



Stage 2: Issues and Options.

**LOCAL PLAN REPRESENTATIONS TO PART 1
SOUTH WARWICKSHIRE PLAN**

LAND EAST OF LOXLEY ROAD, WELLESBOURNE

On behalf of Persimmon Homes (South Midlands)

Date: February 2023 | Pegasus Ref: P20-1086

Author: Pegasus
Group



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	24/02/2023	COT	SB	



Contents.

1. Introduction.....	1
2. Chapter 3: Vision and Strategic Objectives – South Warwickshire in 2050 Issue.....	3
3. Chapter 4: Meeting South Warwickshire’s Sustainable Development Needs.....	5
4. Chapter 6: Delivering homes that meet the needs of all our communities.....	16
5. Chapter 7: A climate resilient and Net Zero Carbon South Warwickshire.....	22
6. Chapter 8: A well-designed and beautiful South Warwickshire.....	25
7. Chapter 11: A biodiverse and environmentally resilient South Warwickshire.....	27
8. Chapter 12: Plan Content.....	29
9. Land East of Loxley Road, Wellesbourne.....	30
10. Conclusion.....	35

Appendices contents.

Appendix 1: Site Location Plan.....	36
Appendix 2: Shropshire Local Plan Inspector Letter.....	37
Appendix 3: Promotional Document.....	38



1. Introduction

- 1.1. These representations are made by Pegasus Group, on behalf of Persimmon Homes (South Midlands), in response to the Issue and Options consultation for the South Warwickshire Local Plan.
- 1.2. These representations relate to specific land covering 17.9ha at Loxley Road, Wellesbourne ('the Site'). The Site is identified on the Location Plan at **Appendix 1** and is being promoted as a site which is an available, achievable and deliverable site which could accommodate residential development comprising circa 400 homes.
- 1.3. The Site was promoted through the 2021 Scoping and Call for Sites consultation and is identified on the Council's interactive maps (South Warwickshire Local Plan (arcgis.com)) with Site ref: **429**, noted as being a housing/residential proposal.
- 1.4. The detail of the Site is not repeated within these representations but specific comments are made where appropriate to respond to the questions identified in the Issues and Options consultation.
- 1.5. These representations have had regard to the published consultation document and questions set out therein, accompanying documentation forming the current evidence base, and the national planning context.
- 1.6. The tests of soundness that Development Plans need to meet so as to be legally compliant and found sound, are set out in the National Planning Policy Framework 2021 (NPPF), paragraph 35:
 - **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;



- **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

17. These tests of soundness, along with other legal and procedural requirements associated with the plan-making process provide a contextual framework for these representations. It is noted that the proposed changes to the NPPF published in December 2022 propose to remove the requirement for Development Plans to be ‘Justified’ in order to be found sound. However, at the time of writing and submission of these representations that change has not been enacted and these representations therefore still take this test into account.

18. These representations refer directly to the specific questions set out in the Issue and Options consultation document and also respond to the following evidence base documents where appropriate:

- South Warwickshire Local Plan Part 1 Stage 2: Issues and Options Consultation, January 2023
- Sustainability Appraisal (SA) November 2022
- Housing and Economic Development Needs Assessment (HEDNA) November 2022
- Urban Capacity Study, October 2022
- South Warwickshire Settlement Analysis, January 2023
- Evolving the Spatial Growth Options – The Story so Far – Topic Paper, August 2022

19. The representations are submitted via email to swlp@stratford-dc.gov.uk and swlp@warwickdc.gov.uk as per the ‘How to Comment’ procedures set out by the Councils.

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

Q-V3.1 Do you agree that the Vision and Strategic Objectives are appropriate?

Q-V3.2 If no, please indicate why

- 2.1. As set out in response to the Scoping and Call for Sites consultation, Persimmon supports Stratford-on-Avon and Warwick District Councils in the continued preparation of a Joint Local Plan. Working together provides the Councils with the opportunity to comprehensively develop the vision, strategic objectives, development requirements, spatial development strategy and policies that will shape detailed development proposals, taking into account changes to the national planning legislation, revisions to the NPPF and National Planning Practice Guidance (NPPG) that have occurred since the adoption of the Development Plans, adopted in 2016 (Stratford) and 2017 (Warwick) respectively.
- 2.2. Any joint Local Plan must embrace similarities between the authorities and the opportunities created (such as the provision of strategic infrastructure) whilst also recognising differences. For example, the two administrative areas at present have differing settlement hierarchies where Stratford on Avon has a much more rural population than Warwick and those differences must be taken into account in the strategic nature of spatial policies that are prepared. Notwithstanding, the Joint Plan itself provides the opportunity to set a spatial hierarchy and identification of land for development which ensures the existing character of the area as a whole is preserved and enhanced.

National Requirements for Plan-Making

- 2.3. Paragraph 33 of the NPPF requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The joint Local Plan will ensure that an up-to-date Local Plan for 'South Warwickshire' will be in place to support growth and meet future development needs. Persimmon supports the Councils' proactive approach to progressing a joint Local Plan to ensure that an up-to-date policy framework exists for the 'South Warwickshire' area, to guide growth to 2050 and to ensure that development is genuinely plan-led.

Vision and Strategic Objectives

- 2.4. The plan's Vision seeks to *"meet South Warwickshire's sustainable development needs to 2050"* and *"provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time."* These representations are broadly supportive of the vision as presented, which accords with para 7 of the NPPF which states that the purpose of the planning system is *"to contribute to the achievement of sustainable development."*
- 2.5. The five overarching principles which then set out the basis on which policies will be formed, and thus how the Vision will be delivered do not match the Vision as drafted. For example, the delivery of 'homes and jobs' does not appear in any of the over-arching principles accompanying the Vision. Whilst the detail of the Issues and Options consultation documents goes onto talk about the delivery of growth, an over-arching principle to underpin the Vision should be developed, from which detailed policies will flow. Such a principle would also tie in to the Strategic Objectives which follow, which do set out a number of objectives to deliver South Warwickshire's development needs.
- 2.6. The Vision places significant emphasis on responding to the 'climate emergency'. Although this principle in general is supported, and it aligns with the Government's aspirations for achieving net zero carbon emissions, it is also important that this does not dominate the Vision and Strategic Objectives of the Plan to the detriment of delivering a balanced, sustainable strategy which achieves the delivery of development to meet identified needs.
- 2.7. The Vision also makes reference to 'beauty' stating that this will create spaces where people want to be, which respect and reflect the existing beauty and heritage of the area. This aspiration is supported in principle and it is acknowledged that national policy is pursuing 'beauty' in planning, however there is a concern that as a concept this is not well defined and will need to be supported by more detailed design which reflect on what beauty might mean in practice.

3. Chapter 4: Meeting South Warwickshire's Sustainable Development Needs

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

- 3.1. The Issues and Options document is supported by a sustainability Appraisal ('the SA'), prepared by Lepus Consulting. The purpose of the SA is to assess the sustainable development implications of the proposals presented in the Issues and Options consultation document, where the SA outputs will help the Authorities to identify sustainable development options and prepare a plan which is *"economically, environmentally and socially sustainable"*.
- 3.2. NPPF paragraph 32 identifies that local plans should be informed throughout their preparation by a SA which meets the relevant legal requirements and which should demonstrate how the Plan has addressed relevant economic, social and environmental objectives.
- 3.3. To support the Issues and Options the SA consultation has considered different locational reasonable alternatives. These include the 5 no. growth options proposed, 7 no. new settlement locations (for development of no less than 6,000 homes), 32 no. Broad Locations for development around the Main settlements (to up to 2,000 homes), and 22 no. Small Settlement Locations for development of between 50-500 homes.
- 3.4. The SA then used the SA Framework to evaluate how the different reasonable alternatives perform against sustainability objectives. The Sustainability Objectives are:
 - **Climate Change** – Reduce the SWLP¹ authorities' contribution towards the causes of climate change
 - **Flood Risk** – Plan for anticipated levels of climate change

¹ SWLP = South Warwickshire Local Plan



- **Biodiversity and Geodiversity** – Protect, enhance and manage biodiversity and geodiversity
- **Landscape** – Protect, enhance and manage the quality and character of landscapes and townscapes
- **Cultural Heritage** – Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance
- **Environmental Pollution** – Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution
- **Natural Resources** – Protect and conserve natural resources including soil, water and minerals
- **Waste** – Reduce waste generation and disposal and support sustainable management of waste
- **Housing** – Provide affordable, high quality and environmentally sound housing for all
- **Human health** – Safeguard and improve community health, safety and wellbeing
- **Accessibility** – Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel
- **Education** – Increase access to education and improve attainment to develop and maintain a skilled workforce
- **Economy** – Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth

3.5. The significance of effects is assessed in accordance with Table 2.1 in the SA:

Table 2.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Adverse Impact	The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention.	-
Major Adverse Impact	The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required.	--

3.6. The principle and broad approach of the SA is supported, however it is recognised that at this stage the SA considers wide areas and therefore the assessments will not apply to each site within these areas equally. As the Plan progresses it will be necessary to undertake more fine-grained, site-based analysis. Further comments are made below and in following sections regarding the sites suitability for development when considered against the SA objectives.

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

A: Set out infrastructure requirements for all scales, types and location of development

B: Focus on strategic infrastructure relating specifically to the growth strategy

3.7. It will be necessary for the South Warwickshire Local Plan to consider infrastructure requirements across the plan area, both strategic and non-strategic. It is suggested that the adoption of a consistent approach to infrastructure across the plan area would be beneficial, would provide certainty for those involved in the planning process and would simplify the viability study of the Local Plan which is now a national requirement.

3.8. It is recognised that elements of the growth strategy may require specific strategic infrastructure in order to ensure deliverability and the Plan will need to clearly identify these requirements, along with the delivery mechanisms to secure this. For non-strategic infrastructure, a less detailed approach is likely to be sufficient which considers different



areas and types/scales of development. However, it will be necessary for both to inform the plan-making process going forward.

Q-I3: Please select the option which is most appropriate for South Warwickshire:

A: Establish a South Warwickshire CIL (or emerging Infrastructure Levy) to support the delivery of the Plan

B: Each District to produce its own Levy

- 3.9. It is acknowledged that both Districts currently have CIL and that the charging schedules have been developed independently. It is also noted that the Plan acknowledges that it is possible to charge different rates of CIL in different zones within a single levy. If it is the Council's intention to review CIL then it would be logical to review this jointly alongside the Local Plan process. This allows for infrastructure costs to be properly understood and suitable delivery mechanisms identified, including potentially CIL or developer obligations. This should inform the viability study of the Plan to ensure that obligations do not undermine delivery of the Plan.

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

- 3.10. The NPPF para 34 requires Local Plans to set out the contributions expected from development including affordable housing requirements, plus other infrastructure such as education, health, transport, flood and water management, green and digital infrastructure. The NPPF states that such contributions should not undermine the deliverability of the Plan.
- 3.11. In developing policies that will set out development contributions expected from developments detail viability work must support the Local Plan process. Such viability work should be based on a detailed, site-specific evidence base that will ensure planning applications which comply with development plan policies will be viable, without the need for further viability work to be undertaken at the application stage as intimated at NPPF para 58.

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

2A: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be provide that the development is in a sustainable location or would increase the sustainability of the area.

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

2C: None of these.

3.12. It is acknowledged that national policy encourages the reuse and redevelopment of brownfield land. However, as identified by Option 2A, it is important that brownfield development should reflect the identified growth strategy in order to ensure that sustainable development is achieved.

3.13. It should be noted that the Urban Capacity Study (October 2022) established that it is unlikely to be possible to meet current development needs without significant greenfield development. Whilst the reuse of suitable brownfield land, in line with the growth strategy and/or in sustainable locations should be encouraged by planning policy, it will not avoid the need for greenfield development as part of the South Warwickshire Local Plan.

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

3.14. Growth at existing settlements across the Joint Plan area should form part of the overall Plan strategy, as this would accord with the differing current pattern of spatial development across the two administrative areas.

3.15. Warwick focuses development around its four main urban areas, whilst Stratford's identified Local Service Villages accommodate a proportion of development as well as its main towns.

3.16. In order to develop the most sustainable pattern of development, growth at existing settlements should be in sustainable locations. It is important that appropriate levels of growth are apportioned to existing settlements in order to maintain the vitality and viability of settlements, support new and existing infrastructure requirements and provide an appropriate mix of housing for the area.

3.17. Wellesbourne is identified as one of 22 small settlements. It should be noted that the ‘small settlements’ are the only areas assessed at this stage aside from seven broad locations for developments (the largest seven settlements across the Districts) and potential new settlement locations. It should be noted that small settlements are sustainable locations for development. The Site would allow for a sustainable development close to existing services and facilities.

3.18. As set out in the Sustainability Appraisal at Table 5.1, Wellesbourne scores similarly to the other small settlements assessed. It is noted that other small settlements score higher than Wellesbourne against Education and Accessibility. This is discussed in more detail in following sections however Wellesbourne has a primary school and has the Wellesbourne Campus of the University of Warwick located north of the main village. It should also be noted that the SA at this stage does not consider any mitigation. Growth at Wellesbourne would assist in supporting and likely enhancing the existing public transport provision which would mitigate any accessibility concerns.

3.19. It is clear that this Site is located in an entirely sustainable location and should be positively considered as a location for growth.

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.

3.20. Wellesbourne is assessed as a whole for the purposes of the Settlement Design Analysis which forms part of the Council’s evidence. The site is identified as parcels 10 and 11 which score a D and C for accessibility respectively. This does not appear to have considered the opportunities to enhance accessibility, for example through connections with existing adjacent residential developments.

3.21. The comments section notes that the village feels unbalanced to the south and that development on parcel 10 would close the gap between the village and the enclosing hill/woodland to the south. As set out in the accompanying Vision Document, there are good reasons to focus growth to the south of the village in view of the significant constraints of much of the land to the north of the village, notably the areas of flood zones 2 and 3 associated with the River Dene and River Avon. The south of the village has no such constraints and is well located to accommodate growth, with good access to local services

and facilities, particularly at the Distribution Park which accommodates a Sainsburys food store. The Vision Document includes consideration of the landscape and visual opportunities and constraints for this site. It notes that this site adjoins the existing settlement edge and therefore residential development in this location would complement the existing context and reduce the susceptibility and sensitivity of the landscape. It also notes that the offset requirements for the woodland coincide with the higher ground on this site (as noted on the Wellesbourne Landform Analysis plan) and would act to retain the local landscape context.

- 3.22. The local facilities analysis states that both parcels are within 800m of open space, leisure, recreation – wellbeing opportunities. It should be noted that Parcel 10 is within 800m of the access for Sainsburys.
- 3.23. The adjacent residential developments are identified as having a mix of inner suburb (40–60 dph) and outer suburb (20–40 dph) densities. It is likely that this site would reflect a mix of appropriate densities across the site.

Issues S6: A Review of Green Belt boundaries

- 3.24. The Issues and Options consultation document does not set out any specific question on Green Belt matters, but these representations support a review of the Green Belt boundary as part of the Plan making process.
- 3.25. As set out in the NPPF para 136, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of Local Plans. Moreover, strategic policies should establish the need for changes to Green Belt, and where proposed, the amended boundaries should be able to endure in the long term, i.e. Green Belt boundaries will not need to be altered at the end of the plan period.
- 3.26. NPPF para 137 requires exceptional circumstances to include evidence of the examination of all other reasonable options for meeting an identified need for development. Importantly, in reviewing Green Belt boundaries sustainable patterns of development should be taken into account.
- 3.27. The Green Belt is tightly drawn around, and indeed, washes over, a number of existing settlements across the Plan area. In proposing, assessing and review growth options, where the most sustainable form of development is likely to be around existing settlements, it is



therefore imperative that the Local Plan evidence base includes a Green Belt review. The Councils' recognition of this in relation to a number of the proposed growth options is supported.

- 3.28. If a Green Belt boundary review is not undertaken, development will need to 'jump the Green Belt' which would result in an isolated pattern of development.

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

Option 2: Sustainable Travel – Appropriate strategy | Neutral | Inappropriate strategy

Option 3: Economy – Appropriate strategy | Neutral | Inappropriate strategy

Option 4: Sustainable Travel and Economy – Appropriate strategy | Neutral | Inappropriate strategy

Option 5: Dispersed – Appropriate strategy | Neutral | Inappropriate strategy

- 3.29. It is noted that the Issues & Options document has reduced the previous seven growth options presented in the Scoping Consultation to five options as outlined above through refining and combining options, including Option 2 sustainable travel (combination of rail and bus corridor) and Option 3 economy (combination of socio-economic and enterprise hub options). In this consultation document, Option 4 sustainable travel and economy effectively combines Options 2 and 3. It is clear from this process that the growth option to be pursued will represent a combination of all five options outlined above.

- 3.30. The options now presented in the Issues and Options, apart from Option 5: Dispersed, perform broadly similarly to each other in the SA (Table 7.1) suggesting not one option may have significantly more or less impact than any of the others when considered against the SA Framework. At this stage, the SA has not considered any mitigation or site-specific options for growth within settlements identified within the 'dispersed' option (5). There could be significant variance in how each settlement and individual sites would perform against the SA objectives. All of the growth options could deliver sustainable development and a combination of all options will be the most appropriate option for the development of the Plan going forward.

3.31. By necessity, the strategy will need to identify areas outside existing settlement boundaries for growth/development. The Urban Capacity Study identifies capacity for 6,145 dwellings within the existing urban boundaries. If the Plan proceeds with the housing figures set out in Table 9 of the Issues and Options consultation at 1,679 dwellings per annum the Urban Capacity Study would only be able to deliver a 3.66 year supply of housing. Land from other sources will therefore be required and it is important that all options are considered in taking the Plan forward.

3.32. Combining sustainable travel (including rail) and economy will naturally direct most growth to the larger, more sustainable settlements. However, it is important that appropriate, proportionate growth is directed to smaller settlements in order to support the continued viability and vitality of these settlements going forward. This would include supporting or enhancing sustainable travel options at these locations. This needs to be positively planned for as part of the South Warwickshire Local Plan and as such an element of dispersal should form part of the final growth option. This will require a careful consideration of all of the options, including growth at existing main settlements, growth at smaller existing settlements, proximity to services and jobs, availability of infrastructure or opportunities for infrastructure delivery and a Green Belt boundary review to ensure development is not isolated beyond the defined Green Belt boundaries.

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?

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 | A higher limit | A lower limit

3.33. The supporting text for this question confirms that the aim of this approach would be to allow for development within or adjacent to existing settlements. This provides greater scope of these settlements to accommodate growth than the current infill only approach. The proposed approach to allow for suitable development within or adjacent to existing settlements is supported and will allow for suitable growth.

3.34. An across the board threshold limit of 10 dwellings is not supported. The amount of development different settlements can accommodate will vary significantly depending on various factors, such as existing services and facilities, local need for housing and the suitability of the proposed site to accommodate a certain level of development.

3.35. In addition, developments of 10 or fewer dwellings are exempt from affordable housing. Even where a lower threshold is set, developments of this scale generally result in a commuted sum towards affordable housing elsewhere. This is due to a variety of factors, including that registered providers often will not take on a small number of dwellings in one location. It is clearly preferable to have affordable housing delivered on site wherever possible to meet local needs. Setting a more flexible threshold that would allow for a higher level of development where appropriate would support greater on-site affordable housing provision.

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

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

Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.

3.36. The South Warwickshire Local Plan provides the opportunity to review all settlement boundaries and ensure they will be fit for purpose across the plan period. Saving all existing settlement boundaries is unlikely to be effective in positively planning for plan-led growth across the plan period. This should apply all settlements as part of the exercise will be to assess which settlements which would benefit from a defined boundary.

3.37. To be found sound, the Plan must be prepared: Positively, in a way that is aspirational, but deliverable, and it should set out a framework for addressing housing needs and other economic, social and environmental priorities (NPPF paragraphs 15 and 16). To shape the spatial strategy for the Plan and ensure all reasonable alternatives are considered, a review of existing settlement boundaries will be required to identify sufficient land, in sustainable location to meet the development needs of the Plan.

3.38. In addition, settlement boundaries will need to be reviewed and amended to take account of new allocations.



- 3.39. For example, the development boundary for Wellesbourne should be reviewed which would allow for the inclusion of this Site within the development boundary to deliver sustainable residential growth.

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

QH1-1: 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

- 4.1. Paragraph 11 of the NPPF requires that strategic policies should as a minimum provide for the objectively assessed need for housing as well as any needs that cannot be met in neighbouring areas. Paragraph 60 sets out the Government's objective of "significantly boosting" the supply of homes and paragraph 61 provides additional guidance identifying that strategic policies should be informed by the minimum local housing need identified by the standard method as well as any unmet needs from neighbouring areas.
- 4.2. The Planning Practice Guidance (PPG) (paragraph 2a-002) again confirms that the standard method provides only the minimum number of homes expected to be delivered but it does allow authorities to diverge from the Standard Method where this can be justified by exceptional circumstances: where such an alternative reflects current and future demographic trends including migration and market signals.
- 4.3. The HEDNA supporting the Issues and Options Consultation has assessed matters of housing need and requirements in great detail across the Coventry and Warwickshire Housing Market Area in which 'South Warwickshire' is located. In coming to the recommendations on proposed housing need (dwellings per annum) across the Housing Market Area the report appears to have followed the relevant Government guidance in demonstrating exceptional circumstances supporting a trend-based approach to housing need for the Joint Plan area.
- 4.4. The modelling of new demographic projects which take account of Census data releases and specific matters relating to the population in Coventry in particular, as part of the housing market area, but also including an assessment of Age Structures across the Housing Market Area (HMA), migration and demographic interactions is supported in



principle. The trend based figures, which equate to an overall housing need across the Joint Plan area of 1,679 dwellings per annum is supported in principle.

- 4.5. The HEDNA also identifies that Warwick has the highest levels of migration of population from Coventry, and that Stratford-on-Avon forms part of the Greater Birmingham Housing Market Area and the authorities should respectively consider planning for unmet need from Coventry and the Greater Birmingham HMA respectively. Whilst the number of homes which may be required in Coventry is likely to reduce based on the overall need being lower in the HEDNA than the 2014 sub-regional based household projections, the unmet need in the Greater Birmingham and Black Country HMA in particular is well evidenced.
- 4.6. The GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) identifies the housing shortfall of the GBBCHMA as 67,160 dwellings. The now revoked Draft Black Country Plan 2018–2039 showed a shortfall of circa 28,000 homes in the Black Country alone. Birmingham City Council have recently suggested a potential shortfall of over 78,000 dwellings. Further, the 'Mind the Gap' Barton Willmore Paper dated March 2021 and 'Falling Short – Taking Stock of Unmet Needs across GB&BCHMA' paper by Turley in August 2021, both commissioned by HBF Members concluded that the significant unmet needs in the GBBCHMA exist now, and will continue to exist in the future.
- 4.7. The Black Country shortfall identified is considered to remain relevant to the Plan-making process and the recent letter from the Inspectors examining the Shropshire Local Plan confirms that the scale of need and unmet need remains relevant to Plan-making. Para 14 of that letter (see **Appendix 2**) concluded that *"Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear."*
- 4.8. It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020 as the adopted Birmingham Development Plan. The Black Country housing shortfall also does not consider the 35% uplift applied to Wolverhampton City Council in May 2021. Such considerations should also feed into the proposed housing targets that are set in the South Warwickshire Plan going forward and this could increase the requirement even further.

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

- 4.9. There is an acute recognition in the Issues and Options consultation documents of an affordability problem across South Warwickshire Plan area, where those on low incomes and young people struggle to access the housing market.
- 4.10. Warwick District Council's latest 'Authority Monitoring Report' (AMR) (for the period 2020-2021) indicates that against an annual requirement of 280 affordable dwellings since the beginning of the currently adopted Plan period in 2011 (within its own area), the Council have delivered 841 affordable dwellings (out of a total requirement for 2,800), 30% of the target.
- 4.11. Stratford-on-Avon's latest AMR for the period 2021-2022 (published December 2022) identifies that in the current Core Strategy plan period of 2011-2031, 3,204 affordable dwellings have been provided out of a total 10,019 dwellings (net) built. This equates to 37% of all dwellings and is just above the Plan's affordable housing policy requirement of 35% of all dwellings to be affordable.
- 4.12. Notwithstanding Stratford-on-Avon's marginal reported over delivery, the HEDNA considered the affordability issue across the District further. It identifies at Table 8.45 that the estimated annual need for affordable housing (rented and affordable home ownership) across Stratford-on-Avon and Warwick is 1,386 dwellings per annum.
- 4.13. Whilst it is recognised that these are 'net' figures and not 'newly arising need', PPG paragraph 2a-024 makes provision to encourage local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need: *"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probably percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes."*
- 4.14. The Issues and Options consultation recognises that the area has an acute affordability problem and it is suggested that to address this, the Plan could consider providing housing above the 'minimum' need, to boost supply, and in turn deliver additional affordable housing.

Q-H3: Please select all options which are appropriate for South Warwickshire

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

Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.

4.15. If the Council are to include a policy requiring new developments to deliver dwellings which comply with Nationally Described Space Standards (NDSS), it must be fully justified. Such a requirement must not make development unviable and must set out such evidence in a proportionate manner to justify its inclusion, as set out in Footnote 49 of the NPPF which states that *“Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”*.

4.16. Further, the Planning Practice Guidance section on Housing: Optional Technical Standards (paragraph O20) states that:

‘Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

4.17. If the use of NDSS is subsequently justified and pursued through a policy, that policy should be sufficiently flexible to recognise that well-designed house types, which fall slightly below will be acceptable, particularly on sites where the majority of the dwellings comply. The



policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.

Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.

- 4.18. It is unnecessary for the inclusion of an M4(2) and or M4(3) policy. The Building Regulations 2010 'Access to and use of buildings' Approved document Part M already provides specific requirements for M4(2) dwellings in relation to Accessible and Adaptable Homes and M4(3) M4 (3)(2)(a) dwellings in relation to Wheelchair Adaptable Homes housing. As such, it is therefore not necessary for this to be repeated in any policy, also because developers are already aware they need to deliver to this standard.

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

- 4.19. This is discussed in answer to Question H1-1.

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

Option 5a: 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

Option 5b: Require large development of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.

Option 5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability

- 4.20. As set out in the Planning Practice Guidance (Paragraph: 016 Reference ID: 57-016-20210208), The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) sets out the legal definition of self-build and custom housebuilding, and also sets out the requirement for each relevant authority to keep a register and publicise the register. Furthermore, Self-build or custom build will help diversify the housing market, as per PPG paragraph 16a Reference ID: 57-016a-20210208.

- 4.21. Whilst there is no in-principle objection to the concept of self-build/custom housing, any specific policy requiring the delivery of such plots must be carefully considered, fully justified and flexible.
- 4.22. Stratford-Upon-Avon District's Self Build & Custom Housebuilding Register had 278 people on it as of 31st March 2022. Warwick's Register had 95 people on it in 2019, but that is the latest published position.
- 4.23. Table 13.1 of the HEDNA identifies that serviced plot demand for self-build dwellings is 63 plots per annum which is 4% of the purported 1,679 dwelling/annum housing requirement set out in the Issues and options consultation.
- 4.24. The emerging Stratford Site Allocations Plan (SAP) has identified specific sites to deliver self-build and custom housing through allocations. It is suggested that the South Warwickshire Local Plan should continue this approach, bring forward the allocations the SAP identified in the most recent Preferred Options document and identify similar suitable sites in Warwick District to ensure a spread across the plan area.

5. Chapter 7: A climate resilient and Net Zero Carbon South Warwickshire

Q-C4.1: Please select all options which are appropriate for South Warwickshire

Option C4.1a: Do not have a policy and allow new developments to comply with the national regulation requirements, which may change over time

Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments

Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards

Option C4.1d: None of these

- 5.1. If a net zero carbon policy is to be employed by the Council it must be fully evidenced and justified, and included in viability considerations.
- 5.2. The Building Regulations Part L 2021 Target for Fabric Efficiency would be applicable to all proposed dwellings and sets the Government's standards for energy efficiency. The Council does not need to set local efficiency standards to achieve the shared net zero goal.

Q-C6.1: Please select the option which is most appropriate for South Warwickshire

Option C6.1a: Include a policy that required new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business as usual' approach to construction

Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods

Option C6.1c: None of these

- 5.3. Whilst the value of Whole Life-Cycle Carbon assessments is recognized and there is no in principle objection to the need for some forms of post construction, pre-occupation



assessment, if a policy is to be pursued on this matter there are a number of key considerations:

- Once sold, properties will be owned by the purchaser and mortgagees. Any policy would need to be carefully worded such that it would not require the sharing of energy use, air quality and overheating risk data with a third party, where the developer no longer owns the dwelling as this could raise GPDR issues. Enforcement of such a policy for future owners and occupiers could also fail the test of conditions on any subsequent planning permission.
- The purpose of such information would also need to be clearly set out. It will not be possible to post factum make alterations to the constructed buildings, so what would be the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising Governments and through amendments to Building Regulations.

Q-C9.1: Please select the option which is most appropriate for South Warwickshire

Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

Option C9.1b: DO not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

Option C9.1c: None of these

- 5.4. Persimmon are supportive of the need to address net losses to biodiversity through the provision of enhancement to deliver an overall net gain. The Environment Act will require all development to provide at least a 10% Biodiversity Net Gain (BNG) increase and there would be no objection to this being carried through into a local policy. Indeed, it would reflect one of the core principles of the NPPF to conserve and enhance the natural environment.
- 5.5. Any such policy though, should be drafted to provide as much flexibility as possible. The test is whether the 10% BNG is delivered, not the method by which it is delivered. It is



important that the way in which 'net gains' are calculated is given careful consideration and a pragmatic view should be taken in terms the delivery of biodiversity enhancements where there are clear landscape and habitat improvements, rather than being wholly reliant on the output of a rigid calculator, in particular where this could impede viability and thus the delivery of much needed housing. It should also allow for contributions to be made towards off-site mitigation with suitable receptor sites or projects identified through the Local Plan process to secure the deliverability of development.

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

Q-D2: Please select all options which are appropriate for South Warwickshire

Option D2a: Develop a South Warwickshire Design Guide

Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change

Option D2c: Develop design guides/codes for strategic development sites/locations

- 6.1. In principle, the introduction of design guides and design codes would accord with national policy where NPPF paragraph 129 states that "*Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale...*"(our emphasis).
- 6.2. The Government also has a National Design Guide and National Model Design Code which are in place to guide the design of development.
- 6.3. Persimmon therefore agree that the principle of Design Codes/Design Guides to guide development is acceptable.
- 6.4. However, the development of such policies should be justified in terms of the specifics of the development that would justify the introduction of a site-specific design code/guide that goes beyond the detailed guidance in the National Design Code. This is likely only to be necessary for larger strategic sites or those with particular design considerations, rather than being a default requirement for all sites.
- 6.5. In addition, design codes/guides are not mandatory as set out in the NPPF, and the desire for such a policy tool to be utilised should not hold up development coming forward if such a tool is not in place. Further, even where introduced there needs to be some element of flexibility to allow developments to come forward even if they are not fully strictly in accordance with all criteria. Site specific matters and failure to comply with all criteria, where the alternative would not have detrimental impacts should not be used as a blanket reason to refuse development.

Q-D3: Please select all options which are appropriate for South Warwickshire

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.

Option D3b: Include a policy which specifies a minimum density require across South Warwickshire, whilst emphasising that the maximum 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.

Option D3c: Identify appropriate density ranges for different locations/areas across South Warwickshire and specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.

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

Option D3e: None of these

- 6.6. There is no in principle objection to a potential policy on housing densities. However, a blanket approach to density is unlikely to be effective. Rather, a site specific/flexible approach to density should be considered. A minimum density may be set out, but where additional development could assist the delivery of services and facilities, sites could be encourage to exceed this minimum density where it could be done in a manner consistent with other development plan policies.

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?

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

- 6.7. The inclusion of a policy on the design of safe and attractive streets is supported in principle. However, any design elements must be fully evidenced and justified and should take into account Warwickshire County Highways Authority design standard, in particular where departure from those standards could affect the future adoption of development proposals.

7. Chapter 11: A biodiverse and environmentally resilient South Warwickshire

Q-B3: Please select the option which is most appropriate for South Warwickshire

Option B3a: Introduce Special Landscape Areas across all of South Warwickshire

Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District

Option B3c: Discard Special Landscape Areas and bolster general landscape policy

- 7.1. Special Landscape Areas currently only exist within Stratford-on-Avon District and were introduced in the currently adopted Core Strategy (2016), as a result of information provided in the Special Landscape Area Study (2012).
- 7.2. Such designation has no basis in national guidance or policy and are not included in Natural England's approach. Rather, paragraph 174 of the NPPF and others seek to conserve and enhance the local environment, ensure that policies take into account landscape implications arising from development, consider landscape and visual impacts, and protect 'valued landscapes'.
- 7.3. Any landscape policy should reflect the content of national guidance, rather than continuing with or introducing additional policies and designations that have no policy basis, as they are not necessary, are not consistent with national policy and are not justified.

Q-B4: Please select the option which is most appropriate for South Warwickshire

Option B4a: Maintain the current policy approach, without the use of a buffer

Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape

- 7.4. Paragraph 176 of the NPPF requires 'great weight' to be given to conserving and enhancing 'landscape and scenic beauty' in, inter alia, Areas of Outstanding Natural Beauty (AONB). It

also requires “...development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

- 7.5. The requirement for development within the 'setting' of AONBs to be sensitively located and designed renders the provision of a policy on this matter unnecessary. National policy guidance seeks to protect AONBs and their setting, and a policy on this matter would be repetitive and is unnecessary.

Q-B8.1: Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?

Yes | No | Don't Know

- 7.6. Para 174 b) of the NPPF states that “*planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside ... including the economic and other benefits of the best and most versatile agricultural land.*” In addition, PPG paragraph 001 Ref ID 8-001-20190721 states that the quality of farmland should be utilised to inform choices about its future use within the planning system.
- 7.7. Any policy should avoid taking a blanket approach as there will be circumstances where development on best and most versatile land is appropriate. This may also apply to some allocations. The policy should be sufficiently flexible and allow for cases when the planning balance favours approval.

8. Chapter 12: Plan Content

Q-P1.3: Do you agree with the selection of policies to be addressed in the Part 1 plan?

Yes | No | Don't Know

Q-P1.4: If not, please indicate why

- 8.1. There is no in principle objection to the proposed list of policies as set out in the Issues and Options consultation. However, in developing a robust and justified evidence base the Plan should not rule out identifying sites for development that are not 'strategic' in the Local Plan Part 1. This could assist in facilitating the delivery of sites in advance of the Local Plan Part 2 and would also come out of the settlement boundary review that these representations suggest is required to inform the Local Plan Part 1. This would clearly fall within the remit of allocation of other sites as necessary for short-term development.
- 8.2. There is a degree of overlap between the proposed content for the Part 1 and Part 2 Plans, particularly regarding strategic allocations and smaller and non-strategic site allocations which effectively appear in both. The Plan will need to be clear which sites are being proposed for allocation now, what is being left for Part 2, why this has been done and the justification for this approach.

9. Land East of Loxley Road, Wellesbourne

- 9.1. Persimmon is promoting land east of Loxley Road, Wellesbourne for residential development, a potential new primary school and on-site green infrastructure, including an opportunity for new woodland planting.
- 9.2. The site comprises of four adjacent agricultural fields with the boundaries with field boundaries defined by hedgerow and sporadic trees. The site is bordered by Loxley Road to the east, beyond which is existing residential development. To the north and west of the site is existing residential development with the southern boundary defined by Wellesbourne Wood.
- 9.3. The site is located at the settlement edge of Wellesbourne which is typified by modern residential development. The development of this site would form part of this context and would effectively round off the settlement in this location. The inclusion of a buffer for the woodland to the south would allow for a soft transition between the new settlement edge and the enclosing woodland and hill which would retain the local landscape character that remains currently in this location.
- 9.4. The accompanying Indicative Development and Landscape Strategy (please see Promotional Document enclosed at **Appendix 3**) shows how the site could accommodate circa 400 dwellings. It shows how the existing field boundaries could inform the development parcels, with boundary vegetation shown as retained and enhanced. The Strategy also responds to the sites contours and indicates a potential single storey development zone in the eastern field where the land begins to slope up towards the woodland. The rest of the higher ground is shown as a landscape buffer to the woodland. The Strategy shows the potential for significant woodland planting in the southernmost part of the site, adjacent to Wellesbourne Wood. This could provide significant biodiversity gains and additional wildlife connectivity.
- 9.5. The Strategy also shows how a new primary school could be accommodated on site. It is proposed that this would be located close to the proposed access on Loxley Road in order to maximise the accessibility of the school for existing and future residents.

Sustainability Appraisal SA

- 9.6. This site is located in the small settlement of Wellesbourne, as shown on Figure C.19.1. The site is within the area identified within the brown outline as 'small settlement at Wellesbourne' on this figure. The site is shown to adjoin the built-up boundary.
- 9.7. The assessment of Wellesbourne against the SA objectives is presented at Section C19.1 of Appendix C. It is acknowledged that, at this stage, the assessment covers a wide area and the ratings will not be applicable to each site within the settlement. Each SA Objective is considered with specific reference to the site below:
- 9.8. **SA Objective 1 Climate Change:** The site would deliver circa 400 dwellings in a sustainable location, close to existing development, services and facilities, and public transport links. The Site could also deliver additional local facilities, for example the potential for a new primary school to be accommodated on-site.
- 9.9. **SA Objective 2 Flood Risk:** The site is entirely within Flood Zone 1, land at lowest risk of flooding. There are areas of surface water flood risk, predominantly in the western field parcel, adjacent to Loxley Road, however this could be addressed by suitable design and sustainable drainage systems. It should be noted that much of the undeveloped land, particularly in the north of Wellesbourne, is constrained by flood risk with significant areas of flood zones 2 and 3 present, associated with the River Dene and River Avon.
- 9.10. **SA Objective 3 Biodiversity, Flora, Fauna and Geodiversity:** The site is not designated as or in close proximity of a Special Conservation Area (SAC), Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), ancient woodland, Local Nature Reserve, Local Wildlife Site, Local Green Space (LGS) or priority habitat. It is acknowledged that the site is within the Impact Risk Zone for Loxley Church Meadow SSSI however this could be addressed by suitable mitigation. Wellesbourne Wood is ancient woodland and, as such, a 15m buffer a required under national guidance has been a key consideration in the masterplanning of this site. It is considered that the potential planting of new woodland could provide significant biodiversity gains.
- 9.11. **SA Objective 4 Landscape:** The site is characterised by modern residential development on three sides. The accompanying promotional document sets out the landscape

considerations that have informed the masterplan strategy for this site. It sets out that development can come forward that reflects the pattern and scale of the landscape, integrates into its landscape context and helps create a high quality environment for the settlement edge.

- 9.12. **SA Objective 5 Cultural Heritage:** The site is not located in proximity to any designated heritage assets. The listed buildings and Conservation Area are concentrated around Bridge Street/Ettington Road, to the north of the site. The scheduled monument and registered park and garden referred to by the SA are located north-east of Wellesbourne and are a significant distance from this Site.
- 9.13. **SA Objective 6 Pollution:** The site is not located in proximity of an Air Quality Management Area (AQMA). The SA refers to the A429 as a potential pollution source. The Site is separated from the A429 by existing modern residential development so it is reasonable to conclude that any mitigation required for noise and air quality would be minimal and achievable.
- 9.14. **SA Objective 7 Natural Resources:** It is acknowledged that the Site would result in a loss of agricultural land however this would be a minor loss in the context of the wider agricultural land in this area. The Site is within a Mineral Safeguarding Area (MSA) however the site is relatively small compared to the MSA and given the location of adjacent residential development mineral extraction is unlikely to be acceptable in terms of residential amenity.
- 9.15. **SA Objective 8 Waste:** A development of circa 400 houses would generate a level of household waste however this can be managed with provision of suitable recycling facilities for all households.
- 9.16. **SA Objective 9 Housing Provision:** The Site would deliver housing in a sustainable location. This would include affordable housing.
- 9.17. **SA Objective 10 Health:** Wellesbourne benefits from a recently developed doctors surgery in the village, delivered via the planning obligations associated with a previous Persimmon development. Wellesbourne benefits from a bus service which provides frequent services to Warwick, Leamington Spa and Stratford-upon-Avon and access to hospitals. There is also good access to leisure and recreation facilities within Wellesbourne with scope to



provide on-site open space and connections to the public open space associated with existing developments to the north and east of the site.

- 9.18. **SA Objective 11 Accessibility and 12 Education:** As outlined above, Wellesbourne benefits from a bus service providing frequent local services to Leamington Spa, Warwick and Stratford-upon-Avon. These locations have train stations for onwards journeys, including to Birmingham. There are also various local services and facilities within the local area, including a primary school. The secondary schools in Stratford-upon-Avon would also be accessible using public transport. The Strategy shows that the site could accommodate a new primary school which would increase the education provision in Wellesbourne.
- 9.19. **SA Objective 13 Economy:** The site is well located to benefit from existing economic and employment opportunities associated with Wellesbourne which include the Distribution Park and the Wellesbourne Campus of the University of Warwick.

Summary

- 9.20. In accordance with national policy, this section sets out the suitability, achievability and deliverability of this Site.

Suitability

- 9.21. The Promotional Document indicates how a scheme of circa 400 dwellings can be achieved having regard to the site constraints and opportunities.
- 9.22. The site benefits from a highly sustainable location within Wellesbourne and is well placed to meet the housing needs of the area. The site is well-placed to ensure easy access to a range of services and facilities including public transport.
- 9.23. The Indicative Development and Landscape Strategy shows how the site development of the site would be informed by the existing field boundaries, with a buffer provided to the woodland which also avoids built development on the higher grounds. This landscape-led approach has resulted in a sensitively designed scheme that would retain the local landscape context. It also shows how a new primary school could be accommodated on site.



- 9.24. Preliminary engineering work has been undertaken and it has been demonstrated that two access points can be achieved, via Loxley Road to the west and via the Ettington Road development to the east.
- 9.25. The site is not subject to any statutory nature or heritage designations. The site is entirely within Flood Zone 1 which represents the lowest risk of flooding. The Site could deliver sustainable drainage systems (SuDS) as part of any development.
- 9.26. In view of the above, there are no known constraints which would prevent development of this site.

Deliverability

- 9.27. Persimmon have a land interest in the Site and are promoting the site for residential development. The Site has already been submitted as part of the Call for Sites exercise associated with the Scoping Consultation in 2021, and accompanying representations were also submitted.
- 9.28. Persimmon is an experienced national housebuilder with a proven track record of delivery across the country, and particularly in Wellesbourne.
- 9.29. Persimmon's willingness for residential development to be delivered on this site is demonstrated through the submission of this representation and previous representations throughout the preparation of the South Warwickshire Local Plan.
- 9.30. As set out above, there are no known constraints which would prevent the delivery of residential development on this site.

Availability

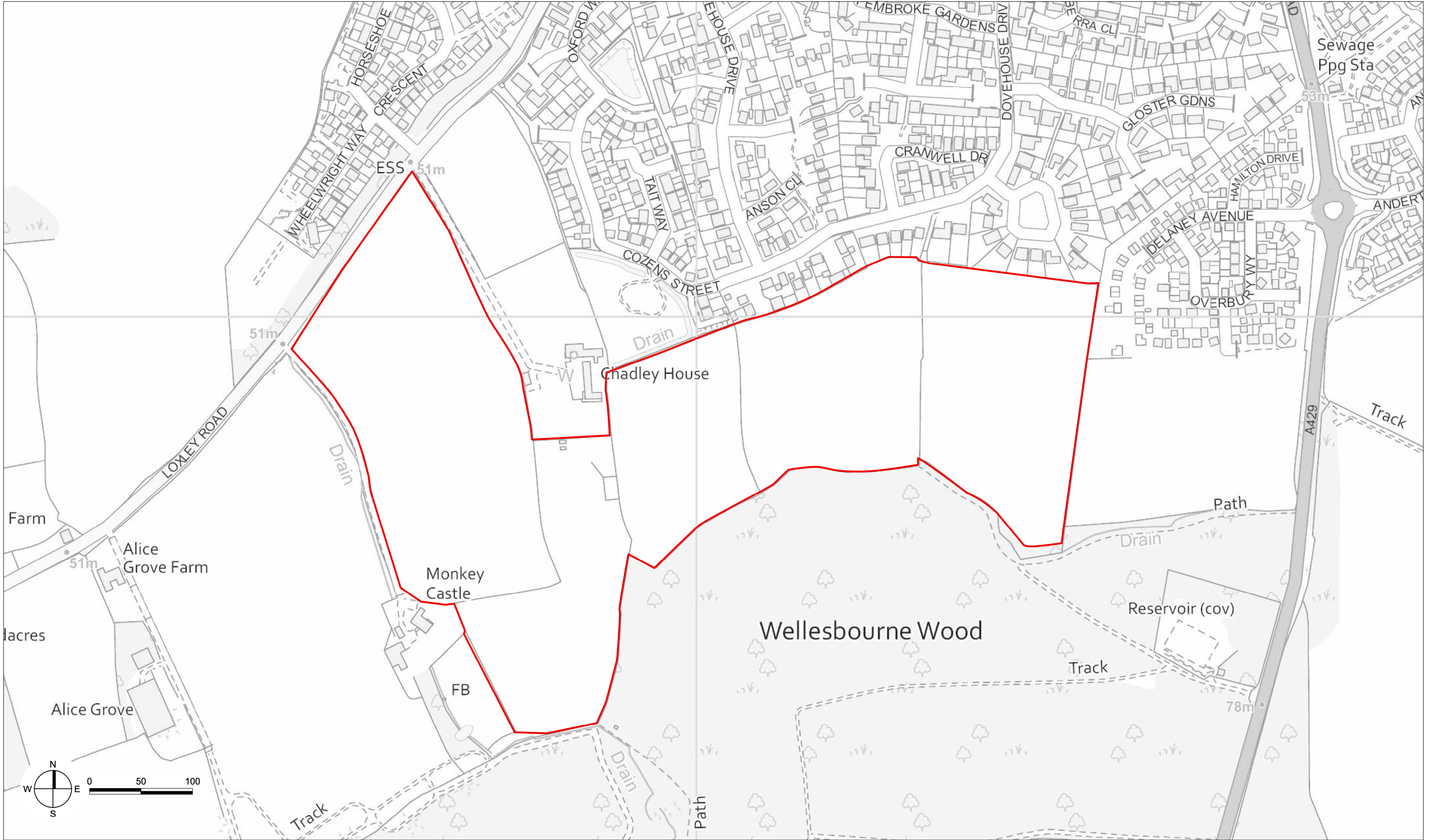
- 9.31. Persimmon has a land interest in this Site and are actively promoting the Site for residential development. The site is immediately available and could deliver housing in the early part of the Plan period.

10. Conclusion

- 10.1. This representation has been prepared by Pegasus Group on behalf of Persimmon Homes.
- 10.2. Persimmon are promoting Land East of Loxley Road, Wellesbourne for residential development. The land is sustainably located adjacent to the built development edge of Wellesbourne and adjoins existing residential development. This land is suitable, available and deliverable and should be identified as a location for future residential development as part of the South Warwickshire Local Plan.
- 10.3. These representations demonstrate that there are no significant constraints that would preclude the development of the site for residential development. The Promotional Document shows how circa 400 dwellings can be accommodated on the site, along with on-site open space and a primary school. Access is proposed to be via Loxley Road and the adjacent Ettington Road development.
- 10.4. Persimmon welcome the opportunity to comment at this early stage of the plan preparation. If the Council require any further information in respect of the site to assist in the accurate assessment of this site, this can be provided upon request.



Appendix 1: Site Location Plan



Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright License number 100022925. Airphoto License number 10022624. English License number 010033187. Standard OS license conditions apply. Pegasus accepts no liability for any use of this document other than for its original client, or licensee Pegasus, or licensee Pegasus, or licensee Pegasus, or licensee Pegasus.

KEY
 SITE LOCATION (TBC)



Appendix 2: Shropshire Local Plan Inspector Letter

ID28

Shropshire Council. Examination of Shropshire Local Plan 2016-2038

Inspectors: Louise Crosby MA MRTPI, Carole Dillon BA (Hons) MRTPI and Nick Palmer BA (Hons) BPI MRTPI

Programme Officer: Kerry Trueman

Tel: 07582 310364, email: programme.officer@shropshire.gov.uk

Mr West
Planning Policy
Shropshire Council
PO BOX 4826
Shrewsbury
SY1 9LJ

15 February 2023

Dear Mr West

Inspectors' Interim Findings following stage 1 hearings sessions

1. Set out below are our interim findings in relation to a number of matters following the stage 1 hearing sessions in July last year and January this year. Some of these findings require the Council to do additional work and some are just confirming Main Modifications (MMs) that were agreed at the hearings and other matters that were discussed, such as updating the evidence base.

Duty to Cooperate (DtC)

2. Following the hearing sessions, we wrote to you on 26 July 2022 (ID17) asking for you to provide more information in relation to the DtC and the activities that took place in relation to this prior to the submission of the Plan for examination.
3. We have now received this and had a chance to consider it and hear from the Council and representors on the matter at a further hearing session on 17 January 2023. Consequently, we can confirm that we are satisfied that the Council has met the legal duty set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), in so far as it imposes a duty on a local planning authority to co-operate with other local planning authorities, the County Council and prescribed bodies or other persons by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document so far as relating to a strategic matter to maximise the effectiveness of the activity of plan preparation. Therefore, the examination can proceed.

Next Steps

4. Before we proceed to stage 2 hearing sessions there are a number of matters where we consider more work is necessary to make the plan sound and these are set out below. We have also taken this opportunity to set out our thoughts on other matters which we said we would give further thought to at stage 2 of the examination.

Plan Period

5. During the matter 1 hearing session the Council agreed to consider whether the Plan period and Local Housing Needs Assessment should be aligned along with any implications of doing so, including those relating to the Housing Requirement set out in policy SP2 and the supply of sites identified in Policies S1 to S21. Please advise what stage the Council have reached with this.

Saved Policies

6. During the matter 3 hearing session the Council agreed to review the means by which the necessary SAMDev policies would be “saved” to ensure that they will, as intended, remain extant for Development Management purposes should the Plan be adopted. Can you please provide further information on how the Council intends to do this, along with any necessary MMs.

Gypsy and Traveller Transit Site Provision

7. During the matter 5 hearing session the Council agreed to provide a cabinet report and minutes regarding new transit site provision for the Gypsy and Travelling community. Can this please be placed on the examination website.
8. Also, as part of the matter 5 hearing session, the Council provided an updated position in respect of the need and supply of pitches. Using this data can the Council please update Table 7.9 and the GTAA conclusion and executive summary as an addendum to the 2019 GTAA Update – Final Report. The Plan’s relevant supporting text should be reviewed in view of this.
9. The Council will be aware of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022, regarding the interpretation of the Planning Policy for Traveller Sites and the application of that policy to Gypsies and Travellers who have ceased to pursue nomadic lifestyles. Can the council please consider whether, in light of this judgment, they wish to review the traveller site needs in the GTAA, and if not, the justification for this?

Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2

10. The Council has identified the need for housing in the County as being 28,750 homes (1430 dwellings per annum) over the Plan period, based on the ‘high growth scenario’ and 300 ha of employment land based on a ‘balanced employment growth scenario’, as set out in the Sustainability Appraisal and Site Assessment Environmental Report, dated December 2020 (SA). The housing

requirement figure in policy SP2 is around 30,800 homes (1400 dwellings per annum) and the employment land requirement is around 300ha. The increase in the total quantum of housing is to take account of the different time period. The annual requirement is virtually the same. However, it is the Council's intention that the Plan should provide 1,500 new homes and 30ha of employment land over the plan period in order to help address a need for housing and employment land in the Black Country, that would otherwise not be met. We consider the question of this unmet need further below.

11. At the hearings, the Council suggested that these 1,500 new homes and 30ha of employment land is accounted for within the aforementioned housing and employment land requirement in policy SP2. We cannot see how. They are not mentioned in the SA and form no part of the growth scenarios considered therein. Consequently, we are concerned that there has been a conflation of housing need and housing requirement and also employment land need and employment land requirement – but these are two distinctly different things.
12. You will appreciate that we need clarity on this point, and the Plan itself must also be equally clear. We therefore ask that the Council provides us with a Topic Paper that unambiguously sets out the need for housing over the plan period and the local plan's housing requirement and the same for employment land. On the face of it, it seems to us that the latter is likely to be the sum of Shropshire's housing/employment need plus the 1,500/30ha homes/employment land relating to unmet need in the Black Country – whatever the case may be, these requirement figures should be made clear in the Plan, through a main modification to policy SP2.
13. This strategic issue crosscuts a number of important matters, including the Plan's development requirements, spatial distribution, Green Belt release and site allocations. As such, it has resulted in a great deal of discussion during the hearing sessions to date. The Council's approach to identifying the housing and employment land needs derived within Shropshire itself is sound. In principle, the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need.
14. Since the initial stage 1 hearings the joint plan making arrangements for the ABCA Councils have materially changed as these four separate councils are now preparing individual plans. The councils are all individually preparing their respective evidence bases, but utilising some of the existing joint evidence that has already been prepared. As a consequence, their anticipated adoption dates will be later than that of the previously proposed joint plan. Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear.

15. However, we are mindful that confirmation of the exact quantum requires the examination of these plans which is some time away and other councils will also be assisting in meeting some of the unmet needs since it is not and should not be the sole responsibility of Shropshire Council to meet all of ABCAs unmet needs for housing and employment land. This would be highly unlikely in any event given the emerging scale of unmet need, the Green Belt constraint within Shropshire, particularly in the part closest to the boundary with ABCA areas and also the AONB constraint in the southern part of the plan area. Nonetheless it remains an important strategic cross boundary matter that should not be deferred.
16. It is clear is that the unmet housing and employment needs being accommodated in Shropshire is the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted. As set out above this is likely to be a number of years away given the stage they are currently at.
17. However, it was not until a point between the Regulation 18 and 19 stages of the plan making process that the Council agreed to accommodate 1500 dwellings and 30ha of employment land to support the unmet needs emerging in the ABCA area. This was after most of the evidence base had been completed, including the SA.
18. Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires that an environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The SA will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects.
19. We are concerned that the objectives and geographical scope of the Plan changed when the Council agreed to accommodate some of the unmet needs of the Black Country, but unfortunately the SA was not revisited. The SA is based on meeting only the needs of Shropshire. It tested different housing and economic growth options as well as different distribution options, but these were all based on just meeting the needs of Shropshire.
20. Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country. In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.
21. If the intention is to contribute towards the unmet need from the Black Country, then for effectiveness this distinction needs to be set out in the housing and employment land requirements in the Plan. In doing so the Council will also

need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.

22. If, following the additional SA work, the Council chooses to pursue the same growth option as before then it follows that the housing and employment land requirements will increase, and more sites will be required. Consideration will also need to be given to the distribution of development since accommodating some of the unmet needs may result in more sites being required in the part of Shropshire nearest the Black Country. It would therefore be helpful if, once the Council has carried out the additional SA work, the proposed strategy in relation to the housing and employment land requirement is set out in the topic paper requested at paragraph 12 above. The Plan should also make clear what the Council's strategy is, through main modifications.
23. Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
24. Great importance is placed on Council's having up to date plans by national planning policy. As set out above there is a requirement to carry out additional work on the SA and to produce topic papers and some main modifications to the Plan once the SA work is complete and there a clear way forward. This is likely to require a pause in the examination whilst the work is undertaken. Once the work has been undertaken, we will take a view on whether we consider further public consultation is required. The need to carry out this additional work will delay the examination and adoption of this Plan. However, we are unable to identify an alternative remedy that would avoid such a delay unfortunately. The additional work we have identified is necessary for us to find that the Plan is sound.
25. Regardless of the outcome of this work, it is likely that there will be a further request from the individual Black Country authorities in the future to meet some more of the unmet needs, but this could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework. We would welcome the Council's formal views on these alternative approaches.
26. Furthermore, we note that the related indicators and targets set out in the Plan's monitoring framework only focus on delivery within the Plan area against the Plan's overall proposed development requirements. In addressing some of the unmet needs of ABCA then the Plan's performance in doing so needs to be monitored. A failure to do this would undermine the effectiveness and therefore soundness of the Plan's approach to meeting housing and employment needs. The monitoring framework will need to be reviewed in light of this concern.

27. Any changes to the Plan as a result of the above will need to form the basis of Main Modifications which should be submitted to the examination.

Habitat Regulations Assessment

28. The matter of the River Clun and nutrient neutrality was discussed at the hearings in July. Shortly after the hearings the Government issued a Written Ministerial Statement (WMS) entitled '*Statement on improving water quality and tackling nutrient pollution*'. The Council's letter of 16th September 2022 (GC16) addresses the WMS. This suggests that the WMS may alter the position of Natural England and the Environment Agency on this matter. Can the Council please approach these organisations with a view to preparing updated SoCG. Once this is done can the Council advise on the implication of the latest position for the Plan and whether any outstanding issues could be dealt with by MMs.

Green Belt – RAF Cosford

29. The Council's Green Belt Topic Paper sets out the exceptional circumstances for the release of land from the Green Belt. This includes 214.2 ha of land at RAF Cosford which is a strategic site in the Plan (policy S21). The Council proposes to inset RAF Cosford in the Green Belt, in recognition of its existing and future operational areas and requirements. Para 7.18 of the Plan says that this will enable numerous and complementary development opportunities and that in turn these will complement and facilitate delivery of the Economic Growth Strategy for Shropshire and the objectives of the Plan.
30. One of these development opportunities is the development of the Midlands Air Ambulance Charity headquarters, however we understand that this now has planning permission despite it being in the Green Belt, demonstrating that this was not a barrier to development. The RAF base has grown and developed over many years and is now also home to the RAF Museum Cosford. There is no evidence before us to demonstrate that the site's Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation.
31. Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land. It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.
32. To summarise, we find that exceptional circumstances do not exist to justify the removal of this site from the Green Belt. Consequently, the Council will need to draft a MM to ensure that this site remains within the Green Belt and make any necessary map changes.

Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)

33. We still have some concerns about the gaps in the IDP and would urge the Council to treat this as a living document and aim to keep populating it when new figures become available.
34. In terms of the SFS, as set out at the hearings this should be forward facing rather than backward looking. The PPG advises that *“this should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the Plan-period”*¹. Can the Council please provide a timescale for updating the SFS.

Five-year Housing Land Supply

35. The Council has requested that we confirm their 5-year housing land supply as part of the examination of the Plan policies. However, the PPG² advises that, among other things, *“when confirming their supply through this process, local planning authorities will need to be clear that they are seeking to confirm the existence of a 5-year supply as part of the plan-making process and engage with developers and others with an interest in housing delivery”*. Crucially, the Council have confirmed that they did not do this and therefore we cannot confirm the 5-year housing land supply through the local plan examination process.
36. In addition, the matter of 5-year housing land supply will be considered at stage 2 of the examination once we have examined the site allocations in the Plan. We still have serious doubts over whether we can fully consider this matter and come to a conclusion on whether the Council have a 5-year supply of housing land given that many of the sites the Council are relying on are allocated in the SAMDev plan and therefore are not before us.

Housing Requirement

37. The housing requirement in the Plan is expressed as ‘around’ 30,800 new homes and the employment land as ‘around’ 300ha. In our view these development requirements should be expressed as definitive minimum figures for both monitoring and effectiveness.

Specialist Housing/Older Persons Housing

38. Paragraph 62 of the Framework requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including older people. The Council’s evidence shows that there is a much higher number of older people residing in the Plan area than the national average.

¹ Paragraph: 059 Reference ID: 61-059-20190315

² Paragraph: 010 Reference ID: 68-010-20190722

39. Whilst there is a requirement within policy DP1 to provide older persons housing on sites of 50 dwellings or more, the amount that will need to be provided is not quantified and it is also not clear why the threshold of 50 dwellings has been chosen. The PPG advises that “*plan-making authorities should set clear policies to address the housing needs of groups with particular needs, such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period (our emphasis)*”³.
40. Whilst the PPG advises that Council’s ‘could’ provide indicative figures, we consider that as there is clear evidence of a higher-than-average need for such accommodation in this particular instance, either the policy should include indicative figures, or the Plan should contain a specific policy to deal with specialist housing.
41. Also, neither this Plan, nor the SAMDev plan appear to make any provision for this sector of the community, by allocating land for specialist housing or requiring it to be provided in some of the larger allocations. This would be another positive way in which the Council could address this matter. Please can the Council give some further consideration to this important matter.

Policy SP4 – Sustainable Development

42. The Council agreed during the hearings that they would introduce a MM to delete policy SP4 from the Plan and instead rely on national planning policy to ensure that development in the district is sustainable. This needs to be included in the list of MMs.

Policy SP5 – High-Quality Design

43. The Council agreed to look at the wording of policy SP5 and whether it should contain a reference to the National Design Guidance. Can the Council please confirm if they have done this and what the outcome was. Any changes will need to be set out as a MM.

Policy SP6 – Health and Wellbeing

44. A discussion took place at the hearings regarding criterion 5a. of this policy and whether it should refer to ‘improved’ health facilities and criterion 10 and its requirement for a Health Impact Assessment for all major development proposals. The Council agreed to give the wording in these 2 criteria further consideration. Can you please confirm the outcome of this and whether any MMs are being advanced as a result.

³ Paragraph: 006 Reference ID: 63-006-20190626

Policy SP10 – Managing Development in the Countryside

45. It was agreed during the hearings that this policy wording needs to clarify that it does not apply to sites in the countryside that are allocated for development in this Plan or any other adopted development plan. This revised policy wording will need to be set out in as a MM.

Policy SP12 Shropshire Economic Growth Strategy

46. We do have some concerns about the effectiveness of this policy as a great deal of it seems to be more of a vision rather than a strategic policy. Can the Council please review this policy in the context of the advice in relation to strategic policies set out in paragraphs 20 to 23 of the Framework. Proposed changes will need to be set out as MMs.

Policy SP13 – Delivering Sustainable Economic Growth and Enterprise

47. It was agreed at the hearings that the text box 'Figure SP13.1', should be incorporated into policy SP13. This will need to be included as a MM.

Strategic Settlements and Sites

48. We have set out our concerns above regarding the removal of the RAF Cosford site from the Green Belt. We have no further comments to make on policy S21 or policy S20 which relate to the former Ironbridge Power Station site.
49. Turning to Tern Hill and policy S19, we have concerns about the deliverability of the affordable housing that would be required in connection with the development of this proposed site allocation given the evidence set out in the Council's Viability Study 2020 (EV115.01) and the fact that the trajectory shows that 400 of the 750 proposed dwellings will be delivered after the Plan period.
50. This also leads us to find that there is a lack of evidence to demonstrate that this proposed allocation will be capable of supporting the necessary infrastructure and services planned. Given the site's location away from any main settlements, it is important that it contains a range of services to limit trips by private car. Therefore, we require evidence which demonstrates that the appropriate necessary infrastructure would be delivered at the appropriate stages in the delivery of this site to serve its occupants.
51. Finally, as discussed in detail at the relevant hearing session we have some concerns about the vagueness of some of the policy wording in policy S19. The Council agreed it would look at this with a view to improving its precision and certainty for the benefit of developers and local residents. These changes should be advanced as MMs.

Strategic Flood Risk Assessment

52. The issue of whether the Council's Strategic Flood Risk Assessment (SFRA) was up to date in terms of hydraulic modelling and fluvial flood risk was raised at the relevant hearing session. It was agreed that the Council would provide a note of clarification regarding the methodology and data relied upon and whether any updating is necessary. Also, the Council should review whether the SoCG with the Environment Agency needs to be updated in view of this.

Local Development Scheme

53. During the matter 1 hearing session the out of datedness of the Local Development Scheme (LDS) and the reasons for that were discussed. We would be obliged if the Council would keep the LDS under review and arrange an update. A note to this effect should be placed on the Council's examination website to inform web users of this.

Overall Conclusions

54. For the reasons set out above, as things stand, the development strategy set out in the Plan is unsound and further work and main modifications will be required to progress the examination. We appreciate that there is a lot in our letter for the Council to consider. Therefore, we have not set a deadline for a response. However, it would be helpful if you could provide an indicative timescale for a response. When you respond in full to our letter can you please also provide a timetable for the additional work that is required for soundness.
55. Once we have a timescale for any additional work, we can then agree some provisional dates for the stage 2 hearings. At these hearings it is likely we will first need to re-consider some of the stage 1 matters as then the development management policies in the plan and the site allocations.
56. The Council and participants should be aware that the above comments do not represent our full findings on these matters, which shall be set out in our final report having considered any representations made in response to further public consultation and/or further hearing sessions which may be required in due course.
57. We are not inviting comments to this letter from representors, they will be given an opportunity to comment on the above matters in due course, either through representations to consultation organised by the Council, through hearing statements, appearing at hearing sessions or through the opportunity to comment on MMs.
58. Should the Council require any further clarification on any of the above matters you can contact us through the Programme Officer.

Louise Crosby, Carole Dillon and Nick Palmer

Examining Inspectors



Appendix 3: Promotional Document



LAND EAST OF LOXLEY ROAD

WELLESBOURNE

PROMOTIONAL DOCUMENT

Prepared by Pegasus Group on behalf of
Persimmon Homes (South Midlands) Ltd

March 2023 | P20-1086E



CONTENTS

Pegasus Group Ltd
 5 The Priory
 Old London Road
 Canwell
 Sutton Coldfield
 B75 5SH
www.pegasusgroup.co.uk | T 0121 308 9570 | F 0121 323 2215

Prepared by Pegasus Group Ltd
 Prepared on behalf of Persimmon Homes (South Midlands) Ltd
 March 2023. Project code P20-1086. Document ref: P20-1086_04E.
 Project Director: David Onions / Catherine O'Toole

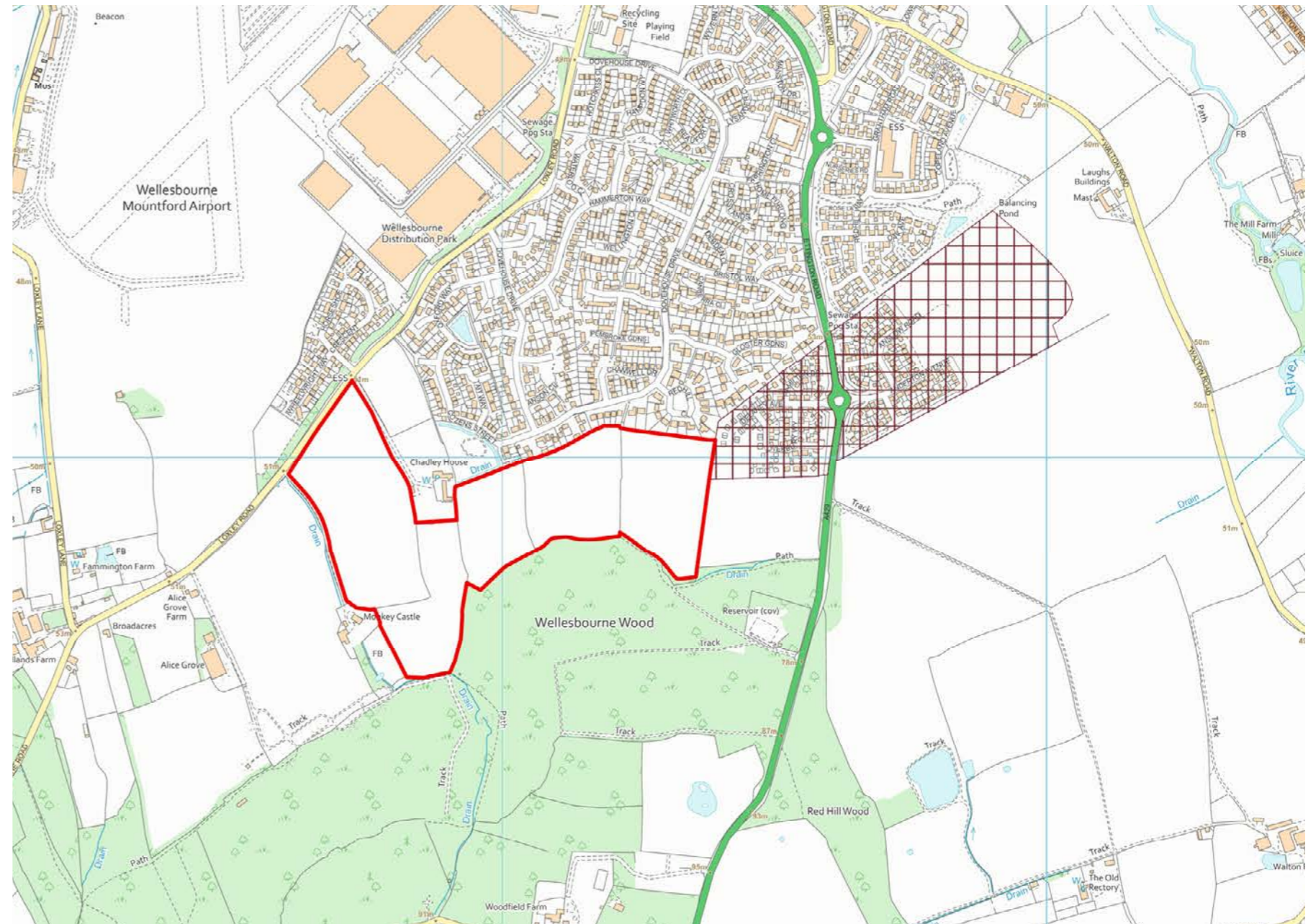
COPYRIGHT The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Ltd. Crown copyright. All rights reserved. License number 100042093.

PAGE 3	1	PAGE 4	2	PAGE 9	3	PAGE 14	4	PAGE 22	5
INTRODUCTION		POLICY CONTEXT		THE SITE AND THE VISION		LANDSCAPE CONSIDERATIONS		PLANNING CONSIDERATIONS	
PAGE 25	6	PAGE 30	7	PAGE 31	8	PAGE 32	9	PAGE 33	10
HIGHWAYS CONSIDERATIONS		ECOLOGICAL CONSIDERATIONS		HERITAGE CONSIDERATIONS		STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT		CONCLUSIONS	

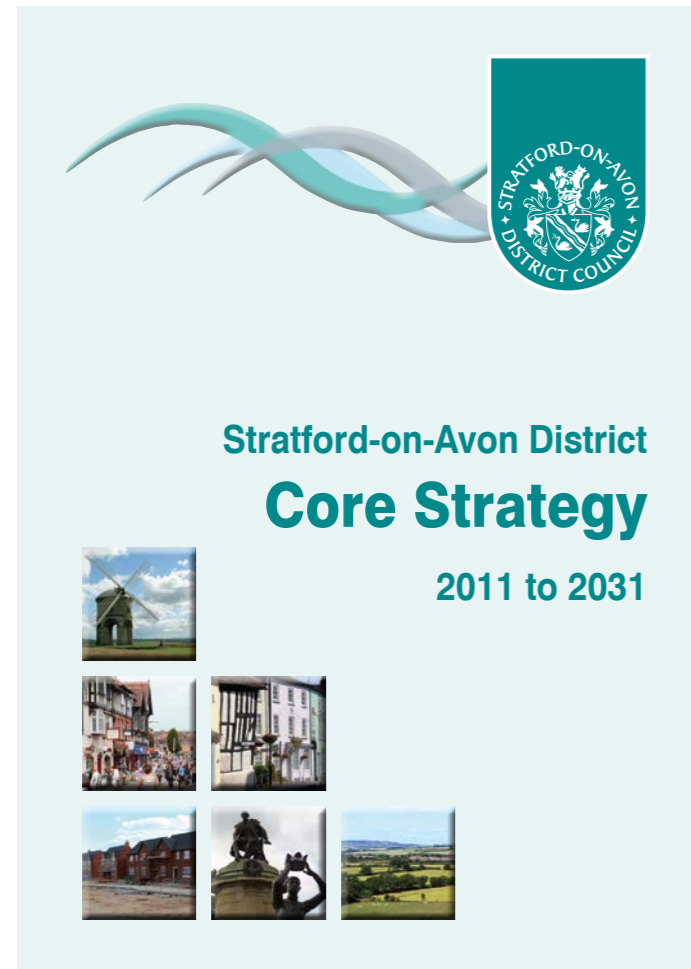
INTRODUCTION

- 1.1 Persimmon Homes are one of the UK's most successful house builders and operate on a national basis. Persimmon Homes South Midlands have been involved in developing land within Wellesbourne in three locations namely The Grange, Ettington Road; Mountford Place off Dovehouse Drive and the recently completed Ettingham Park Development off Ettington Road. These developments have all been successfully completed and demonstrate that there is significant demand for housing in Wellesbourne.
- 1.2 Wellesbourne is a large village with a range of facilities. This includes substantial employment associated with Wellesbourne Airfield and the adjacent Wellesbourne Distribution Park. The centre of the village contains a range of shops and other facilities. A large Sainsburys store is located adjacent to the Distribution Park, to the west of Loxley Road. The village also contains a range of sporting and leisure facilities including the Wellesbourne Sports and Community Centre, Wellesbourne Cricket Club, playing fields and play facilities. Wellesbourne also contains a primary school located to the northern end of the village.
- 1.3 Wellesbourne is identified as a Main Rural Centre in the adopted Stratford-on-Avon Core Strategy. This represents the second tier of settlements in the settlement hierarchy, below the principle settlement of Stratford-on-Avon.
- 1.4 The Core Strategy, which remains the Development Plan for the District, identified a requirement of least 14,600 additional homes during the period 2011-2031. The Core Strategy was adopted on 11th July 2016. The NPPF makes clear that policies in local plans should be reviewed to assess whether they need updating at least once every five years and then should be updated as necessary. In accordance with this policy the Council are embarking on a new South Warwickshire Local Plan in conjunction with Warwick District Council. The South Warwickshire Local Plan Issues and Options was published in January 2023. This document identified Wellesbourne as one of 22 'small settlements'. This indicates the village is a sustainable location for growth.
- 1.5 This Vision Document is prepared to inform Officers and Members of Stratford-on-Avon District Council of the potential of this site to deliver sustainable housing development, in a settlement which provides a wide range of facilities and is recognised as one of the most sustainable in the District.

Site Location · 1:10,000



POLICY CONTEXT



- 2.1 The adopted development plan for the area is the Stratford-on-Avon Core Strategy (2011-2031). This sets out both the housing requirement for the plan period and also the core policies which will guide future development.
- 2.2 Policy CS1 sets out the Council's support and apply the principle about planning to secure a high quality environment, managed economic growth and social equity of equal importance. It identifies that development proposals should contribute towards the character and quality of the District and to the wellbeing of those who live, work in and visit the District. Development should be located and designed so that it contributes to the maintenance of sustainable communities.
- 2.3 Policy CS5 deals with landscape. It states the landscape character and quality of District will be maintained by ensuring that development takes place in a manner that minimises and mitigates its impact and where possible incorporates measures to enhance the landscape. The cumulative impact of development proposals on the quality of the landscape will be taken into account. The policy sets out of a number of criteria which must be considered with regards to landscape character and enhancement, visual impact and trees, woodland and hedges.
- 2.4 Policy CS15 is of particular relevance in that it identifies the distribution of development within the District. The policy identifies the main town as Stratford-upon-Avon and that this will be the main focus for housing and business development. Below the main town are identified the main rural centres and these include Wellesbourne. Main rural centres are identified as suitable locations for housing and business development.

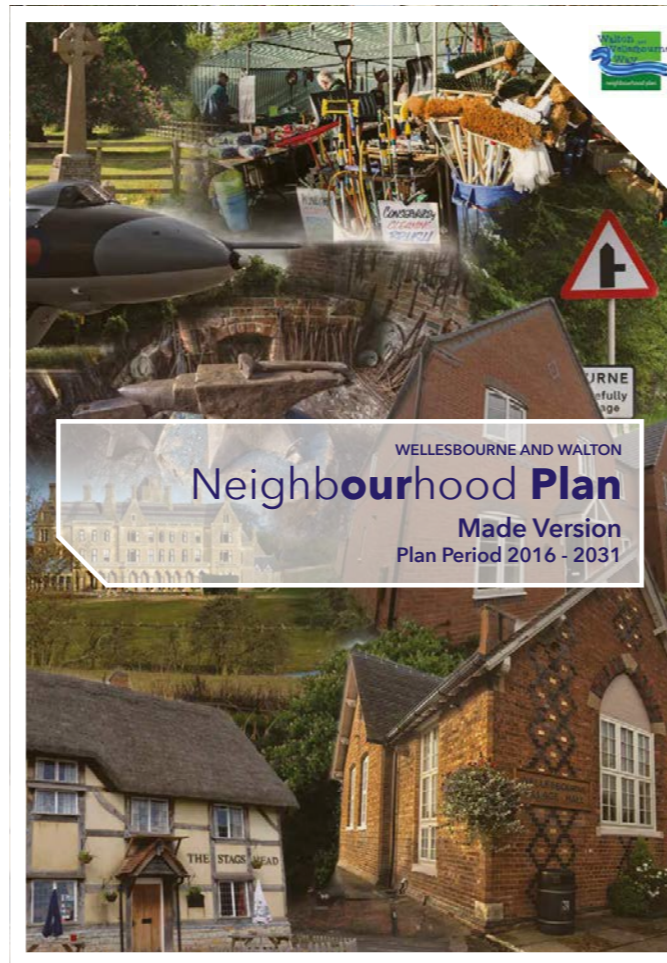
- 2.5 Policy CS16 identifies that provision will be made for at least 14,600 additional homes. For main rural centres approximately 3800 homes have been identified. The Core Strategy does not identify any sites in Wellesbourne. The policy goes on to indicate that the future site allocation plan will identify reserve housing site providing flexibility to ensure that the District can meet its full agreed housing requirement which incorporates its share arising in the Coventry and Warwickshire housing market area to 2031.
- 2.6 Policy CS17 refers to accommodating housing needs arising from outside of the District. It also sets out the Council will work with other local authorities in the Coventry and Warwickshire Housing Market Area to prepare and maintain a joint evidence based including housing need and housing availability, take part in a process to agree a strategic approach to address any shortfall of land availability and if there is clear evidence of housing need which cannot be met within the administrative boundaries of the authority in which the need arises and part or all of the need would be most appropriately met within Stratford-on-Avon District, the Council will seek to identify the most appropriate sites to meet this need and will review the Local Plan to do this, should it be required.

Site Allocation Plan

- 2.7 The Site Allocation Plan is still being prepared by the District Council. It has reached Regulation 19 stage which was consulted upon in the second part of 2019 and an updated version in 2022. The Council have yet to publish any further version of the plan nor to submit the document to the Secretary of State for examination.
- 2.8 The Site Allocation Plan identified eleven specific site proposals. None of these proposals was within Wellesbourne.
- 2.9 Part A of the Site Allocation Plan identified reserved housing sites. Again, none of these sites were identified within or adjacent to Wellesbourne.

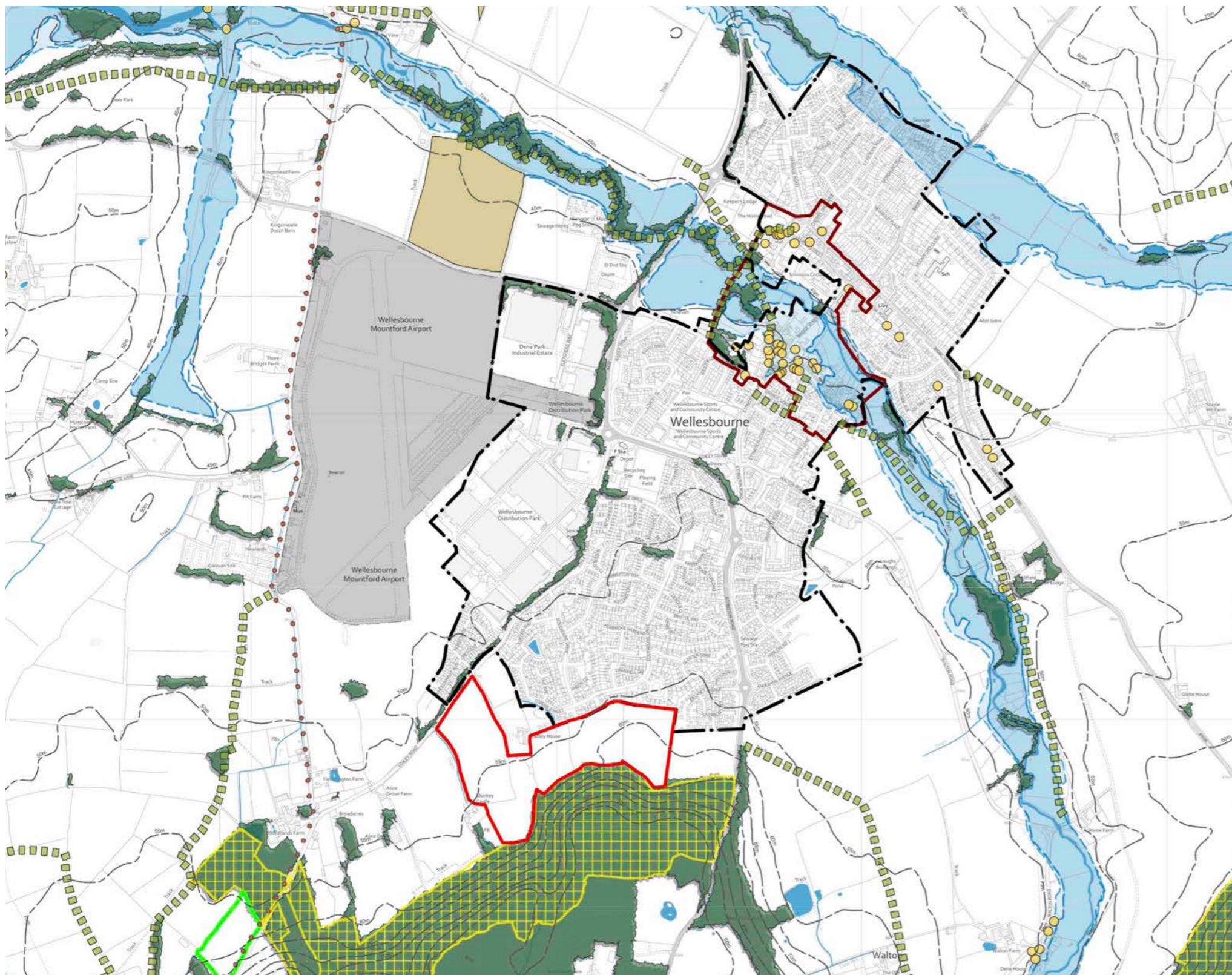
Wellesbourne Neighbourhood Plan

- 2.10 The Wellesbourne and Walton Neighbourhood Plan was made in 2018. It covers the period 2016-2031 to align itself with the Core Strategy. The Neighbourhood Plan identified nine key objectives. These included the conservation and enhancement of heritage assets, retention of high quality agricultural land and hedgerows, new developments being located in designated areas that helped preserve the balance of housing around the traditional centre of Wellesbourne, taking due account of landscape and biodiversity factors and no housing being permitted within the River Dene and Newbold Brook floodplain.
- 2.11 The Neighbourhood Plan includes a range of policies and information items. These include cherished views around Wellesbourne and Walton and Policy WW4 identifies how planning applications impact on these views should be considered. The Neighbourhood Plan identifies that consideration should be given to the desire to maintain the separation between Wellesbourne and Walton in order to maintain the distinctive character of both locations, avoid the loss of picturesque views across open countryside between the villages and preserve the wide range of historic sites and monuments that have been identified in the area between Wellesbourne and Walton.
- 2.12 The Neighbourhood Plan identifies one housing site within land known as Area 1. The majority of this land falls within Flood Zones 2 and 3 and therefore should not normally be developed. A small portion of the area is identified as a possible Reserve site for use beyond 2030.



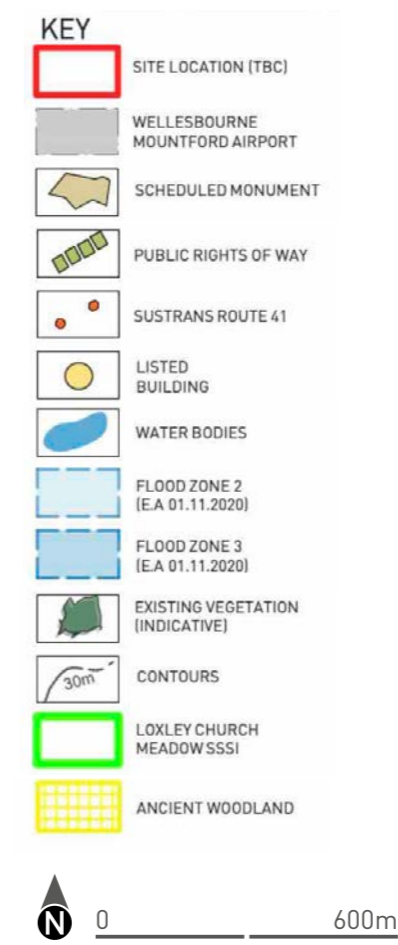
South Warwickshire Local Plan

- 2.13 The council are working with Warwick District Council to produce a new local plan for South Warwickshire. This Plan will replace the strategic policies of the adopted Core Strategy.
- 2.14 The Scoping Consultation ran from May - June 2021. The Scoping Consultation identified a series a potential Growth Options for the emerging plan, a number of which identified Wellesbourne as a settlement capable of delivering growth.
- 2.15 The Issues and Options Consultation ran until March 2023. The Issues and Options document identified five Growth Options of which four included Wellesbourne as a settlement capable of accommodating growth.
- 2.16 This document has been prepared to assist the Council and provide more information regarding Land East of Loxley Road, Wellesbourne.



2.17 The adjacent plan shows the high level constraints across Wellesbourne. The plan demonstrates that the south of Wellesbourne is less constrained than the north which is significantly affected by flood risk.

Wellesbourne - Constraints Plan · 1:15,000



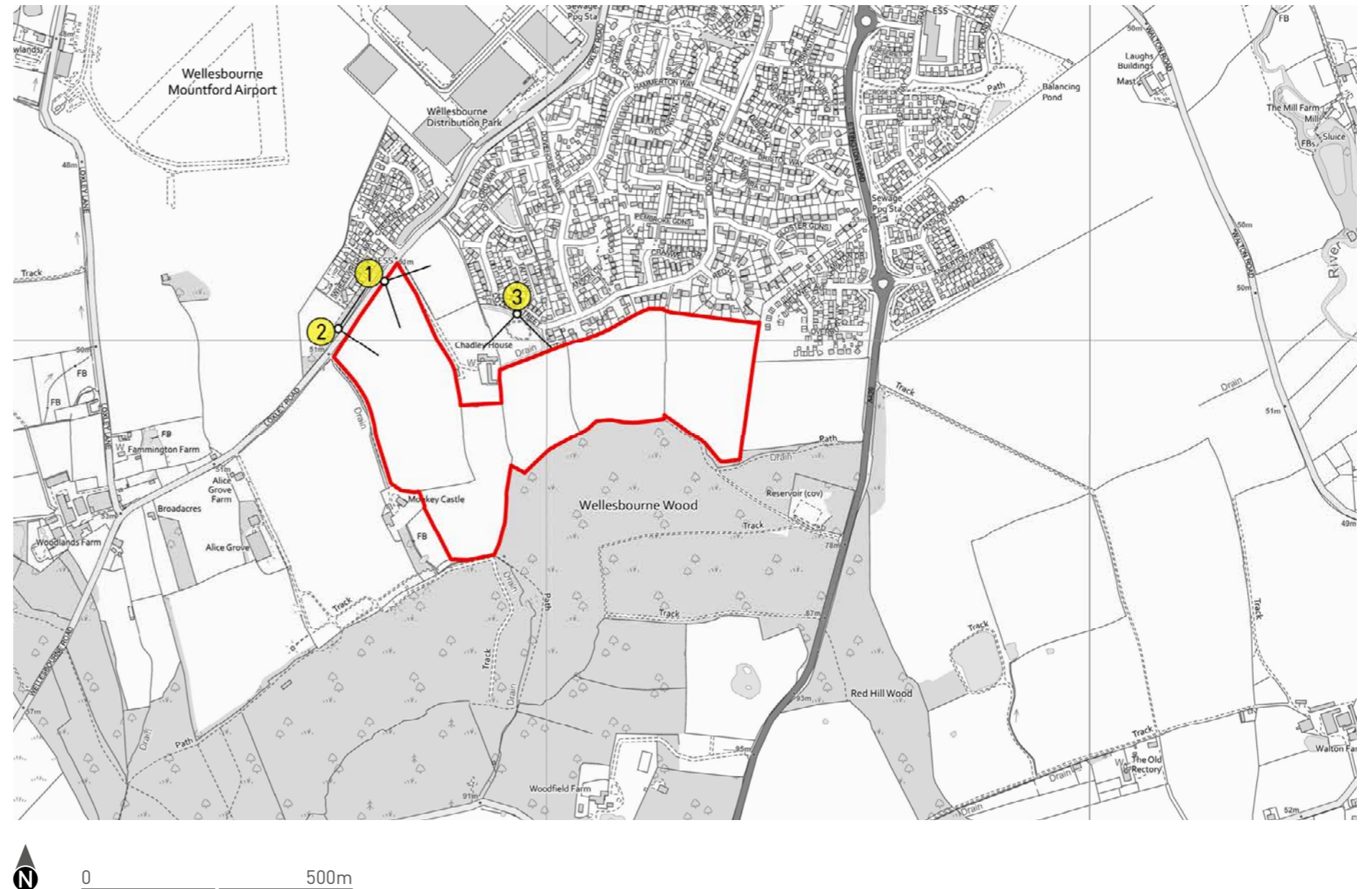




THE SITE AND THE VISION

- 3.1 The site is located on the southern edge of Wellesbourne and comprises 17.9ha of land. It consists of land between Loxley Road and The Grange development (Ettington Road).
- 3.2 The site area includes several agricultural enclosures that extend across the lower slopes of a local hill, with landform rising to the south up to and including the dense mature woodland area of Wellesbourne Wood. The wider settlement area of Wellesbourne is broadly formed around the route of the A429, and includes larger residential areas as well as the distribution park and airfield on its western edge. The River Dene flows in a north-west direction through the village and loosely dividing the settlement into two parts.
- 3.3 The site is situated immediately adjacent to the settlement edge and is contained to the south physically by rising landform and woodland structure. A detailed analysis of the characteristics of the site from a landscape perspective is set out later in this promotional document.

Viewpoint Locations · 1:10,000







2 View looking north-east from the settlement threshold at Loxley Road



3 View looking south from the settlement edge of Wellesbourne, off Cozens Street

Immediate Boundaries

3.4 The northern boundary of the site is formed by the established residential development contained within Wellesbourne. As a consequence the site is clearly influenced by established development. The western boundary of the site is formed by Loxley Road. The site excludes the existing residential property, known as Chadley House. The eastern boundary is an existing field boundary, adjacent to recent residential development undertaken by Persimmon. The southern boundary of the site is formed by an established woodland known as Wellesbourne Wood East.

Surface Water Drainage

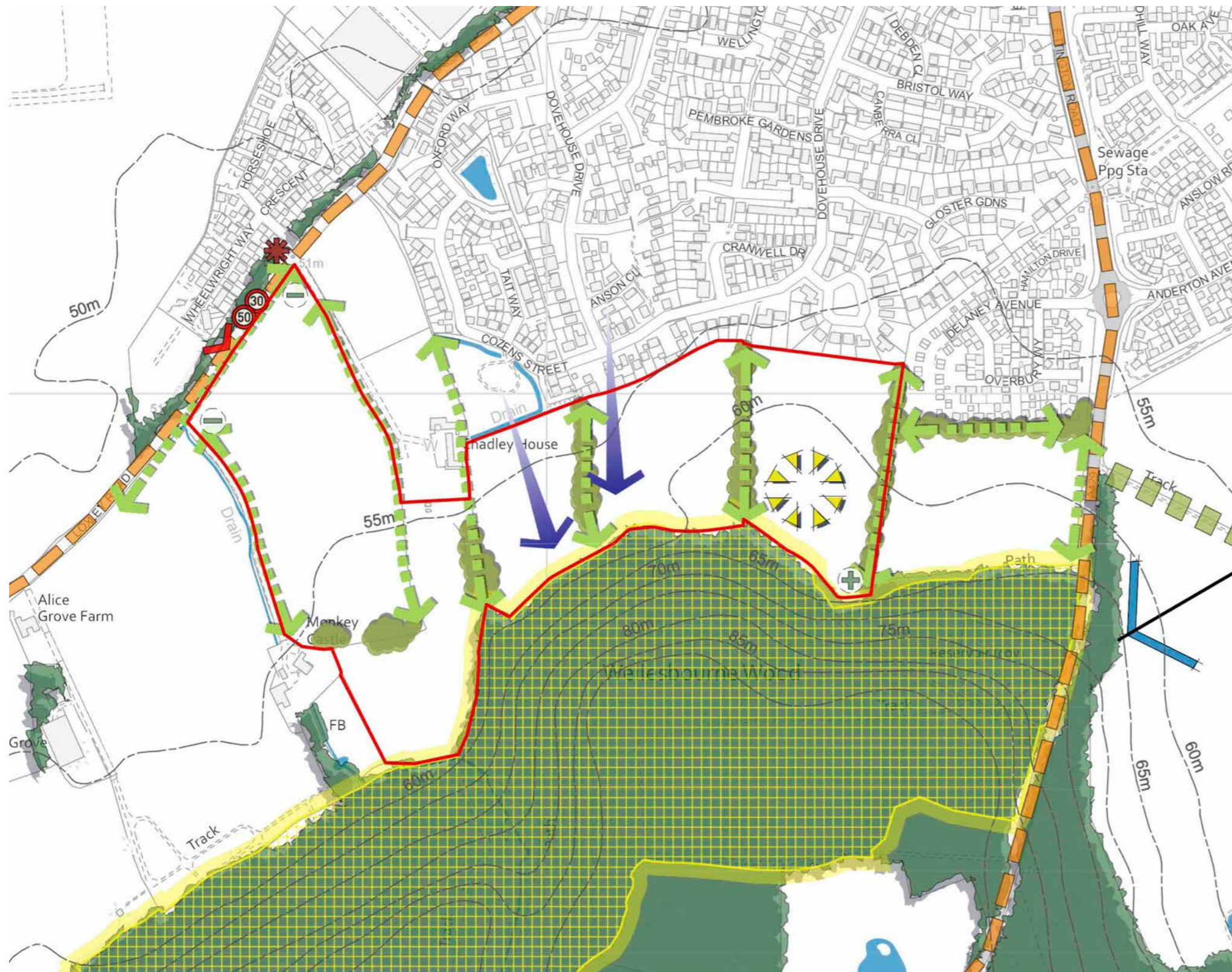
3.5 Environment Agency data identifies all of the site falling within Flood Zone 1, indicating the risk of flooding from rivers and water courses is extremely low. Changes to surface water run-off from the proposed development will follow the same sustainable drainage principles that have already been established in the recently constructed housing developments immediately adjacent to the site.

Noise



















3.6 There are no obvious noise constraints. Some traffic noise will be generated from Ettington Road but it has already been established through the development of new housing on either side of the road that subject to suitable mitigation measures traffic noise is not a constraint on housing development.

Access

3.7 There are two potential access points via extensions from The Grange and Mountford Place developments. Both developments allow provision for existing roads to be extended to provide access to the site.



Site Constraints & Opportunities · 1:5,000

- KEY**
-  SITE LOCATION (TBC)
 -  SITE LOW POINT
 -  SITE HIGH POINT
 -  EXISTING VEGETATION (INDICATIVE)
 -  EXISTING VEGETATION WITHIN SITE BOUNDARY (INDICATIVE)
 -  SUB STATION
 -  SPEED LIMIT
 -  SPEED LIMIT
 -  LOXLEY ROAD AND ETTINGTON ROAD CORRIDORS
 -  EXISTING SITE ACCESS
 -  CONTOURS
 -  WATER BODIES
 -  ANCIENT WOODLAND
 -  ANCIENT WOODLAND 15M OFFSET
 -  LOCALISED PLATEAU OF HIGH GROUND
 -  GREEN INFRASTRUCTURE FRAMEWORK DEFINES SMALL TO MEDIUM SCALE FIELD PATTERNS
 -  LONG DISTANCE VIEWS TO WELLESBOURNE WOOD
 -  SHORT DISTANCE GLIMPSED VIEWS TO SLOPES





LANDSCAPE CONSIDERATIONS

Site Description

Overview

- 4.1 The site is situated immediately adjacent to the settlement edge and is contained to the south physically by rising landform and woodland structure. The largest parcel is the field located immediately adjacent to Loxley Road. Immediately south of that medium scale enclosure is a smaller parcel of land, irregular in plan form, that extends up to the edge of Wellesbourne Wood and around the property at 'Monkey Castle'. Two smaller scale, more regular field enclosures are located to the east, and encompass the area between the existing settlement edge and Wellesbourne Wood.

Landform

- 4.2 The landform across the site is broadly consistent, comprising the gradually rising slopes up to the high point at Red Hill and steeper slopes within Wellesbourne Wood.

Land Use

- 4.3 Land use across the site is agricultural given predominantly grazing pasture. Field sizes are mixed but generally limited to small and medium scale; with the exception of the south-western field the fields are broadly regular in plan form.

Green Infrastructure

- 4.4 Green infrastructure across the site comprises the network of field boundary hedgerows that define the local field pattern. These are generally dense and continuous, often tall. Frequent hedgerow trees are present along the lengths of the hedgerows. Linear tree belts are present in the western part of the site, situated on the northern and southern edges and located along the respective access tracks to local properties (Chadley House and Monkey Castle). The southern edge of the site is defined by the woodland edge of Wellesbourne Wood; this area is designated as ancient re-planted woodland extends to ca. 43.59 hectares (ha) overall and sits across the localised slopes and high ground, forming a backdrop in many views across the area. The northern edge of the site is consistent with existing residential edge of Wellesbourne and this comprises a mix of boundary types, but including some sections of hedgerow and occasional hedgerow and/or garden trees.

Settlement Pattern

- 4.5 The settlement pattern relative to the site is defined by the southern edge of Wellesbourne. This is currently characterised by late twentieth century residential development, including a mix of dwelling types and heights. Overall the settlement edge is well defined. To the west of the site, the settlement pattern extends slightly further south as a result of more recent residential development off Loxley Road (including Wheelwright Way) and to the east, separated from the site by a single field, more recent residential development (some under construction) is present off Ettington Road.

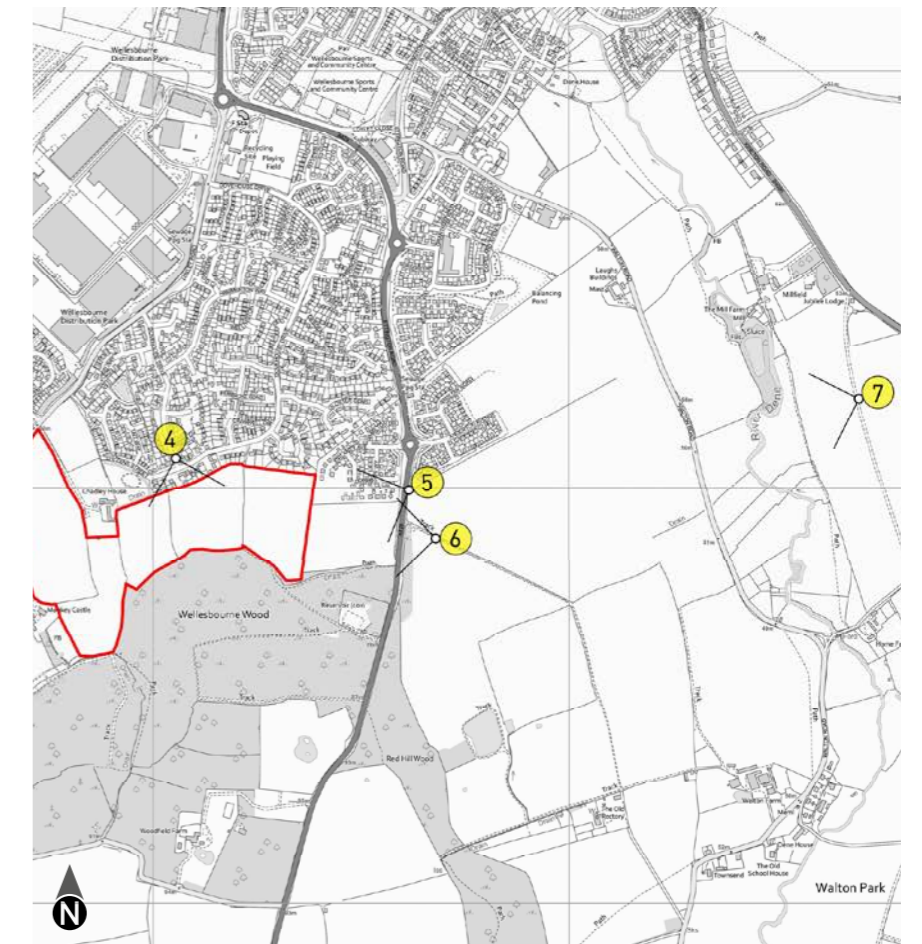
Access and recreation

- 4.6 Access to the site in the form of formal public rights of way or public highways is limited and there are no routes apparent across the site. Consequently experience of the site from public locations is limited to the local highway routes to the west, along Loxley Road and immediately adjacent to the site) or from Ettington Road to the east, however this is removed from the site by the remaining field enclosure and emerging settlement edge. The residential estate to the north affords some perception of the site, however this is limited to locations within the existing streetscape and small pockets of open space, with no obvious direct access.

Views

- 4.7 Given the nature of the existing settlement pattern, relative lack of access across the site, and the physical containment provided by the combination of landform, vegetation and existing built form, views into and across the site are relatively limited.
- 4.8 Vantage points are available along Loxley Road (limited to road users, with generally no pedestrian footways); from this route there are glimpsed views through field access points and potential views into the western field parcel of the site, however layers of green infrastructure tend to screen views into the core of the site area.

- 4.9 The southern edge is generally more prominent due to the nature of the landform as it rises to the high ground and woodland. From Ettington Road views to the site tend to be screened by vegetation along the highway corridor, the recent residential development and also by intervening vegetation associated with the fields between the site and this route. A public bridleway is present to the east of Ettington Road, however views to the site are similarly screened. To the north, the settlement area on this edge of Wellesbourne comprises a residential estate with a mix of dwelling types and heights, the streetscape and open spaces, combined with the breaks in massing, allow some partial views through to the site, particularly the higher ground closer to the woodland edge. Such views tend to be intermittent and limited.





4 View looking south from the settlement edge of Wellesbourne, off Dovehouse Drive



5 View looking south-west from Ettington Road



6 View looking west from the public bridleway, east of Ettington Road



7 View looking west, illustrating longer distance views from an access track, west of Kineton Road

Overview of Stratford Landscape Sensitivity Study (2012)

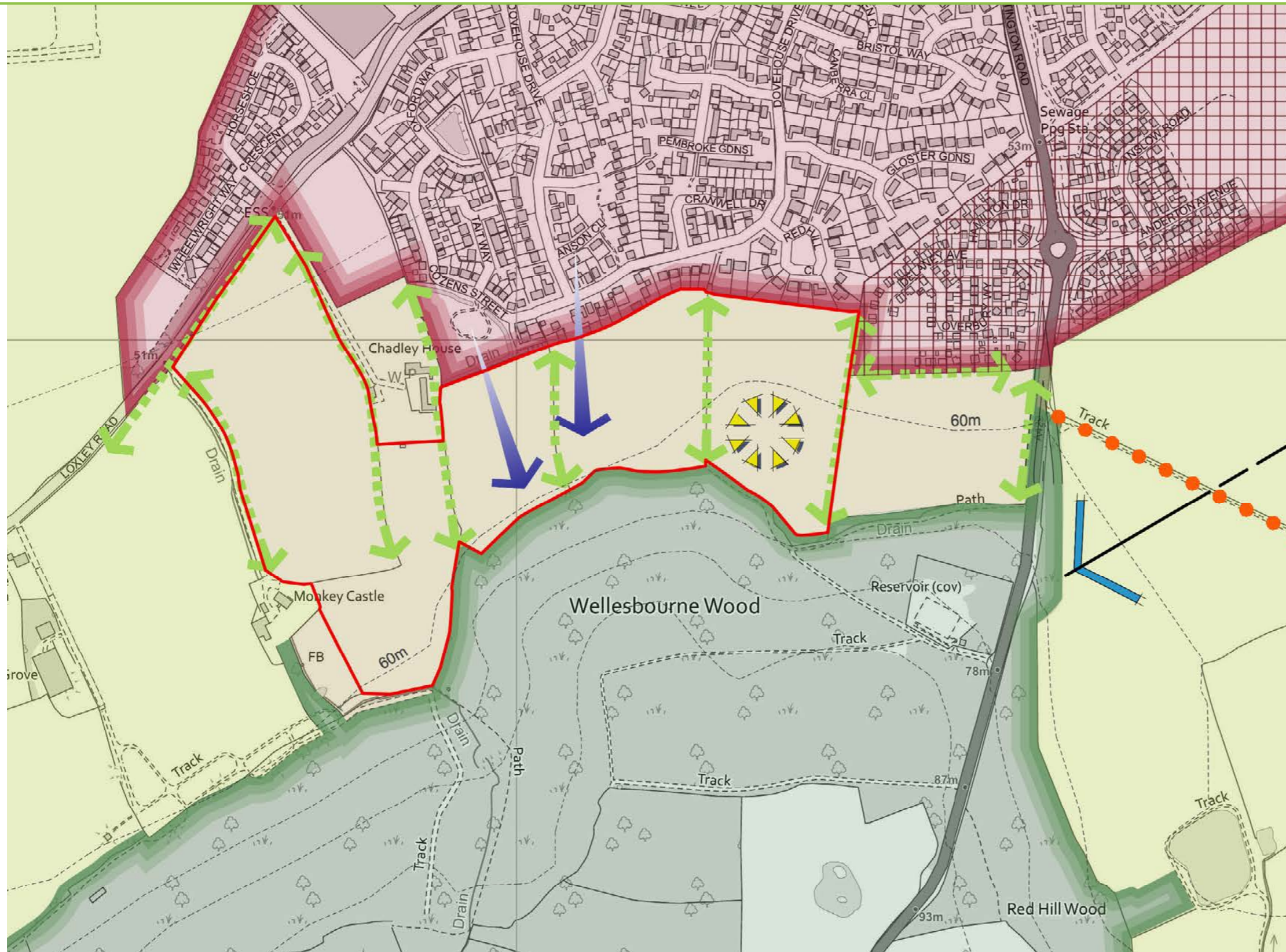
- 4.10 The evidence base for planning policy within the District includes a Landscape Sensitivity Assessment (LSA), prepared by White Consultants and published in 2012; this included the main settlements in Stratford-on-Avon District. The LSA pre-dates latest best practice guidance on determining landscape sensitivity, but the LSA findings retain some relevance.
- 4.11 The focus for the LSA was noted as land identified for assessment in the SHLAA, which focussed on land on the edge of the larger settlements of the district, however the areas are noted as being defined by the character of the landscape and urban edge, not on individual land parcels.
- 4.12 The LSA determined sensitivity of land parcels as low, medium or high (or incremental levels between). The site is located in an area defined by the LSA as 'WA08 – Wellesbourne' which the LSA defines as 'medium to high' sensitivity to residential development. It should be noted that land immediately west of Ettington Road, which is now under construction for residential development, is also located in the same parcel and judged to be as 'medium to high' sensitivity.

- 4.13 In determining the medium to high sensitivity, the LSA recognises:
- the small scale pastoral landscape rising gently to an adjoining wooded escarpment;
 - there is a distinctive pattern with farmsteads set back from the road while the edge of Wellesbourne is generally screened;
 - that the area has an intimate, enclosed and attractive character although views within the area are generally filtered by a hedgerow trees and the area is not widely visible;
 - that it has a character that; and
 - compares favourably with the more open arable landscapes around the settlement.
- 4.14 This analysis pre-dates the construction and completion of the emerging settlement edge on land to the west of Ettington Road and also the new residential estate to the west of Loxley Road, both of which influence the prominence of the existing settlement edge and reflect on the character of the LSA parcel.
- 4.15 Overall, despite the considerations of the LSA, it is considered that there is sufficient variation across the site to account for some variation in landscape sensitivity at a site level, with a lower sensitivity in the northern areas of the site likely to be determined on a site specific analysis.














Wellesbourne Neighbourhood Plan

- 4.16 Landscape sensitivity is a matter raised in the Neighbourhood Plan for Wellesbourne, whereby the Plan refers to studies undertaken by the County (referencing a 2015 study) and illustrating the difference sensitivity zones around the settlement (albeit this appears to be from the conclusions of the 2012 District study).
- 4.17 The Neighbourhood Plan also identifies several 'cherished views' stating that 'access to, and views of, the countryside have a significant positive impact on the lifestyle and wellbeing of residents'. None of the identified 'cherished views' look across the site, nor generally toward the site. The Neighbourhood Plan 'cherished view 6' (from Jubilee Way to Wellesbourne Wood) has some relevance and is reflected by Viewpoint 10 included in these representations. In overall terms any development of the site is not likely to materially influence 'cherished view 6' due to the distance and the intervening built form of the recently constructed sites off Ettington Road.
- 4.18 In respect of physical landscape components, Policy WW 4 of the Neighbourhood Plan makes reference to existing hedgerows and the need to retain these where possible as well as encouraging the establishment of new native hedges, the gapping up of existing hedgerows and the planting/replacement of hedgerow trees.

Landscape and Visual Analysis · 1:5,000



KEY

-  Site boundary
-  Key contours
-  Public bridleway
-  Green infrastructure framework defines small to medium scale field patterns
-  Long distance views to Wellesbourne Wood
-  Short distance glimpsed views to slopes
-  Existing and emerging settlement edge provides containment to the north
-  Wellesbourne Wood provides physical containment to the south
-  Localised plateau of high ground
-  Small to medium scale mixed agriculture
-  Larger scale arable
-  Recent development
-  0 200m



Indicative Development and Landscape Strategy · 1:5,000

KEY

-  Site boundary
-  Recent development
-  Potential development
9.98H @40DPH = circa 400 dwellings
-  Potential 1FE school
1.2 Hectares
-  Potential single storey development
-  Proposed buffer/ POS
-  Existing green infrastructure
-  Contour (10m interval)
-  Retained visual connections
-  Proposed green infrastructure
-  Proposed new woodland



Indicative Development and Landscape Strategy

- 4.21 Following the initial review of baseline information, the consideration of landscape and visual constraints and opportunities has informed the design evolution of a potential development framework and landscape strategy for the site.
- 4.22 Adopting this 'landscape and visually led' approach ensures that the location, scale and character of an emerging masterplan will respond to the local landscape character and will avoid, or minimise, potential landscape and visual effects.
- 4.23 The development and landscape strategy for the site is outlined below, and is founded on the following principles:
- Identification of a suitable 'development envelope' taking into account landscape character and visual containment of the site; and
 - Creation of additional green infrastructure and open space on site, which is both consistent with and complementary to, the existing local landscape character.
- 4.24 The development and landscape strategy have been considered as separate but integrated components and comprise the elements described below.
- The approximate development envelope is primarily set on the lower ground and broadly below the 60m contour to ensure that built form is not situated in the highest parts of the site, consequently minimising potential visibility;
 - Existing green infrastructure will be retained and development cells are set back from these elements (hedgerows and hedgerow trees) so as to ensure that the existing vegetation is retained and incorporated into green corridors – this has the added benefit of incorporating a mass and scale into the layout that reflects the pattern and scale of the local landscape;
 - The Loxley Road approach to the settlement is protected by the inclusion of a substantial landscape buffer to the western edge of the site, including an area of open space that will present design opportunities for a high quality green gateway at the threshold to the settlement

- Wellesbourne Wood (ancient replanted woodland) will be protected by the inclusion of a substantial landscape buffer that can be used to incorporate additional planting, landscape management and biodiversity enhancements where appropriate;
 - Native woodland expansion is proposed in the south-western corner of the site, situated on higher ground, this will represent a clear, distinct and meaningful extension to the woodland habitat; and
 - Dovehouse Drive and pockets of open space off Cozens Street experience some broken, channelled views to the existing landscape and this context will be maintained through the inclusion of a north to south open space, set along the hedgerow field boundary, consequently maintaining a sense of connection to Wellesbourne Wood.
- 4.25 It is considered that the site has the capacity to accommodate residential development that does not result in unacceptable landscape and visual impacts.
- 4.26 The Indicative Development and Landscape Strategy also illustrates how a primary school could be accommodated on the site within the identified development envelope. The school is illustratively shown adjacent to the access point to make the school accessible to future and existing residents. The inclusion of a primary school will be subject to discussions with Warwickshire County Council as the Local Plan progresses.
- 4.27 Furthermore, by considering landscape and visual constraints as guiding principles to an emerging masterplan, development can come forward that reflects the pattern and scale of the landscape, integrates into its landscape context and helps create a high quality environment for the emerging settlement edge.

PLANNING CONSIDERATIONS

- 5.1 As set out in the Policy Context Section, the site is located in Wellesbourne which is identified as a second-tier settlement. This means that it has been identified as one of the most sustainable locations within the District and therefore is in a logical location to support development. This aligns with Policy CS15 which sets out the distribution of development in the District. A number of the growth options set out in the South Warwickshire Local Plan Scoping document identified Wellesbourne as a potential focus for development. This demonstrates that Wellesbourne is a sustainable settlement option for development.
- 5.2 Wellesbourne contains a number of local services and facilities including a primary school, doctors surgery, supermarket and distribution estate. These services are accessible via walking or cycling. The site is highly accessible and would provide for sustainable travel options.
- 5.3 The site is located to the south of the existing settlement and to the north of Wellesbourne Wood which forms a strong physical boundary. The site is located between two main routes into Wellesbourne, Ettington Road and Loxley Road. There are recent residential developments located on both routes. The proposed site is well-contained and would comprise a logical 'rounding off' of the settlement. The existing road infrastructure and Wellesbourne Wood provide strong physical boundaries to the proposed site.
- 5.4 The site is not located in the Green Belt and currently comprises agricultural land. As set out in the preceding sections, there are no technical constraints which would preclude the development of this site to provide residential dwellings. This site is located in Flood Zone 1 which is the preferred location for residential development. This is in contrast to the majority of the reserved sites identified in the Neighbourhood Plan which are affected by the flood zones associated with the River Dene and the watercourse which forms the northern boundary of Wellesbourne. There would also be associated ecological and biodiversity features to consider. It should also be noted that the Stratford Landscape Sensitivity Study determined that the parcels to the north and south of Wellesbourne all scored 'medium to high' sensitivity in landscape terms. This is in contrast to the majority of the reserved sites identified in the Neighbourhood Plan which are affected by the flood zones associated with the River Dene and the watercourse which forms the northern boundary of Wellesbourne. There would also be associated ecological and biodiversity features to consider. It should also be noted that the Stratford Landscape Sensitivity Study determined that the parcels to the north and south of Wellesbourne all scored 'medium to high' sensitivity in landscape terms. To the north of Wellesbourne key landscape considerations include the impact on the river corridor, coalescence with Charelecot, the views and landscape setting of Charlecote Park and views from the right of way network between Charlecote and Newbold Pacey.
- 5.5 The southern edge of Wellesbourne also has access to a range of services and facilities within comfortable walking and cycling distance including the Cooperative Food, Sainsburys and the employment development located off Loxley Road. In addition, residents would have easy access to the bus stop on Ettington Road which currently serves The Grange development. The bus route travels through the village of Wellesbourne and on to Stratford Upon Avon and Warwick. A primary school could also be accommodated on the site, subject to discussions with the County Council. The proposed site is therefore as sustainable as the reserve sites to the north in terms of access to local services and facilities.
- 5.6 The landscape analysis has concluded that this site could accommodate residential development which would integrate with the landscape context and create a high-quality context for the emerging settlement edge of Wellesbourne. It is acknowledged that the adjacent Wellesbourne Wood is designated as ancient replanted woodland and therefore an appropriate stand-off is required. This could be accommodated within the site and would function as public open space/green infrastructure. The location of the stand-off coincides with higher ground within the site which is advantageous in visual terms and directs built development to lower levels.
- 5.7 The site is ideally located to provide residential development to meet the needs of the District through the emerging South Warwickshire Local Plan. The proposed site accords with the existing distribution of development policy and would constitute a logical extension to Wellesbourne. The strong physical boundaries of the site support its allocation and would effectively round-off the settlement.

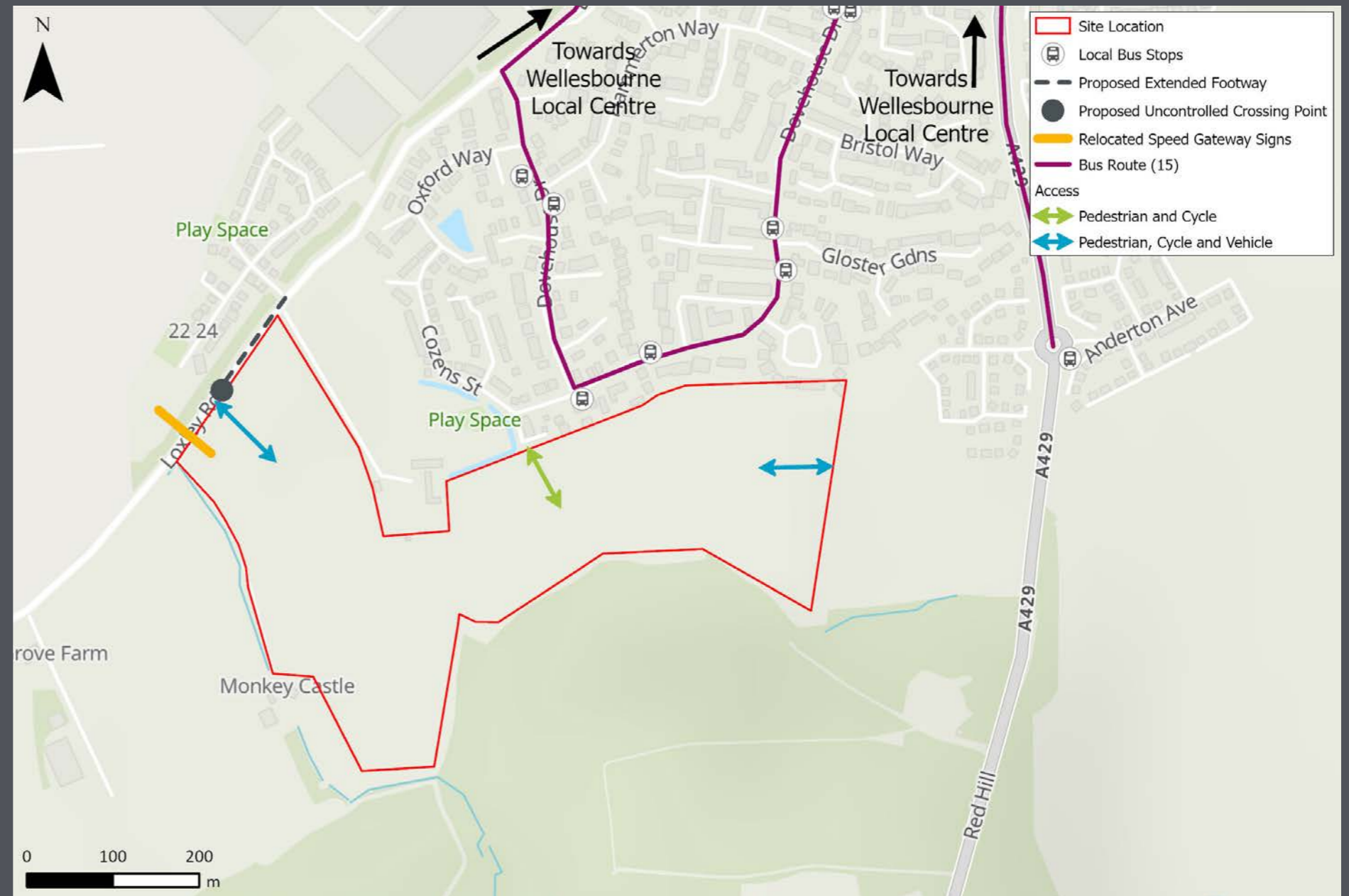




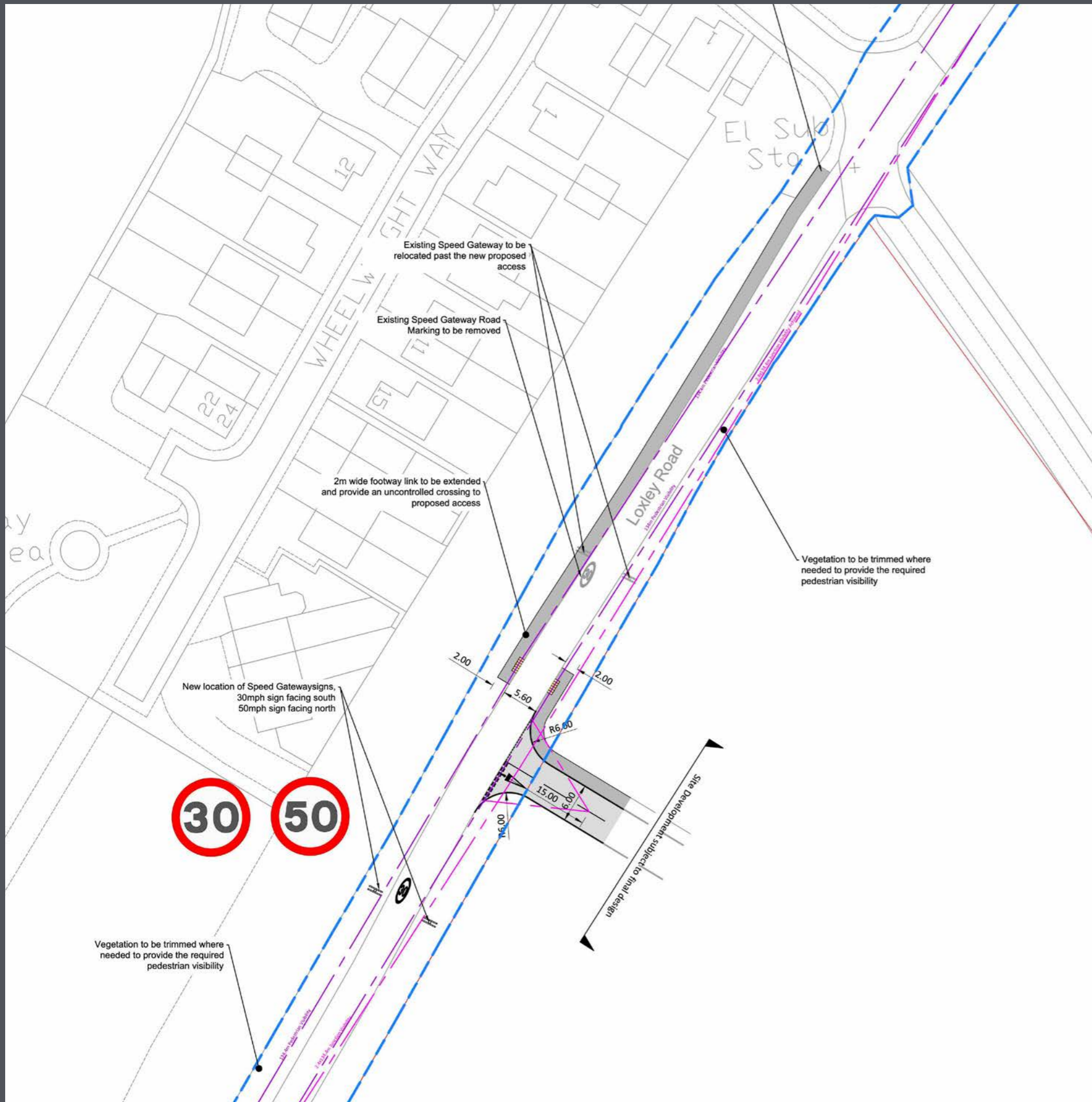
HIGHWAYS CONSIDERATIONS

CONNECTIVITY AND ACCESS

- 6.1 A comprehensive transport strategy for the site has been developed based upon the site context and the following key opportunities:
- The potential to provide direct access for vehicles onto Loxley Road, as well as through the Land at Ettington Road development providing access onto A429 Ettington Road – the main route between Wellesbourne, Warwick and the M40.
 - The site is within walking and cycling distance of local facilities and employment opportunities in Wellesbourne; and
 - Access to existing bus stops served by the number 15 bus route which provides a regular and frequent service between the site, Wellesbourne local centre, Stratford-upon-Avon, and Warwick.
- 6.2 The transport strategy also considers the following constraints:
- The lack of existing crossing facilities and footway along the site frontage on Loxley Road.
 - High vehicle speeds along Loxley Road within vicinity of site access, approaching the current 30mph speed limit gateway.



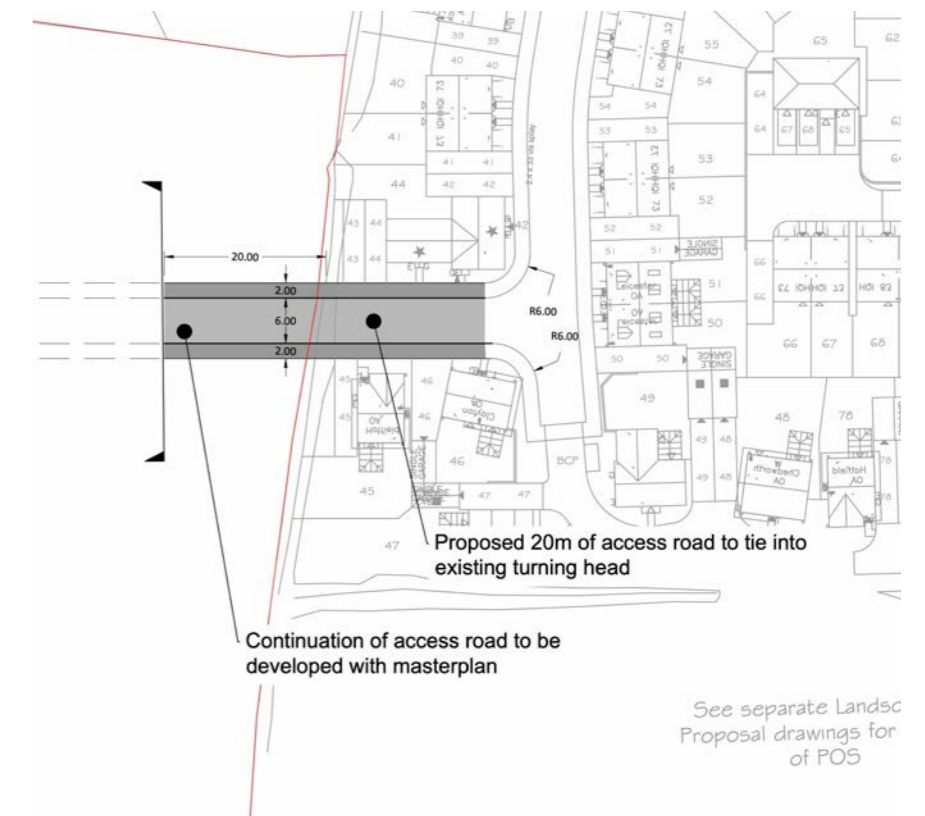
Transport Strategy · Not to Scale



Priority Junction • 1:750

DELIVERABLE ACCESS

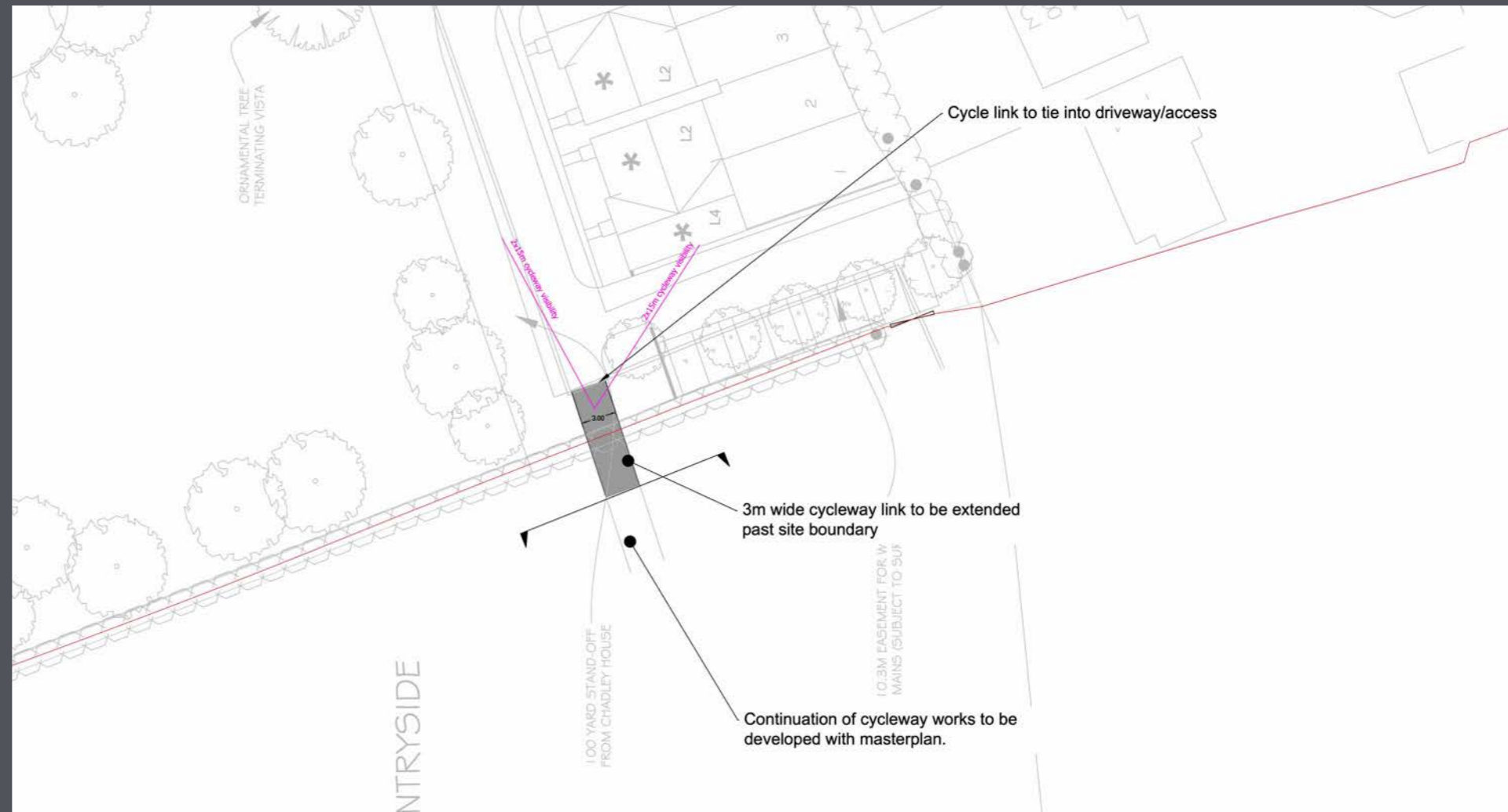
- 6.3 The site benefits from frontage onto Loxley Road and is also bounded by the Land at Ettington Road development to the east. It is therefore proposed to provide:
- Access to the west via a priority junction onto Loxley Road; and
 - Access to the east through the Land at Ettington Road development, as a continuation of the existing estate roads.
- 6.4 Preliminary design drawings have been prepared which demonstrate that the proposed access strategy is deliverable in accordance with the relevant design standards, and can be implemented entirely within the site curtilage and adopted highway boundary.



Site Access to Ettington Road Development • 1:1,000

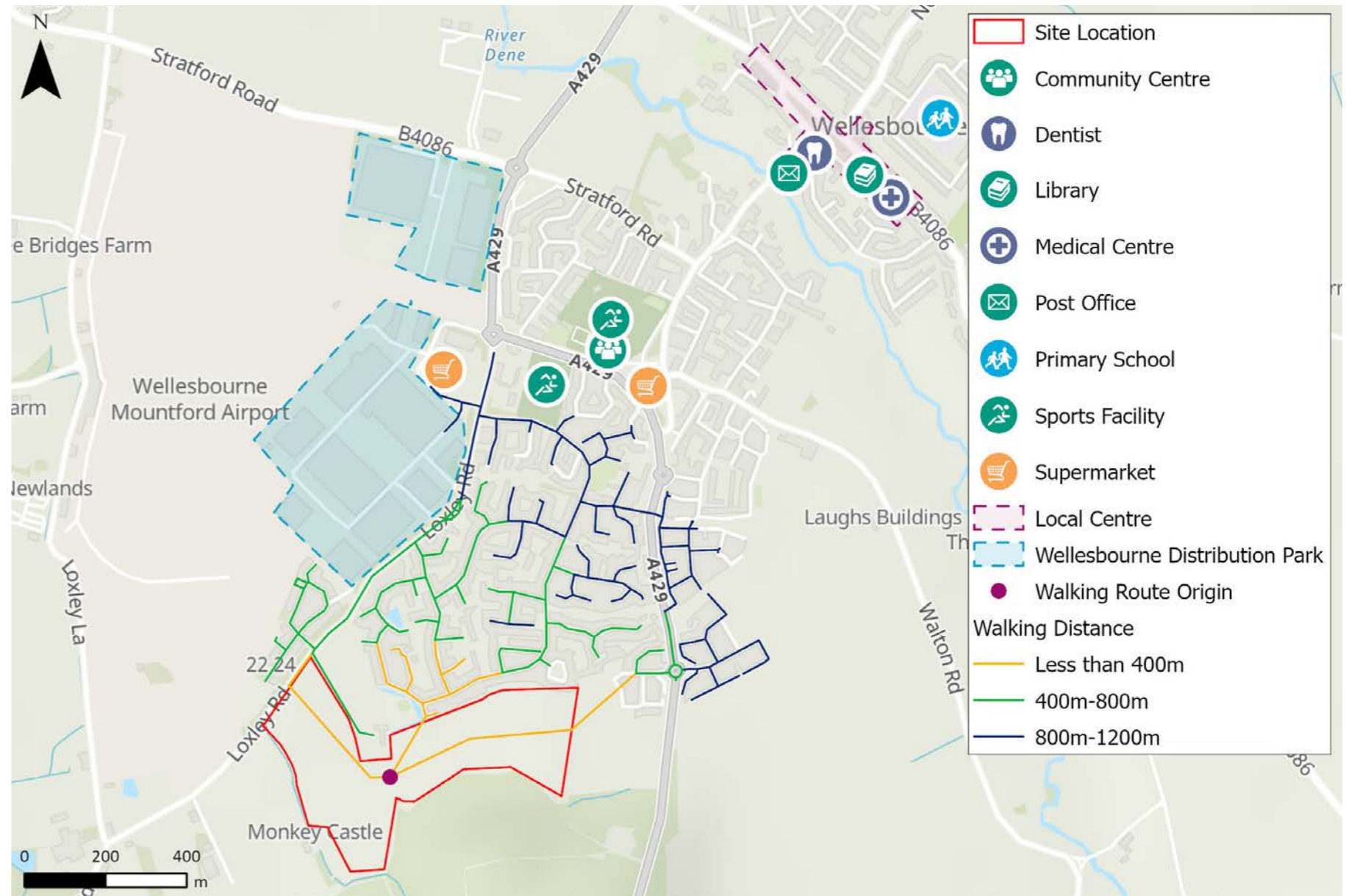
CONNECTIVITY

- 6.5 In order to bring forward sustainable development on the site, it is acknowledged that connectivity to the existing built form of Wellesbourne and public transport infrastructure will be required.
- 6.6 A connectivity strategy to provide improved linkages to facilities within Wellesbourne and to public transport infrastructure, including:
- Provision of a new footway on Loxley Road to the north of the site access, and an uncontrolled crossing point to connect to the existing footway network heading towards Wellesbourne;
 - Provision of a 3m shared footway/cycleway link onto Cozens Street to the north of the site, providing a route through the residential estates to the north; and
 - Provision of 2m footway on both sides of site access into adjacent development at Land at Ettington Road (Delaney Avenue).
- 6.7 In addition, it is proposed to relocate the 30mph speed limit gateway approximately 60m further south, bringing the site frontage and proposed access within the 30mph speed limit. This will ensure drivers are aware they are entering an urban area and highlighting that pedestrians may be crossing Loxley Road.



Pedestrian/Cycle Access to Cozens Street - 1:500





Local Amenities • Not to Scale

6.8 The site is within walking distance of local facilities and employment opportunities in Wellesbourne, including the following:

- Sainsbury's (Loxley Road);
- Co-Operative Supermarket (A429);
- Wellesbourne Sports and Community Centre; and
- Wellesbourne Distribution Park.

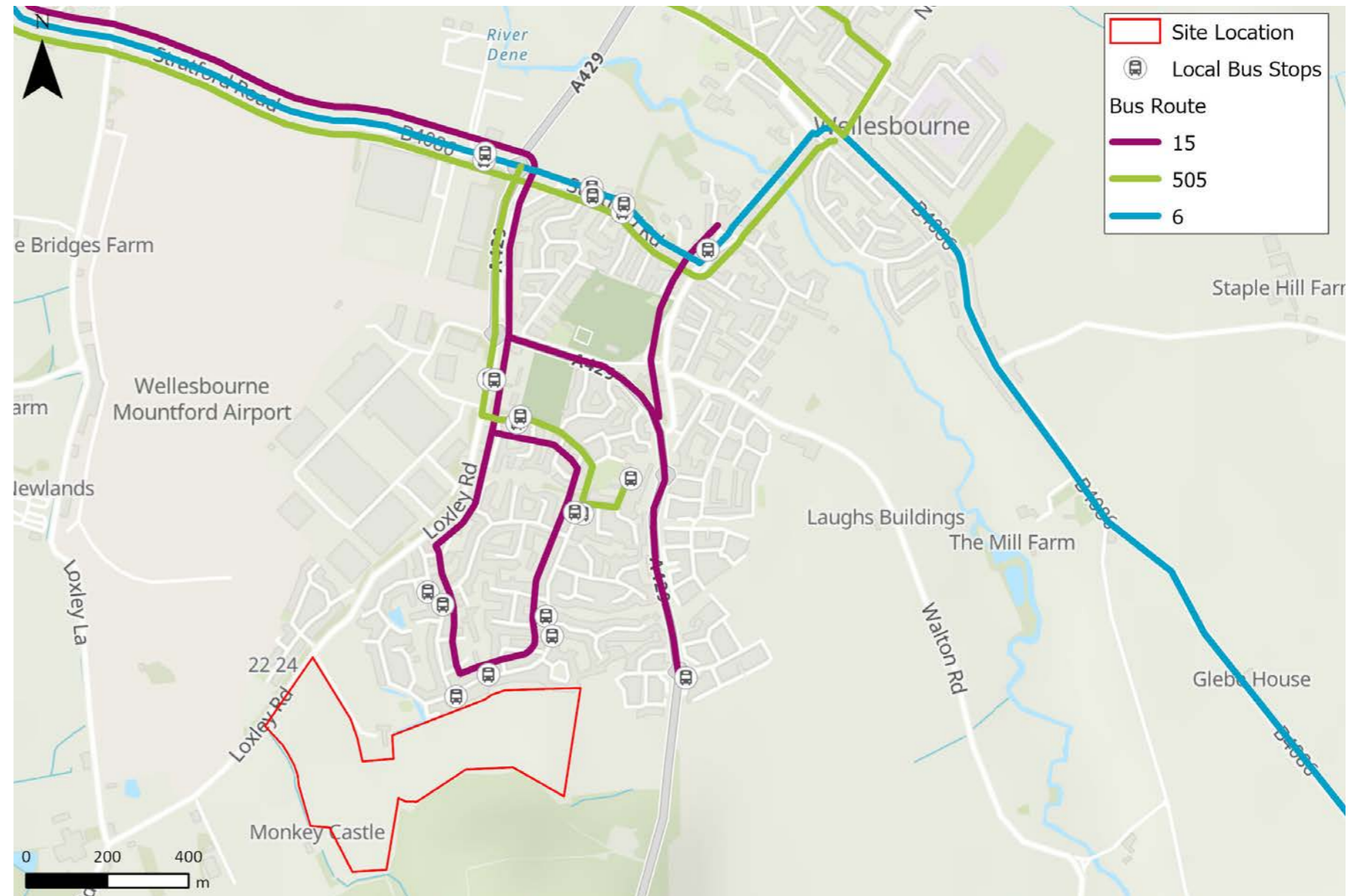
6.9 Wellesbourne Local Centre is 2.3km (27-minute walk / 9-minute cycle) from the site. To the north of the site, the routes towards these facilities follow residential streets which provide footways and street lighting. The roads are lightly trafficked making them also suitable for cycling.

6.10 To the south-west of the site, National Cycle Route 41 routes along Loxley Road towards Stratford to the west and Warwick and Leamington Spa to the north. This route is mostly on-road within the vicinity of the site. The site is within approximately 8km of Stratford-upon-Avon, approximately a 30 minute cycle, providing access to additional local facilities and employment opportunities.

6.11 The majority of the site is within 400m of the nearest bus stops (either on Dovehouse Drive or Ettington Road). Both of these stops are served by the number 15 service which provides a regular and frequent service towards Stratford-upon-Avon. The furthest distance from any point in the site to an existing bus stop is approximately 600m.

SUMMARY

6.12 A comprehensive transport strategy has been developed for the site which overcomes existing constraints, whilst facilitating the use of sustainable transport modes for trips to local facilities and employment opportunities.



Public Transport - Not to Scale

ECOLOGICAL CONSIDERATIONS

- 7.1 A Phase 1 Ecological Survey has been carried out at the site.
- 7.2 The site is not subject to any statutory or non-statutory designations. The nearest statutory designation to the site is Loxley Church Meadow Site of Special Scientific Interest (SSSI) which is located approximately 0.8km of the site. The nearest non-statutory designation is the Smatchley, Loxley and Wellesbourne potential Local Wildlife Site (pLWS) which is located immediately south of the site. This area is also designation as ancient woodland on MAGIC and is identified as such on the Site Constraints and Opportunities plan. The ancient woodland is located uphill from the site so run-off or potential contaminants from the site to enter the woodland is unlikely. National guidance recommends a 15m buffer is provided from the woodland and this is shown on the Indicative Development and Landscape Plan.
- 7.3 The Survey found that the site is generally comprises of species-poor agriculturally improved grassland. The site and field boundaries are marked by hedgerows, scattered scrub and trees which provide greater ecological value in the context of the site. These have informed the development envelope shown on the Indicative Development and Landscape Plan.
- 7.4 The Survey indicated that the site has suitable habitats and potential opportunities for a number of faunal species. The Survey concluded that the potential presence of species and associated mitigation and continued habitat opportunities appear to be readily achievable through masterplanning given the scale and nature of the site. As the proposals evolve, more detail will be provided regarding ecological mitigation.
- 7.5 In summary, there do not appear to be any overriding ecological constraints associated with the development of this site for residential use and considerable opportunities exist to deliver ecological enhancements are part of any development proposals.

HERITAGE CONSIDERATIONS

- 8.1 An assessment has been made of the potential heritage constraints to residential development of the Site, considering both built heritage and the potential for below-ground archaeological remains.

BUILT HERITAGE

- 8.2 Potential impacts upon the significance of designation and non-designated heritage assets in the vicinity of the Site, by way of changes to setting, have been considered. The only potentially sensitive asset is the non-designated Chadley House, which lies beyond the northern site boundary.
- 8.3 Chadley House is a detached former farmhouse, dating to the c.1730s, set within substantial grounds to the north. A range of former stables and stable-hand's quarters, since extended to the south, lie to its south and have been in residential use since the 1970s.
- 8.4 Residential development of the site would be anticipated to result in a minor degree of harm to the overall heritage significance of Chadley House and former stables, via a change in setting. This minor harm would derive principally from redevelopment of agricultural land with which the asset has a historic functional association. However, within the context of both alterations to the asset and its curtilage, alongside modern development to the east, which has reduced the contribution of the agricultural setting towards its heritage significance, the level of harm is anticipated to be low. The degree of harm will ultimately be dependent upon the proposed development parameters, and it would be possible to reduce the degree of harm via the adoption of appropriate embedded mitigation measures.

ARCHAEOLOGY

- 8.5 On the basis of existing evidence, the potential for significant archaeological remains of prehistoric, Romano-British or Early Medieval date within the site is low.
- 8.6 The site appears to have comprised part of the agricultural landscape between the parishes of Wellesbourne Mountford and Walton from the Medieval period onwards and thus has a high potential for artefacts and deposits associated with agricultural activities from this period. Such remains would, however, unlikely be of sufficient significance as to be considered heritage assets.
- 8.7 Ridge and furrow earthworks dating to the Medieval period onwards are recorded by the Warwickshire Historic Environment Record and a review of modern LiDAR imagery and evidence gathered during the site visit has confirmed that areas remain extant. These earthworks would be considered to form part of the surviving ridge and furrow across the parishes of Wellesbourne and Walton which, collectively, represent a non-designated heritage asset of lower significance.

- 8.8 The available evidence indicates that there is high potential for Post Medieval buried artefacts and deposits associated with agricultural activities within the site. These again would not be considered to represent heritage assets.
- 8.9 The construction stage would likely require ground clearance, preparation, excavation, and construction of foundations, alongside provision of highways and below-ground infrastructure. As such, future development would be anticipated to result in the removal of extant ridge and furrow earthworks. Development of the site also has the potential to disturb, truncate or destroy any undiscovered buried archaeological remains. However, based on the information available, there is low potential for remains of a significance that would require preservation in situ or otherwise preclude development.

SUMMARY

- 8.10 Overall, assessment of the heritage resource within and surrounding the site has concluded that there are no major heritage constraints to residential development.



STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

SHLAA

9.13 This table sets out the Council's SHLAA assessment of the site (split into two sites; 9A and 9B). This Promotional Document include further work and information that was not available during the SHLAA Assessment. The table includes an additional column which reassesses the site against the SHLAA criteria using the additional information as presented in this document.

		9A SHLAA Assessment	9B SHLAA Assessment	Updated Assessment (Combined)
General Site Information	Location	South of Dovehouse Drive	South of Loxley Road (south)	Land West of Loxley Road
	Gross Site Area (Ha)	7.5	7.5	15
	Greenfield/Brownfield	Greenfield	Greenfield	Greenfield
	Land Use	Agriculture	Agriculture	Agriculture
	Green Belt			
Major Planning Considerations	AONB			
	Conservation Area			
	European/National Wildlife Site			Adjacent to Ancient Woodland. 15m buffer can be provided.
	Special Landscape Area/Area of Restraint			
	Flood Risk			
	Designated Heritage Asset			
	Major Infrastructure			
	Agricultural Land Quality			
	Minerals and Waste			All Wellesbourne sites are inside safeguarding area.
	Access to Site (vehicles)			Section 6 demonstrates that suitable vehicular access can be provided.
	Access to Site (walking and cycling)			
Other Planning Considerations	Accessibility to Local Facilities			Wellesbourne Distribution Park within 800m of site.
	Public Transport			Within 400m of bus stops at Anson Close, Cranwell Drive and The Grange (frequent services)
	Relationship to Highway Network			
	Public Right of Way			
	Coalescence			

Availability Assessment	Settlement Form			Site would effectively 'round-off' settlement.
	Settlement Character			Sufficient variation in landscape and recent residential development support a lower degree of landscape sensitivity in parts of the site.
	Neighbouring Amenity			Good urban principles can address residential development to the north. Ancient woodland to south will require buffer.
	Neighbouring Land Uses			
	Non-designated Heritage Asset			*
	Landscape Sensitivity			Lower degree of landscape sensitivity in parts of the site, an up-to-date landscape appraisal has been undertaken to support this document which confirms the site could be appropriately developed.
	Contaminated Land			
	Tree Preservation Order TPO			
	Local Wildlife/Geological Site			
	Natural Features			Agricultural land unlikely to support valuable habitats.
	Pollution			
	Site Assembly			
	Site Topography and Shape			
	Current Use			
	Intentions			
Legal			Housebuilder has option agreement on the site.	
Ownership				
Achievability	Local Market Analysis			
	SHLAA History			

* LOW POTENTIAL FOR REMAINS OF SIGNIFICANCE THAT WOULD REQUIRE PRESERVATION IN SITU

Overall Assessment	Planning History			
	Viability			Likely to be viable.
	Availability			
	Suitability – Environmental	Landscape impact, impact on settlement. Impact on Ancient Woodland.	Landscape impact, impact of settlement character.	Indicative Development and Landscape Strategy, based on up-to-date assessment, demonstrates site could be developed with suitable landscape mitigation. This would include a 15m buffer to the ancient woodland. The site would effectively round-off the settlement and would reflect existing residential development to the north and east.
	Suitability – Technical	Provision of vehicle access		Suitable vehicular access has been demonstrated.
	Achievability			
	Initial Overall Deliverability			
	Scope for Mitigation	Makes a major contribution to landscape setting of the village and to Ancient Woodland to south that mitigation could not resolve effectively.	Makes a major contribution to landscape setting of the village that mitigation could not resolve effectively.	The site has variable landscape sensitivity and could be developed with appropriate mitigation, including Ancient Woodland buffer.
	Adjusted Overall Deliverability			
	Dwelling Capacity	Net Site Area (Ha)		
30 dph				300
35 dph				350
40 dph				400
Timescale	1-5 years			
	6-10 years			
	11-15 years			
	16+ years			

♦ EXCLUDING LAND FOR PRIMARY SCHOOL. BELOW CAPACITY FIGURES ARE BASED ON 9.98HA

CONCLUSIONS

SUMMARY

- 10.1 The site lies immediately adjacent to the southern edge of Wellesbourne settlement which is acknowledged as having a good range of services and facilities with Stratford upon Avon District. The land itself can be successfully integrated into existing development to improve permeability along the southern edge of Wellesbourne and integrate itself with existing public rights of way and the village generally.
- 10.2 There are no significant constraints on the land. The site does not contain any significant existing features and the limited amount of hedgerows and trees that are in the vicinity can be protected during the course of any development proposals.
- 10.3 Overall the proposal is considered to represent a sustainable location which can provide additional new housing to assist in meeting the need for housing within Stratford on Avon District and particularly the yet to be finalised additional housing which may arise outside of Stratford on Avon District. On this basis it is commended to the Council as a suitable l

DELIVERABILITY

- 10.4 It is anticipated that the South Warwickshire Local Plan will be adopted in 2025, based on timescales set out in the Local Development Scheme (LDS). An outline application would be submitted on adoption with the following timescales anticipated for the site:
- Outline Consent: 2026
 - Reserved Matters Consent (Phase One): 2027
 - Infrastructure Works/Site Set-up: 2028
 - Housing Start: 2029 (allow 18 months from outline)
 - Sales Completion: 2036
- 10.5 The above figures assume circa 400 dwellings would be provided on site (based on 9.98ha of developable land at 40 dwellings per hectare) at a build-out rate of 60 dwellings per annum. This rate reflects Persimmon's experience of other similar sites. As an experienced national housebuilder, Persimmon has a proven track record of delivery across the country and specifically in Wellesbourne. This document has demonstrated that the proposed site is suitable and deliverable. The above sets out that new dwellings could be delivered in the early part of the proposed plan period.

OUR OFFICES

BIRMINGHAM (City)

39 Bennetts Hill
Birmingham
B2 5SN

E Birmingham@pegasusgroup.co.uk
T 0121 308 9570

BIRMINGHAM (Sutton Coldfield)

5 The Priory
Old London Road
Canwell
Sutton Coldfield
B75 5SH

E Birmingham@pegasusgroup.co.uk
T 0121 308 9570

BRISTOL

First Floor, South Wing
Equinox North
Great Park Road
Almondsbury
Bristol, BS32 4QL

E Bristol@pegasusgroup.co.uk
T 01454 625 945

CAMBRIDGE

Suite 4 Pioneer House
Vision Park
Histon
Cambridge
CB24 9NL

E Cambridge@pegasusgroup.co.uk
T 01223 202 100

CIRENCESTER

Pegasus House
Querns Business Centre
Whitworth Road
Cirencester
GL7 1RT

E Cirencester@pegasusgroup.co.uk
T 01285 641 717

DUBLIN

Ormond Building
31-36 Ormond Quay Upper
Dublin
Dublin 7

E enquiries@pegasusgroup.co.uk
T +353 (0) 1526 6714

EAST MIDLANDS

4 The Courtyard
Church Street
Lockington
Derbyshire
DE74 2SL

E EastMidlands@pegasusgroup.co.uk
T 01509 670 806

LEEDS

Pavilion Court
Green Lane
Garforth
Leeds
LS25 2AF

E Leeds@pegasusgroup.co.uk
T 0113 287 8200

LIVERPOOL

No. 4 St Paul's Square
Liverpool
L3 9SJ

E Liverpool@pegasusgroup.co.uk
T 0151 317 5220

LONDON

10 Albemarle Street
London
W1S 4HH

E London@pegasusgroup.co.uk
T 020 3897 1110

MANCHESTER

Queens House
Queen Street
Manchester
M2 5HT

E Manchester@pegasusgroup.co.uk
T 0161 393 3399

NEWCASTLE

The Corner
26 Mosley Street
Newcastle upon Tyne
NE1 1DF

E Newcastle@pegasusgroup.co.uk
T 0191 917 6700

PETERBOROUGH

Allia Future Business Centre
Peterborough United Football Club
Peterborough
PE2 8AN

E enquiries@pegasusgroup.co.uk
T 01733 666600

GROUP SERVICES

5 The Priory
Old London Road
Canwell
Sutton Coldfield
B75 5SH

E enquiries@pegasusgroup.co.uk
T 0333 0160777



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

PEGASUSGROUP.CO.UK

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

RIBA
Royal Institute of
British Architects

URBAN
DESIGN
GROUP
RECOGNISED
PRACTITIONER



Expertly Done.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified **9001, 14001, 45001**



[Pegasus_Group](#)



[pegasusgroup](#)



[Pegasus_Group](#)

PEGASUSGROUP.CO.UK

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE