vision Document accompanying the representations).</p> <p>Firstly, Crest Nicholson support the inclusion of this area as a potential option for the consideration of development in the future, given its location on the southern boundary of Coventry and the development approved and under construction on the Crest Nicholson site to the south of Westwood Heath Road for 425 dwellings (W/22/0055) at the western end of the C.17 area.</p> <p>We however query why, when considering reasonable alternatives, the 'South Coventry' area is being classified as a 'small settlement location' and not a 'broad location at the main settlements' due to its location on the edge of Coventry. It is maintained that, whilst Coventry is outside of the Local Plan area, the South Coventry location is more akin to the 'broad locations' identified around settlements such as Leamington Spa, Warwick and Kenilworth, particularly given the commitment in the Local Plan Vision to meet, where agreed and appropriate, unmet need from neighbouring authorities.</p> <p>In relation to the boundary shown for the Coventry South location, it is noted that this omits land that has previously been removed from the Green Belt and forms part of the adopted Warwick Local Plan housing allocation H42. To maximise the potential capacity in this sustainable location adjacent to an existing committed development, and assist with reducing the amount of land that might need to be removed from the Green Belt through this new Local Plan, it is requested that the entirety of the H42 non Green Belt land is included as part of the Coventry South location. The additional land to be included is highlighted in the plan below.</p> <p>A Vision document is being submitted alongside these Issues and Options representations, which shows the potential of this blue land for accommodating additional residential development in a way which can be assimilated into the landscape context whilst not resulting in significant harm to the nearby Scheduled Monument. There is also currently considered to be capacity within the local highway network to accommodate the expansion of this existing committed site in the manner suggested.</p>



**Figure 1 – Land to be included in ‘South Coventry’ (shaded blue)**

We have reviewed the assessment undertaken by the Sustainability Appraisal in relation to C17, and have the following comments:

- Table C.17.1 ‘SA Objective 1: Climate Change’ refers to the assumption that this location could deliver a maximum of 500 dwellings. Clarification is sought that this is in addition to the already approved 425 dwellings (W/22/0055) in this location.
- Table C.17.11 ‘SA Objective 11: Accessibility’ shows scores for a number of receptors, including a negative score for ‘Local Services’. However, the methodology set out in Chapter 2 of the SA refers to ‘Food Stores’ as opposed ‘Local Services’ and states that a positive score will be given where a location is within 800m of a food store. It is noted that the approved residential scheme at Westwood Heath will deliver a food store on site and therefore the entire South Coventry location will be within 800m of the store. This accordingly ought to be given a positive score. This is of particular relevance to SA Objective 11, where the South Coventry location has a positive score in relation to all other accessibility categories. However, due to the SA taking only the lowest score into account for each objective, the ‘Local Services’ negative score is the only one included in the summary table for the Small Settlement Locations (Table 5.1).

**Q-I2:**

**Please select the option which is most appropriate for South Warwickshire**

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

*If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.*

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

*In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts*

Crest Nicholson supports option I2a. Infrastructure requirements, and how they are considered alongside the housing requirements of South Warwickshire, are key for the Local Plan. At an early stage this should be considered in relation to all proposed / potential growth areas and allocation sites (irrespective of whether these will be included in Part 1 or Part 2 Local Plans) in a joined up fashion, to ensure that there

	<p>is clarity in relation to how infrastructure is being planned for across the Local Plan area.</p> <p>The NPPF requires Local Planning Authorities (LPAs) to plan for, and allocate sufficient sites to deliver the strategic priorities of the area (see NPPF paragraph 23).</p> <p>The extent and costs for the supporting infrastructure required should be understood at an early stage.</p> <p>Crest Nicholson considers that the most efficient way for the South Warwickshire LPAs to achieve this would be to progress a single Local Plan, as opposed to a plan in two parts. This would ensure that there is suitable confidence that the infrastructure to deliver all housing supply is available and has been suitably planned for.</p> <p>It is not considered to be either necessary or efficient for the emerging Local Plan to be split into two parts. It should also be noted that the proposals being mooted through the Levelling Up and Regeneration Bill seek to speed up the Plan-making process and do not align with the sort of two-part approach being sought by the South Warwickshire authorities.</p> <p>The production of a single Local Plan would therefore be the simplest and most transparent option for enabling the South Warwickshire authorities to provide certainty and demonstrate at the earliest opportunity that it has an up-to-date deliverable Development Plan that can achieve the NPPF allocation and land supply requirements, backed up with a robust plan for the delivery of infrastructure.</p> <p>Crest Nicholson understands that the approach jointly proposed by the Councils to prepare the Plan in two separate parts, to first set out a Vision, Objectives and Growth / Strategic Policies (Part 1) followed by Detailed Policies and Strategic and Smaller Site Allocations (Part 2), is intended to enable the first part of the Local Plan to be prepared more quickly. However, this is likely to lead to specific site allocations taking longer to be adopted. The plan will only become effective once specific locations for development are identified. Without these, unplanned development may come forward and unsustainable patterns of development are at risk of being perpetuated.</p>
<p><b>Q-I3:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan</b>  <i>A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.</i></p> <p><b>Option I3b: Each District Council to produce its own Levy</b>  <i>Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances..</i></p> <p>At present both Warwick and Stratford-on-Avon district Councils have a CIL charging schedule in place, which have different charges payable for residential development.</p> <p>Our initial analysis has shown that for general residential development at present this CIL charge can vary from £82.01 per sqm. in Warwick town, to £168.51 per sqm. in the wider Stratford on Avon area.</p> <p>Therefore, Crest Nicholson consider that market characteristics are important when deciding on appropriate level of CIL levy (as evidenced by the vastly differing rates between the LPAs at present). These area-based characteristics could either be picked up through the appropriate use of zoning across this wider area under a single South Warwickshire CIL, under a joined up approach to charge and collect funds for delivering infrastructure that served this Local Plan area, or through separate CILs for each LPA as long as there is a suitable mechanism to ensure that the funds are spent in a way that reflects the joined up nature of the wider</p>

	<p>development strategy.</p> <p>Under whichever option is pursued, it is important to consider the viability of individual sites when determining the CIL levels to charge (see PPG Paragraph: 021 Reference ID: 25-021-20190901).</p>
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<p><b>Q-I4.1:</b></p>	<p><b>Should we include a policy to safeguard specific infrastructure schemes within the SWLP?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>It is noted that the SA location plans include the safeguarded land areas identified as part of the High Speed Rail 2 (HS2) project. It is considered appropriate to include a policy within the Local Plan to safeguard this land. The need for such policies should however be kept under review during the course of the production of the Local Plan to respond to the need / opportunity for the delivery of specific infrastructure schemes (e.g. A46 Strategic Link Road) to ensure that the Local Plan is appropriately planning for, and mitigating the delivery of, development requirements and impacts from both within and adjacent to the Local Plan area.</p>
<p><b>Q-I4.2:</b></p>	<p><b>Please add any comments you wish to make about these specific safeguarding provisions</b></p> <p>Any safeguarding policy for HS2, or other identified infrastructure schemes, should include a mechanism for safeguarded land to be considered for an alternative use once it is no-longer required, subject to the requirements of other Local Plan policies.</p>
<p><b>Q-I5:</b></p>	<p><b>Please add any comments you wish to make about infrastructure, viability and deliverability</b></p> <p>Infrastructure, viability and deliverability are all key considerations in the production of the South Warwickshire Local Plan. At this stage, key documents such as the Infrastructure Delivery Plan (IDP) and Housing and Economic Land Availability Assessment (HELAA) are yet to be produced, and therefore the key underlying assumptions of any viability work are unknown.</p> <p>Once evidence base documents such as the IDP and HELAA are available, the Council should undertake a detailed viability assessment to inform the preferred options consultation due to take place later this year.</p> <p>To ensure that the plan is consistent with national policy, as required by NPPF paragraph 35, any requests for contributions could be made in compliance with the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, and confirmed at paragraph 57 of the NPPF. As identified in NPPF paragraph 34 the policies and levels of contributions included within the Local Plan should not undermine the viability and deliverability of the Local Plan.</p>

<p><b>Q-S1:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced</b>  <i>Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.</i></p> <p><b>Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy</b>  <i>Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy.</i></p> <p>Crest Nicholson supports option S1a. The Councils should identify at the earliest possible stage in the development of this Local Plan which assets it wishes to protect, along with a clear rationale and justification for the selection. This should ensure that the preferred development options are not unduly constrained or compromised at a later date and thereby reduce delays to progression of the Local Plan.</p>
<p><b>Q-S2:</b></p>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.</b>  <i>Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.</i></p> <p><b>Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes</b>  <i>In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles.</i></p> <p><b>Option S2c: Do not have a policy which encourages intensification</b>  <i>This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower.</i></p> <p>Chapter 11 of the NPPF encourages effective use of land, including: taking into consideration the need for different types of housing; the desirability of maintaining an area’s prevailing character and setting; and the use of minimum density standards for city and town centres and other locations that are well served by public transport.</p> <p>Crest Nicholson therefore recognises that there is role for the intensification of</p>

	<p>development in certain areas of the Local Plan area as part of the wider strategy. However, development site character and context will vary significantly across the Local Plan area, both within town centres and outside of the town centres. Planning policies will need to be sufficiently flexible to be able to accommodate this. Accordingly Crest Nicholson supports option S2b, to enable the well-planned best use of available land, incorporating intensification where appropriate but without prejudicing the need to reflect context and character on a site-by-site basis, particularly on the rural fringes of settlements.</p>
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<p><b>Q-S3.1:</b></p>	<p><b>Please add any comments you wish to make about the Urban Capacity Study</b></p> <p>The limitations of the Urban Capacity Study (Arup 2022) are highlighted in the report. The study is a theoretical exercise only. It is not intended to conclusively establish the urban housing capacity of South Warwickshire over the period to 2050. Instead it simply indicates potential urban housing capacity. More detailed work is required to confirm actual capacity. It is important to note that the study has not been informed by the outcome of an area-wide HELAA.</p> <p>The Urban Capacity Study concludes that there is a potential 19,950 dwelling supply (including windfall sites) and states that there is an additional potential up to 3,400 dwellings capacity that could be delivered on car parks. This means that in total up to 23,350 dwellings may be able to be delivered in urban areas in South Warwickshire. This assumes that all sites identified in the urban capacity study are deliverable and viable, and that the upper number of dwellings to be delivered on car parks is achievable. All of these assumptions require further testing, including on a viability basis, once the HELAA has been published.</p> <p>This identified capacity compares to a total baseline housing need in the area of 41,975 dwellings as calculated from the trend based calculation in the HEDNA, assuming a plan period from 2025-2050. This results in a c.18,625 dwelling shortfall (which could be higher once any cross-boundary apportionment of development from Coventry and / or Birmingham have been taken into consideration). The study concludes that it is unlikely to be possible to meet current development needs without significant greenfield development. However, in light of the figures set out above, the study should categorically conclude that a significant amount of greenfield development in sustainable locations will be required.</p>
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<p><b>Q-S3.2:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.</b></p> <p><i>Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.</i></p> <p><b>Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location</b></p> <p><i>This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in</i></p>
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	<p><i>unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.</i></p> <p><b>Option S3.2c: None of these</b></p> <p>Paragraph 119 of the NPPF is clear that planning policies should make effective use of land, including as much use as possible of previously-developed or “brownfield” land. Furthermore, NPPF paragraph 120 states that planning policies should give substantial weight to the value of using suitable brownfield land. Nevertheless this should be viewed in the context of NPPF paragraph 73, which identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing villages and towns, provided that they are well located.</p> <p>Although significant encouragement is given to the development of brownfield land, it is still necessary to provide an adequate justification for the use of brownfield land in accordance with the strategy for the sustainable distribution of growth within the Local Plan area. It should not be the case that brownfield land should be considered over all other options if the specific sites are not suitable, viable, deliverable or sustainable locations for housing in line with the Council’s strategy. In particular, the deliverability of development on brownfield land can be significantly impacted by existing ground conditions and the necessary associated site clearance and mitigation works. This can result in delays to delivery and greatly increase development costs, thus negatively impacting on scheme viability and wider housing delivery across the plan period.</p> <p>To ensure a plan led approach, the Council’s strategy should be to follow a clear locational strategy that promotes sustainable development, which includes the optimisation of brownfield land where appropriate, whilst also acknowledging the role that greenfield land should play. This approach is considered to be a variation of option S3.2a.</p>
<p><b>Q-S4.1:</b></p>	<p><b>Do you think that growth of some of our existing settlements should be part of the overall strategy?</b></p> <p><b>Yes   No   Don’t Know</b></p> <p>As included in response to QS3.2, NPPF paragraph 73 identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing villages and towns, provided that they are well located. The growth of existing settlements, to take account of the existing services, facilities and infrastructure that is already in place, therefore needs to be part of the overall strategy.</p> <p>Crest Nicholson supports the existing main settlements being part of the overall Local Plan strategy and the preferred Spatial Growth Option. As set out in Option F (Main Urban Areas) of the Scoping for the South Warwickshire Local Plan (2021) there is a significant benefit arising from delivering new homes and jobs in and around the five main urban areas in South Warwickshire, as well as the edges of the adjacent urban areas of Coventry and Redditch. Crest Nicholson contends that whilst Coventry is not within the Local Plan area, it is immediately adjacent to the Local Plan area, and is connected to this area both in terms of infrastructure and commuting patterns. The consideration of land on the edge of Coventry is also important at this stage of the process given that there is a recognition that the Local Plan area may need to play a role in accommodating the sustainable growth of and / or the unmet need from Coventry.</p> <p>It is noted that ‘Evolving the Spatial Growth Options – The Story So Far’ Topic Paper (August 2022), concluded that Option F should not be taken forward as a stand-alone scenario but ‘<i>urban areas however remain a component of all the other growth scenarios</i>’ (Appendix 2).</p>



As such it is maintained that all of the Growth Options set out in the Issues and Options document should include growth along the boundary with Coventry, as shown in the adjacent figure extract from Option F.

Option F can be combined with any of the Growth Options (albeit has particular synergy with Growth Option 4: Sustainable Travel and Economy), given the ability to locate homes close to, or on public transport links to, existing jobs and potential new job locations. As set out in the Issues and Options consultation document a *'growth option where jobs and homes are co-located means that more people are given the option of living close to their place of work'* (page 96).

Crest Nicholson is keen to highlight that its site to the South of Westwood Heath Road, which is predominantly within the 'South Coventry' area has the potential to deliver additional housing within this area, as a modest extension to its existing committed housing development. Further details of this are set out in the accompanying Vision Document.

**Q-S4.2:**

**Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on**

In relation to the settlement analysis, and having reviewed the sustainability appraisal, we wish to make comments in relation to small settlement C.17 South Coventry. This area contains our client's existing committed development to the south of Westwood Heath Road and some of the proposed expansion area for this development (as set out in the Vision Document accompanying the representations).

Firstly, Crest Nicholson supports the inclusion of this area as a potential option for the consideration of development in the future, given its location on the southern boundary of Coventry and the development approved and under construction on the Crest Nicholson site to the south of Westwood Heath Road for 425 dwellings (W/22/0055) at the western end of the C17 area.

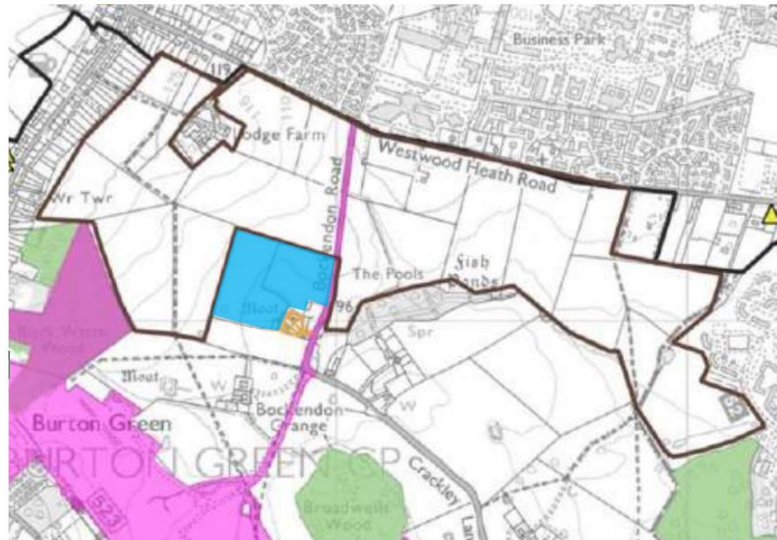
Crest Nicholson however queries why, when considering reasonable alternatives, the 'South Coventry' area is being classified as a 'small settlement location' and not a 'broad location at the main settlements' due to its location on the edge of Coventry. It is maintained that, whilst Coventry is outside of the Local Plan area, the South Coventry location is more akin to the 'broad locations' identified around settlements such as Leamington Spa, Warwick and Kenilworth, particularly given the commitment in the Local Plan Vision to meet, where agreed and appropriate, unmet need from neighbouring authorities.

In relation to the boundary shown for the Coventry South location, it is noted that this omits land that has previously been removed from the Green Belt and forms part of the adopted Warwick Local Plan housing allocation H42. To maximise the potential capacity in this sustainable location adjacent to an existing committed development, and assist with reducing the amount of land that might need to be removed from the Green Belt through this new Local Plan, it is requested that the entirety of the H42 non Green Belt land is included as part of the Coventry South location. The additional land to be included is highlighted in the plan below.

A Vision document is being submitted alongside these Issues and Options representations, which shows the potential of this blue land for accommodating additional residential development in a way which can be assimilated into the



landscape context whilst not resulting in significant harm to the nearby Scheduled Monument. There is also currently considered to be capacity within the local highway network to accommodate the expansion of this existing committed site in the manner suggested.



**Figure 1 – Land to be included in ‘South Coventry’ (shaded blue)**

Appendix 3 of the Settlement Design Analysis (January 2023) includes design analysis for the ‘South of Coventry’ location.

The Westwood Heath Road Connectivity Analysis identifies the residential area of Crest Nicholson’s committed residential development to the south of Westwood Heath Road. The connectivity of land immediately to the south and west of this (2(C) and 1(D)) should be more positively scored than it is on the basis that connections can be delivered into the road, walking and cycling network being brought forward as part of the existing committed residential development area through an amendment to the layout to this development. The opportunities for this are shown within a Vision Document which is being submitted alongside these representations.

The Westwood Heath Road Density Analysis should be updated to reflect the density of residential development that is being delivered at the committed Crest Nicholson residential development to the south of Westwood Heath Road in order to ensure that the context is being most appropriately represented.

<p><b>Q-S5.1:</b></p>	<p><b>Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options</b></p> <p>No comment</p>
<p><b>Q-S5.2:</b></p>	<p><b>Do you think new settlements should be part of the overall strategy?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>The delivery of new settlements should be <u>taken into consideration</u> as part of the wider strategy, given the potential that they offer to make a significant contribution to new housing delivery. It should however be recognised that the delivery from large strategic sites can be slow in the early stages of the new Local Plan period. As set out in the Lichfields ‘Start to Finish Report’ (Feb 2020) the average time from the validation of first application to completion of the first dwelling for a scheme of 2,000+ dwellings is 8.4 years. As such it is crucial that a sufficient number of smaller sites are identified to address the first 10 years of the plan period, and to complement the delivery of larger strategic sites and / or new settlements throughout the Local Plan period.</p>

<p><b>Q-S5.3:</b></p>	<p><b>In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>In relation to the location of new development in general, and not just limited to the locations of new settlements, and as identified in the response to Q-S7.2, Crest Nicholson is supportive of the opportunities arising from locating new development close to public transport corridors, including rail corridors. The South Warwickshire authorities benefit from a large number of railway stations which provide links to a multitude of locations across both HMAs and the wider region.</p>
<p><b>Q-S5.4:</b></p>	<p><b>If not, what approach would you take?</b></p> <p>No comment</p>
<p><b>Issue S6: A review of Green Belt Boundaries</b></p>	<p>Whilst a question is not posed for Issue S6 (Green Belt), Crest Nicholson would support the undertaking of a review of the Green Belt in order to inform the assessment of the most suitable and sustainable sites for release from the Green Belt within South Warwickshire. The planning system must make land available in the right places and for the right form of development. The undertaking of a Green Belt Review is an essential part of the process of making developable land available in the most sustainable locations. NPPF paragraph 142 highlights that when drawing up or reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account.</p> <p>National policy currently identifies that Green Belt boundaries can only be altered in exceptional circumstances through the preparation of Local Plans, and this provision is expected to remain through the current review of the NPPF, along with the Sustainability Appraisal requirement for LPAs to review and assess reasonable alternatives.</p> <p>In establishing the housing requirements for an area, particularly if affordability concerns are to be addressed at larger settlements surrounded by Green Belt, Green Belt cannot currently be used as: the sole justification to direct development elsewhere; or as the sole justification to artificially suppress housing delivery; or the rationale for distributing housing to less sustainable locations.</p> <p>The 300,000 homes a year target set by the Government, and the subsequent response to the consultation on housing numbers in December 2020, identifies Coventry and Birmingham as being two key areas for housing growth to meet the target. South Warwickshire is adjacent to the Coventry City Council administrative area. Whilst the evidence base to underpin the new Coventry Local Plan is not yet available it is expected that Coventry City Council will be unable to meet its housing needs in full and this unmet need should be considered as a key part of the strategy for the South Warwickshire Local Plan from the start of the Local Plan-making process. A Green Belt Review should form part of the evidence base to inform the Local Plan.</p> <p>The delivery on Crest Nicholson's existing housing commitment immediately to the south of Westwood Heath Road is on land previously removed from the Green Belt on the edge of Coventry, and will contribute to the housing needs of Coventry City. The current planning permission (W/22/0055) relates to most, but not all, of the existing Warwick Local Plan allocation H42. There is still land in the southern part of H42 which has been removed from the Green Belt for development which has not yet been subject to approval for residential development.</p> <p>Crest Nicholson has undertaken a further review of environmental and technical considerations relating to the remaining area of allocation H42 and considers that the additional vehicular traffic movements that might arise from further development in this location can be accommodated within the capacity of the local highway network and that the landscape and heritage impacts of development in this location can be mitigated and accommodated to avoid significant harm arising. This is set out further in a Vision Document that has been submitted in support of these</p>

	<p>representations.</p> <p>Crest Nicholson considers that it is important that the South Warwickshire Councils give full consideration to maximising the capacity of land already removed from the Green Belt for development within existing Local Plan allocations as part of the development plan strategy, along with the potential to remove further land from the Green Belt in sustainable locations in order to meet the development needs arising.</p>
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<b>Q-S7.1:</b>	<p><b>Please provide any comments you have on the emissions estimation modelling for the five growth options</b></p> <p><b>No comment</b></p>
<b>Q-S7.2:</b>	<p><b>For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire::</b></p> <p><b>Option 1: Rail Corridors</b>  <b>Appropriate strategy   Neutral   <del>Inappropriate strategy</del></b>  Further comments</p> <p>Crest Nicholson supports the an approach to development which embraces the benefits arising from accommodating development within or in close proximity to rail corridors in locations which are already sustainable or could be made more sustainable through the delivery of further development. Proximity of new development to public transport services is an important consideration in delivering a strategy which seeks to reduce carbon emissions in response to the climate change challenges.</p> <p>Crest Nicholson's site at Westwood Heath (within the South Coventry Small Settlement Location) is located 1.5km from Tile Hill railway station and as such receives a Major Positive Impact score in the SA in accordance with the criterion of being within 2km of a national network railway station. This should accordingly be taken into account in formulating the choice of growth option(s) and the choice of sites to meet these options.</p> <p>However it is noted that the South Coventry area is not shown as a growth location on the Option 1 plan. It is assumed that this is because Tile Hill railway station is outside of the South Warwickshire area. On the basis that this is an existing rail corridor that serves South Warwickshire residents and provides a connection to regular services to a range of destinations, including Birmingham New Street, Northampton and London Euston, this should be factored into the Local Plan delivery strategy. South Coventry should therefore be included as a growth area within Option 1.</p> <p><b>Option 2: Sustainable Travel</b>  <b>Appropriate strategy   Neutral   <del>Inappropriate strategy</del></b>  Further comments</p> <p>Crest Nicholson supports the an approach to development which embraces the benefits arising from accommodating development within or in close proximity to sustainable rail and / or bus travel corridors in locations which are already sustainable or could be made more sustainable through the delivery of further development. Proximity of new development to public transport services is an important consideration in delivering a strategy which seeks to reduce carbon emissions in response to the climate change challenges.</p> <p>Crest Nicholson's site at Westwood Heath (within the South Coventry Small Settlement Location) is located 1.5km from Tile Hill railway station and as such receives a Major Positive Impact score in the SA methodology in accordance with</p>

the criterion of being within 2km of a national network railway station. This development site is also within 400m of a regular bus route and the committed development that is taking place has already been designed with an internal highway network that can accommodate a bus route in the future if necessary. The expansion of this site being proposed by Crest Nicholson through this Local Plan review process can benefit from this existing and potential future sustainable travel connectivity. This should accordingly be taken into account in formulating the choice of growth option(s) and the choice of sites to meet these options.

However it is noted that the South Coventry area is not shown as a growth location on the Option 2 plan. It is assumed that this is because Tile Hill railway station and Westwood Heath Road are both outside of the South Warwickshire area. On the basis that the Tile Hill station is an existing rail corridor that serves South Warwickshire residents and provides a connection to regular services to a range of destinations, including Birmingham New Street, Northampton and London Euston, and Westwood Heath Road is an existing bus route which serves South Warwickshire residents this should be factored into the Local Plan delivery strategy. South Coventry should therefore be included as a growth area within Option 2.

### **Option 3: Economy**

**Appropriate strategy | Neutral | ~~Inappropriate strategy~~**

Further comments

Crest Nicholson supports the principle set out within Option 3 on the basis that it seeks to locate homes close to existing or potential job opportunities and the fact that this approach would facilitate the expansion of existing residential development areas that are already well connected to facilities, amenities and employment areas. This principle should form part of the chosen approach that is taken forward.

In this regard Crest Nicholson wishes to highlight that the proximity between the proposed expansion of the committed housing site to the south of Westwood Heath Road (in the 'South Coventry' area) which Crest Nicholson is bringing forward and the wider opportunities available within this location, including the close proximity to major employment opportunities at Westwood Business Park, Charter Avenue industrial Estate and the University of Warwick.

### **Option 4: Sustainable Travel and Economy**

**Appropriate strategy | Neutral | ~~Inappropriate strategy~~**

Further comments

Crest Nicholson notes that this proposed option is a hybrid of Options 2 and 3. On the basis that Crest Nicholson has expressed its support for approaches which give due consideration to locating new development in appropriate locations in close proximity to sustainable transport corridors and in locations which can offer a synergy with, or connections to, employment opportunities then the approach offered through this Sustainable travel and Economy Option is also supported in principle.

In a similar vein to the responses given to growth Options 1 and 2, opportunities in the 'South Coventry' location, notably the potential for the accommodation of additional development south of Westwood Heath Road (as an expansion to the existing committed residential development) should be factored into the approach set out under Option 4. This location is extremely well located in terms of public transport (even if some of those links are located outside of South Warwickshire) and is within walking distance of a wide range of employment opportunities. This specific location is considered to be logical in its own right, notwithstanding the potential that it can offer for assisting with accommodating unmet housing need from Coventry.

	<p><b>Option 5: Dispersed</b>  <b>Appropriate strategy   Neutral   Inappropriate strategy</b>  Further comments</p> <p>Crest Nicholson notes that the dispersed option approach could assist with enhancing the vitality of a wider range of individual settlements. The limitations of the dispersed Option are recognised and careful consideration would need to be given to the sustainability of the locations chosen for growth. Crest Nicholson is supportive of the outcome of this option insofar as the approach is supportive of the significant potential that the ‘South Coventry’ location can offer. The expansion of the existing housing commitment to the South of Westwood Heath Road, which Crest Nicholson is promoting, is within this growth location and provides an opportunity to bring forward further residential development on the edge of a large urban area, close to jobs, services and public transport links.</p> <p>The responses set out above highlight that Crest Nicholson is not wedded to a specific identified growth option. In general terms Crest Nicholson is supportive of an approach which enables sustainable development to take place in locations on the edge of existing settlements served by public transport links, with good connectivity to a range of facilities, services and job opportunities and which can also assist with meeting unmet housing need arising from other LPAs if necessary. In this context the approach taken forward should specifically acknowledge and accommodate the potential provided by land to the South of Coventry (south of Westwood Heath Road) as a suitable location to accommodate new housing development in a way which successfully integrates with the existing housing commitment in this location.</p>
<p><b>Q-S8.1:</b></p>	<p><b>For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?</b></p> <p><b>Yes   No   Don’t Know</b></p> <p>No comment</p>
<p><b>Q-S8.2:</b></p>	<p><b>For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?</b></p> <p><b>Limit of 10 dwellings per site</b>  <b>A higher limit is appropriate</b>  <b>A lower limit is appropriate</b></p> <p>No comment</p>
<p><b>Q-S9:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.</b></p> <p><i>Any revisions to existing boundaries, and consideration of which settlements have boundaries, would be saved for Part 2 plans and NDPs. The advantage of this approach is that waiting until Part 2 is likely to mean more detailed information is available – for example non-strategic allocations will likely not be made until Part 2, so waiting for these to come forward means any boundary revisions can accurately reflect new allocations. The disadvantages are that inconsistencies of approach between Stratford-on-Avon and Warwick Districts would not be addressed in the short term; and it results in a longer time period to address any out-of-date boundaries.</i></p> <p>There will be a need for Part 1 Local Plan policies to be applied in a consistent way across the whole of the Local Plan area. If policy provisions seek to control what development can occur within and outside of settlement boundaries then there would be logic to ensuring that the approach to setting settlement boundaries is also</p>

	<p>consistent across the Local Plan area. There is an opportunity for this consistency to be achieved in the first instance through the Part 1 Local Plan.</p> <p>This approach will however need to acknowledge that the South Warwickshire Councils are currently not planning to identify all of the allocations needed to meet the development requirements for the Local Plan period through the Part 1 Local Plan and that some of these will need to be met through the Part 2 Local Plan and / or through Neighbourhood Development Plans. As set out in the response to Q-12, such an approach is seen to be counter-intuitive, but if this is carried forward then the Part 1 policies will need to ensure that it is made clear that any settlement boundaries shown within the Part 1 Local Plan can be subject to review through the Part 2 Local Plan and Neighbourhood Development Plans in order to accommodate the additional site allocations deemed necessary to meet the housing needs of the Local Plan period.</p>
	<p><b>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.</b></p> <p><i>The aim would be to achieve a consistent approach across Stratford-on-Avon and Warwick Districts regarding the type or size of settlement that has a defined boundary. The main impact is on where limited infill development is permitted, and where 'open countryside' policies apply. The disadvantage is that some non-strategic land allocations will likely not be made until Part 2 plans come forward. In such cases, it becomes difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations.</i></p> <p>Please refer to the answer given to Option S9a above.</p>
<b>Q-S10:</b>	<p><b>Please add any comments you wish to make about the development distribution strategy for South Warwickshire</b></p> <p>No further comments to add to the commentary already provided in response to Q-S1 to Q-S9 and the additional commentary provided in relation to Issue S6 (Green Belt review).</p>

<b>Chapter 6</b>	
<b>Q-H1-1:</b>	<p><b>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?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>The NPPF (paragraph 61) identifies that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method, unless exceptional circumstances justify the use of an alternative approach. Such an alternative approach should reflect current and future demographic trends.</p> <p>It is acknowledged that the ONS has highlighted that the 2014-based household projections gave rise to inconsistencies with the resultant housing need figure for Coventry. The South Warwickshire Councils are in a Housing Market Area (HMA) with Coventry. In this context this current Local Plan review process provides an opportunity to consider what the need for Stratford on Avon and Warwick District Councils might be if more up to date household formation figures are taken into account within the HMA. It is understood that the approach followed through the HEDNA seeks to achieve this. Whilst the output from the HEDNA results in a slight lowering of the overall HMA need on a dwelling per annum basis, it is noted that the trend-based figures identified for Warwick and Stratford-on Avon Districts represent an increase over and above the standard method based equivalents. This is influenced by the high levels of net migration projected for these Districts within the HEDNA.</p>

	<p>It is accordingly considered to be a sensible and robust approach for the South Warwickshire Local Plan to be planning for, and identifying allocations to meet, this higher figure in order to ensure that there is a sufficient supply of homes coming forward in this area, as a minimum. Due regard should also be given through the Local Plan process to the opportunity to increase provision against this figure to both ensure that there is a sufficient supply and variety of housing sites to enable the Government's aim of significantly boosting the supply of housing (NPPF paragraph 60) to be met, but to also ensure that the issue of housing affordability within this area is also appropriately addressed.</p> <p>It should also be recognised that the unmet need arising from Coventry will not be crystallised until further evidence base reporting is published by Coventry City Council on the capacity of land within its administrative boundaries. There may therefore be a need for the South Warwickshire Local Plan to allocate additional land to assist with meeting any unmet need for Coventry, with appropriate regard given to the opportunity provided by land on the southern edge of Coventry (south of Westwood Heath Road) to assist with achieving this.</p>
<p><b>Q-H1-2:</b></p>	<p><b>If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?</b></p> <p>N/A</p>
<p><b>Q-H2-1:</b></p>	<p><b>What is the best way to significantly increase the supply of affordable housing across South Warwickshire?</b></p> <p>Crest Nicholson welcomes the fact that the Issues and Options consultation document recognises the affordability of housing across South Warwickshire as a key issue, particularly for younger people and others who work in the area on lower incomes. The need for a greater focus on affordability, tenure type, and mix of housing to be delivered in the South Warwickshire is an important aspect of delivering sustainable communities. Housing stock is the most appropriate indicator of housing supply and housing need. Where past housing delivery has not met housing need, this results in suppressed household formation in younger age cohorts and an imbalance between housing supply and housing demand. In turn, this has influenced the increasing gap between average incomes and average house prices.</p> <p>Getting this mix of homes right will maximise the beneficial impact that the delivery of more homes can bring. For example, planning for the right size homes can help address affordability and planning for specialist housing such as older peoples' housing in the right locations through allocations can have the knock-on effect of freeing up much needed family homes. It is essential that a mix is not prescriptive and is flexible and it should be recognised that not doing so will result in a mix that becomes redundant over time and harm the social outcomes it was designed to achieve. This will especially be the case over a long plan period, where flexibility will enable the mix to be best tailored to the needs of new communities across South Warwickshire. In addition, planning for more routes into home ownership, such as First Homes and Shared Ownership, will help younger people make that important first step onto the housing ladder. This objective is important to develop and sustain a mixed community to support economic activity and growth.</p> <p>The South Warwickshire Local Plan, and any associated CIL charging also needs to reflect the fact that the contributions and provisions expected from development arising from planning policy requirements should not cumulatively undermine the deliverability of the Local Plan. Robust regard should be given to this through the Local Plan viability assessment work when this is carried out. The unintended consequence of overloading development with additional technical, design and financial requirements could be that the amount of affordable housing being delivered ends up being reduced in order to make a development viable.</p> <p>Furthermore, as identified in response to Q-H2-1, the supply of affordable housing, and the affordability of housing in general, is also influenced by the overall supply of housing coming forward. The South Warwickshire Plan should accordingly be seeking to plan for the delivery of more than the minimum number of homes</p>

	<p>identified by the HEDNA to assist with this.</p> <p>It is important the solutions for addressing the affordability gap are addressed at the earliest stages of policy-making and through undertaking site assessments for allocations.</p>
<p><b>Q-H2-2:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire:</b></p> <p><b>Option H2-2a: A single South Warwickshire wide affordable housing requirement</b>  <i>A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.</i></p> <p><b>Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts</b>  <i>Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting of variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.</i></p> <p><b>Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire</b>  <i>A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the Districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial growth strategy.</i></p> <p>Crest Nicholson considers that the market dynamics and demand within the South Warwickshire area should be taken into consideration when setting the affordable housing approach. This should give regard to the data included within the HEDNA, as well as the scenario testing and analysis undertaken through the viability assessment work when this is undertaken. This may highlight that particular areas, sizes of site or types of site should be assigned a lower affordable housing figure or may show that a Local Plan wide area based approach works or that a LPA area based approach works. There is not considered to be sufficient information available in the public domain at present to be able to provide a firm answer to this question. Further evidence needs to be made available, notably with respect to viability.</p>



<p><b>Q-H2-3:</b></p>	<p><b>How should South Warwickshire best address the specialist needs for older people?</b></p> <p>Planning for a range of types and sizes homes in suitable locations, as well as homes that are capable of adaptation to respond to changing requirements, can help address affordability and provide opportunities for the housing needs of older people to be met.</p>
<p><b>Q-H3:</b></p>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.</b></p> <p><i>It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.</i></p> <p><b>Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.</b></p> <p><i>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</i></p> <p><b>Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.</b></p> <p><i>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</i></p> <p><b>Option H3d: None of these</b></p> <p>It should be noted that across South Warwickshire there is a strong demand for new homes and these sell, despite the adopted Local Plan not including policy requirements which bring in these additional Technical Standards. There is therefore not considered to be a need to introduce such standards in order to deliver homes that meet market demand. It would be for the South Warwickshire Councils to demonstrate through an appropriate evidence base that the imposition of additional Technical Standards.</p> <p>NPPF footnote 49 states that policies may also make use of the nationally described space standard (NDSS), where the need for an internal space standard can be justified. In relation to the NDSS the PPG (Paragraph: 020 Reference ID: 56-020-20150327) identifies that LPAs need to take account of need, viability and timing. In relation to the M4(2) and M4(3) standards the PPG (Paragraph: 007 Reference ID: 56-007-20150327) states that there is a need for LPAs to give regard to: the likely future need for housing for older and disabled people (including wheelchair user dwellings); size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability.</p> <p>This evidence base has not been made available to provide clear justification to support the inclusion of these additional technical standards alongside the Issues and Options consultation. Therefore as it stands Option H3d would represent the current position.</p>

<p><b>Q-H4-1:</b></p>	<p><b>Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>The shortfall being planned for through the emerging Stratford on Avon Site Allocations document to meet a previously-identified unmet need arising from the Birmingham and Black Country HMA is separate (in terms of scope, area and documentation) to the considerations underway for the South Warwickshire Local Plan. This current consultation should focus on what the appropriate strategy should be for the combined area, in the context of the wider relationships with different HMAs for the Plan period up to 2050, and should be based on the latest housing data.</p>
<p><b>Q-H4-2:</b></p>	<p><b>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 South Warwickshire Local Plan</b></p> <p>The housing need within the Greater Birmingham and Black Country HMA is still under review, following the halting of the joint Black Country Local Plan. The Black Country authorities are currently reconsidering their housing needs and how this will impact on the wider HMA. In light of this, the significant housing shortfall identified by Birmingham City Council, and the likelihood that Coventry City Council will not be able to accommodate all of its housing needs (even at the reduced trend-based level of 1,964 homes per annum), the South Warwickshire authorities will need to consider how additional unmet need from these areas could be accommodated within the Local Plan area.</p> <p>It is noted that page 109 of the Issues and Options consultation document highlights that there is a strong argument that if homes are being provided to meet needs arising in Coventry and Birmingham then those homes should be located as close as possible to the source of those needs in order to minimise travel. Crest Nicholson contends that areas should be being considered from the start of the Local Plan review process which are / could be able to accommodate unmet need. This includes established residential locations on the edge of Coventry City. There is a need for the South Warwickshire Councils to continue to monitor the housing capacity studies being undertaken in the Birmingham and Black Country HMA and by Coventry City Council to assist with identifying what appropriate contributions it might need to make to assist with meeting the unmet need.</p>
<p><b>Q-H4-3:</b></p>	<p><b>If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?</b></p> <p><i>You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question</i></p> <p>The links with Coventry City arise through commuting patterns, as well as the physical location of Warwick District on the edge of the Coventry built up area. The relationship with the Birmingham and Black Country HMA is intrinsically linked to the migration / commuting patterns. Good connectivity with the primary transport infrastructure in both instances is important, notably in relation to the sustainable travel infrastructure to provide access to the relevant, employment, leisure and community facilities, both within this external HMA and within the South Warwickshire Local Plan area. Sites for housing development should be located where this can be achieved.</p>

	<p>As identified in response to Issue 6 (Green Belt) and in response to the identified spatial growth options, a spatial distribution strategy which capitalises on opportunities provided by the existing sustainable transport network, as well as providing good connectivity between homes and employment opportunities in main towns is important. Locations that can achieve this through existing sustainability credentials, or can be made more sustainable through additional development, should be considered for allocation. This should include appropriately located land in the Green Belt or land that has already been removed from the Green Belt in order to meet development needs.</p> <p>In the case of meeting some of the housing need for Coventry, and in the context of locating development in close proximity to sustainable travel routes to Birmingham, the expansion of the committed Crest Nicholson housing site to the south of Westwood Heath Road can make an important contribution. This site is considered to be capable of providing c.50-150 additional homes over and above the current allocation for 425 units, which is currently being built out. Further details are set out in the Vision Document accompanying these representations.</p>
<p><b>Q-H5:</b></p>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.</b></p> <p><i>This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.</i></p> <p><b>Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live or on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.</b></p> <p><b>Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.</b></p> <p><i>This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of self and custom build home are made available</i></p> <p>Crest Nicholson considers that Option H5c is appropriate for meeting any identified requirement arising during the Local Plan period. The requirement for custom and self-build housing plots need to be determined on a case by case basis. The very nature of self and custom build housing means that it is difficult to plan for precise locations of delivery. Such requirements should be based on local evidence such as the self and custom build register and local eligibility test (See PPG Reference: Paragraph: 025 Reference ID: 57-025-20210508).</p>

Q-H7:	<p><b>Please add any comments you wish to make about delivering homes in South Warwickshire</b></p> <p>No further comment at this stage. There will be a need to review the position relating to the delivery of homes in South Warwickshire when more evidence is made available to inform the needs and strategy for this area.</p>
Q-C3.1:	<p><b>Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site?</b></p> <p><b>Yes   No   Don't Know</b></p> <p>It is important that new planning policy requirements are soundly based and include flexibility to enable them to respond to the specific circumstances faced by individual sites / developments in terms of development type, physical characteristics and local market economics. A carbon offsetting approach would provide an opportunity for developments to mitigate their impact against any evidenced policy requiring zero carbon development where the requirements cannot be met on site.</p> <p>However any approach relating to carbon offsetting would need to be supported by a mechanism setting out how this would be applied in practice, identification of receptor sites / schemes for the funds paid and a demonstration through the local plan viability work that this would not adversely impact on the viability and deliverability of development (as recognised by NPPF paragraph 34).</p>
Q-C3.2:	<p><b>Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?</b></p> <p>No comment</p>
Q-C3.3:	<p><b>Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire</b></p> <p>No comment</p>
Q-C4.1:	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time. <i>Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.</i></p> <p>Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments. <i>This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.</i></p> <p>Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards. <i>This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development</i></p>

	<p><i>industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.</i></p> <p>Option C4d: None of these</p> <p>In the absence of evidence being presented by the Council, Crest Nicholson supports option C4.1a. Building Regulation standards are able to change to address and accommodate best practice and the latest technology and standards being brought forward by the development industry on a comparable, national, basis. Local Plan policy is not as agile in responding to such innovation and as such is not an appropriate way to control building standards. Crest Nicholson requests that the South Warwickshire LPAs clarify the evidence they propose to rely upon to justify any proposed additional standards.</p> <p>In the absence of a robust evidence based justification there is still an opportunity for policy wording to encourage developers to exceed the requirements set out within Building Regulations to seek for individual sites and developers to deliver net zero carbon in advance of this becoming enshrined in the Building Regulations, where this is possible.</p> <p>Crest Nicholson is the first UK housebuilder to have its net-zero target validated by the Science Based Targets initiative (SBTi), reflecting its commitment to reducing greenhouse gas (GHG) emissions across its value chain and reaching net-zero GHG emissions by 2045. Crest Nicholson is already making progress in reducing GHG emissions, driving the efficient use of plant and equipment on site, trialling lower carbon technologies including hybrid generators and an electric telehandler, using alternative low carbon fuels and increasing the procurement of renewable electricity.</p> <p>To reduce emissions relating to other organisations in its supply chain, Crest Nicholson continuously reviews the design, technologies and materials used within its homes. It is also a member of the Future Homes Hub's Embodied and Whole Life Carbon Workgroup, which is developing guidance, tools and an implementation plan to support an industry-wide reduction in whole life carbon. Such measures will be introduced at the Crest Nicholson site to the south of Westwood Heath Road, to minimise the GHG impacts of the proposed development. There are opportunities for other house builders and developers to follow suit without rigid requirements and timescales being set within Local Plan documents.</p>
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<p><b>Q-C4.2:</b></p>	<p><b>What scale of development should the requirements apply to?</b></p> <p><b>Option C4.2a: All new development</b> <i>Including for example residential extensions</i></p> <p><b>Option C4.2b: Development over a certain size</b> <i>For example all developments of 1 dwelling or more, or 100+ square metres?</i></p> <p>An approach aligned to Building Regulations will apply to all development. Approaches which seek to introduce a standard which is in excess of the Building Regulation requirements will need to be appropriately justified, including through the use of a viability appraisal.</p>
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<p><b>Q-C6.1:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business-as-usual' approach to construction</b></p> <p><i>A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.</i></p> <p><b>Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.</b></p> <p><i>A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area's development needs.</i></p> <p><b>Option C6.1c: None of these</b></p> <p>The preferred option relating to carbon emissions should be informed by reference to a robust evidence base. Neither the National Planning Policy Framework nor the Planning Practice Guidance require embodied carbon emissions to be measured. The proposed policy approach does not provide any detail in relation to: the application of the embodied carbon assessment; what baseline the assessment will be measured against; and how the outcome of the assessment would be enforced. There are currently considered to be data collection issues impacting on the ability to undertake a proper Whole Life Carbon Assessment. Principally, many manufacturers are still lacking the creation and verification of data for Environmental Product Declarations. Any requirements which are over and above national policy need to be clearly evidenced, including through impacts on viability.</p>
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<p><b>Q-C6.2:</b></p>	<p><b>If a phased approach is used, what dates and thresholds should be used?</b> <i>For example, achieve 80% reduction by 2030 and 100% reduction by 2040.</i></p> <p>No comment.</p>
<p><b>Q-C6.3:</b></p>	<p><b>Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire</b></p> <p>No further comment.</p>

<p><b>Q-C9.1:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity</b>  <i>This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.</i></p> <p><b>Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity</b>  <i>Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development.</i></p> <p><b>Option C9.1c: None of these</b></p> <p>Crest Nicholson supports Option C9.1b. Option C9.1a maybe at odds with the requirement to make most efficient use of land (NPPF paragraph 125) as well as the requirement to achieve high quality design. Any such requirements which seek to limit hard standing on site need to be considered in tandem with other site requirements, such as open space provision and connectivity requirements, so the overall impact on development can be understood. The evidence base should include examples demonstrating how C9.1a can work in practice without compromising other development requirements, objectives or scheme deliverability if this option is to be taken forward.</p>
<p><b>Q-C9.2</b></p>	<p><b>Please add any comments you wish to make about climate responsive development design in South Warwickshire</b></p> <p>No comment.</p>
<p><b>Q-C10.1:</b></p>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated?</b>  <i>RCP 8.5 is a 'business-as-usual' scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.</i></p> <p><b>Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?</b>  <i>Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. <u>Stratford-on-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation</u> is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.</i></p> <p><b>Option C10.1c: None of these</b></p> <p>Further information is required on Climate Change Risk Assessments and how these would operate. Crest Nicholson wishes to avoid any need to submit a document which might replicate what is already required by other documents submitted as part of a planning application.</p> <p>However if such a document is to be required, a policy should be developed that is informed by a suitable level of evidence to ensure that it is adequately justified for</p>

	use in determining planning applications. Overall, the SWLP should not be imposing additional requirements over and above national guidance.
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<b>Q-C10.2</b>	<b>Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire</b>  No further comment.
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<b>Chapter 8</b>	
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<b>Q-D1.1:</b>	<b>Do you agree that this is an appropriate range of topics for a strategic design policy?</b>  <b>Yes   No   Don't Know</b>
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<b>Q-D1.2:</b>	<b>If no, please indicate why</b>  Any policy setting out strategic design principles should also include reference to deliverability and viability and how design choices need to be weighed up against these two key issues.
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<b>Q-D2:</b>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option D2a: Develop a South Warwickshire Design Guide</b> <i>A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.</i></p> <p><b>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.</b>  <i>This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans.</i></p> <p><b>Option D2c: Develop design guides/codes for strategic development sites/locations.</b> <i>Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.</i></p> <p><b>Option D2d: None of these</b>  A set out in paragraph 128 of the NPPF, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences in order to provide maximum clarity about design expectations at an early stage.</p>
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	<p>Such design guides / codes should be high level document and should not be overly prescriptive, thus enabling the design of each site to be considered based on its own merits and the context of the specific site. Detailed design of a site should take into account the specific technical considerations of that location which will not be fully investigated at design guide / code stage.</p>
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<p><b>Q-D3:</b></p>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.</b>  <i>This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</i></p> <p><b>Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.</b>  <i>This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</i></p> <p><b>Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.</b>  <i>This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis) and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.</i></p> <p><b>Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.</b>  <i>This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125 (e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in some places across South Warwickshire compared with the conventional approach.</i></p>
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	<p><b>Option D3e: None of these</b></p> <p>Crest Nicholson supports Option D3a, which proposes inclusion of a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.</p> <p>It is considered that this would enable a more locally tailored approach to density, which seeks to make the most efficient use of land, taking into account the specific context each site. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF. This approach could also be adapted to align with the general requirement set out within paragraph 125 of the NPPF for Local Plans to include the use of minimum density standards for city and town centres and other locations that are well served by public transport.</p>
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<b>Chapter 10</b>	
<b>Q-T1:</b>	<p><b>Please select all options which are appropriate for South Warwickshire</b></p> <p><b>Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.</b>  <i>It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.</i></p> <p><b>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.</b>  <i>This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn't warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire.</i></p> <p><b>Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.</b>  <i>This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.</i></p> <p>Crest Nicholson supports Option T1a. National policy does not currently require all developments in all locations to achieve Building for a Healthy Life accreditation or endorse the principles of a 20 minute neighbourhood. The connectivity and context of developments can be determined on a site by site basis.</p>

<b>Chapter 11</b>	
<b>Q-B1:</b>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District</b>  <i>Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed.</i></p> <p><b>Option B1b: Remove Areas of Restraint designations</b>  <i>Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.</i></p> <p><b>Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.</b>  <i>This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.</i></p> <p>No comment</p>
<b>Q-B2:</b>	<p><b>Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?</b></p> <p><b>Yes   No   Don't Know</b></p> <p><i>The Vale of Evesham Control Zone relies upon collaboration between local authorities and HGV Haulers to work effectively. If neighbouring authorities removed the policy designation then there would be little merit in South Warwickshire continuing with it in isolation. Do you agree that if Wychavon and Cotswold District Councils remove the Vale of Evesham Control Zone, that South Warwickshire should follow suit?</i></p> <p>No comment</p>

<p><b>Q-B3:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option B3a: Introduce Special Landscape Areas across all of South Warwickshire</b>  <i>Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA's refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA's within Stratford remain relevant and where any SLA's within Warwick should be located, an updated study would need to be undertaken.</i></p> <p><b>Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District</b>  <i>Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.</i></p> <p><b>Option B3c: Discard Special Landscape Areas and bolster general landscape policy</b>  <i>Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.</i></p> <p><i>A consistent approach should be applied across the Local Plan Area in order for the Local Plan to provide a clear basis for determining planning applications. There is no national requirement for Strategic Landscape Areas to be in place. There is an opportunity for the evidence base to include Landscape Character Assessments for the whole Local Plan area as an alternative.</i></p>
<p><b>Q-B4:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option B4a: Maintain the current policy approach, without the use of a buffer</b>  <i>Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.</i></p> <p><b>Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape</b>  <i>Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.</i></p> <p><i>No comment</i></p>

<p><b>Q-B5:</b></p>	<p><b>Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option B5a: Explore and pursue an integrated Environmental Net Gain Policy</b></p> <p><i>To consider Environmental net gain as a new and pioneering approach to support nature's recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice. However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.</i></p> <p><b>Option B5b: Explore environmental net gain through separate policies</b></p> <p><i>A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate policies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.</i></p> <p><b>Option B5c: None of these</b></p> <p><i>Any policy or policies relating to the operation and securing of environmental net gain need to be fully evidenced and the implications of such policies on local plan viability need to be understood. Crest Nicholson reserves the right to comment on the suitability of this as an approach once more information is made available.</i></p>
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<p><b>Q-B6:</b></p>	<p><b>Should the South Warwickshire Local Plan introduce Wildbelts designations?</b></p> <p><b>Yes   No   Don't Know</b></p> <p><i>Designate areas of Wildbelts across the Local Plan Area to support nature's recovery and the Wildlife Trust's goal to have 30% of our land and sea managed for nature by 2030.</i></p> <p><i>"Wildbelts" is not a recognised land use defined in the NPPF which Local Plans need to accommodate. Crest Nicholson requests that clarification is provided on whether the intention is that such 'Wildbelts' sites would be allocated, with the approval of a willing landowner, in order to also deliver offsite BNG, carbon offsetting and other mitigation requirements that are not able to be accommodated on development sites.</i></p>
<p><b>Q-B7:</b></p>	<p><b>Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?</b></p> <p><b>Yes   No   Don't Know</b></p> <p><i>Where possible, the SWLP will seek to signpost to relevant policies in other documents, rather than duplicating or paraphrasing these policies. It is not within the scope of the SWLP to produce its own distinct policy regarding minerals. This approach also avoids difficulties of varying plan periods for different plans.</i></p> <p><i>No comment</i></p>

<p><b>Q-B8.1:</b></p>	<p><b>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?</b></p> <p><b>Yes   No   Don't Know</b></p> <p><i>Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The 'best and most versatile' land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.</i></p> <p>As set out in footnote 58 of the NPPF 'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'. As such any such policy should refer specifically to 'significant' development. It is however questioned whether this policy needs to be included given that the approach to development on agricultural land is already included in the NPPF. It is contended that the Local Plan should not include any provisions relating to development on agricultural land that go over and above those included within the NPPF.</p>
<p><b>Q-B8.2:</b></p>	<p><b>When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?</b></p> <p>No comment</p>
<p><b>Q-B9:</b></p>	<p><b>Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.</b></p> <p><b>Yes   No   Don't Know</b></p> <p><i>Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non-designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.</i></p> <p>No comment</p>
<p><b>Q-B10:</b></p>	<p><b>Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire</b></p>
<p><b>Chapter 12</b></p>	
<p><b>Q-P1.1:</b></p>	<p><b>Do you agree with the proposed broad content of the Part 1 plan?</b></p> <p><b>Yes   No   Don't Know</b></p>
<p><b>Q-P1.2:</b></p>	<p><b>If no, please indicate why</b></p> <p>The NPPF requires Local Planning Authorities (LPAs) to plan for, and allocate</p>

sufficient sites to deliver the strategic priorities of the area (National Planning Policy Framework (2021) paragraph 23).

Crest Nicholson considers that the most efficient way for the South Warwickshire LPAs to achieve this is to progress a single local plan, as opposed to a two part plan. This would ensure that there is suitable confidence that the infrastructure to deliver all housing supply is available and has been suitably planned for.

It is not considered to be either necessary or efficient for the emerging Local Plan to be split into two parts. It should also be noted that the proposals being mooted through the Levelling Up and Regeneration Bill seek to speed up the Plan-making process and do not align with the sort of two-part approach being sought by the South Warwickshire authorities.

The production of a single Local Plan would therefore be the simplest and most transparent option for enabling the South Warwickshire authorities to provide certainty and demonstrate at the earliest opportunity that it has an up-to-date deliverable Development Plan that can achieve the NPPF allocation and land supply requirements, backed up with a robust plan for the delivery of infrastructure.