**TOWN AND COUNTRY PLANNING ACT 1990**

**SOUTH WARWICKSHIRE LOCAL PLAN PART 1**

**ISSUES AND OPTIONS CONSULTATION (REGULATION 18)**

**SUBMISSION ON BEHALF OF THE BIRD GROUP**

**LAND OFF BILLESLEY ROAD, WILMCOTE**

**MARCH 2023**

 **FRAMPTON TOWN PLANNING LTD**

**OUR REF: LS/10604**



1. **INTRODUCTION**
	1. The response to the This statement has been prepared by Frampton Town Planning in response to the South Warwickshire Local Plan Issues and Option Consultation (2023).
	2. The statement is submitted on behalf of the Bird Group for the promotion for residential development in respect of land at Land at Billesley Road, Wilmcote (‘the Site’). A location plan of the site is attached (ENC 1).
	3. Representations were submitted to the Scoping Consultation (2021) and the site was submitted in response to the Call for Sites (2021) (Ref ID 483) and these comments should be read alongside these previous submissions.
	4. The site is deliverable, available and suitable to deliver a high-quality residential development that will significantly assist in meeting South Warwickshire’s identified housing need as well as the unmet need from Coventry and from Greater Birmingham and the Black Country.
	5. Wilmcote is considered to be a sustainable village and is served by train and bus, has a primary school, a church, a village hall and youth centre, a social club, two pubs, a scout hut, a children’s play area, two playing fields a shop and post office. Wilmcote is identified as a ‘local service village, it is acknowledged that the village is ‘washed over’ by the Green Belt.’
	6. Any scheme brought forward on this site would be designed to respect the existing settlement and be fully integrated. The site has the potential to deliver up to 10 dwellings however it is recognised that any planning application at the site will need to take into account the existing site constraints and opportunities alongside the scale of the existing settlement. The extent of development would not result in the identity and/or integrity of the settlement being undermined. The scale of the proposals is proportionate to the village and is acceptable in terms of landscape impacts. If the allocation is not made, then the settlement will likely not deliver growth for many years. This would result in a lack of investment in the settlement which would harm all services, employment and other benefits of growth.
	7. Wilmcote is identified as a Local Service Village (LSV) and therefore is one of the most sustainable villages for development based on the level of service provision. LSVs were sorted into categories by applying a qualitative assessment of three key services: general store, primary school and public transport, together with the existing size of the settlement.
2. **ISSUES AND OPTIONS QUESTIONS**

**Chapter 4**

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

* 1. The NPPF at paragraph 32 states:

*‘Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed the relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).’*

* 1. It is noted that the SA in the conclusion for the Sustainability Appraisal states, at paragraph 7.15.11:

*‘High level assessment of Spatial Growth Options that are not all distinct from each other, with the exception of Option 5, means that* ***sustainability performance can only be evaluated with several caveats****. These include the fact that detailed locational information is not available and the ability to identify effects with precision is challenging. The scores in Table 7.1 are strictly a guide and do not represent a diagnostic analysis****. Mitigation has not been factored into the performance of the Growth Options since it is best worked up once more detailed*** locational information is available.’ [emphasis added]

* 1. As the Issue and Options are very high level at this stage, it is hard to properly comment on the SA which by its own admission is caveated and no mitigation has not been considered.

**Q-S3.2: Please select the option which is most appropriate for South Warwickshire**

**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.**

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.

**Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location**

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 unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.

**Option S3.2c: None of these**

* 1. It is noted that the South Warwickshire Urban Capacity Study (October 2022) has concluded on capacity that:

*‘This capacity of around* ***19,950*** *compares to a housing need for South Warwickshire over the new plan period of* ***30,750****. This housing need figure is subject to change, and is also likely to require the addition of a buffer to allow choice and competition in the market in accordance with Planning Practice Guidance. We have sought to ensure that the assumptions underlying these figures strike an appropriate balance between conservatism and optimism to ensure robustness – whilst there may be some scope to further optimise capacities, particularly if the SWLP were to include policies to require the higher end of our established optimised density ranges, this is likely to require a higher burden of evidence in order to ultimately demonstrate that the SWLP is a sound local plan. A theoretical exercise to consider the potential yields from car park consolidation has indicated that between 800 and 3,400 dwellings could be created. This would however require significant levels of intervention and management to be realised.*

*The shortfall between urban and existing committed housing capacity could be reduced by undertaking development on public car parks around South Warwickshire, where we have identified potential yields of up to 3,400 dwellings. However, this would necessitate a significant programme of intervention and management in order to be realised. It may also be possible to apply the optimised densities established through the Urban Capacity Study to some sites which have been allocated in existing local plans but which do not yet have planning permission (Site Category 2). However, whilst the measures considered through this study could allow the SWLP to get a reasonable way towards meeting housing needs through urban sites and existing commitments,* ***we consider it impossible to meet development needs without significant greenfield development.’ [emphasis added]***

* 1. Therefore, the Council(s) evidence base clearly demonstrates the need for the release of greenfield.

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

 Yes | ~~No | Don’t Know~~

* 1. Yes, we consider that growth of some of South Warwickshire’s existing settlements should be part of the overall strategy.
	2. South Warwickshire has a dispersed settlement pattern (as set out in Policy CS.15 of the adopted Stratford-upon-Avon Core Strategy) and is home to a significant number of existing settlements of varying sizes. The explanatory text under Issue S4 sets out that there are nine towns (Alcester, Henley-in-Arden, Kenilworth, Royal Leamington Spa, Shipston-on-Stour, Southam, Stratford-upon-Avon, Warwick and Whitnash), at least 82 villages and hundreds of hamlets.
	3. Issue S4 sets out that the South Warwickshire Local Plan will seek to maximise the capacity of its existing urban areas in order to meet development needs to 2050. However, in deciding upon the best distribution strategy for new development within South Warwickshire, it is important for the Local Plan to consider the potential for growth around the edges of the existing settlements (of all categories).
	4. Wilmcote is categorised as a *‘Category 2 Local Service Village’* in Policy CS.15 of the adopted Stratford-upon-Avon Core Strategy.
	5. Wilmcote offers a large range of services and facilities, including a pub; social club; church, primary school; play area. There are several bus stops in the village and there is a train station to the east of the village. The village is relatively close to Stratford-upon-Avon.
	6. The site is located immediately adjoins the built-up area boundary of the village. The promotion site would be well connected to the built-up area of and would constitute sustainable development.
	7. Given the pressing need for additional housing within the Stratford-upon-Avon District, Wilmcote is clearly a sustainable location to accommodate additional housing growth. The site has been carefully considered to enable a comprehensive planned development to be achieved to deliver new housing (market and affordable) which is well-located in relation to the town and will enhance its vitality in line with national planning policy. Accordingly, it is considered that the site should be allocated as a residential site within the South Warwickshire Local Plan.

**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**

* 1. The settlement analysis does not consider **all** settlements in the Districts, it should also consider ‘networks of villages’ which can provide local amenities for new residential development. The settlement analysis should therefore be updated to include all settlements in the District, to do so would be in line with Paragraph 79 of the NPPG (2021) which states that:

*‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities****. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’***

**Q-S5.2: Do you think new settlements should be part of the overall strategy?**

 Yes | No | Don’t Know

* 1. The Bird Group does not object to the consideration of new settlements as part of the Council’s Growth Option.
	2. A range of sites varying in scale and size should be explored in order to secure the delivery of new homes. The expansion of existing settlements and new settlements allocated in the Local Plan should also be explored further to see whether there is capacity to be extend these further. Smaller sites are likely to have no significant infrastructure or utility constraints. The site can be accessed off public highways, the site is in the control of a developer (the Bird Group) which makes it a deliverable site

**Q-S5.3: In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree**?

Yes | No | Don’t Know

**Q-S5.4: If not, what approach would you take?**

**Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options**

* 1. No comments

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

**Option 1: Rail Corridors**

Appropriate strategy | Neutral | Inappropriate strategy

Further comments

**Option 2: Sustainable Travel**

Appropriate strategy | Neutral | Inappropriate strategy

Further comments

**Option 3: Economy**

Appropriate strategy | Neutral | Inappropriate strategy

Further comments

**Option 4: Sustainable Travel and Economy**

Appropriate strategy | Neutral | Inappropriate strategy

 Further comments

**Option 5: Dispersed**

Appropriate strategy | ~~Neutral | Inappropriate strategy~~

Further comments

* 1. The preferred options are:

**Option 5**

Dispersed. This option allows development be distributed over a range of settlements rather than in single settlements in order to ensure the vitality and viability of settlements is entirely consistent with national policy and the principles of sustainable development (see notably NPPF paragraphs 77-78).

* 1. This option reflects the current Core Strategy, such as distribution which follows the settlement hierarchy established in Policy CS.15 in the Core Strategy, would reflect the emphasis on a clear connection between development plan documents under section 19(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) and NPPF paragraphs 20 and 35.
	2. The adopted Core Strategy was found sound by the examining Inspector back in July 2016 and therefore is consistent with national policy then in force. The clear preference was for a wider distribution over a range of settlements, but in particular at Wilmcote as one of the most sustainable of such settlements.
	3. The merits of allocating a range of size of sites, including locations such as Wilmcote , is that the overall housing market will be more fluid and competitive simultaneously due to a larger number and wider range of house builders being involved in the delivery of housing. Smaller sites, favouring smaller house builders, will also favour more sub-regional and local builders, who are more likely to use locally sourced trainees, apprentices and materials suppliers bringing more inward investment per home that a large-scale national house builder would typically bring.
	4. The site at Wilmcote has been carefully considered to enable a comprehensive planned development to be achieved to deliver new housing (market and affordable) which is well-located in relation to the village and will enhance its vitality in line with national planning policy. The suitability of the LSVs for development is addressed in the Inspector’s conclusions for the Stratford on Avon Core Strategy at paragraphs 197-199, respectively: ‘*197. There has been some criticism of the level of housing proposed for LSVs, but in the context of a large rural District some level of housing in villages would be appropriate. The housing strategy in the adopted Local Plan, and its predecessors, appears to have been successful in directing new housing to the main towns. There is evidence before the examination that this pattern has continued to be quite marked since 2015. Amongst other things the growth in the number of households in the urban part of the District is said to be nearly ten times higher in percentage terms than in the rural area and this is said to have given rise to a disproportionate ageing demographic within the rural area. In the context of a District in which 45 % of the existing population lives outside the main towns, the level of housing that is proposed to be directed to the main villages would help to address these problems and sustain their long-term future. I have no reason to doubt the Council’s claim that there are another 100 villages below category 4, which underlines that the housing is being directed to the largest, most sustainable, rural settlements.*

*198. Inevitably such an approach is subject to the complaint that this would lead to a less sustainable pattern of development, in terms of, among other things, transport patterns and access to retail facilities. However the LSV methodology has expressly taken account of the existence of public transport and village shops, as well as settlement size and whether there is a primary school, in categorising villages. It might have been better if the methodology had taken account of employment, but I am not convinced that the end result is unfit for purpose. In my view the list of villages, as proposed to be modified, is a reasonable basis on which to direct the 2,000 dwellings currently proposed, in order to achieve a sustainable outcome. This level of housing would help to sustain the existing services and facilities in these villages, including public transport, primary schools and shops. At a minimum it would maintain the vitality of rural communities and therefore comply with the policy in paragraph 55 of the Framework, which seeks to promote sustainable development in rural areas. 199. I acknowledge that the rationale for the current figure of 2,000 dwellings appears to be rather arbitrary. The Council’s explanation is that the overall quantum has been derived using a bottom-up approach taking the approximate mid-point of the ranges deemed appropriate for each category of LSV. However the chosen ranges necessarily involve a value judgment and so it is hard to escape the view they were established in order to achieve the residual number of dwellings specified in the CS. Nevertheless, for the reasons discussed, I am not convinced that the end result is inappropriate.’*

* 1. These paragraphs remain broadly valid. It is consistent with national planning policy and basic sustainability principles to ensure that housing is focused in existing villages, such as Wilmcote, where there are existing services, and where there is a need to ensure vitality. The site at Wilmcote, should be allocated as a housing site.

**Q-S8.1: 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?**

 Yes | No | Don’t Know

**Q-S8.2: For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?**

Limit of 10 dwellings per site

A higher limit is appropriate

A lower limit is appropriate

 **Q-S9: Please select the option which is most appropriate for South Warwickshire**

* 1. A higher limit is appropriate for individual sites this will ensure flexibility and a subsequent increase in housing delivery.

**Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.**

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-upon-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.

**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.**

The aim would be to achieve a consistent approach across Stratford-upon-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 nonstrategic 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.

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

* 1. All settlement boundaries should be reviewed as part of the SWLP, this will ensure consistencies of approach between Stratford-upon-Avon and Warwick Districts, out of date boundaries can be reviewed which and there could be a subsequent increase in housing delivery.

**Chapter 6**

**Q-H1-1: The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?**

Yes | ~~No | Don’t Know~~

* 1. It is important to emphasise that the Planning Practice Guidance is clear in its approach that the *‘standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area’* (Paragraph 010; Reference ID: 2a-010-20190220). The draft South Warwickshire Local Plan should therefore reflect that the proposed ‘Housing Need’ figure is only the starting point and additional housing may be required to facilitate economic growth or the delivery of affordable housing.
	2. For example, an appeal decision for up to 800 dwellings at the Former North Warwickshire Golf Club (Appeal Ref. APP/P4605/W/18/3192918 – a decision which was ‘called-in’ by the Secretary of State) highlighted the chronic shortfall in affordable housing which has come forward within Birmingham City since 2011. Paragraph 14.108 of the Inspector’s Report states that only 2,757 new affordable homes were provided in the City over the first 6 years of the Plan period. This represents less than half of the target provision and a net increase in only 151 affordable homes if Right to Buy sales are taken into account. The Inspector goes on to state that given the heavy reliance in the five year housing land supply on City Centre apartment schemes, it is difficult to see how that trend can be reversed in the short to medium term (paragraph 14.109).
	3. Whilst it is noted that Birmingham City Council does not form one of South Warwickshire’s Authorities, it highlights recent difficulties with delivering homes on brownfield sites. The high proportion of flatted developments, coupled with the increased likelihood of viability issues, has led to a chronic shortfall in the provision of affordable homes. Should the South Warwickshire Authorities follow a similar approach, it may therefore be necessary to increase the Housing Requirement, in accordance with national guidance, to improve affordability.
	4. We note that work is ongoing to confirm how much housing can be provided from various sources, both in terms of existing and future capacity to help meet the need. This includes an understanding what has already been built, has planning permission or is identified for development in existing Plans and the capacity of small ‘windfall’ sites.
	5. Overall, we support a trend-based approach in principle. However, it is considered that any shortfall in housing supply should be regarded as a minimum given that it is currently calculated against an untested housing target that may require an upward adjustment to take account of affordability.

**Q-H1-2: If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?**

**Q-H2-1: What is the best way to significantly increase the supply of affordable housing across South Warwickshire?**

* 1. The Local Plan needs to address the key strategic issue of housing and affordability. The main approach of dealing with this issue is by facilitating housing growth to ensure a balance of demand and supply which will be the only means of driving housing prices down. The allocation of sites will also facilitate the delivery of affordable housing. Since the adoption of the Core Strategy, national policy has developed following first the Housing White Paper, Fixing the Broken Housing Market (February 2017), and then latterly the Revised NPPF (2021), which build on that original document.
	2. The key messages of national policy have therefore been ensuring faster delivery, diversification of supply and consequent strong support for small and medium housebuilders and smaller sites in sustainable rural locations. NPPF paragraph 20a emphasises the importance of a comprehensive strategy in respect of housing delivery, which in turn reflects section 19(1B)-(1C) of the PCPA 2004.
	3. NPPF paragraph 60 continues to emphasise the importance of boosting supply. This is reinforced by NPPF paragraphs 74 to 77, which collectively set in place a requirement to ensure a healthy, rolling 5 year housing land supply.
	4. NPPF paragraph 69 reflects the need to ensure a range of small and medium sized sites, as these can be built out quickly on the importance of choice and competition and paragraphs NPPF 78-79 in respect of delivering supply at villages). These are all key components of soundness under NPPF paragraph 35.
	5. A number of these principles are reflected in the most recent Housing White Paper: Planning for the Future (August 2020) and Changes to the Current Planning System (August 2020), which represent a clear direction of travel for national policy in the early part of 2021, and thus during the examination of the new Local Plan.

**Q-H2-2: Please select the option which is most appropriate for South Warwickshire:**

**Option H2-2a: A single South Warwickshire wide affordable housing requirement**

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.

**Option H2-2b: Separate affordable housing requirements for Stratford-on Avon and Warwick Districts**

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.

* 1. We consider Option H2-2b; providing a separate affordable housing requirement for Stratford-upon-Avon and Warwick Districts, would be appropriate in terms of reflecting local requirements and local viability calculations. However, it is considered that the tenure and type of affordable homes sought should be determined on a site-by-site basis, based on national planning policy and best available information regarding local housing needs, site surroundings and viability considerations.

**Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire**

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.

As acknowledged on Section 6.1 (fourth paragraph) of the Scoping report increasing the housing target would address housing affordability: ‘We could consider increasing our housing figure to help address housing affordability.’

**Q-H4-1: 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**?

Yes | ~~No | Don’t Know~~

* 1. Birmingham City Council has commenced work on its Local Plan Review to 2042 and has published an Issues and Options consultation. This identifies a shortfall in housing of 78,415 homes.
	2. Issue H1 above sets out the approach to needs arising within Coventry and Warwickshire. Even under the redistribution of housing resulting from the trend-based projection, Coventry may not be able to accommodate all of its housing needs (1,964 homes per annum), and as such a relatively modest shortfall may exist to 2050.
	3. South Warwickshire sits most fully within the Coventry and Warwickshire HMA, with Warwick District most strongly related to Coventry given its shared boundary and interrelationships with the city. South Warwickshire is also within the Birmingham and Black Country HMA owing to Stratford-upon-Avon District’s shared boundaries and inter-relationships with Solihull and Redditch boroughs and Bromsgrove district. Through the Duty to Co-operate, South Warwickshire has a responsibility to help address unmet needs.
	4. Given the size of South Warwickshire, it is considered that any additional needs can be accommodated outside of any protected areas (e.g., Cotswolds National Landscape/AONB). One exception could be areas designated as Green Belt, particularly if such locations are deliverable, available and suitable for release from the Green Belt to deliver high quality residential developments. Locations for additional growth should be sustainable in close proximity to where people want to live.
	5. In light of the above considerations, we agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-upon-Avon District.

**Q-H4-2: Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan**

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

You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question

**Q-H5: Please select all options which are appropriate for South Warwickshire**

* 1. Contributions to meeting the Birmingham and Black Country HMA shortfall to 2031 can be accommodated by either increasing the growth proposed for Option 5: Dispersed. Housing targets should be minimum ones in light of the wider Housing Market Area issue and the need to address the Birmingham and Black Country HMA unmet housing needs.

**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**.

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.

* 1. Contributions to meeting the Birmingham and Black Country HMA shortfall to 2031 can be accommodated by either increasing the growth proposed for Option 5: Dispersed. Housing targets should be minimum ones in light of the wider Housing Market Area issue and the need to address the Birmingham and Black Country HMA unmet housing needs.

**Chapter 8**

**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.**

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.

* 1. A flexible approach to density in new development, which is consistent with national policy which states that Council’s should avoid unnecessary prescription or detail, and should set out their own approach to housing density to reflect local circumstances (paragraphs 123 of the NPPF).

**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. 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.

**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. 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.

**Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places**. 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.

**Option D3e: None of these**

**Q-D4.1: Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?**

Yes | No | Don’t Know

**Q-D4.2: If no, please indicate why**

* 1. No comments

**Chapter 10**

**Q-T1: Please select all options which are appropriate for South Warwickshire**

**Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.**

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.

* 1. It is agreed that this scenario is more appropriate to reflect the context of specific locations and places. As stated above ‘networks of villages’ can provide local amenities for new residential development. The settlement analysis should therefore be updated to include all settlements in the District, to do so would be in line with Paragraph 79 of the NPPG (2021) which states that:
	2. *‘To promote sustainable development in rural areas, housing should be located where it will enhance or* maintain *the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.’*