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6th March 2023

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Dear Sir/Madam,

South Warwickshire Local Plan: Part 1 – Stage 2: Issues and Options Consultation (Jan 2023)

Representations Submitted on behalf of Rockspring Barwood Southam Ltd. (Barwood Land): Land at Welsh Road West, Southam

Executive Summary

Rockspring Barwood Southam Ltd (Barwood Land) has a controlling interest in land to the north and south of Welsh Road West, Southam (Call for Sites Ref: 453); which should be allocated for development in the next consultation draft of the Local Plan as follows:

- **Land South of Welsh Road West** which could accommodate up to 190 dwellings alongside a publicly accessible riverside park to the benefit of all residents in Southam; and
- **Land North of Welsh Road West** which could accommodate up to 375 dwellings together with associated landscaped open space and land to provide for enhanced facilities at Southam College.

The Local Plan should plan for the minimum figure contained in the HEDNA. Thereafter, there is a need to plan for unmet needs from neighbouring authorities. This is in addition to the HEDNA figure.

The Local Plan should provide a strategy consistent with national policy to deliver the growth required to meet the identified needs of both Districts, together with unmet needs from neighbouring authorities.

1. Introduction

General

- 1.1 We refer to the above consultation exercise and respond on behalf of our clients, Rockspring Barwood Southam Ltd (Barwood Land).
- 1.2 Barwood Land has a strong belief in the principle of the plan-led system. In setting out our representations upon the Regulation 18 Part 1 Stage 2: Issues and Options Consultation on the South Warwickshire Local Plan jointly by the District Councils of Stratford-on-Avon and Warwick, we hope to be able to work with the Councils in order to ensure the subsequent Local Plan is fit for purpose in seeking to facilitate sustainable development that can deliver the much-needed new homes whilst also securing the provision of supporting infrastructure to ensure the creation of places where people will want to live and work in locations that are truly sustainable.
- 1.3 Barwood Land has considerable experience and expertise in dealing with and realising development schemes through the planning system.
- 1.4 In this context, we welcome the preparation of the Joint Local Plan, for which the current consultation is an initial step.
- 1.5 The Local Plan should provide a strategy consistent with national policy to deliver the growth required to meet the identified needs of both Districts, together with unmet needs from neighbouring authorities.
- 1.6 Our comments have been informed by a review of the background documents which accompany the consultation exercise (the 'Technical Evidence'), including the Sustainability Appraisal.
- 1.7 We note the ongoing work by the Council in relation to a significant range of technical matters. This includes the Housing and Economic Land Availability Assessment ("HELAA") and a Landscape Character Assessment. We welcome the opportunity to comment upon the additional evidence base as and when studies are made available.

1.8 Our representations are submitted in response to the following chapters of the consultation draft Local Plan:

- Chapter 4: Sustainable Development Needs
- Chapter 6: Delivering Homes
- Chapter 7: A Climate Resilient South Warwickshire
- Chapter 8: A Well-Designed South Warwickshire
- Chapter 10: A Well-Connected South Warwickshire

1.9 As set out in the Executive Summary above, Barwood Land has a controlling interest in land north and south of Welsh Road West at Southam, which site(s) we are promoting as a housing allocation.

1.10 Our detailed representations are set out below. They are accompanied by the following particulars:

- Vision Statement (Feb 2023) (Node)
- Highways and Accessibility Technical Note (Stantec) (Feb 2023)
- Archaeology & Heritage Assessment (BSA Heritage) (March 2023)
- Heritage Technical Note (BSA Heritage) (March 2023)

1.11 We have also responded to individual questions on the Consultation Portal.

2. Deliverable Opportunity for Housing Growth on land north and south of Welsh Road West, Southam

Context

2.1 Whilst it is noted that the consultation document states (page 2) that “Land which was submitted in the previous Call for Sites exercise in 2021 should not be provided again unless there are proposed changes to the boundary or the proposed use”, additional technical work has been undertaken on the land parcels which we consider relevant to Council’s assessment of the sites. Thus, these representations highlight and emphasise the suitability, availability and achievability of the land controlled by our clients north and south of Welsh Road West, Southam (Site Ref 453).

- 2.2 In doing so, we wish to highlight areas where the Council's evidence base does not reflect the thorough technical work undertaken by our client which confirms the suitability, availability and achievability of the land north and south of Welsh Road West, Southam.
- 2.3 The thorough technical work accompanying our representations demonstrates that the land is appropriate for inclusion as an allocation for delivery of between 140 to 190 dwellings on the southern parcel and between 280 to 375 dwellings on the northern parcel (based on density range of 30-40dph). Development of the site(s) can come forward as an integral part of the role to be played by Southam as a Main Rural Centre in helping to meet identified housing needs, in a sustainable location, during the plan period.
- 2.4 Focusing some of the housing growth at Southam would contribute to sustainable patterns of development in helping to meet identified housing needs within the South Warwickshire area during the plan period (including unmet needs from neighbouring authorities (especially the Cities of Birmingham and Coventry)). Such an approach would acknowledge the suitability of Southam for growth due to its range of local services and quality public transport services to other towns within the plan area and beyond including Leamington Spa and Rugby.
- 2.5 Furthermore, and as detailed below, our clients control land which will enable the expansion of educational facilities in the town, further enhancing its suitability for growth. The potential for schemes to deliver additional educational capacity is highlighted as an important factor in considering the scope of towns and villages to grow and the ability of our clients to achieve this for Southam should be recognised in its acknowledgement of a location for further growth.
- 2.6 Our representations are accompanied by two site submissions for land on the western side of Southam which have previously been promoted through the preparation of the Stratford-on-Avon specific Site Allocations DPD; and the Scoping & Call for Sites Consultation for the South Warwickshire Local Plan undertaken in May 2021.

Promoted Site(s)

- 2.7 Land controlled by Barwood Land extends to approximately 30ha and comprises two land parcels as follows:
- **Parcel 1 – Land South of Welsh Road West** which could accommodate approximately 140 dwellings at 30dph or approximately 190 dwellings at 40dph; alongside a publicly accessible riverside park to the benefit of all residents in Southam; and
 - **Parcel 2 – Land North of Welsh Road West** which could accommodate approximately 280 dwellings at 30dph or approximately 375 dwellings at 40dph; together with associated landscaped open space.
- 2.8 The sites have been included in the Councils' 'List of Call for Sites Submissions December 2021' under Site Ref: 453.
- 2.9 The land comprises an available, suitable and deliverable opportunity to accommodate housing needs (both market and affordable), in a sustainable location, within walking distance from the town centre. There are no landscape and/or technical constraints to bringing the land forward for development in the early stages of the plan period, and/or in helping to meet a shortfall in the five year supply of deliverable land.
- 2.10 For the avoidance of doubt, the development opportunity afforded by the land north and south of Welsh Road West can come forward independently of one another, or as a comprehensive opportunity to be masterplanned as a whole.
- 2.11 The land has inherent sustainability merits which make it suitable for residential development, and in our view represents a development opportunity providing a logical rounding off to the western edge of Southam on land north and/or south of Welsh Road West.
- 2.12 The development of the sites at Welsh Road West, Southam can make an important contribution towards achieving sustainable patterns of growth, especially with respect to the emerging aspirations relating to 20-minute neighbourhoods, particularly that associated with Southam (as referenced in Chapter 10 of the Regulation 18 document (Issue T1)).

2.13 The benefits of allocating the land parcels for housing development north and south of Welsh Road West, Southam, are manifest. The benefits are set out below.

Overview

2.14 Informed by the technical work submitted in respect of landscaping, highways and sustainability matters, we consider that both parcels north and south of Welsh Road West are suitable for identification as a housing allocation in the emerging Local Plan.

2.15 The accompanying Vision Document explains how the land parcels could be developed as follows:

Land South of Welsh Road West:

- Approximately 140 - 190 dwellings
- Access from Welsh Road West
- Housing parcels well-related to the existing settlement
- Landscape buffer to the west
- Provision of a landscaped and publicly accessible riverside park; and enhanced pedestrian access

Land North of Welsh Road West:

- Approximately 280 - 375 dwellings
- Access from Welsh Road West
- Housing well-related to the existing settlement form (including the Taylor Wimpey development to the north), creating a new and defined edge to Southam
- Potential to assist Southam College with future expansion plans and/or assist in managing conflicts between the school and the leisure centre
- Direct pedestrian / cycle links to the College via the playing fields, negating the need for pupils to travel to school by car or along Welsh Road West
- Landscape buffer to the west
- Public open space; enhanced access

2.16 Collectively the two parcels could provide between c. 420 to 565 dwellings, to include a mix of house sizes and types as well as policy-compliant levels of affordable housing provision.

2.17 Where justified in accordance with paragraph 56 of the NPPF and Regulation 122(2) of the CIL Regulations 2010, financial contributions to be secured as part of a future planning permission would contribute towards improving services and facilities in

the area; whilst the provision of a publicly accessible riverside park would enhance the setting of the town whilst also benefiting both existing and future residents in terms of providing a new opportunity for outdoor leisure and recreation.

2.18 Additional benefits include the provision of a new high-quality gateway into Southam from the west, opportunities to improve bus services and connectivity/sustainability for new and existing residents in this part of the town. Traffic calming measures can also be incorporated, with reduced speeds as well as improved walking/cycling links.

2.19 The site is located adjacent to the College for easy and sustainable access for education, with possible opportunities to support improvements in the education offer. For example, following direct discussions with the College, it is our understanding that the school aspires to having a new sixth form block and SEND provision, the development of which would require the loss of playing field space. In line with Sport England guidance, this would require re-provision. Our client owns all undeveloped land surrounding the College and is therefore in the unique position to be able to assist in facilitating these requirements. We would be very pleased to discuss these matters in further detail with the Local Plan team and Education Authority.

2.20 On the basis of the foregoing, and as a whole, the site represents a development opportunity that could deliver substantial and wide-ranging public benefits.

2.21 As set out in the introduction above, the land parcels are available as single development sites that can come forward independently of one another, or as a comprehensive opportunity to be masterplanned as a whole. However, we would stress that there are considerable public benefits associated with the comprehensive development.

Highways and Sustainability

2.22 As set out in the accompanying Highways and Accessibility Technical Note prepared by Stantec, the land to the north and south of Welsh Road West adjoins the Southam built up area and represents one of the most sustainable locations in helping to meet the Plan area's housing requirements as well as any unmet needs

from neighbouring authorities including the cities of Birmingham and Coventry as explained below.

- 2.23 The sustainable and accessible location of the land is further acknowledged at paragraph 6.7.6 of the adopted Stratford-on-Avon Core Strategy which recognises Southam's role as acting as a service centre for the eastern part of Stratford-on-Avon District together with the adjoining areas of Rugby District. It is therefore appropriate to ensure sufficient housing is delivered in Southam to safeguard its role as a service centre and maintain the viability and vitality of existing services consistent with paragraph 78 of the NPPF.
- 2.24 The whole plan area also has strong relationships with both the cities of Birmingham and Coventry through its inclusion of the housing market areas associated with both places.
- 2.25 Stantec has prepared a Technical Note in support of the merits and suitability of developing the land in the manner proposed having regard to highways, sustainability and access considerations.
- 2.26 The Technical Note includes a clear conclusion in relation to the suitability of developing the land parcels in the context of these considerations.
- 2.27 This includes the ability of the development to potentially fund an extended bus service that would further enhance the sustainability merits of the wider area, thus contributing to sustainable patterns of growth. It is also concluded that a safe means of access can be provided to the parcels and that they are within walking distance from local services and facilities.
- 2.28 Development on land north and/or south of Welsh Road West offers a unique opportunity to provide for housing growth adjoining Southam College. Not only would pupils from the scheme be able to walk to school, but the allocation of either of the plan parcels (north or south of Welsh Road West) provides opportunities to enable the expansion of the College (as discussed above).
- 2.29 Overall, development of the sites will result in significant sustainability benefits to the wider community (residents and College pupils), including, but not limited to,

reduced traffic speeds through traffic calming, improved accessibility via enhanced foot and cycleway provision and extended and enhanced bus services.

Flood/Drainage

- 2.30 As explained in the Vision Document, the land is within flood zone 1 and development for up to c. 565 dwellings can be satisfactorily achieved in relation to the proposed surface water and foul drainage strategy.

Landscape

General

- 2.31 Se set out in the Vision Document, the landscape-led approach to the scheme design has been informed by a thorough review of the landscape character of the sites and surrounding area.

Land South of Welsh Road West: Masterplan Approach

- 2.32 The Masterplan approach has been informed by a thorough landscape appraisal. As a result, the illustrative layout provides for the retention of feature trees and hedgerows both within and on the boundaries of the site whilst also proposing new structural planting to provide for a significant amount of green infrastructure which helps to assimilate the development into the wider landscape character comprising dwellings interspersed with trees/landscaping.
- 2.33 The proposed development can be accommodated without material impact upon the character of the area or the visual amenity of public vantage points.
- 2.34 The peripheral areas around the edges of the residential areas have been designed to create a soft edge to the development, respecting the site's edge of settlement location.
- 2.35 A wide green corridor is provided within the residential part of the development, which provides a quiet area of land. It incorporates the existing hedgerows and will be part of a sustainable urban drainage system. Buffer planting along the western boundaries will screen the site from the wider countryside to further to the west.

2.36 The Riverside Park is the principal area of publicly accessible open space, designed to be used by residents and the wider community. It is proposed as a large (circa 5ha) area of public open space with an area of wildflower meadow towards the western site boundary and an area of managed grassland for informal recreation.

2.37 The Riverside Park will also secure biodiversity enhancements. Ecological survey work undertaken to date has identified that within the site there are no habitats of county, regional, national or international nature conservation importance.

2.38 The Riverside Park could provide a range of public, recreational and ecological benefits, including as follows:

1. A large circa 5ha publicly accessible open space

2. A **Riverside Park trail** (to include provision of information boards along a riverside trail highlighting the wildlife of the Stowe Valley. They could also provide information relating to local heritage, the wetland and aquatic habitats, grasslands and meadows and orchard being provided within the park. The path will also take people past the Holy Well scheduled and listed monument beyond the south-eastern corner of the site. This recreational resource could also provide educational benefits linked to local schools)

3. **Tree planting** (planting of small groups and scattered parkland trees within the Riverside Park reflects the character of the Stowe Valley and the parkland at Stoney Thorpe and ties in with the local landscape. Whilst softening and filtering views towards the built edge, the trees are arranged so as to allow for the continued enjoyment of elevated views across the Stowe Valley and Stoney Thorpe Native species used to strengthen the landscape structure, soften the built edge and provide foraging for birds and bats)

4. A range of biodiversity enhancements

5. A trim trail/play area

6. Community orchard

7. Ponds and wetlands

2.39 Development of the Site provides a unique opportunity to secure a Riverside Park as a public asset for the town.

2.40 The proposed development will include measures to enhance the nature conservation interest of the site, through the creation of new areas of 'habitat'. This will maintain and enhance opportunities for wildlife habitats in the local area. In

addition, the existing trees and hedgerows are to be retained and enhanced with appropriate species, which will have further ecological benefits providing a greater mitigation of the potential visual impact of the scheme.

- 2.41 Overall, the landscape assessment of the proposed development concludes that the scheme will have a long-term **moderate beneficial** effect on the landscape character. This is in part due to the Riverside Park proposals which will enable the enhancement of degraded aspects of the landscape and provide a wide range of landscape, green infrastructure and recreational benefits.

Land North of Welsh Road West: Masterplan Approach

- 2.42 Development within the eastern part of the site would relate to the existing settlement edge on the valley sides, tying-in with the Lilley Meadow development to the north. Containing development within the existing field pattern and reinforcing hedgerows and hedge tree planting would preserve the landscape structure.
- 2.43 As illustrated in the Vision Document, there would be opportunities to deliver substantial new woodland copse long with planting and tree belts to strengthen the field hedgerows on the slopes of the Itchen Valley. This reflects the published landscape guidelines for the area and would tie-in with woodland along the Itchen Valley to the west and south west of the Parcel.

Landscape Summary: Both Parcels (North and South of Welsh Road West)

- 2.44 Some key design principles for the development of the Parcels to the west of Southam have been developed through the analysis of the landscape character and sensitivity. These have been incorporated into the Framework Masterplan for both Parcels and include the following:
- Characteristic woodland copses and tree belts to boundaries to strengthen landscape structure, soften development edge and filter views;
 - Hedgerows retained through development parcels within green corridors, providing opportunities to connect through the site and biodiversity and landscape benefits;

- Setting properties beyond a soft, well treed edge. Includes opportunities to soften the defined edge formed by properties above the Stowe Valley;
- Creating a new, positive gateway at the entrance to Southam on Welsh Road West. Properties fronting the road, set-back beyond tree and hedgerow planting; and
- Riverside Park wrapping around the edge of the development, connecting with existing recreation routes and forming a circular work to the south and west of Southam. Opportunities to manage the park and open space areas for biodiversity and wildlife gain whilst retaining the open aspect to the lower slopes of the Stowe and Itchen valleys.

2.45 As the Vision Document explains, both Parcels could be delivered together to provide a comprehensive development that respects the character of the settlement edge and incorporates a robust landscape structure providing enhancements to the character of the Itchen Valley and agricultural landscape to the west of Southam, whilst providing substantial areas of Green Infrastructure and open space managed for access and wildlife.

2.46 Development of the Parcels, both independently or together as part of a wider scheme offer opportunities to provide enhancements to the landscape structure and provision of new landscape features including woodland and trees in line with guidelines set out in the Warwickshire Landscape Character Assessment.

2.47 A substantial benefit of development of each of the parcels individually is that both offer the potential to provide large areas of land provided with public access as a riverside park, incorporating new links to the surrounding Public Rights of Way network and connecting with Southam and the wider countryside. In addition to the amenity benefits, the parks offer opportunities to be managed for wildlife delivering biodiversity enhancements.

Heritage

2.48 As explained in the accompanying Archaeology & Heritage Assessment, designated heritage assets including listed buildings and Southam Conservation Area mostly lie at some distance from the proposed development and the site does not currently enhance their significance. Given level topography, intervening vegetation and built form, none of their settings would be adversely affected.

2.49 The Holy Well, which is both listed and scheduled, lies immediately south east of the site. Although this feature is of county significance, vegetation screens it from the site. Modern development lies close by and the open field system and meadows which would have formed its original setting have been enclosed. Nonetheless, the agricultural fields of the undeveloped valley of the River Stowe surrounding the well, including the south easternmost site field, do enhance the well's historical significance. Much of the adjacent field would ideally be left as open space and the developed edge of the site should be landscaped.

2.50 The heritage context has informed the vision for the site, with the proposed development parcels respecting the setting of designated heritage assets.

Benefits

2.51 Development of the land North and South of Welsh Road West for housing secures many benefits, including as follows:

- Delivery of up to circa 565 dwellings (including policy-compliant affordable provision)
- Potential to assist Southam College with future expansion plans and/or assist in managing conflicts between the school and the leisure centre
- Aiming for provision of at least 10% Biodiversity Net Gain (with initial results showing a BNG in excess of 60% when using the DEFRA Metric)
- Provision of high-quality areas of publicly accessible open space.
- Provision of new and enhanced pedestrian and cycle links.
- All new homes to be within walking and cycling distance from the town centre.
- The potential to contribute towards an enhanced public bus service to serve the proposed development and existing homes in this part of Southam.

3. Chapter 4: Sustainable Development Needs

Introduction

3.1 Chapter 4 of the consultation draft Local Plan references the findings of the Sustainability Appraisal (“SA”) and sets out to promote a sustainable pattern of development that seeks to meet the needs of South Warwickshire aligned with the provision of supporting infrastructure and improvements to the environment.

3.2 Our comments upon Chapter 4 of the consultation draft Local Plan may be summarised as follows:

- **Issue I1: The land parcels controlled by Barwood Land should be assessed in the SA separate from Broad Location B.22.** This would result in a far more positive assessment against the SA objectives.
- **Issue S7: We support Growth Option 2,** to include the allocation of land to the west of Southam (Site Ref: 453) as an allocation for up to c. 565 dwellings.
- **Issue S9: Revise the settlement policy boundary for Southam, to include land to the west of the town.**

Issue I1: The Sustainability Appraisal

Overall Methodology

3.3 As part of the assessment undertaken to inform the spatial growth options to be included in the Issues and Options consultation, the Sustainability Appraisal (“SA”) included an assessment of 32 broad locations for up to 2,000 dwellings at the main settlements.

3.4 It is our view that the methodology adopted in the SA is fundamentally flawed. Indeed, in terms of the reasonable alternatives there is no explanation as to why a figure of 2,000 dwellings from a single location has been applied to the assessment of potential development locations. This seems to represent an arbitrary quantum of development and an arbitrary approach to assessing the merits of one or more

locations. Importantly, the methodology also fails to consider the opportunities afforded by smaller land parcels in the main settlements, which cumulatively could provide a total of 2,000 dwellings and would likely lead to faster overall delivery and a better range of housing.

- 3.5 Taking Southam as an example, there is no justification in the SA as to why sites/locations capable of delivering 2,000 dwellings is the only approach considered for the settlement. For example, why is it so important to include all housing for Southam on a single site? Why have smaller strategic sites (i.e. those capable of delivering 500+ homes) not been considered in Southam, as they have been at other settlements?
- 3.6 We would also raise that the 'broad locations' (BL) are so extensive in size, that to assess them as 'one site' is absolutely meaningless. For example, the 'Southam Northwest' broad location is some 115ha which could likely support the delivery of c. 4,000 dwellings and arguably therefore should have been divided into two under the SA methodology. However, as it has been considered as one entity, the scores attributed to it through the SA are simply not robust when determining the acceptability of parcels within the BL as being suitable for development.
- 3.7 In the circumstances, the SA clearly cannot claim to be robust or to have assessed the reasonable alternatives to any level of adequacy.

SA Assessment of Southam

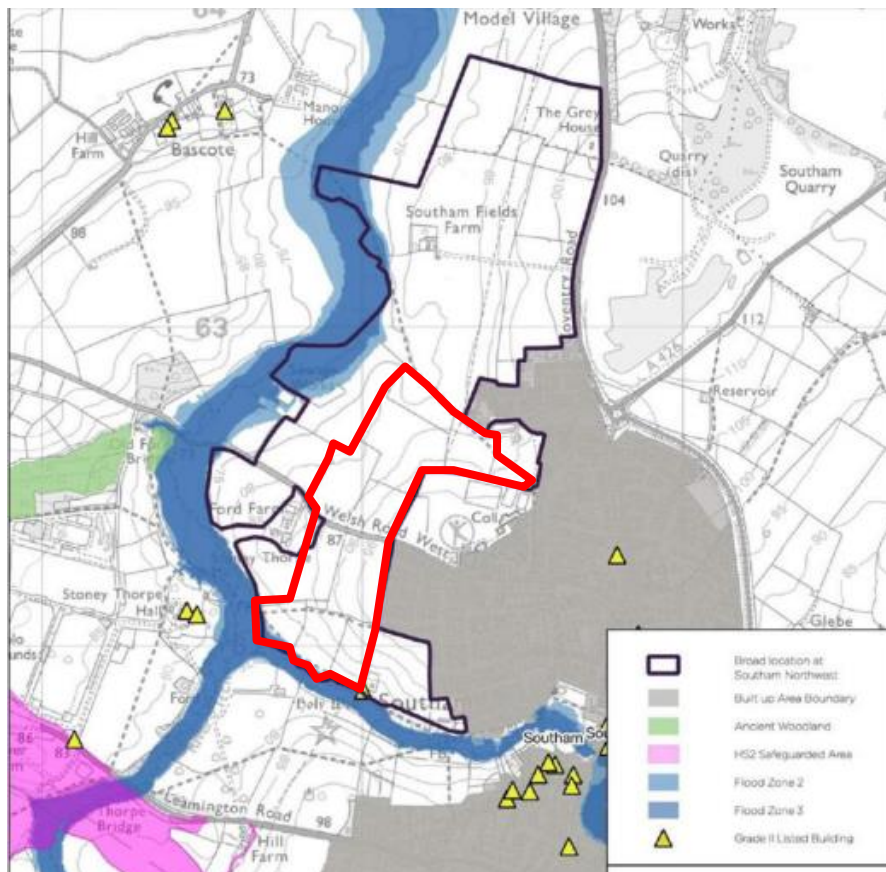
- 3.8 The land parcels controlled by Barwood Land to the west of Southam were assessed under Broad Location B.22 – Southam Northwest.
- 3.9 As stated above, this BL is some 115ha in size and thus the SA analysis fails to carry out robust assessment of land parcels within this extensive Broad Location.
- 3.10 The land parcels controlled by Barwood Land form a much smaller part of Area B.22 (although are still capable of delivering some c. 565 dwellings) and have different characteristics and locational merits to the wider areas of land included in the assessment. Consequently, we are of the view that the scores assigned to Barwood's sites within the SA are completely meaningless and are not grounded in reality.

3.11 Due to the SA's flawed methodology, **the land parcels controlled by Barwood Land should be assessed separately from Broad Location B.22** in order to get a true understanding of the suitability of the site for strategic residential development. We have therefore undertaken this exercise below which emphasises the concerns/negative scoring included in the SA for Broad Location B.22.

3.12 The extent of north-west Southam assessed in area B.22 of the SA is illustrated in Figure 1 below, with our client's land edged red.

Figure 1.

Extract of Assessment parcel B.22 in Sustainability Appraisal – land north west of Southam with clients land edged red



3.13 Figure 2 below comprises an extract from the illustrative masterplan for our client's land, which demonstrates how a smaller part of Broad Location B.22 could be developed in a sympathetic manner for up to c. 565 dwellings.

Figure 2.

Extract of illustrative masterplan for delivery of between 420 and 565 dwellings on land off Welsh Road West, Southam.



Observations upon the SA Objectives for Broad Location B.22

3.14 We now set out our assessment of the analysis contained in the SA for Broad Location B.22 as it relates to the 13 SA objectives.

SA Objective 1: Climate Change

3.15 Whilst the SA highlights a concern about an increase in emissions which could partially be resolved through supporting 20 minute neighbourhoods. This fails to acknowledge the merits of our client's land in terms of its proximity to the existing primary and secondary schools in Southam alongside the facilities of the town

centre. These are all within 1km of the site and consequently can contribute towards this objective.

3.16 Providing for housing allocations to the west of Southam is inherently more sustainable in pedestrian and cycle terms than proposing the eastwards expansion of the town, beyond the A423 which operates as a physical barrier to safe and convenient connections to the town centre.

3.17 Furthermore, development on our client's land off Welsh Road West would help support the vitality and viability of existing services in the town centre which is also a benefit to existing residents further demonstrating attainment of the principles of the 20-minute neighbourhood.

SA Objective 2: Flood Risk

3.18 The SA indicates that flood risk is not a factor which limits development to the north west of Southam. This is acknowledged and therefore not considered further.

SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

3.19 With respect to biodiversity and related matters, the SA identifies potential impacts with respect to Ancient Woodland and Local Wildlife Sites. However, our client's land is not subject to these designations/constraints and therefore this is not relevant to the assessment of the site. In the circumstances, the land controlled by our client would receive a positive score for this SA objective.

SA Objective 4: Landscape

3.20 The SA identifies a number of matters with respect to the impact of this Broad Location on the landscape, including with respect to landscape sensitivity.

3.21 The comparative landscape assessment prepared by Incola in July 2022 which accompanied the response to the consultation by Stratford-on-Avon District Council on its Draft Site Allocations document provided a review of the landscape sensitivity

work which the authority relied upon¹. As an updated landscape sensitivity assessment and character assessment is in preparation by the authorities, it is not considered appropriate to rely upon the findings of the earlier appraisal. This is for the reasons as detailed in paragraphs 3.8 to 3.10 of the Incola assessment, which state as follows:

Since the publication of the LSA in 2011, there has been a significant amount of new housing permitted and constructed, including that on land adjacent to site SOU.11 at Lilley Meadow to the north / northwest of the town and at Manders Croft, within the Stowe Valley east of site SOU.10.

The development at Lilley Meadow lies within parcels assessed by the LSA as being of a High and High / Medium landscape sensitivity to housing development, including parcel SOU10 within which the sites north and south of Welsh Road West being promoted by Barwood Land are situated.

It is therefore clear that the Council has not previously considered the findings of the LSA to be an absolute constraint to development at Southam on land assessed as being of a high landscape sensitivity. Importantly, it also highlights that the automatic discounting of sites SOU.10 and SOU.11 from further consideration as reserve housing sites due to landscape sensitivity was fundamentally flawed.

3.22 The Incola Assessment references the draft masterplan previously provided and within paragraph 3.14 states:

Land parcel So10 assessed by the LSA is considerably larger than the Barwood Land sites north and south of Welsh Road West, extending westwards into the Itchen Valley. As demonstrated by the masterplan at Appendix 2, there are opportunities to develop land within the sites north and south of Welsh Road West, either individually or together, in a manner which respects the sensitivities associated with the wider views, sloping landform, setting of Holy Well, field pattern and tree and hedgerow cover.

3.23 It is therefore clear that the conclusions of the SA with respect to the north-western quadrant at Southam does not apply to our client's site. Consequently, having regard to this objective, **the land off Welsh Road West would be appropriate.** Again, this would be assessed as positive in a refined SA.

¹ Landscape Sensitivity Analysis 2011

SA Objective 5: Cultural Heritage

- 3.24 The SA identifies a number of factors which need to be resolved with respect to heritage impacts. This includes the Grade II Listed Buildings of Holy Well and Stoney Thorpe Hall alongside the Scheduled Ancient Monument of Holy Well.
- 3.25 It is acknowledged that our client's land south of Welsh Road West is close to these heritage assets. A planning application for up to 175 dwellings was previously considered by the Council (LPA Ref: LPA ref 17/01254/OUT). The officers delegated report details the assessment of impact upon heritage assets. The assessment (page 13) was:

Policy CS.8 states that proposals will be of high quality and sensitive to the historic context. The level of harm will be assessed against public benefit.

Considerable importance and weight should be given to the duties set out in the Planning (Listed Buildings and Conservation Areas Act 1990, when making decisions that affect listed buildings and conservation areas respectively. These duties affect the weight to be given to the factors involved. The decision of Barnwell Manor was that decision-makers should give 'considerable importance and weight' to the desirability of preserving the setting of listed buildings and when carrying out the balancing exercise. Even when the harm to heritage assets is less than substantial, the balancing exercise required by national policy cannot ignore the overarching statutory duty imposed by Section 66(1). It is considered that "preserving" means doing no harm; there is therefore a strong presumption against granting planning permission for any development which would fail to preserve the setting over heritage assets.

Listed Buildings

The Conservation Officer has identified two listed buildings near to the site which could be affected by the proposals, namely Stoneythorpe Hall and the Holy Well, which is also a scheduled monument. In respect of Stoneythorpe Hall he has identified only a very minor impact on its setting, and insufficient harm to count as 'less than substantial' in NPPF terms.

For Holy Well, the northern part of this site, the housing element, would be sufficiently removed to restrict harm to its setting. The restricted harm that is caused would mainly be through noise and lighting from this area. Of greater concern is the southern part of the site, adjacent to the Holy Well, which is identified as being for a Riverside Park. The open agricultural fields surrounding the Holy Well make a significant contribution to its setting and concern is

raised at the proposals to replace this without more contrived environment. Notwithstanding this, a riverside park with minimal intervention to the existing setting of the Holy Well is still possible given the outline nature of the application and, the potential harm can be minimised to such an extent as to not trigger paragraph 134 of the NPPF.

Conservation Area

The application site is approximately 300m from the edge of Southam Conservation Area (375m from the residential element of the proposal). Given this distance and the topography of the land between the two areas, I do not consider that the proposed development would unacceptable impact on the historic setting and importance of the Conservation Area.

Archaeology

The application site is not identified as within an area of any archaeological sensitivity according to the council's data. It is considered that the risk posed by this proposed development to archaeological remains is minimal. Notwithstanding this, given the undeveloped nature of the site and proximity to several historic features, it is considered that further archaeological work should be required by condition should the proposal be successful.

Having regard to the above, I consider the development complies with Policy CS.8 of the Core Strategy. In this assessment, I have considered the special weight to be given to the desirability of preserving the special interest and setting of historic assets.

- 3.26 The above detailed appraisal by the Council in determining the previous application confirms that the land off Welsh Road West would not have a harmful impact upon heritage assets. This justifies a more positive SA score for this objective than the current results.
- 3.27 Our assessment is further supported by the findings of the Archaeology and Heritage Assessment prepared by BSA Heritage (Feb 2023); and the separate Archaeology and Heritage Technical Note, also prepared by BSA Heritage (Feb 2023).
- 3.28 Paragraphs 1.17 onwards of BSA's Technical Note reviews the Heritage and Settlement Sensitivity Assessment ("HSSA") that was prepared by Place Services in support of the draft Local Plan.
- 3.29 The analysis undertaken by BSA concludes that the findings in the HSSA for the area 'west' of Southam are flawed. BSA's assessment confirms that development in this

location can be accommodated without harming the setting of heritage assets, subject to securing necessary mitigation. On a proper analysis, our client's site to the west of Southam does not warrant a negative score in heritage terms under this SA objective.

SA Objective 6: Pollution

3.30 The SA identifies potential issues for north-west Southam associated with its proximity to the A423 and the watercourse. However, our client's site is not adjacent to the A423 and therefore no noise or air quality issues impact the site for housing, as confirmed by the previous application relating to the proposed development of land to the south of Welsh Road West.

3.31 It is acknowledged that the southern parcel is adjacent to the River Stowe. However, as evidenced by the previous planning application, the provision of a riverside park in this location will provide adequate mitigation to the existing watercourse. As such, our client's site would receive a neutral score in the SA.

SA Objective 7: Natural Resources

3.32 The SA highlights two matters of concern with respect to natural resources, relating to (1) agricultural land quality; and (2) minerals. Whilst the latter is noted, the appraisal details the mitigation.

3.33 For agricultural land, with respect to the land south of Welsh Road West, the Council's determination of the earlier outline application for up to 175 dwellings (LPA ref 17/01254/OUT) considered this matter. This is on page 2 of the Officer's Report which states:

The agricultural land classification is Subgrade 3, due to a soil wetness limitation. The site does, therefore, not comprise best and most versatile agricultural land.

3.34 It is clear that natural resources are not matters which limits delivery of our client's site, especially with respect to the southern part.

SA Objective 8: Waste

- 3.35 The SA notes that the development will increase the amount of waste, although this applies equally to any proposal and therefore it is not considered determinative.

SA Objective 9: Housing

- 3.36 The delivery of housing on the site will achieve the benefits as envisaged in the appraisal.

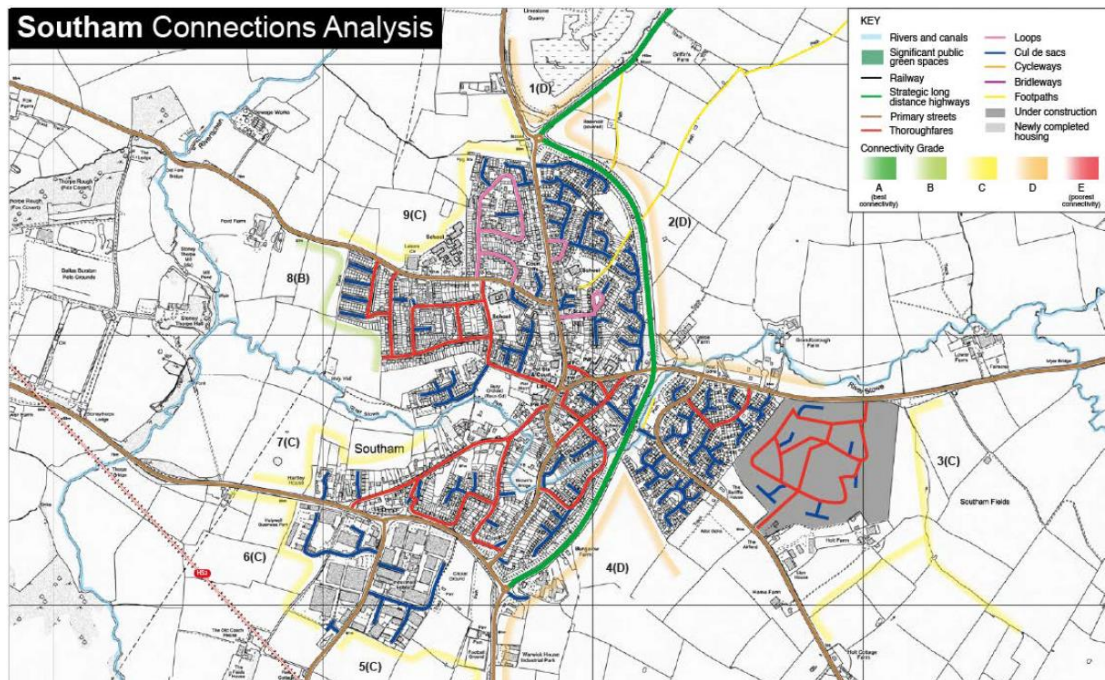
SA Objective 10: Health

- 3.37 The assessment with respect to health within the SA indicates that it is broadly acceptable, other than access to hospital and the proximity to the A423. This consideration applies to all of the sites being assessed for their suitability for development at Southam. Moreover, access to the hospital in Warwick would be enhanced through improved public transport (as noted in the Appraisal).

SA Objective 11: Accessibility

- 3.38 The SA notes that north-western Southam is accessible, other than to rail. This would be addressed through enhanced public transport.
- 3.39 It is unclear why the SA considers the south-west of Southam to be the best in accessibility terms, particularly as the Settlement Analysis Topic Paper clearly shows our client's site (north west Southam) as being the best connected. It received the best connectivity grade (Grade 'B') of any location in Southam, with the south-west receiving a 'C' grade.
- 3.40 An extract from Appendix 3 of the Topic Paper is included in Figure 3 below. Our client's site includes land to the west of Southam marked as '8(B)'.

Figure 3.
 Extract from the Southam Connections Analysis contained in the Settlement Analysis Topic Paper.



SA Objective 12: Education

3.41 With respect to education, the SA identifies the proximity of north-west Southam to schools. Unsurprisingly, the location received the highest scoring from the Broad Locations for this objective. Proximity to education is a substantial benefit of allocation our client’s land off Welsh Road West for housing.

SA Objective 13: Economy

3.42 With respect to economic objectives, the SA notes the potential to deliver additional employment floorspace within the wider area.

3.43 Although our client’s land off Welsh Road West has been promoted for residential development, the results of the 2021 Census indicate that 39.5% of over 16 year olds in employment, work at or mainly at home. Whilst this may have been influenced by national policy with respect of measures to contain the Covid pandemic, it nevertheless illustrates the ability of this to continue thereby negating the need for extensive employment land and buildings. The ability for home working

is reinforced by the highly skilled and educated workforce in Stratford-on-Avon district with 54.1% of those over 16 in employment within managerial, professional or technical occupations.

3.44 The construction of dwellings can therefore also contribute towards economic growth through home working opportunities, and would also assist in wider objectives of minimising the need to travel and also provide scope for enhanced social interactions. This arises as there is then time available for other activities which would otherwise have been spent commuting.

3.45 The scheme for land off Welsh Road West, Southam therefore can still achieve benefits for the employment objective.

Summary

3.46 Our analysis clearly demonstrates that a finer-grained analysis of parcels within Broad Location B.22 (comprising land controlled by Barwood Land north and south of Welsh Road West) would receive positive scores against the SA objectives if assessed separate from the Broad Location. This is of particular relevance to the application of the tests of soundness and the allocation of the most appropriate sites for development.

3.47 In addition, the failure of the SA process to assess site/locations to accommodate less than 2,000 dwellings represent a flawed approach as it fails to consider the reasonable alternatives.

3.48 On a proper analysis, our client's site would receive positive scores for any of the SA objectives. It is an obvious candidate site to provide for housing growth that would clearly contribute to sustainable patterns of growth.

Issue S7: Spatial Growth Options

3.49 The draft Local Plan identifies a number of options for delivering growth across the plan area. This includes the expansion of existing settlements alongside consideration of new settlements.

- 3.50 We do not consider that new settlements need to be included in the strategy, including on the basis that there are options to provide growth as sustainable extensions to existing settlements.
- 3.51 Given the clear benefits that growth at existing settlements, including Southam would provide for achievement of sustainable behaviours, including those associated with a 20 minute neighbourhood, it is considered that urban extensions should be the focus of the approach of the emerging Joint Plan.
- 3.52 Whilst the Sustainability Appraisal suggests that 20 minute neighbourhoods have been scaled to equate to an 800m walk or cycle ride which would then deliver around 2,000 dwellings at a town within the Joint Plan area (paragraphs E8 and E9), as detailed in the observations with respect to Southam, these broad areas have been defined so that each area adjoining the settlement includes the relevant facilities as a focus for the neighbourhood. It does not therefore take account of the existing opportunities which would arise by using existing facilities as the focus. This is illustrated by the current location of primary and secondary schools off Welsh Road West, Southam. For the reasons detailed, a smaller area should have been considered as a reasonable alternative taking account of these principles.
- 3.53 Such an approach would be reflective of that of other local authorities, as illustrated by the work by East Hampshire².
- 3.54 East Hampshire has provisionally defined 20 minute neighbourhoods for its emerging Local Plan based upon the existing location of important shopping centres together with primary schools, albeit that they have applied a 1,200m buffer rather than 800m as currently envisaged in the Joint South Warwickshire Plan area.
- 3.55 East Hampshire's Topic Paper on Settlement Areas³ explains in paragraph 3.13 the reasons for identifying a 1,200m buffer was due to:

These results show accessibility based on 1,200m distances from primary schools, mainline railway stations and the town, district or local centres identified by Policy CP8 from the East Hampshire Joint Core Strategy. Initially, a 20-minute neighbourhood area based on 800m distances – this being a 20-minute round trip on foot – was

² <https://www.easthants.gov.uk/media/7727/download?inline>

³ <https://www.easthants.gov.uk/media/7727/download?inline>

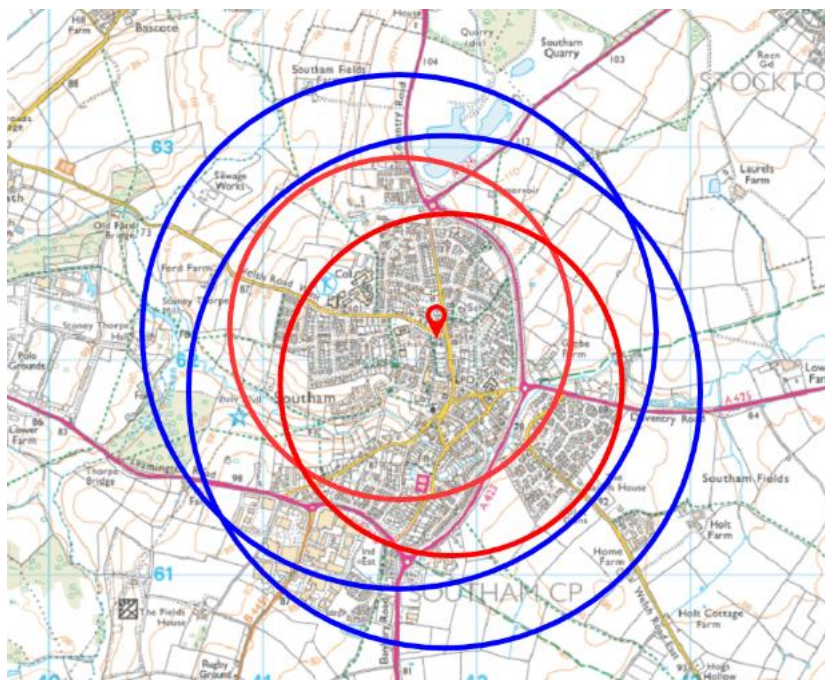
investigated, but this was found to exclude many residential areas within the larger settlements (e.g. Alton, Whitehill & Bordon, Liphook, Four Marks). An alternative neighbourhood area based on 1,600m distances – being a 20-minute walk in one direction on foot – was also investigated, but this would imply a 40-minute round trip. This duration was considered to be excessive when determining potential accessibility by walking⁴. As such, a compromise position of using 1,200m distances to define a 20-minute neighbourhood has been applied.

- 3.56 Given the similarities with respect to existing settlement forms across the Joint Plan area, as illustrated in Southam where there are undeveloped areas within 800m of the centre and/or primary educational facilities, these should be the focus for growth. Further, reflecting the refined approach as envisaged in East Hampshire, an enlarged area of up to 1,200m should be considered and this then applied to Southam and other settlements across the Joint Plan Area.
- 3.57 Therefore, like East Hampshire, the achievability of existing settlements to accommodate growth within an appropriate 20 minute neighbourhood should be explored, with undeveloped areas within the buffers considered further (like our client’s land off Welsh Road West).
- 3.58 An initial illustration of the extent that existing areas of Southam are within a 20 minute neighbourhood based upon 800m and 1,200m buffers to the town centre and primary school is illustrated in Figure 4 below. This confirms the location of our client’s land off Welsh Road West within the buffers as drawn around the primary school.

⁴ The Government’s National Travel Survey data shows a sharp drop in the average number of trips per person per year by walking when the trip distance reaches 2 miles (i.e. c.3,200m, estimated as a 40-minute trip). Source: National Travel Survey 2020, Table NTS0308

Figure 4.

Illustration of 800m and 1,200m buffers for Southam town centre and primary school (800m buffers are shown in red with 1,200m buffer shown blue).



3.59 With regard to the refined growth options, we comment as follows:

- **Option 1:** As set out in the consultation document, this option is limiting and will likely result in the release of substantial amounts of green belt land, which given the availability of land in large sustainable settlements (such as Southam) outside of the green belt, would not appear justified with regard to demonstrating Very Special Circumstances.
- **Option 2:** this option is more well-rounded than Option 1 and is generally supported. However, as expressed within these representations, given the overall sustainability of Southam, including the good level of bus service provision, it is our view that if this Option is pursued, Southam must be included as a location for growth.
- **Option 3:** this option is generally supported, although with the increase of home working, we would be of the view that access to key facilities such as town centres, primary and secondary schools is just as important as access to

job locations. As such, focussing on 20 minute neighbourhoods may lead more sustainable travel patterns overall.

- **Option 4:** this option, which is a hybrid of 2 and 3, is generally supported for the reasons given above.
- **Option 5:** this option is not supported as it will lead to less sustainable forms of growth. We consider that growth should be directed to sustainable settlements such as Southam in the first instance.

3.60 Overall, and building upon our representations upon the previous Scoping and Call for Sites consultation (Representations dated June 2021), we endorse a hybrid of Growth Options 2, 3 and 4.

3.61 Should Option 2 be pursued, given the excellent level of bus service provision in Southam alongside its other sustainability credentials, this settlement must be included as a location for growth under this option.

3.62 Given the inherent suitability and sustainability advantages of Southam in terms of the settlement hierarchy, including for the reasons assessed in the SA, it is clearly a key candidate for growth when assessed against the potential options across the joint plan area.

3.63 At a Southam-centric level, our client's site represents the key candidate site for growth at the settlement, including on the basis that it outperforms the potential alternatives in terms of its sustainability advantages.

3.64 Providing for additional housing allocations at Southam will benefit from embedded travel behaviours, which arise from co-locating and enhancing the existing 20 minute neighbourhoods which are already established for the town. These are therefore the focus for key activities associated with health, leisure, work, education and convenience shopping which are already available in Southam. Therefore, additional residents in and adjoining the town (including on land off Welsh Road West) will adhere to sustainable behaviours from initial occupation. This contrasts with that associated with new settlements, (towns and villages) where delivery of key facilities

to promote and achieve 20 minute neighbourhoods will not arise until there are sufficient residents and/or workers to ensure the relevant service can be viably supported.

- 3.65 This is a key virtue which supports growth at Southam as a result of its existing access to a range of facilities for health, leisure, work, education and convenience shopping to achieve 20 minute neighbourhoods.
- 3.66 The Department of Transport document LTN 02/08 'Cycle Infrastructure Design'⁵ (section 2.2) explores typical cycle trip distances and confirms that **“two out of every three personal trips are less than five miles in length – an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For school children, the opportunities are even greater: three quarters of children live within a 15 minute cycle ride of a secondary school, while more than 90% live within a 15 minute walk of a primary school”**. This confirms the potential for longer trips by bicycle, which will include commuting to work alongside those to secondary education as outlined above. This therefore indicates that the geographical extent of the 20 minute neighbourhood will be enlarged from that envisaged by the Council.
- 3.67 Although the TCPA Guidance⁶ on 20 minute neighbourhoods (page 19) states **“Not all neighbourhoods will include a full range of services or facilities accessible by foot, which is why it is important to provide high-quality cycling routes and public transport for longer journeys to other places”**, these opportunities are available at Southam. Consequently, it is clearly an acceptable and appropriate location for growth.
- 3.68 Chapter 4 of the consultation document outlines a number of approaches to delivering growth across the plan area. Within these, the Sustainability Appraisal identifies “Option 2 – Sustainable Travel” as one of the best performing. Options 3 and 4 also perform well. Whilst the Bus accessibility research by the Councils confirms the quality of services available at Southam, this is not listed as one of the indicative settlements covered. This is a clear failure whereas it is referenced in other options. Given the earlier comments with respect to the appraisal of our client’s land off Welsh Road West together with the Council’s research on bus

⁵ <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

⁶ <https://tcpa.org.uk/resources/the-20-minute-neighbourhood/>

services, we confirm our support for a hybrid of options 2, 3 and 4 provided it includes Southam.

3.69 As noted in the draft Local Plan, Option 2 seeks to strengthen the existing bus services which is a benefit to both existing and future residents of the plan area.

3.70 As previously outlined, development of our client's land on land off Welsh Road West, Southam for between 420 to 565 dwellings (including affordable) will make significant infrastructure contributions through CIL and other mechanisms which can contribute towards infrastructure in the district and wider Joint Plan Area. This could include improved accessibility via enhanced foot and cycleway provision and extended and enhanced bus services.

4. Chapter 6 - Delivering Homes

Introduction

4.1 This Chapter of the draft Local Plan sets out the approach to meeting housing needs during the plan period to 2050.

The Plan Period

4.2 We support the approach to planning for the period to 2050. This is on the basis that there are no arbitrary phasing policies which prevent development delivery early in the plan period where it has been unjustifiably tied to unrealistic expectations of delivery of larger scale growth, including in new settlements. As outlined in the representations, delivery of our client's site west of Southam could occur at an early stage in the plan period of the SWLP.

4.3 Furthermore, any decision on the plan period for the document does not negate the requirement for the plan authorities to undertake reviews at least every five years to ensure that they adequately plan for the development needs in the areas as required by the NPPF⁷.

⁷ Also be statute - [The Town and Country Planning \(Local Planning\) \(England\) \(Amendment\) Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2017/1003/contents/part-1/section-1)

- 4.4 This review of development needs will also include consideration of changes in unmet housing needs from neighbouring authorities including the cities of Birmingham and Coventry, which could result in a need for additional homes.

Issue H1: Providing the Right Number of New Homes

Issue H4: Accommodating Housing Needs Arising from Outside South Warwickshire

- 4.5 The draft Local Plan outlines the derivation of the Local Housing Need (LHN) for both Districts, comprising the extent of the South Warwickshire Plan area. It also summarises the evidence within the HEDNA for Coventry and Warwickshire which reviews the realism of the LHN approach having regard to more recent evidence, including the initial results of the 2021 Census.
- 4.6 Whilst the HEDNA provides comparisons with the mid year estimates for 2020, it has not included comparisons with the projected growth in the various household and population projections in 2014, 2016 and 2018 (the former being those which currently underpin the standard method). The Government has indicated that the 2020 based projections will take account of the results of the 2021 Census.
- 4.7 The tables below provide comparisons of the population and household projections alongside the results of the Census.
- 4.8 Our comparison indicates that the population growth for both authorities within the joint plan area within the 2021 Census were significantly above each of the forecasts, and for households, this also applies for Stratford-on-Avon District. The actual household growth in 2021 is marginally below that projected in the 2014 projections whereas it is higher than both the 2016 and 2018 projections.
- 4.9 The HEDNA references comparison of the 2020 mid-year population estimates and the results of the 2021 Census. These are repeated below alongside the corresponding forecasts within the sub-national projections.

Table 1: Population projections comparison with Census Results

Data source	LPA	Year				Average change	
		2011	2020	2021	2031	2011 - 2021	2021 - 2031
Census ⁸	Stratford	120,485	132,400	134,725		1,424	
	Warwick	137,648	144,900	148,453		1,801	
	Coventry	316,960	379,400	345,324		2,836	
2014 based projections	Stratford		124,300	124,900	130,400		550
	Warwick		143,200	143,900	151,700		780
	Coventry		370,200	374,500	417,500		4,300
2016 based projections	Stratford		124,700	125,200	128,700		350
	Warwick		140,900	141,300	146,400		510
	Coventry		377,400	382,300	427,700		4,540
2018 based projections	Stratford		131,536	133,480	149,876		1,640
	Warwick		144,062	144,892	154,998		1,011
	Coventry		378,966	383,820	422,919		3,910

Table 2: Household projections comparison with Census Results

Data source	LPA	Year			Annual change	
		2011	2021	2031	2011-21	2021-31
Census	Stratford	51,928	59,641		753.3	
	Warwick	58,679	62,617		393.8	
	Coventry	128,592	134,138		554.6	
2014 based projections	Stratford	52,090	55,997	60,075	390.7	407.8
	Warwick	58,714	63,007	67,743	429.3	473.6
	Coventry	128,470	152,730	173,730	2,426.0	2,100.0
2016 based projections	Stratford	51,961	55,166	58,105	320.5	293.9
	Warwick	58,432	60,492	63,322	206	283
	Coventry	127,550	151,089	170,618	2,353.9	1,952.9
2018 based projections	Stratford	51,961	57,884	65,602	592.3	771.8
	Warwick	58,432	61,863	66,796	343.1	493.3
	Coventry	127,550	151,161	168,700	2,36.1	1,753.9

4.10 Alongside the comparisons of the projections with the Census results, the implications for the expectations on average household size (based upon population / households) is shown in the table.

4.11 This confirms that across the Joint Plan area and Coventry, the average household size has not reduced to the extent envisaged.

4.12 Whilst this might be a result of slowing in societal changes and the expected growth in especially single person households, it could also be a result of constrained

⁸ Mid-year estimates for 2020 – source: [Population estimates - local authority based by five year age band - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

housing delivery both nationally and locally which has impacted upon household creation with associated impacts upon over-crowding and wider social needs.

- 4.13 This represents a reason for delivering additional homes across the plan area to reflect the minimum levels in the HEDNA, even though they exceed the Local Housing Need.
- 4.14 The impacts upon wider society is illustrated by the very significant growth in household size in Coventry, whereas had the city’s housing stock increased as envisaged, this would not have arisen.
- 4.15 Whilst it is recognised that the existing plans include allowances for unmet need in Coventry, given the plan preparation programmes and subsequent delivery, they would not have boosted the supply sufficiently to ensure Coventry would have had sufficient homes.
- 4.16 In any event, these will have been included in the figures for the authorities surrounding the city, including the Joint Plan area. Nevertheless, higher household size figures, especially compared to those envisaged in the 2014 projections indicates that this additional housing was nevertheless insufficient.

Table 3: Household size comparison with Census Results⁹

Data source	LPA	Year		
		2011	2021	2031
Census	Stratford	2.32	2.26	
	Warwick	2.35	2.37	
	Coventry	2.46	2.57	
2014 based projections	Stratford		2.23	2.17
	Warwick		2.28	2.24
	Coventry		2.45	2.40
2016 based projections	Stratford		2.27	2.21
	Warwick		2.34	2.31
	Coventry		2.53	2.51
2018 based projections	Stratford		2.31	2.28
	Warwick		2.34	2.32
	Coventry		2.54	2.51

- 4.17 The HEDNA indicates that the need for housing within the joint plan area exceeds the LHN when derived consistent with the guidance.

⁹ Based upon population / households (not residents in households as defined in Census)

4.18 Table 7.9 of the HEDNA indicates that the respective housing needs for the districts are as follows:

Stratford-on-Avon:	868dpa
Warwick:	811dpa

4.19. This compares to their minimum LHN of 564dpa and 675dpa respectively.

4.20. The above analysis indicates that the growth achieved in the plan area between the 2011 and 2021 Census' was above that forecasted, and this further supports the use of the higher housing figures derived from the HEDNA since these better reflect the local demographic changes of the local housing figures. As noted, household size did not decline to the extent expected.

4.21. The HEDNA figures result in a higher baseline figure before any consideration of unmet needs from neighbouring authorities.

4.22. **In the circumstances, the Joint Plan should plan for the minimum figure contained in the HEDNA. Thereafter, there is a need to plan for unmet needs from neighbouring authorities.** This is in addition to the HEDNA figure.

Unmet Needs from Neighbouring Authorities

4.23. The unmet need would include proportions of that arising in the cities of Birmingham and Coventry. The emerging approach for this is detailed in section 6 associated with issue H4 – needs arising from outside of South Warwickshire.

4.24. The consultation document (page 112) notes that unmet need from the City of Birmingham is currently assessed to be around 78,400 dwellings. The South Warwickshire Plan area currently tests the provision of between 5,000 and 10,000 homes as a contribution towards this unmet need. Such an approach is supported.

4.25. For the city of Coventry, the HEDA provides an alternative assessment of housing need compared to the LHN approach and this potentially shows a reduced overall need. Given the capacity of the city to accommodate growth, should Coventry's housing needs be reduced to reflect the outputs from the HEDNA, this would lower

the extent of any deficit which would need to be addressed in neighbouring area, including South Warwickshire.

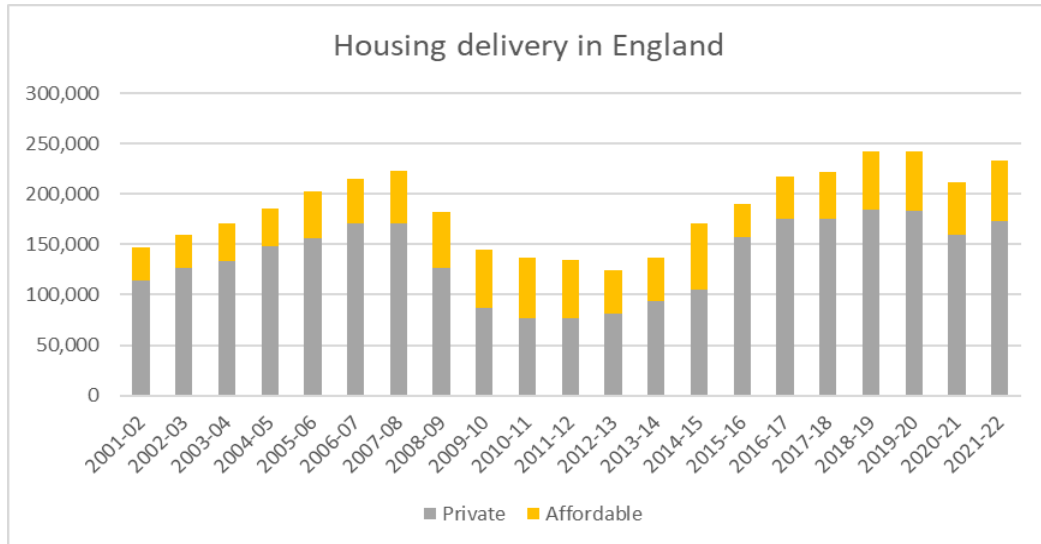
- 4.26. Whilst the HEDNA calculates a lower need for Coventry, as noted above, the development plans of the authorities around the city include uplifts to contribute towards its unresolved needs. Therefore, a proportion of the expected growth of the city has been exported to its neighbours and this therefore further supports the HEDNA calculations associated with especially the Joint Plan area.
- 4.27. A review of the HEDNA's conclusion with respect of Coventry's housing needs is therefore essential to ensure sufficient housing, especially to address social issues such as that arising from the unexpected increase in housing size as shown by the 2021 Census.
- 4.28. The extent of unmet need within Coventry is therefore likely to be above that associated with the HEDNA as given the comments above, it is not considered that this provides a robust assessment of needs given the results of the Census.

Housing Delivery

- 4.29. The reversal of the reduction in household sizes, especially associated with the city from that projected (as indicated in the tables above) is a further indication of the reasons why further housing is necessary across Warwickshire, including the Joint Plan area.
- 4.30. **As a minimum, we advocate that the plan area's housing targets are aligned with the baseline assessment in the HEDNA** for the reasons outlined, especially as recent performance exceeded the forecasts associated with the 2014 and subsequent projections. This support for delivering the higher growth figures as they are reflective of recent experience as confirmed by the results of the 2021 Census.
- 4.31. Additionally, whilst figure 22 on page 100 of the draft Local Plan illustrates house building rates achieved in England in the period to 2009, it does not include data for

the period 2009 to 2022. That information is shown in Figure 4 below (derived from Governments data)¹⁰.

Figure 5. Housing Delivery in England since 2009



4.32. As Figure 5 shows, overall housing delivery is heavily reliant upon provision by private developers with outputs significantly above 150,000 annually, including from 2005-2008, unlike that intermated in the Council’s document. Therefore, it is important to emphasise the clear and important role of private developers like Barwood in delivering homes, especially as they also contribute towards affordable housing which is included in the above figures.

4.33. Furthermore, whilst local authorities and other affordable housing providers have a role in providing additional homes, the vast majority will only come forward on non-public sector land which will be delivered by the private sector. This is therefore a fundamental factor in ensuring achievement of the Government’s wider objectives for 300,000 homes annually within England.

4.34. The delivery of homes by private developers is consequently an important factor in boosting housing supply which will consequently limit changes in house prices, especially where these are affected by limitations in supply. The provision of additional homes to reflect the minimum requirements as identified in the HEDNA is therefore essential for the emerging Plan as envisaged in question Q-H1-1, although

¹⁰ Total completions from Net Additional Dwellings (Live Table 122). Affordable housing supply statistics (Live Table 1000C).

this must be recognised as providing a minimum for the joint plan area given the higher growth demonstrated by the 2021 Census compared to the household projections.

- 4.35. Taking account of the above analysis, the responses to the specific questions posed in chapter 6 are outlined below:

Questions H1-1 and H1-2

- 4.36. We agree that the HEDNA provides an appropriate base for determining the housing needs of Stratford-on-Avon District and Warwick District i.e. the South Warwickshire Plan Area. **The minimum respective housing needs for each authority is therefore 868dpa and 811dpa.**

- 4.37. As explained above, we disagree with the conclusions of the HEDNA in its determination of the need in Coventry and the extent of its shortfall. This is because an element of this is included in the recent delivery elsewhere in Warwickshire and therefore the additional uplifts required under LHN must also apply to the redistribution.

Questions H2-1 and H2-2

- 4.38. Within issue H2 on providing the right tenure and mix type of homes, the above analysis emphasises both the role of the private sector in delivering dwellings of all tenures (including affordable) together with the challenges for increasing provision of affordable homes taking account of the ownership of land across the plan area. To achieve increased delivery of housing, especially affordable is only feasible and realistic where there is close partnership working between private and public sectors.

- 4.39. Table 10 on page 105 of the consultation draft Local Plan explains the level of need for affordable housing. This is 547dpa for Stratford-on-Avon District and 839dpa for Warwick District which (63% and 103% of the respective overall housing needs for each authority as assessed in the HEDNA). Such levels are not viable to deliver even with partnership working of the private and public sectors.

- 4.40. Whilst there is a need for affordable housing in both authorities, to ensure that its delivery is directed to residents in need within the respective authorities there should be a separate target for each area.
- 4.41. We do not consider that affordable housing targets should be refined to apply varying requirements within each authority as this would only be appropriate if there is clear evidence in terms of:
- A) The need for affordable housing including size and tenure including from the housing waiting list;
 - B) How affordable housing need compares to that for market homes (including size) to ensure socially mixed communities;
 - C) That the level of need will not affect viability of development;
 - D) There is sufficient acceptable land to meet the need; and
 - E) That the phasing of delivery is appropriate without either displacement of need into other areas or it resulting in over-provision with households relocating across the plan area.
- 4.42. These are all matters which would mean that the approach of the plan is not addressing the wider needs of the area as envisaged in NPPF paragraph 61.

Question H3

- 4.43. Issue H3 references the analysis with respect to the size of dwellings to be sought according to tenure and district in the Joint Plan area. It also references the optional national space standards. The analysis above (Table 3) illustrated that household size across the Joint Plan area has not changed as envisaged. Whilst this provides information on the accuracy of the forecasts of need, the 2021 Census also confirms the very significant role of the current housing stock for meeting existing and evolving needs.
- 4.44. Unless the authorities are also seeking to ensure necessary adaptation of the existing stock to achieve these standards, there will be significant viability concerns regarding compliance with the requirements. Additionally, there is no evidence that dwellings currently being provided do not adequately meet the needs of residents. This collectively means that we do not consider any space standards are required (Answer H3d).

- 4.45. For considering housing needs from outside of South Warwickshire (Issue H4), as explained we agree that the Joint Plan area should provide sites for between 5,000 and 10,000 dwellings (in addition to that arising from the Plan area as calculated in the HEDNA) to contribute towards unmet needs from Birmingham (page 112 and questions H4-1 and H4-2).
- 4.46. For question H4-2 regarding where unmet need should be provided, this should be delivered on sites at sustainable locations, to include Southam – which approach is consistent with and the adopted and emerging strategy. This view is taken as there is no appropriate or justified mechanism, especially for private homes which will represent the majority of future delivery; which restricts where residents associated with the unmet need can live.
- 4.47. We note a desire for self build homes as outlined in issue H5. We consider that the Councils (in first instance) should seek to ensure this requirement is addressed from specific promoted sites for this purpose.
- 4.48. For gypsy and travellers (Question H6), we do not consider that pitches should be provided within large scale general housing sites taking account of the specific social and cultural needs of this community, and their rejection of bricks and mortar.

5. Chapter 7 – A Climate resilient and Net Carbon South Warwickshire

Issue C4: New Buildings

- 5.1 We do not consider that there is any justification for seeking achievement of standards on carbon uses which exceed building regulations.
- 5.2 The Government have set out a clear roadmap to low carbon homes that will alongside the decarbonisation of the national grid ensure that the Government can meet its commitments to net zero by 2050.
- 5.3 Government recognises that the improvements in energy efficiency of new homes should be a transition which ensures that new homes continue to come forward to meet housing needs whilst still be sufficiently challenging to significantly reduce the carbon emissions of new homes from 2025.

- 5.4 There is no requirement or justification for additional standards to be placed on development through local plans.

Issue C9: Mitigating Biodiversity loss

- 5.5 We do not consider that there is any justification for setting specific measures beyond the levels set by Government in the Environment Act. This is because the imposition of additional measures does not reflect the specific characteristics and opportunities alongside constraints which will vary from site to site.

6. Chapter 8 – A well-designed and beautiful South Warwickshire

Issue D3: Designing adaptable, diverse and flexible spaces

- 6.1 We do not consider that there is any justification for seeking to define minimum densities which must be achieved across the plan area, this this will not fully reflect the specific characteristics and opportunities alongside constraints which will vary from site to site.

7. Chapter 10 – A Well-Connected South Warwickshire

Issue T1: 20-Minute Neighbourhoods

- 7.1 For the reasons set out in response to Chapters 4 and 6 above, we support the principle of the 20-minute neighbourhood.

8. Summary

- 8.1 We support the plan-making process, noting the importance of maintaining momentum with the evolving Plan to ensure the strategy for delivering the necessary growth within South Warwickshire is achieved at the earliest opportunity. In this regard, it is essential that the emerging Plan is prepared to be consistent with national advice as outlined earlier in this response.

8.2 We trust the above comments are of assistance in producing the Local Plan and await confirmation of receipt of our representations in due course

8.3 Finally, we welcome the opportunity to enter into dialogue with the Council in relation to the preparation of the Local Plan.

Yours faithfully

Woolf Bond Planning LLP

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Enc.