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Dear SWLP Team

South Warwickshire Local Plan: Issues and Options - Response on behalf of Warwickshire Property & Development Group, Land off Bush Heath Road, Harbury

Please find attached a response to the current consultation that has been prepared by WSP Environment & Infrastructure Solutions Ltd on behalf of Warwickshire Property & Development Group (WPDG).

This comprises a detailed response and (at Appendix A) a copy of the consultation questionnaire, with responses provided on behalf of WPDG to relevant questions. Appendix B of the response provides details of WPDG's landholding at Bush Heath Road, Harbury and the site's development potential based on a concept masterplan which has been prepared having regard to known development constraints and opportunities.

Please do not hesitate to contact me if you would like to discuss any of the material submitted in more detail.

Yours sincerely

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South Warwickshire Local Plan

Issues and Options Consultation, January 2023 – Response on behalf of Warwickshire Property & Development Group, Land off Bush Heath Road, Harbury

1. Introduction

1.1 Background

- 1.1.1 Warwick and Stratford-on-Avon District Councils are in the process of preparing the South Warwickshire Local Plan (SWLP). The geography of South Warwickshire means that the districts have a strong relationship in relation to infrastructure, the economy, population migration, social and cultural offer, and environmental assets. For these reasons there is a strong planning case for closer working on strategic planning issues. A single plan will enable the districts to tackle the strategic and cross-boundary issues together to create a strong strategic development framework for the area.
- 1.1.2 The Councils are currently undertaking an Issues and Options (I&O) Consultation (and Call for Sites) for the SWLP. This Issues and Options consultation is the second stage in the preparation of the SWLP, following a Scoping and Call for Sites consultation in 2021.
- 1.1.3 This response to the current consultation has been prepared by WSP Environment & Infrastructure Solutions Ltd on behalf of Warwickshire Property & Development Group (WPDG). WPDG is responding on several aspects of the current consultation, including the vision and spatial strategy, the role of new settlements in helping to meet needs, the scale of housing need, importance of protecting the Green Belt, other sources of supply of housing (including windfall) and aspects of the evidence base. WPDG submitted details of land off Bush Heath Road, Harbury to the previous call for sites and this response also highlights the role that Harbury could make as a sustainable location for growth.
- 1.1.4 The Councils have asked a lot of questions. This response includes answers to some of those questions, together with some points made that do not necessarily respond to a specific question but are nonetheless considered appropriate to raise at this stage because they are seen as relevant to the Local Plan and/or the evidence base material that is also being consulted on.
- 1.1.5 A copy of the questions asked is provided at **Appendix A** of this response. This includes a summary response and should be read in conjunction with this main response.
- 1.1.6 **Appendix B** provides details of WPDG's landholding at Bush Heath Road, Harbury and the site's development potential based on a concept masterplan which has been prepared having regard to known development constraints and opportunities.

1.2 Response summary

1.2.1 The key points in our response are summarised below with more detail provided in the remainder of this document:

- **Vision and strategic objectives** –The intention to develop a vision and strategic objectives that cover the period to 2050 is supported and is in accordance with Paragraph 22 of the National Planning Policy Statement. However, to accord with this approach, the SWLP should include consideration of the spatial strategy over the same period, including future infrastructure requirements. Furthermore, the vision is too narrowly focused on the main settlements and needs to ensure that a comprehensive vision for the plan area is included for which provides the basis for preparing Local Plan 2s (LP2s) for each district. A comprehensive vision that relates to the plan area as a whole should be one of the key drivers for preparing a Joint Local Plan.
- **Spatial strategy** – 1.4 of the I&O documents says: *“Part 1 of the Plan will establish a robust and flexible framework which will set out where and how much development should take place across South Warwickshire.”* At present the strategy appears too focused on the main towns and needs to be broadened to include other suitable settlements within the plan area – reflecting the polycentric nature of both districts in order to ensure that some of these other settlements have the opportunity to realise their potential as centres for growth which can become more sustainable in the future and act as service centres for other rural communities.

Paragraph 11 of the NPPF highlights the need for plans to promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. To comply with paragraph 11 of the NPPF, the SWLP needs to provide a comprehensive spatial strategy that seeks to: meet the development needs of the whole area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. The discussion in relation to the spatial strategy in the I&O document is considered too limited in scope and overly focused on the main towns. It is also crucial that the Part 1 Plan provides a coherent strategy for LP2s and updates to Neighbourhood Plans.

- **Green Belt** - The vision and spatial objectives should be clear that the principle of the Green Belt remains, and it will continue to shape new development, especially with regard to its fundamental aim of preventing urban sprawl by keeping land permanently open (NPPF paragraph 137). The key purposes of preventing sprawl and merging of settlements (NPPF paragraph 138) is a critical issue on the fringes of the Greater Birmingham conurbation and Coventry. Paragraph 141 of the NPPF states: *“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”* (emphasis added)
- **Housing and employment needs** - The housing and employment needs that the SWLP needs to respond to should be set out in future consultations. The I&O document is heavily focused on the spatial strategy and puts forward some potential options for growth but does not set this within the context of how much additional growth needs to be accommodated to supplement existing commitments– including the potential for a significant amount of growth arising from the Greater Birmingham and Black Country Housing Market Area (HMA), over the period 2031 to 2050. Future un-met development needs of Coventry will also need addressing. Any discussion

about how to meet such needs is potentially premature when the scale and origin of that need, allowing for existing commitments, is not yet understood.

- **New settlements as a source of supply** - The options considered include several locations that are presented as new settlements. These all appear to have been appraised on the basis that they could provide up to 6,000 dwellings. As information has not been provided on the sites it is not clear if this assumption about the capacity of the identified locations is appropriate and therefore whether development on this scale represents a reasonable alternative at each location. The assumptions about the capacity of sites promoted by landowners/developers should be made clear in the evaluation of any location. Any revisions to the assumptions about new settlements as a source of supply should be reflected in the Sustainability Appraisal. It is also important that delivery considerations are clearly set out both in terms of the need of viability and timing having regard to the period of the Local Plan.
- **Justifying new settlements** - Any proposals for new settlements that are taken forward into the Local Plan will need to demonstrate compliance with paragraph 73 of the NPPF, which requires new settlements to be “*well located*” and “*supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*”. Paragraph 73 of the NPPF goes on to state that Councils should “*identify suitable locations for such development where this can help to meet identified needs in a sustainable way*” through considering “*opportunities presented by existing or planned investment in infrastructure*”. (emphasis added)
- **Delivering new settlements** - Paragraph 73 of the NPPF states that policies for new settlements should “*ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community*”. Note these requirements could have implications for the ability of the Local Plan to be progressed. Examples of where Inspectors have raised concerns on these matters in relation to other Local Plans are provided in our main submission.
- **The consideration of smaller settlements in spatial options** - it is noted that within the supporting technical evidence some smaller settlements have been considered within growth options but not Harbury. From our review of the evidence base it is not clear why Harbury has not been considered given that it is of equivalent size to some of the settlements that are included in the I&O document. Harbury is well located in relation to Leamington/Warwick and the ‘Core Opportunity Area’, has a good range of services and reasonable public transport links (with scope for further enhancement). Given these factors we consider that Harbury could contribute to growth associated with either Option 2 or 4, and therefore to achieve consistency of approach across the plan area it is suggested that any future update to the evidence base includes a review of the settlement hierarchy across both districts to see if/how they align and to address any inconsistencies such the one we have highlighted here.
- **Windfalls and Urban Capacity** - Additional information is required to ensure that assumptions associated with windfall rates are robust. In order to comply with Paragraph 71 of the NPPF authorities must provide additional evidence in relation to the sources of supply that windfalls will come from over the plan period, trend data may not be appropriate if historic sources of supply are coming to an end. The Urban Capacity Study is helpful in illustrating the that urban capacity in the settlements reviewed is limited and that some of the potential sources of supply (including existing town centre car parks) serve an important role in helping to maintain the vitality and viability of centres and are not suitable for redevelopment. The study rightly emphasises the need for greenfield allocations in appropriate locations.

- **20-minute neighbourhoods** - The concept of 20-minute neighbourhoods is supported but policies relating to this should recognise the importance of choosing the right location in the first place and making existing settlements more self-contained, i.e. those settlements with high quality public transport, leisure, education services (rail and/or high frequency bus corridors) and which also offer access to higher order services and employment opportunities. The concept should also be applied across all suitable settlements, rather than being restricted to areas of new development. This means greater granularity in relation to the spatial strategy will also be required.
- **Climate change mitigation** – The evidence in relation to carbon dioxide emissions requires further justification. The study appears to make assumptions about factors like the take up of electric vehicles (EVs) and the rate of retrofitting of existing buildings under each of the spatial growth options; assumptions which appear to have a significant bearing on the emissions associated with each option but are not suitably transparent for an understanding of the basis upon which they have been reached.

2. Detailed Response

2.1 Vision and Strategic Objectives (Q-V3. 1 and P1.1)

- 2.1.1 The intention to develop a vision and strategic objectives that cover the period to 2050 is supported and is in accordance with Paragraph 22 of the National Planning Policy Statement, which states:
- “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”*
- 2.1.2 The longer-term framework is required to inform both plan making and decision taking. However, to accord with this approach, the SWLP should include consideration of the spatial strategy over this period, including future infrastructure requirements.
- 2.1.3 Paragraph 11 of the NPPF highlights the need for plans to promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. The vision and strategic objectives are too narrowly focused on the main settlements and not therefore compliant with Paragraph 11 of the NPPF. There is a need to ensure that a comprehensive vision for the plan area provided, which will in turn provide a more suitable basis for preparing LP2s for each district. A comprehensive vision that relates to the plan area as a whole should be one of the key drivers for preparing a Joint Local Plan.
- 2.1.4 The vision and strategic objectives as written are not therefore considered to have sufficient granularity.

Infrastructure requirements I2 and I5

- 2.1.5 Given the need for the vision and spatial objectives to provide a comprehensive vision for the whole of the plan area (not just the main settlements) it follows that the Local Plan should identify the infrastructure requirements for all scales, types and location of

development (Option I2a). This approach is also consistent with Paragraph 11 of the NPPF.

2.1.6 In terms of the relationship between infrastructure delivery and development, with SWLP should accord with Paragraphs 68 of the NPPF and in so doing:

“identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”.

2.1.7 Too much emphasis on larger site allocations could also negatively impact on housing delivery due to some common problems associated with bringing such sites forward. For example, it is common for large sites to be in multiple ownerships requiring complicated legal arrangements to be in place before development can be progressed. There are also often lengthy lead in times due to enabling infrastructure being required first to ‘open up’ a site. Mindful of such issues, the NPPF at Paragraph 69 further states that:

“small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly.”

2.2 Spatial Strategy S7.2 and P2.1

2.2.1 The following comments are over-arching in nature and relate to the approach to the options considered in S7.2.

2.2.2 1.4 of the I&O documents states that: *“Part 1 of the Plan will establish a robust and flexible framework which will set out where and how much development should take place across South Warwickshire.”* At present the strategy (and associated optioneering) appears too focused on the main towns and needs to include other settlements within the plan area – reflecting the polycentric nature of both districts, in order to ensure that rural communities, equally with urban communities, can become more sustainable in the future.

2.2.3 As noted above, Paragraph 11 of the NPPF highlights the need for plans to promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. To comply with paragraph 11 of the NPPF, the SWLP needs to provide a comprehensive spatial strategy that seeks to: meet the development needs of the whole area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. In relation to the spatial strategy the I&O document is too limited in scope and overly focused on the main towns. It is also crucial that the Part 1 Plan provides a coherent strategy for LP2s and updates to Neighbourhood Plans, rather than leaving it to Part 2 Plans to establish the strategy. The Adopted Stratford Core Strategy states (quoting the former Commission for Rural Communities:

“Our challenge is to chart a course by which rural communities, equally with urban communities, can become more sustainable in the future”.

2.2.4 Question P2.1 asks if there are any areas where equality and inclusivity in planning needs further attention. We suggest that this is the case for rural communities where issues such as housing affordability should be addressed via a clear spatial strategy that provides for the needs of rural areas as well as for urban areas.

2.2.5 The spatial strategy options that have been considered are:

- 1 - Rail corridors
- 2 - Sustainable travel (rail and bus)

- 3 - Economy
- 4 - Sustainable Travel and Economy (hybrid of the new 2 and 3)
- 5 - Dispersed

2.2.6 As noted elsewhere in these representations, it will be important to ensure that the spatial strategy reflects the polycentric nature of the plan area and provides a spatial framework that helps deliver sustainable development across the joint local plan area. On this basis we consider that Option 4, which represents a hybrid option that looks to integrate consideration of sustainable travel and employment opportunities, provides the basis for the most appropriate strategy.

Green belt considerations

2.2.7 It is noted that the I&O document states at page 58 that, at this stage, the spatial growth options are presented with Green Belt policy “off.”

2.2.8 The vision and spatial objectives should be clear that the principle of the Green Belt remains, and it will continue to shape new development, especially with regard to its fundamental aim of preventing urban sprawl by keeping land permanently open (NPPF paragraph 137). The key purposes of preventing sprawl and merging of settlements (NPPF paragraph 138) is a critical issue on the fringes of the Greater Birmingham conurbation and Coventry. Paragraph 141 of the NPPF states:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” (emphasis added)

2.2.9 The sequential approach to the consideration of locations for growth should also be reflected in the evaluation of the growth options. This applies to consideration of sites for need arising within the districts and any shortfall arising from outside of South Warwickshire (referenced at QH4-3). Any future consideration of spatial options should therefore include a Green Belt policy “on” appraisal.

2.3 Housing and Employment Needs

2.3.1 The housing and employment needs that the SWLP needs to respond to should be clearly set out in future consultations. The I&O document is heavily focused on the results of previous consultations (which could have been reported on separately to help focus the main document on the proposed content of the Local Plan) and the spatial strategy. The I&O document puts forward some potential options for growth but does not set this within the context of how much additional growth needs to be accommodated to supplement existing commitments– including the potential for a significant amount of growth arising from the Greater Birmingham and Black Country Housing Market Area (HMA), over the period 2031 to 2050. Future needs from Coventry will also need addressing. Any consultation about how best to meet needs is potentially premature when the scale and origin of that need, allowing for existing commitments, is not clearly set out.

2.4 Windfalls, Urban Capacity (S3.1), Intensification (S2) and Previously developed Land (S3.2)

2.4.1 The Urban Capacity Study (Arup, October 2022) includes consideration of windfalls as a source of supply for housing across the plan area. The proposed windfall allowance is

based on historic trends and suggests that 4,480 dwellings could come forward between 2028 and 2050. Additional information is required to ensure that assumptions associated with windfall rates are robust.

2.4.2 Paragraph 71 of the NPPF notes (our emphasis):

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

2.4.3 It is considered that in order to comply with Paragraph 71 of the NPPF authorities must provide additional evidence in relation to the sources of supply that windfalls will come from over the plan period, trend data may not be appropriate if historic sources of supply are coming to an end. This observation is consistent with the recommendation from Arup’s review of SHLAAs undertaken in 2019 in Greater Nottingham. The review highlighted the NPPF’s emphasis on both past evidence and future trends, and to allow a more nuanced and robust allowance it was suggested this could be carried out on a use class basis.¹

2.4.4 It is also noted that Arup, in undertaking an analysis of windfall rates for the SWLP, recommended a review of windfall assumptions through the HELAA process (page 31 of the Urban Capacity Study). The windfall assumptions provided in the Urban Capacity Study should therefore be treated with caution until additional work on future trends associated with anticipated source of supply is undertaken.

2.4.5 The Urban Capacity Study considers the potential for additional housing development within existing settlement boundaries. The majority of identified capacity is associated with sites with planning permission that are not yet fully built out (5,878 dwellings) and allocated sites without planning permission (7,655 dwellings).

2.4.6 The Urban Capacity Study helpful in illustrating that urban capacity in the settlements reviewed is limited, some of the potential sources of supply that are identified (including existing town centre car parks) and employment sites serve an important role in helping to maintain the vitality and viability of centres and local employment and may not therefore be suitable for development and the study concludes that only two sites with potential capacity for 104 dwellings should be considered (if found to be suitable, available and achievable in the forthcoming HELAA). The study rightly emphasises the need for greenfield allocations in appropriate locations.

2.4.7 The Arup study demonstrates that there is limited potential for new sites to come forward within the boundaries of the settlements considered. This reflects not only the limited supply of brownfield land that is available, but also the inherent development constraints that are associated with many of these historic settlements due to their intrinsic character and sensitivity to change. Policies which encourage intensification are not therefore considered to offer a realistic avenue to meet any significant share of future development needs (S2c).

2.4.8 Brownfield development should be encouraged where it contributes to a sustainable pattern of development and is consistent with other objectives of the Local Plan, e.g. relating to the protection of employment land. The agent of change principle will also be important and could be reflected in any policy (S3.2a).

¹ <https://www.gnplan.org.uk/media/3371770/review-of-greater-nottingham-shlaas.pdf>

2.5 The Role of New Settlements in Meeting Future Needs (S5.2 and S5.3)

- 2.5.1 New settlements could have a role in helping to meet future needs but there is a need to ensure that they form part of a coherent spatial strategy for the whole plan area, are in sustainable locations, are deliverable, viable and will contribute to housing land supply over the plan period.
- 2.5.2 The options considered include several locations that are presented as new settlements. These all appear to have been appraised on the basis that they could provide up to 6,000 dwellings. As information has not been provided on the sites it is not clear if this assumption about the capacity of the identified locations is appropriate and therefore whether or not development on this scale represents a reasonable alternative at each location. The assumptions about the capacity of sites promoted by landowners/developers should be made clear in the evaluation of any location. Any revisions to the assumptions about new settlements as a source of supply should be reflected in the Sustainability Appraisal.
- 2.5.3 Paragraph 68 of the NPPF states (our emphasis):
- “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”*
- 2.5.4 The above emphasises the need to consider locations for growth that are developable. To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged, Annex 2 of the NPPF.
- 2.5.5 Any proposals for new settlements that are taken forward into the Local Plan will also need to demonstrate compliance with paragraph 73 of the NPPF, which requires new settlements to be “*well located*” and “*supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*”. Paragraph 73 of the NPPF goes on to state that Councils should “*identify suitable locations for such development where this can help to meet identified needs in a sustainable way*” through considering “*opportunities presented by existing or planned investment in infrastructure*”.
- 2.5.6 Paragraph 73 of the NPPF states that policies for new settlements should “*ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community*”.
- 2.5.7 Paragraph 106 of the NPPF requires planning policies to be prepared with the active involvement of local highways authorities and other transport infrastructure providers and operators so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- 2.5.8 The Inspector for the examination into the Tunbridge Wells Local Plan raised concerns around the treatment of large scale strategic allocations in the submitted Local Plan in his initial findings.² The Inspector raised concerns regarding the adequacy of the evidence base in relation to the new settlement at Tudeley Village (new settlement of 2,800 dwellings), as well as in relation to aspects of the growth at Paddock Wood (3,500 homes and 11 ha employment).

² https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/434392/ID-012-Inspectors-Initial-Findings.pdf

- 2.5.9 In relation to Tudeley Village the Inspector highlighted the need for the Local Plan evidence base to include additional information in relation to infrastructure requirements, including funding and phasing and the relationship between delivery rates and viability.
- 2.5.10 In the absence of this information the Inspector concluded that the Local Plan required modification to make it sound and capable of adoption. He also concluded that providing additional information in relation to Tudeley Village would not be a quick or a straightforward exercise. Modifying the policy could also add significant delays to the examination process. The third option he presented was to delete the allocation and make consequential changes to the Local Plan.
- 2.5.11 Similarly, the Inspectors Report into the Shared Strategic Local Plan for North Essex³ concluded in relation to the Garden Community proposals that they need demonstrate a reasonable prospect of being viably developed, setting out clear details of phasing of necessary infrastructure linked to a delivery timetable and that any garden community proposals must be clearly shown to be financially viable.
- 2.5.12 Supplementary Planning Documents (SPDs) are sometimes seen as a mechanism for resolving matters associated with planning for new settlements. While SPDs have a potential role in helping to bring sites forward they cannot allocate land for development, as an SPD does not form part of the development plan, which means that decisions around the location of a local centre, employment or other specific uses will need to be made as part of Local Plan preparation so that these can be identified on the Local Plan proposals map.
- 2.5.13 Where options for new settlements are taken further the assessment of sites should also consider likely lead in times and anticipated delivery rates and how these will impact on the delivery of housing, particularly during the earlier stages of the plan period – the Lichfield Report (From Start to Finish)⁴ includes an analysis of delivery rates and a rate of 160 homes per annum is typical for sites over 2,000+ homes. The report highlights the significant lead in times that can be associated with larger development (i.e. sites of over 500 homes) from the date at which an outline application is validated, the average figures can be 5.0 to 8.4 years for the first home to be delivered.
- 2.5.14 Question S5.3 asks specifically about rail corridors as a location for growth. This approach to spatial development is considered too simplistic and might not necessarily lead to a more sustainable development strategy over alternatives. This is because not all settlements that are currently served by rail are located in accessible locations for non-rail based movements. Furthermore, not all of these settlements currently have existing services, social and community facilities etc and therefore would only be a sustainable location for growth if major development was focused at such settlements with requisite supporting infrastructure. It is considered best to have a blended spatial strategy and if rail represents a viable option implement this in a staged way over more than one Local Plan period.
- 2.5.15 Any development adjacent to an existing railway station that requires expansion of rail facilities will also clearly have to demonstrate that issues around viability and deliverability of new rail related infrastructure have been addressed. Network Rail is the licenced, regulated manager of the rail network, its guidance clearly and repeatedly states the need for, and benefits of, early engagement with industry, including Train Operating Companies (TOCs), Rail Freight Operating Companies (FOCs), Department for Transport (DfT) and other industry stakeholders. Any such matters would be potentially complex but would

³ <https://www.braintree.gov.uk/downloads/file/2940/examiners-report-on-the-examination-of-nea-s1-10th-dec-2020>

⁴ <https://lichfields.uk/content/insights/start-to-finish>

need to be satisfactorily resolved prior to submission of the Local Plan because they fall under the duty to co-operate.

- 2.5.16 All of the above highlights the importance of the Local Plan front loading relevant issues and the associated evidence base in relation to the delivery of any new settlements that are included in the SWLP, particularly of the scale envisaged, even if delivery is envisaged later in the plan period.

The Role of the Sustainability Appraisal Q-I1

- 2.5.17 As noted above, more information is required on the locations that are being assessed as locations for new settlements to confirm their suitability. The assumptions about the capacity of sites promoted by landowners/developers should also be made clear in the evaluation of any location. This also applies to the locations for growth considered around settlements that are discussed in later sections of the SA (Sections 4, 5 and 6). Where locations are not being actively promoted, they should not be treated as reasonable alternatives unless it can be demonstrated that they are developable. Sites that do not meet the criteria in Annex 2 of the NPPF should not be treated as reasonable alternatives.

2.6 The consideration of smaller settlements in spatial options (S4.1, S4.2 , S5.2 and P1.4)

- 2.6.1 It is noted that some smaller settlements have been considered as part of the technical work for some of the growth options but not Harbury.
- 2.6.2 The spatial strategy options considered are:
- 1 - Rail corridors
 - 2 - Sustainable travel (rail and bus)
 - 3 - Economy
 - 4 - Sustainable Travel and Economy (hybrid of the new 2 and 3)
 - 5 - Dispersed
- 2.6.3 Having refined the spatial growth options, the Councils then identified settlements for consideration under selected spatial strategy options. Settlements for initial assessment were identified by the Councils on the basis that they fell within the first or second tier settlements within either the Stratford on Avon District Core Strategy ('Main Town' and 'Main Rural Centres') or the Warwick District Local Plan ('Urban Areas' or 'Growth Villages') and are relevant to more than one of the refined spatial options identified by the Councils.
- 2.6.4 A key stage in developing a truly joint Local Plan that achieves consistency of approach across South Warwickshire (a key aim of preparing a joint local plan) would have been to revisit the classification of settlements across both districts using a common set of criteria. Given the desire to achieve consistency of approach across the area it is suggested that the update to the evidence base includes a review of the settlement hierarchy across both districts to see if/how they align and to address any inconsistencies.
- 2.6.5 Harbury, with a population of 2,420 (2011 census) is of equivalent size to some of the settlements that are included in the I&O document) and is considerably larger than others, for example Bearley (population of 724 as of 2011). Harbury is well located in relation to Leamington/Warwick and the Core Opportunity Area for employment that is identified in the I&O document. It has a good range of services and reasonable public transport links

with scope for enhancement. Harbury could contribute to growth under either Option 2 or 4 for example.

2.6.6 Paragraph 69 of the NPPF also notes that:

“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”

2.6.7 Growth of existing settlements should be part of the overall strategy (S4.1). Harbury should be considered in future updates to the evidence base as a location that could contribute to growth associated with options 2 and 4.

Threshold approach (S8.1, S8.2)

2.6.8 Site capacity should be optimised, rather than artificially capped. The scale of development should reflect other factors, including its size, location and development potential – reflecting its relationship to the existing settlement, topography, heritage, ecology, flood risk etc.

Settlement boundaries (S9a and S9b)

2.6.9 Where a site is considered strategic, the SWLP should amend the settlement boundary, rather than relying on LP2s or NDPs, which could lead to delays in sites coming forward and development being delivered in a timely way to meet need. Any allocation would also need to be suitably developed to demonstrate that it is deliverable/developable.

2.6.10 Question S9b asks if the SWLP should review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries. We suggest that this exercise is undertaken as part of an overall review of the approach to the classification of settlements to achieve a consistent approach between the two districts. A consistent and suitably evidenced settlement hierarchy is an essential element of a Joint Plan.

The development distribution strategy for South Warwickshire (S10)

2.6.11 As noted elsewhere in this response, the distribution strategy should include consideration of the role of other settlements. As currently proposed, the Part 1 plan is effectively the core strategy with the Part 2 plan allocating non-strategic sites.

2.6.12 The Part 1 plan needs to set the strategic context for such allocations. The settlement hierarchy from the adopted local plans have simply been rolled forward – these should be reviewed to see if they still reflect the position of settlements within the hierarchy or their ability to grow and become more sustainable plus, as it is a joint plan, to ensure consistency of approach between both districts.

2.7 Economic Policy (E3)

2.7.1 Policy relating to economic growth should ensure that this is aligned with the scale and location of planned housing growth within South Warwickshire, ensuring that a balance between homes and jobs is maintained as far it is practical to do so to help ensure that a significant increase in out-commuting or in-commuting is avoided.

2.8 Protecting Economic Assets (E6a)

2.8.1 A policy protecting economic assets, e.g. Wellesbourne Airfield, Stoneleigh Park and other similar built infrastructure is supported. Another way to ensure that such locations

are not at risk from development is allocating sufficient land for housing and employment elsewhere within the plan area.

2.9 Core Employment Area (E7.1)

- 2.9.1 The Core Employment Area is supported. It will be important to ensure a balance between homes and employment within this area and ensure that a range of housing, including affordable housing is available to help avoid in-commuting from outside of the area. Harbury could have a role to play in helping meet housing need within the Core Employment Area.

2.10 Major Investment Sites (E7.2)

- 2.10.1 Allocating additional land for employment uses at the major investment sites within the Core Employment Areas is consistent with Paragraph 82 of the NPPF, it will help create the conditions in which business can invest, expand and adapt and is supported.

2.11 Existing Employment Allocations (E8.1)

- 2.11.1 It is agreed that existing employment allocations, including revisions to Atherstone Airfield, should be carried over into the SWLP. This will help safeguard the sites for employment use.

2.12 Protecting Existing Employment Uses (E8.3)

- 2.12.1 Proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests. Such measures will help ensure that employment land and buildings are protected from development pressure for higher value uses. It is also suggested that any requirements for marketing relate to a continuous period (to avoid sites being placed on the market for a few weeks, taken off and then put back on the market).

2.13 Housing Need (H1.1)

- 2.13.1 Paragraph 61 of the NPPF notes that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”

- 2.13.2 The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) sets out the rationale for deviating from this approach, because of historic overestimation of the population of Coventry. The HEDNA adopts a trend-based projection and this approach is supported.

2.14 Affordable housing (H2-1 and H2-2)

- 2.14.1 Question H2.1 asks what is the best way to significantly increase the supply of affordable housing across Warwickshire? Affordable housing needs to be delivered in key settlements and villages to meet local need where it arises over the plan period. If a halt

is put on development in such settlements as part of the spatial strategy this will only lead to increased affordability issues in rural areas.

- 2.14.2 Paragraph 62 of the NPPF highlights the importance of assessing needs and reflecting these in planning policies:

“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers²⁷, people who rent their homes and people wishing to commission or build their own homes).”

- 2.14.3 Paragraph 63 continues:

“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.”

- 2.14.4 This emphasises the need for the Local Plan to set out a spatial strategy with sufficient granularity to ensure that local housing needs are met where the need arises and especially those settlements which offer sustainable development opportunities such as Harbury.

- 2.14.5 Table 8.5 of the HEDNA highlights the income gap between private renting and buying. Table 8.45 of the HEDNA identifies a total need for affordable housing (rented and affordable home ownership) of 547 dwellings per annum in Stratford on Avon and 830 dwellings per annum in Warwick. Affordable housing delivery is therefore a key challenge for the South Warwickshire Local Plan and the best way to significantly increase the supply of affordable housing is to ensure that sufficient deliverable and developable sites are allocated for housing over the plan period. This should include a balanced portfolio of sites, in terms of their size and location. Over reliance on large sites (with associated lead in times and build out rates) could inhibit the ability to deliver affordable housing over the plan period.

- 2.14.6 Question H2.2 relates to the approach to affordable housing requirement, with the options of a single affordable housing requirement for the whole of South Warwickshire, separate affordable housing requirements for Stratford-on-Avon and Warwick Districts or a more localised approach with separate affordable housing requirements for different localities across South Warwickshire. It is noted that the existing Stratford Core Strategy has different thresholds for different areas. This approach was based on the findings of the Affordable Housing and Core Strategy Viability Assessment (March 2014) and it is suggested that this approach should therefore be replicated, unless the emerging evidence base indicates otherwise. H2-2c is therefore the preferred approach.

2.15 Specialist Needs for Older People (H2.3)

- 2.15.1 It is important to provide accommodation for people to downsize into that is also capable of adaptation. The viability of such housing is best achieved via larger developments that can offer a dwelling and tenure mix and still remain viable, this approach also helps ensure the provision of mixed communities.

2.16 Minimum Space Standards (H3)

- 2.16.1 H3a and H3b relate to the provision of minimum space standards. The minimum space standards have applied to permitted development since September 2020. The requirement for all development to meet the minimum space standards is supported (H3b).

- 2.16.2 H3c suggests including a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards. This approach is supported but any requirement would need to be evidenced based and subject to viability testing.

2.17 Meeting Un-met needs arising from Birmingham and the Black Country ((H4.1, 2 and 3)

- 2.17.1 The approach to meeting needs to 2031 is supported. The scale and shortfall of future needs arising from Birmingham (78,415 to 2041) and the Black Country to 2050 is likely to be significant and will clearly need co-operation across authorities within the housing market area (and possibly further afield), including agreement on the scale of need and the basis for apportioning this to local authorities.
- 2.17.2 Question H4.3 asks: *“if we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?”*
- 2.17.3 This question seems oddly framed since there is no provision currently in place to ‘require’ the authorities to meet shortfalls from outside of South Warwickshire.
- 2.17.4 As noted above, the I&O document recognises the need to consider un-met needs from neighbouring authorities. The timetable for the Joint Local Plan indicates that the Plan would be submitted by June 2025 and adopted by December 2025. It is therefore likely that the Local Plan will be examined under existing legal requirements (including the duty to co-operate). This highlights the need to ensure that any contribution to un-met needs arising from outside the district that the Councils agree to is incorporated in future iterations of the Local Plan. As the duty to cooperate relates to the preparation of the plan it cannot be rectified post-submission, so if the Inspector finds that the duty has not been complied with, they will recommend that the local plan is not adopted and the examination will not proceed any further (Planning Practice Guidance Paragraph: 031 Reference ID: 61-031-20190315).
- 2.17.5 The duty to co-operate therefore provides the mechanism for agreeing any arrangements but such arrangements would need to be agreed by the authors of the plan and relevant parties prior to the SWLP being submitted. An inspector could not amend the plan once it is submitted because any issues relating to the duty to co-operate cannot be rectified post submission. In terms of meeting any identified need it is suggested that the SWLP identifies specific sites that are suitably located to help meet needs arising from outside the district – with other sites allocated to meet needs arising from within the districts. The Green Belt represents a significant constraint. Options for accommodating sustainable development outside of the Green Belt should be considered before locations within the Green Belt are considered, consistent with Paragraph 141 of the NPPF.

2.18 Custom built housing (H5)

- 2.18.1 Question H5 explores options relating to the provision of sites for self-build and custom homes (H5a - identify specific sites, H5b - require large sites to provide a proportion of custom housing, H5c – case by case basis). The requirement for larger sites to include a proportion of self build and custom housing on site will help ensure that sites for self build and custom build homes are brought forward with the necessary infrastructure in place, H5b is therefore supported.

2.19 Delivering Homes in South Warwickshire (H7)

From a review of the I&O document and supporting evidence base the key points in relation to delivering homes in Warwickshire are:

- The SWLP must avoid being too strategic and focussing on strategic allocations – it must provide a spatial strategy with sufficient granularity for the whole of the plan area.
- It must provide a balanced portfolio of sites – ensuring a continuous supply of deliverable and developable sites over the plan period (avoiding over reliance on strategic sites that may not start delivering housing until the second quarter of the plan period).
- It should identify a range of housing sites that will meet future needs, including affordable housing – rather than relying on LP2s and NDPs.
- The evidence base should be reviewed to ensure a consistent approach to the identification of sustainable locations for growth across the plan area, this includes revisiting the settlement hierarchy.

2.20 Climate Change Mitigation and New Buildings (C4.1 and C4.2)

- 2.20.1 WPDG supports a phased approach to net zero carbon for new buildings, setting a future date by which all new development will need to achieve net zero standards. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan. In the intervening period new development will need to meet building regulation standards.
- 2.20.2 Question C4.2 asks what scale of development the requirement should apply to. It is suggested that this is applied to major developments as defined in Annex 2 of the NPPF (subject to viability testing).

2.21 Biodiversity net-gain (C9.1)

- 2.21.1 Providing biodiversity net gains is consistent with paragraph 174 of the NPPF and the Environment Act 2021. It is suggested that the policy under 9.1a is couched in these terms rather than having an arbitrary maximum percentage of paved/hard surfaces on site – which may not achieve the intended objective of a net gain in biodiversity.

2.22 Climate change mitigation (10.1 and 10.2)

- 2.22.1 The requirement for proposals to include a climate change checklist for major developments (as defined in the NPPF) is supported (C.10.b).
- 2.22.2 Question C10.2 asks for any additional comments in relation to Climate Change Risk Assessments. It is suggested that the Council's should prepare the checklist and associated guidance and ensure that it is proportionate to the development that is proposed.

2.23 Water Quality (C11)

- 2.23.1 It is suggested that existing policies in relation to water quality can be carried forward. This could be kept under review as the evidence base for the Local Plan evolves.

2.24 Flood risk

2.24.1 The plan should adopt a sequential approach in line with paragraph 161 of the NPPF:

“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.”

2.24.2 This approach should be reflected in the search for sites and identification of preferred sites.

2.25 Design Guidance (D1 and 2)

2.25.1 The I&O identifies three approaches to the use of design guides (D2a – a comprehensive guide for the whole area, D2b – guidance for specific places, D2c – guidance for strategic locations / sites). Of the options presented, option D2c is considered the most appropriate and proportionate. The character of the plan area is far too varied to warrant a single guide for the whole area and bespoke guidance for settlements would also be a huge undertaking given the number of settlements that might be included.

2.26 Density (D3)

2.26.1 Various approaches to density are set out. D3a is a general policy, which does not identify specific density requirements, D3b-d outline different approaches to identifying density at the settlement level. It is considered that the plan area is too diverse to be prescriptive about densities. The approach set out in D3a is considered proportionate. Any policy should highlight the need to optimise density, having regard to the existing character of an area, open space requirements and other development considerations.

2.27 20-minute neighbourhoods (T1)

2.27.1 The concept of 20-minute neighbourhoods is supported but policies relating to this should recognise the importance of choosing the right location in the first place and making existing settlements more self-contained, i.e. those with high quality public transport (rail and high frequency bus corridors), leisure, education services and for access to higher order services and employment. The concept should also be applied across all suitable settlements, rather than being restricted to areas of new development. The Local Plan should explore the potential for encouraging 20-minute neighbourhoods across the plan area. This means greater granularity in relation to the spatial strategy will also be required.

2.27.2 Option T1b, which includes reference to the principles of a 20-minute neighbourhood within a broader overarching policy, is supported.

2.27.3 It is noted that reference is also made to ‘similar’ design approaches, e.g. Building for a Healthy Life, such approaches would be complimentary to the 20-minute neighbourhood approach but would only relate to new development. The 20-minute neighbourhood concept has potential to be applied at the settlement level (through a top-down approach) – including the retrofitting of facilities and services to address any existing shortfalls. Building for Healthy Life is primarily concerned with how new development can be integrated into existing settlements (bottom-up approach). The London Borough of Newham provides an example of where a strategic approach is being taken to the application of the 20-minute neighbourhood concept across the plan area.

2.28 Sustainable Transport (T2 and T5)

- 2.28.1 Two options are presented T2a envisages changes to parking standards – with less provision in those areas with good active/public transport links, such as the main urban centres. T2b appears to encourage the take up of more sustainable forms of transport, without associated restrictions on car parking. Given the rural nature of much of the plan area it is suggested that car parking restrictions are not appropriate for much of the area. The approach under T2b is therefore considered appropriate.
- 2.28.2 T5 asks for any additional comments about a well-connected South Warwickshire. Directing development to locations that have access to a range of services and facilities and public transport that are close to the main urban centres and planned employment growth will help achieve the desired outcome. It is considered that Harbury represents such a location.

2.29 Special Landscape Areas (B3)

- 2.29.1 Three options are presented in relation to Special Landscape Areas (SLAs) (B3a – maintain SLAs in Stratford on Avon district and introduce SLAs into Warwick District, B3b – maintain SLAs in Stratford on Avon but don't introduce them into Warwick and B3c, discard SLAs and bolster landscape policy. Given the intention to create a Joint Local Plan it would make sense for option B3c to be adopted.

2.30 Environmental net gain (B5) and Wildbelt designations (B6)

- 2.30.1 Options relating to net gain are discussed, the first B5a is an 'integrated approach' with a policy covering air quality, water quality and carbon capture – biodiversity net gain would still be required. Option B5b is to have separate policies relating to biodiversity, air quality etc. It is suggested that option B5b is preferable – keeping the requirement for biodiversity net gain separate from other requirements will help provide clarity.
- 2.30.2 Wildbelts are discussed under B6 as a new approach to aiding nature recovery. From the information provided it appears that these could also act as wildlife corridors and stepping stones, which the NPPF (paragraph 179) already encourages, alongside areas identified by national and local partnerships for habitat management, enhancement, restoration and creation – it therefore appears that the NPPF provides a policy hook for local policies aimed at achieving these objectives.

2.31 Links to the Minerals Plan (B7)

- 2.31.1 It is agreed that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP.

2.32 Agricultural Land (B8.1)

- 2.32.1 Question B8.1 asks: "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?". It is noted that the Government intends to produce a new suite of national development policies, and this may well be covered in there. The NPPF provides policy at paragraph 174b and a specific Local Plan policy that repeats national policy is not considered to be warranted.

2.33 Protecting biodiversity and geodiversity (B8.2 and B9)

- 2.33.1 Question B8.2 is: *“should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.”*
- 2.33.2 From the explanatory text in the I&O part of the driver for the question appears to be that the two existing local plans have similar policies with different wording. It makes sense to have one policy covering the different designations that are in the area, the degree of protection given to such sites would need to be consistent with paragraph 175 of the NPPF. This principle would also apply to any policy referenced under Question B9.

2.34 Climate change mitigation (S5.1 and S7.1)

- 2.34.1 The evidence in relation to Carbon dioxide emissions requires further justification. The study appears to make assumptions about factors like the take up of electric vehicles (EVs) and the rate of retrofitting of existing buildings under each of the growth options. These assumptions appear to have a significant bearing on the emissions associated with each option. For example, operational building emissions are assumed to decrease at a slower rate under the Rail Growth option but the rationale for this is not explained:
- “Transport and operational buildings emissions slowly decrease in the Rail growth option in line with the decarbonisation of the national grid as shown in Figure 4 and Figure 5, however operational buildings emissions decrease at a slightly slower rate than other growth options.”*
- 2.34.2 As noted above, take up rates for Electric Vehicles also vary by scenario, e.g. *“In terms of transport emissions, long and short distance trip car mode share reduction in 2050 was assumed to be 8% (Table 4) compared to 10% in the Rail option, as more new settlements were assumed to still be on the road network, slightly higher private car use is still assumed. With a higher private car reliance assumed, naturally higher EV uptake rates were assumed as shown in Table 4. Ultimately the higher EV rates meant that ‘Car driver’ emissions began to fall in-line with the carbon intensity of the grid which meant that total transport emissions fell at a faster rate despite ‘Car driver’ still taking up the highest percentage of the transport mode split by 2050.”*
- 2.34.3 The assumptions underpinning the evaluation of the options therefore require greater justification.

3. Land off Bush Heath Road, Harbury

- 3.1.1 In Appendix B we have provided an overview of the Land off Bush Heath Road Harbury (the Site) and details of key development opportunities and constraints that have been considered to inform a concept masterplan scheme design which is also presented.
- 3.1.2 Harbury is a sustainable settlement served by public transport with an existing range of social and community facilities and services, and therefore a logical location for focusing further development thru the new Joint Local Plan.
- 3.1.3 The site is available and deliverable, and offers an important opportunity to bring forward new homes to meet local and district needs in a timely way whilst also securing wider

community benefits in the form of new POS, new community allotments and dedicated parking for its users and for the adjacent sports pitches.

Appendix A

Consultation Questions

	Question	Warwickshire Property & Development Group Response
Chapter 3		
Q-V3.1	Do you agree that the Vision and Strategic Objectives are appropriate? Yes <u>No</u> Don't Know	
Q-V3.2:	If no, please indicate why:	Please refer to main response - The intention to develop a vision and strategic objectives that cover the period to 2050 is supported and is in accordance with Paragraph 22 of the National Planning Policy Statement. However, to accord with this approach, the SWLP should include consideration of the spatial strategy over the same period, including future infrastructure requirements. Furthermore, the vision is too narrowly focused on the main settlements and needs to ensure that a comprehensive vision for the plan area is included for which provides the basis for preparing Local Plan 2s (LP2s) for each district. A comprehensive vision that relates to the plan area as a whole should be one of the key drivers for preparing a Joint Local Plan.
Chapter 4		
Q-I1:	Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.	More information is required on the locations that are being assessed as locations for new settlements to confirm their suitability. The assumptions about the capacity of sites promoted by landowners/developers should also be made clear in the evaluation of any location. This also applies to the locations for growth considered around settlements that are discussed in later sections of the SA (Sections 4, 5 and 6). Where locations are not being actively promoted, they should not be treated as reasonable alternatives unless it can be demonstrated that they are developable. Sites that do not meet the criteria in Annex 2 of the NPPF should not be treated as reasonable alternatives.

<p>Q-12:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option 12a: Set out infrastructure requirements for all scales, types and location of development <i>If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.</i></p> <p>Option 12b: Focus on the strategic infrastructure relating specifically to the growth strategy <i>In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts</i></p>	<p>Given the need for the vision and spatial objectives to provide a comprehensive vision for the whole of the plan area (not just the main settlements) it follows that the Local Plan should identify the infrastructure requirements for all scales, types and location of development (Option 12a). This approach is also consistent with Paragraph 11 of the NPPF.</p>
<p>Q-13:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option 13a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan <i>A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.</i></p> <p>Option 13b: Each District Council to produce its own Levy <i>Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances..</i></p>	<p>No comment</p>

Q-I4.1:	<p>Should we include a policy to safeguard specific infrastructure schemes within the SWLP?</p> <p>Yes No Don't Know</p>	No comment
Q-I4.2:	<p>Please add any comments you wish to make about these specific safeguarding provisions</p>	No comment
Q-I5:	<p>Please add any comments you wish to make about infrastructure, viability and deliverability</p>	<p>In terms of the relationship between infrastructure delivery and development, with SWLP should accord with Paragraphs 68 of the NPPF and in so doing:</p> <p><i>“identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”.</i></p> <p>Too much emphasis on larger site allocations could also negatively impact on housing delivery due to some common problems associated with bringing such sites forward. For example, it of common for large sites to be in multiple ownerships requiring complicated legal arrangements to be in place before development can be progressed. There are also often lengthy lead in times due to enabling infrastructure being required first to ‘open up’ a site. Mindful of such issues, the NPPF at Paragraph 69 further states that:</p> <p><i>“small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly.”</i></p>

<p>Q-S1:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced <i>Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.</i></p> <p>Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy <i>Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy.</i></p>	<p>No comment</p>
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<p>Q-S2:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.</p> <p><i>Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.</i></p> <p>Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes</p> <p><i>In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles.</i></p> <p>Option S2c: Do not have a policy which encourages intensification</p> <p><i>This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a</i></p>	<p>S2c is the preferred approach to intensification. The Arup study demonstrates that there is limited potential for new sites to come forward within the boundaries of the settlements considered. This reflects not only the limited supply of brownfield land that is available, but also the inherent development constraints that are associated with many of these historic settlements due to their intrinsic character and sensitivity to change. Policies which encourage intensification are not therefore considered to offer a realistic avenue to meet any significant share of future development needs (S2c).</p>
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	<p><i>design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower.</i></p>	
<p>Q-S3.1:</p>	<p>Please add any comments you wish to make about the Urban Capacity Study</p>	<p>Please refer to main response. The Urban Capacity Study (Arup, October 2022) includes consideration of windfalls as a source of supply for housing across the plan area. The proposed windfall allowance is based on historic trends and suggests that 4,480 dwellings could come forward between 2028 and 2050. Additional information is required to ensure that assumptions associated with windfall rates are robust.</p>

<p>Q-S3.2:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.</p> <p><i>Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.</i></p> <p>Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location</p> <p><i>This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.</i></p> <p>Option S3.2c: None of these</p>	<p>Brownfield development should be encouraged where it contributes to a sustainable pattern of development and is consistent with other objectives of the Local Plan, e.g. relating to the protection of employment land. The agent of change principle will also be important and could be reflected in any policy (S2a).</p>
<p>Q-S4.1:</p>	<p>Do you think that growth of some of our existing settlements should be part of the overall strategy?</p> <p>Yes No Don't Know</p>	<p>Please refer to main response. Harbury, with a population of 2,420 (2011 census) is of equivalent size to some of the settlements that are included in the I&O document) and is considerably larger than others, for example Bearley (population of 724 as of 2011). Harbury</p>

		is well located in relation to Leamington/Warwick and the Core Opportunity Area for employment that is identified in the I&O document. It has a good range of services and reasonable public transport links with scope for enhancement. Harbury could contribute to growth under either Option 2 or 4 for example.
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	Please refer to main response - A key stage in developing a truly joint Local Plan that achieves consistency of approach across South Warwickshire (a key aim of preparing a joint local plan) would have been to revisit the classification of settlements across both districts using a common set of criteria. Given the desire to achieve consistency of approach across the area it is suggested that the update to the evidence base includes a review of the settlement hierarchy across both districts to see if/how they align and to address any inconsistencies.
Q-S5.1:	Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options	Please refer to main response: The evidence in relation to Carbon dioxide emissions requires further justification. The study appears to make assumptions about factors like the take up of electric vehicles (EVs) and the rate of retrofitting of existing buildings under each of the growth options. These assumptions appear to have a significant bearing on the emissions associated with each option. For example, operational building emissions are assumed to decrease at a slower rate under the Rail Growth option but the rationale for this is not explained
Q-S5.2:	Do you think new settlements should be part of the overall strategy? Yes No <u>Don't Know</u>	Please refer to main response. The options considered include several locations that are presented as new settlements. These all appear to have been appraised on the basis that they

		<p>could provide up to 6,000 dwellings. As information has not been provided on the sites it is not clear if this assumption about the capacity of the identified locations is appropriate and therefore whether development on this scale represents a reasonable alternative at each location. The assumptions about the capacity of sites promoted by landowners/developers should be made clear in the evaluation of any location. Any revisions to the assumptions about new settlements as a source of supply should be reflected in the Sustainability Appraisal. It is also important that delivery considerations are clearly set out both in terms of the need of viability and timing having regard to the period of the Local Plan.</p>
<p>Q-S5.3:</p>	<p>In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?</p> <p>Yes No Don't Know</p>	<p>Please refer to detailed response. This approach to spatial development is considered too simplistic and might not necessarily lead to a more sustainable development strategy over alternatives. This is because not all settlements that are currently served by rail are located in accessible locations for non-rail based movements. Furthermore, not all of these settlements currently have existing services, social and community facilities etc and therefore would only be a sustainable location for growth if major development was focused at such settlements with requisite supporting infrastructure. It is considered best to have a blended spatial strategy and if rail represents a viable option implement this in a staged way over more than one Local Plan period.</p>
<p>Q-S5.4:</p>	<p>If not, what approach would you take?</p>	

Q-S7.1:	Please provide any comments you have on the emissions estimation modelling for the five growth options	Please refer to detailed response. The evidence in relation to Carbon dioxide emissions requires further justification. The study appears to make assumptions about factors like the take up of electric vehicles (EVs) and the rate of retrofitting of existing buildings under each of the growth options. These assumptions appear to have a significant bearing on the emissions associated with each option. For example, operational building emissions are assumed to decrease at a slower rate under the Rail Growth option but the rationale for this is not explained
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<p>Q-S7.2:</p>	<p>For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire::</p> <p>Option 1: Rail Corridors Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 2: Sustainable Travel Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 3: Economy Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 4: Sustainable Travel and Economy Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 5: Dispersed Appropriate strategy Neutral Inappropriate strategy Further comments</p>	<p>Please refer to detailed response. At present the strategy (and associated optioneering) appears too focused on the main towns and needs to include other settlements within the plan area – reflecting the polycentric nature of both districts, in order to ensure that rural communities, equally with urban communities, can become more sustainable in the future.</p> <p>As noted elsewhere in these representations, it will be important to ensure that the spatial strategy reflects the polycentric nature of the plan area and provides a spatial framework that helps deliver sustainable development across the joint local plan area. On this basis we consider that Option 4, which represents a hybrid option that looks to integrate consideration of sustainable travel and employment opportunities, provides the basis for the most appropriate strategy.</p>
<p>Q-S8.1:</p>	<p>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?</p> <p>Yes No Don't Know</p>	<p>Site capacity should be optimised, rather than artificially capped. The scale of development should reflect other factors, including its size, location and development potential – reflecting its relationship to the existing settlement, topography, heritage, ecology, flood risk etc.</p>

<p>Q-S8.2:</p>	<p>For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?</p> <p>Limit of 10 dwellings per site A higher limit is appropriate A lower limit is appropriate</p>	<p>As above.</p>
<p>Q-S9:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP. <i>Any revisions to existing boundaries, and consideration of which settlements have boundaries, would be saved for Part 2 plans and NDPs. The advantage of this approach is that waiting until Part 2 is likely to mean more detailed information is available – for example non-strategic allocations will likely not be made until Part 2, so waiting for these to come forward means any boundary revisions can accurately reflect new allocations. The disadvantages are that inconsistencies of approach between Stratford-on-Avon and Warwick Districts would not be addressed in the short term; and it results in a longer time period to address any out-of-date boundaries.</i></p>	<p>Where a site is considered strategic, the SWLP should amend the settlement boundary, rather than relying on LP2s or NDPs, which could lead to delays in sites coming forward and development being delivered in a timely way to meet need. Any allocation would also need to be suitably developed to demonstrate that it is deliverable/developable.</p>

	<p>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.</p> <p><i>The aim would be to achieve a consistent approach across Stratford-on-Avon and Warwick Districts regarding the type or size of settlement that has a defined boundary. The main impact is on where limited infill development is permitted, and where ‘open countryside’ policies apply. The disadvantage is that some non- strategic land allocations will likely not be made until Part 2 plans come forward. In such cases, it becomes difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations.</i></p>	<p>Question S9b asks if the SWLP should review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries. We suggest that this exercise is undertaken as part of an overall review of the approach to the classification of settlements to achieve a consistent approach between the two districts. A consistent and suitably evidenced settlement hierarchy is an essential element of a Joint Plan.</p>
Q-S10:	<p>Please add any comments you wish to make about the development distribution strategy for South Warwickshire</p>	<p>As noted in our detailed response, the distribution strategy should include consideration of the role of other settlements. As currently proposed, the Part 1 plan is effectively the core strategy with the Part 2 plan allocating non-strategic sites.</p> <p>The Part 1 plan needs to set the strategic context for such allocations. The settlement hierarchy from the adopted local plans have simply been rolled forward – these should be reviewed to see if they still reflect the position of settlements within the hierarchy or their ability to grow and become more sustainable plus, as it is a joint plan, to ensure consistency of approach between both districts.</p>
Chapter 5		
Q-E1.1:	<p>Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?</p> <p>Yes No Don't Know</p>	No comment
Q-E1.2:	<p>If your answer to E-1.1 is No, what would be a more appropriate approach to calculating future employment needs for this Local Plan?</p>	No comment

<p>Q-E2:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option E2a: Include a policy which encourages businesses to be low carbon <i>This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low carbon infrastructure such as renewable energy. This would be a new policy in response to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.</i></p> <p>Option E2b: Do not include a policy encouraging businesses to be low carbon <i>It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area.</i></p> <p>Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy. <i>This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change.</i></p>	<p>No comment</p>
<p>Q-E3:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option E3a: Include a policy expanding on SDC's current existing policy.. <i>This sets out the principles for economic activity within South Warwickshire and would also include setting out how much employment provision would need to be provided..</i></p> <p>Option E3b: Have separate policies for individual sectors.</p>	<p>Policy relating to economic growth should ensure that this is aligned with the scale and location of planned housing growth within South Warwickshire, ensuring that a balance between homes and jobs is maintained as far it is practical to do so to help ensure that a significant increase in out-commuting or in-commuting is avoided.</p>

<p><i>These would set out criteria for economic activity including how much employment provision should be provided for each sector and may need to be adapted depending on whether the area is urban or rural.</i></p> <p>Option E3c: Include a policy that secures employment strategies through S106.</p> <p><i>This would look at a strategy which would indicate how developers would promote employment and skills at certain stages of the development process for local people. For example, it could be a percentage of jobs are advertised to local people only. It would help to retain local skills and provide jobs for local people.</i></p> <p>Option E3d: None of these</p>	<p>No comment</p>
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<p>Q-E4.1:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E4.1a: Include a policy supporting diversification <i>This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford’s Core Strategy and Warwick’s Local Plan.</i></p> <p>Option E4.1b: Do not include a specific policy on diversification. <i>This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.</i></p> <p>Q-E4.2: Please select the option which is most appropriate for South Warwickshire</p> <p>Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas <i>This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy.</i></p> <p>Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas <i>This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.</i></p>	<p>No comment</p>
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<p>Q-E5:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E5a: Include a policy which supports a range of business units. <i>This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren't any specific existing policies in relation to this in either the Core Strategy or Local Plan.</i></p> <p>Option E5b: Do not include a policy in Part 1. <i>This level of detail may be considered beyond the scope of the Part 1 plan. Existing detailed policies may be 'saved' and subsequently incorporated into a Part 2 plan and/or other policy documents as appropriate.</i></p>	<p>No comment</p>
<p>Q-E6:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p>	

	<p>Option E6a: Include a policy which protects South Warwickshire’s economic assets. <i>As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change.</i></p> <p>Option E6b: Do not include a policy protecting all these economic assets. <i>This could mean that there would be a loss to the economy if some of these assets are not protected and are lost to other uses. It may be that some of these assets would be covered under alternative policies, or the view may be taken that specific protection is not needed. Alternatively, protecting these assets could be seen as beyond the scope of part one of the plan, and instead be considered in part two of the Plan.</i></p>	<p>A policy protecting economic assets, e.g. Wellesbourne Airfield, Stoneleigh Park and other similar built infrastructure is supported. Another way to ensure that such locations are not at risk from development is allocating sufficient land for housing and employment elsewhere within the plan area.</p>
<p>Q-E7.1:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E7.1a: Include a policy directing employment to the Core Opportunity Area. <i>This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment.</i></p> <p>Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area. <i>This could mean that South Warwickshire fails to capitalise on employment opportunities or that new investment is focused outside of the Core Opportunity Area and fails to capitalise on the connectivity that the core opportunity area brings.</i></p>	<p>The Core Employment Area is supported. It will be important to ensure a balance between homes and employment within this area and ensure that a range of housing, including affordable housing is available to help avoid in-commuting from outside of the area. Harbury could have a role to play in helping meet housing need within the Core Employment Area.</p>

Q-E7.2	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E7.2a: Include a policy relating to additional economic growth at the major investment sites. <i>This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire.</i></p> <p>Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites. <i>This could mean that South Warwickshire fails to capitalise on employment opportunities. It could also undermine the presence of existing businesses as they find themselves unable to grow in the long-term. This could put existing jobs at risk.</i></p>	<p>Allocating additional land for employment uses at the major investment sites within the Core Employment Areas is consistent with Paragraph 82 of the NPPF, it will help create the conditions in which business can invest, expand and adapt and is supported.</p>
Q-E8.1:	<p>Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?</p> <p>Yes No Don't Know</p> <p>This approach will provide investment certainty and ensure that we can continue to grow the local economy. If existing allocations are not included, we will need to find even more new greenfield sites across South Warwickshire to meet our employment needs.</p>	<p>It is agreed that existing employment allocations, including revisions to Atherstone Airfield, should be carried over into the SWLP. This will help safeguard the sites for employment use.</p>
Q-E8.2:	<p>If, no please list the sites that should be excluded and give reasons.</p>	

<p>Q-E8.3:</p>	<p>Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests?</p> <p>Yes No Don't Know</p>	<p>Proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests. Such measures will help ensure that employment land and buildings are protected from development pressure for higher value uses. It is also suggested that any requirements for marketing relate to a continuous period (to avoid sites being placed on the market for a few weeks, taken off and then put back on the market).</p>
<p>Q-E8.4:</p>	<p>Pease specify what you consider to be appropriate tests</p>	<p>As above</p>
<p>Q-E9:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan. <i>In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire.</i></p> <p>Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2. <i>This may not be considered a strategic matter for Part 1 to address. However, saving existing boundaries would result in an inconsistent approach across the two Districts</i></p>	<p>No comment</p>
<p>Q-E10:</p>	<p>Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?</p> <p>Yes No Don't Know <i>Whilst Tourism is essential to the vitality of South Warwickshire, there are few aspects of tourism that have an effect on the spatial planning of an area. It is therefore proposed that tourism is addressed fully, within Part 2 of the South Warwickshire Local Plan.</i></p>	<p>No comment</p>

Q-E11:	Please add any comments you wish to make about delivering South Warwickshire's economic needs	
Chapter 6		
Q-H1-1:	<p>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?</p> <p>Yes No Don't Know</p>	<p>Paragraph 61 of the NPPF notes that: <i>"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."</i></p> <p>The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) sets out the rationale for deviating from this approach, because of historic overestimation of the population of Coventry. The HEDNA adopts a trend-based projection and this approach is supported.</p>
Q-H1-2:	If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?	
Q-H2-1:	What is the best way to significantly increase the supply of affordable housing across South Warwickshire?	<p>Please refer to detailed response. Affordable housing needs to be delivered in key settlements and villages to meet local need where it arises over the plan period. If a halt is put on development in such settlements as part of the spatial strategy this will only lead to increased affordability issues in rural areas.</p>

Q-H2-2:	<p>Please select the option which is most appropriate for South Warwickshire:</p> <p>Option H2-2a: A single South Warwickshire wide affordable housing requirement <i>A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and</i></p>	<p>It is noted that the existing Stratford Core Strategy has different thresholds for different areas. This approach was based on the findings of the Affordable Housing and Core Strategy Viability Assessment (March 2014) and it is suggested that this approach should therefore be replicated, unless the emerging evidence base indicates otherwise. H2-2c is therefore the preferred approach.</p>
	<p><i>for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.</i></p> <p>Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts <i>Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting of variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.</i></p> <p>Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire <i>A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the Districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial growth strategy.</i></p>	<p>As above</p>
Q-H2-3:	<p>How should South Warwickshire best address the specialist needs for older people?</p>	<p>It is important to provide accommodation for people to downsize into that is also capable of adaptation.</p>

		<p>The viability of such housing is best achieved via larger developments that can offer a dwelling and tenure mix and still remain viable, this approach also helps ensure the provision of mixed communities.</p>
<p>Q-H3:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option H3a: Do not seek to include minimum space standards in a policy in the SWLP. <i>It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.</i></p> <p>Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence. <i>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</i></p> <p>Option H3c: H3 <i>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</i></p> <p>Option H3d: None of these</p>	<p>H3a and H3b relate to the provision of minimum space standards. The minimum space standards have applied to permitted development since September 2020. The requirement for all development to meet the minimum space standards is supported (H3b).</p> <p>H3c suggests including a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards. This approach is supported but any requirement would need to be evidenced based and subject to viability testing.</p>

Q-H4-1:	Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford- on-Avon District? Yes No Don't Know	The approach to meeting needs to 2031 is supported.
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	The scale and shortfall of future needs arising from Birmingham (78,415 to 2041) and the Black Country to 2050 is likely to be significant and will clearly need co-operation across authorities within the housing market area (and possibly further afield), including agreement on the scale of need and the basis for apportioning this to local authorities.
Q-H4-3:	If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls? <i>You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question</i>	Please refer to detailed response. In terms of meeting any identified need it is suggested that the SWLP identifies specific sites that are suitably located to help meet needs arising from outside the district – with other sites allocated to meet needs arising from within the districts. The Green Belt represents a significant constraint. Options for accommodating sustainable development outside of the Green Belt should be considered before locations within the Green Belt are considered, consistent with Paragraph 141 of the NPPF.

<p>Q-H5:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.</p> <p><i>This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.</i></p> <p>Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live or on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.</p> <p>Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.</p> <p><i>This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of self and custom build home are made available</i></p>	<p>The requirement under H5b for larger sites to include a proportion of self build and custom housing on site will help ensure that sites for self build and custom build homes are brought forward with the necessary infrastructure in place, H5b is therefore supported.</p>
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<p>Q-H6:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes.</p> <p><i>This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not likely be appropriate.</i></p> <p>Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site.</p> <p><i>This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. Whilst this option has the potential to build positive relationships between the settled and travelling communities and enable both communities to benefit from sustainable infrastructure that is provided as part of a large development, measures would likely need to be put in place to manage and foster these relationships. This approach may not be suitable for Travelling Showpeople yards which are typically larger in order to accommodate circus and fairground equipment. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.</i></p> <p>Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.</p> <p><i>This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Showpeople homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.</i></p>	<p>No comment</p>
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<p>Q-H7:</p>	<p>Please add any comments you wish to make about delivering homes in South Warwickshire</p>	<p>From a review of the I&O document and supporting evidence base the key points in relation to delivering homes in Warwickshire are:</p> <ul style="list-style-type: none"> • The SWLP must avoid being too strategic and focussing on strategic allocations – it must provide a spatial strategy with sufficient granularity for the whole of the plan area. • It must provide a balanced portfolio of sites – ensuring a continuous supply of deliverable and developable sites over the plan period (avoiding over reliance on strategic sites that may not start delivering housing until the second quarter of the plan period). • It should identify a range of housing sites that will meet future needs, including affordable housing – rather than relying on LP2s and NDPs. • The evidence base should be reviewed to ensure a consistent approach to the identification of sustainable locations for growth across the plan area, this includes revisiting the settlement hierarchy.
<p>Chapter 7</p>		

Q-C1.1:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes <i>Allocating suitable land would set the groundwork for future renewable energy proposals. The details of any such proposal would be further assessed through planning applications. Allocating land would also help prevent schemes coming forward in less suitable locations.</i></p> <p>Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location. <i>Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy would show general support but would not identify specific locations. Proposals would therefore be considered on a site- by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.</i></p> <p>Option C1.1c: None of these</p>	No comment
Q-C1.2:	Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?	No comment

Q-C2	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable <i>Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments.</i></p> <p>Option C2b: Have a policy encouraging the consideration of decentralised energy systems <i>Option 2 allows for greater flexibility, but is a weaker policy that may result in opportunities being missed.</i></p> <p>Option C2c: None of these</p>	No comment
Q-C3.1:	<p>Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site?</p> <p>Yes No Don't Know</p>	No comment
Q-C3.2:	<p>Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?</p>	No comment
Q-C3.3:	<p>Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire</p>	No comment

<p>Q-C4.1:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time. <i>Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.</i> Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments. <i>This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.</i></p> <p>Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards. <i>This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.</i></p>	<p>WP&DG supports a phased approach to net zero carbon for new buildings, setting a future date by which all new development will need to achieve net zero standards. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan. In the intervening period new development will need to meet building regulation standards.</p>
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	Option C4d: None of these	
Q-C4.2:	<p>What scale of development should the requirements apply to?</p> <p>Option C4.2a: All new development <i>Including for example residential extensions</i></p> <p>Option C4.2b: Development over a certain size <i>For example all developments of 1 dwelling or more, or 100+ square metres?</i></p>	It is suggested that this is applied to major developments as defined in Annex 2 of the NPPF (subject to viability testing).
Q-C5:	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications <i>Achieving net zero carbon requirements on existing buildings that are converted or change use is a great way to be able to retrofit climate change adaptation and mitigation measures into South Warwickshire’s existing building stock. However, the ability to make changes to existing buildings can be more restrictive and expensive than on new builds and may result in some developments becoming unviable.</i></p> <p>Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas <i>A policy that proactively encourages the retrofitting of climate change measures into existing buildings, within certain parameters, can make it easier and provide more certainty for property owners to be able to tackle climate change. In sensitive locations this approach may be more challenging and if taken forward it will be important for solutions to be sought to minimise any adverse impact on local surroundings.</i></p> <p>Option C5c: None of these</p>	No comment

<p>Q-C6.1:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a ‘business-as-usual’ approach to construction</p> <p><i>A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.</i></p> <p>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.</p> <p><i>A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area’s development needs.</i></p> <p>Option C6.1c: None of these</p>	<p>No comment</p>
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Q-C6.2:	<p>If a phased approach is used, what dates and thresholds should be used? <i>For example, achieve 80% reduction by 2030 and 100% reduction by 2040.</i></p>	No comment
Q-C6.3:	<p>Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire</p>	
Q-C7:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures? <i>This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.</i></p> <p>Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures <i>Not having a policy requiring developments to adapt to higher temperatures would result in new building stock not being designed to deal with this effect of climate change.</i></p> <p>Option C7c: None of these</p>	No comment
Q-C8:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events <i>This would include SuDS and water efficiency requirements</i></p> <p>Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events <i>Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.</i></p> <p>Option C7c: None of these</p>	No comment

Q-C9.1:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity <i>This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.</i> Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity <i>Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development.</i> Option C9.1c: None of these</p>	<p>Providing biodiversity net gains is consistent with paragraph 174 of the NPPF and the Environment Act 2021. It is suggested that the policy under 9.1a is couched in these terms rather than having an arbitrary maximum percentage of paved/hard surfaces on site – which may not achieve the intended objective of a net gain in biodiversity.</p>
Q-C9.2	<p>Please add any comments you wish to make about climate responsive development design in South Warwickshire</p>	<p>No comment</p>
Q-C10.1:	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This</p>	<p>The requirement for proposals to include a climate change checklist for major developments (as defined in the NPPF) is supported (C.10.b).</p>

	<p>could this be in line with RCP 8.5 in order to maximise the level of interventions incorporated?</p> <p><i>RCP 8.5 is a 'business-as-usual' scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.</i></p> <p>Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?</p> <p><i>Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. <u>Stratford-on-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation</u> is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.</i></p> <p>Option C10.1c: None of these</p>	
<p>Q-C10.2</p>	<p>Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire</p>	<p>It is suggested that the Council's should prepare the checklist and associated guidance and ensure that it is proportionate to the development that is proposed.</p>

Q-C11:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C11a: Do not include a policy on water quality in the SWLP Part 1 ‘Save’ <i>existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.</i></p> <p>Option C11b: Include policy along similar lines to the existing policies, where supported by up-to-date evidence <i>Prioritise water quality as a strategic issue, and develop a new policy based upon up-to date evidence.</i></p> <p>Option C11c: None of these</p>	<p>It is suggested that existing policies in relation to water quality can be carried forward. This could be kept under review as the evidence base for the Local Plan evolves.</p>
Q-C12:	<p>Please add any comments you wish to make about water management or flood risk in South Warwickshire</p>	<p>The plan should adopt a sequential approach in line with national policy and this should be reflected in the search for sites and identification of preferred sites.</p>
Chapter 8		
Q-D1.1:	<p>Do you agree that this is an appropriate range of topics for a strategic design policy?</p> <p>Yes No Don't Know</p>	<p>The criteria in the policy seem to be appropriate.</p>
Q-D1.2:	<p>If no, please indicate why</p>	
Q-D2:	<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option D2a: Develop a South Warwickshire Design Guide <i>A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual</i></p>	<p>Of the options presented, option D2c is considered the most appropriate and proportionate. The character of the plan area is far too varied to warrant a single guide for the whole area and bespoke guidance for settlements would also be a huge undertaking given the number of settlements that might be included.</p>

	<p><i>settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.</i></p> <p>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.</p> <p><i>This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans.</i></p> <p>Option D2c: Develop design guides/codes for strategic development sites/locations.</p> <p><i>Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.</i></p> <p>Option D2d: None of these</p>	
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<p>Q-D3:</p>	<p>Please select all options which are appropriate for South Warwickshire</p> <p>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. <i>This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</i></p> <p>Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h. <i>This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding</i></p>	<p>It is considered that the plan area is too diverse to be prescriptive about densities. The approach set out in D3a is considered proportionate. Any policy should highlight the need to optimise density, having regard to the existing character of an area, open space requirements and other development considerations.</p>
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	<p><i>appropriate density ranges in areas of change, as advocated by Paragraph 125 of the NPPF.</i></p> <p>Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places. This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis)</p> <p>Chapter 8 – A well-designed and beautiful south WarwickshireSouth Warwickshire Local Plan 142 <i>and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.</i></p> <p>Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places. <i>This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125 (e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in some places across South Warwickshire compared with the conventional approach.</i></p>	<p>As above</p>
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	Option D3e: None of these	
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<p>Q-D4.1:</p>	<p>Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?</p> <p>Yes No Don't Know</p>	<p>No comment.</p>
<p>Q-D4.2:</p>	<p>If no, please indicate why</p>	
<p>Q-D5:</p>	<p>Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?</p> <p>Yes No Don't Know</p> <p><i>Heritage assets are undoubtedly important to the character of South Warwickshire and should be considered at a strategic level within Part 1 of the South</i></p>	<p>No comment.</p>

	<i>Warwickshire Local Plan, helping inform the strategic growth strategy. Detailed heritage policies are will be deferred to part 2.</i>	
Q-D6:	Please add any comments you wish to make about a well-designed and beautiful South Warwickshire	No comment
Chapter 9		
Q-W1:	<p>Should the Part 1 plan include a policy on pollution? Yes </p> <p>No Don't Know</p> <p><i>This policy would cover all pollution and would ensure that any development that would result in a significant impact on the health and wellbeing of people in an area as a result of pollution will not be permitted unless effective mitigation can be achieved. This policy should also look to protect those areas which are within Air Quality Management Areas by requiring air quality assessments and where necessary a mitigation plan to demonstrate practical and effective measures have been taken to avoid any adverse impacts</i></p>	No comment
Q-W2:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option W2a: Include a policy on Health Impact Assessments. <i>Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.</i></p> <p>Option W2b: Do not include a policy on Health Impact Assessments. <i>Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.</i></p>	No comment

Q-W3:	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option W3a: Include an overall policy on health. <i>This policy would aim to address all aspects of health and assist in creating communities which are safe, healthy, and inclusive for everyone across South Warwickshire as a whole. This would build on the existing health policies in both the Warwick District Local Plan and the Stratford Core Strategy.</i></p> <p>Option W3b: Do not include a policy on health. <i>This would mean that health is not picked up at a strategic level within part 1 of the plan and there could be a missed opportunity to make communities as safe, healthy and inclusive as possible. It could be included within part 2 where more detailed specific health policies would be developed.</i></p>	No comment.
Q-W4:	<p>Please add any comments you wish to make about a healthy, safe and inclusive South Warwickshire</p>	No comment.
Chapter 10		
Q-T1:	<p>Please select all options which are appropriate for South Warwickshire</p>	<p>The concept of 20-minute neighbourhoods is supported but policies relating to this should recognise the importance of choosing the right location in the first place and making existing settlements more self-contained, i.e. those with high quality public transport (rail and high frequency bus corridors), leisure, education services and for access to higher order services and employment. The concept should also be applied across all suitable settlements, rather than being restricted to areas of new development. The Local Plan should explore the potential for encouraging 20-minute neighbourhoods across the plan area. This means greater granularity in relation to the spatial strategy will also be required.</p>

	<p>Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development. <i>It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.</i></p> <p>Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy. <i>This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn't warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire.</i></p> <p>Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals. <i>This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.</i></p>	<p>Option T1b, which includes reference to the principles of a 20-minute neighbourhood within a broader overarching policy, is supported.</p> <p>It is noted that reference is also made to 'similar' design approaches, e.g. Building for a Healthy Life, such approaches would be complimentary to the 20-minute neighbourhood approach but would only relate to new development. The 20-minute neighbourhood concept has potential to be applied at the settlement level (through a top-down approach) – including the retrofitting of facilities and services to address any existing shortfalls. Building for Healthy Life is primarily concerned with how new development can be integrated into existing settlements (bottom-up approach). The London Borough of Newham provides an example of where a strategic approach is being taken to the application of the 20-minute neighbourhood concept across the plan area.</p>
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<p>Q-T2:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure. <i>This would be based on those living in rural areas, urban areas etc. It could include making changes to car parking standards and lowering them in areas where there are good active/public transport links in place such as in main urban centres. The policy would explore opportunities to use existing green and blue infrastructure as potential active travel options. The policy should also ensure that proposals are in line with the priorities as set out in the Local Transport Plan such as promoting and looking at alternative options for sustainable travel, e.g. car club initiatives, e scooters etc.</i></p> <p>Option T2b: Do not include a policy which takes a hierarchical approach. <i>There could be a general policy on sustainable transport which requires the necessary infrastructure and services (including the use of existing green and blue infrastructure) in place to allow both existing and new communities to become more sustainable and to have much easier access to key services and facilities. This would be regardless of whether residents live in rural or urban areas and could be an expansion of Policy CS.26 in the Core Strategy. This could also include a section on ensuring that proposals are in line with the priorities as set out in the Local Transport Plan. If a hierarchical approach is not taken it may still lead to those residents who have good access to public transport still continuing to use their cars for everyday use as there would be little incentive to change travel habits.</i></p>	<p>Given the rural nature of much of the plan area it is suggested that car parking restrictions are not appropriate for much of the area. The approach under T2b is therefore considered appropriate.</p>
<p>Q-T3:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option T3a: Include a policy encouraging more sustainable road-based transport for businesses. <i>It is acknowledged that employment and businesses will still need to operate using roads as their predominant form of transport particularly for the distribution of goods. This policy would encourage businesses to become more sustainable such as by using electric vehicles, introducing low emission zones, workplace</i></p>	<p>No comment</p>

	<p><i>levies, looking at the possibility of 'last mile' freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods. This could also include measures required in order to mitigate against any unacceptable impacts that road-based travel from business/employment may have on the environment such as poor air quality. This will help in meeting the climate change aspirations of the plan.</i></p> <p>Option T3b: – Do not include a policy encouraging more sustainable road-based transport for business. <i>This may be beyond the scope of the Part 1 plan as it could be picked up under a more general sustainable transport policy rather than specifically for business and employment. If it is not considered to be a strategic issue for Part 1, a detailed policy could be developed as Part 2 of the plan.</i></p>	
Q-T4:	Please provide suggestions for how smart cities technologies could be supported in South Warwickshire	No comment
Q-T5:	Please add any comments you wish to make about a well-connected South Warwickshire	Directing development to locations that have access to a range of services and facilities and public transport that are close to the main urban centres and planned employment growth will help achieve the desired outcome. It is considered that Harbury represents such a location.
Chapter 11		

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

<p>Q-B3:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B3a: Introduce Special Landscape Areas across all of South Warwickshire <i>Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA's refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA's within Stratford remain relevant and where any SLA's within Warwick should be located, an updated study would need to be undertaken.</i></p> <p>Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District <i>Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.</i></p> <p>Option B3c: Discard Special Landscape Areas and bolster general landscape policy <i>Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.</i></p>	<p>Given the intention to create a Joint Local Plan it would make sense for option B3c to be adopted.</p>
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<p>Q-B4:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B4a: Maintain the current policy approach, without the use of a buffer <i>Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.</i></p> <p>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 <i>Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.</i></p>	<p>No comment</p>
<p>Q-B5:</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B5a: Explore and pursue an integrated Environmental Net Gain Policy</p>	<p>Options relating to net gain are discussed, the first B5a is an ‘integrated approach’ with a policy covering air quality, water quality and carbon capture – biodiversity net gain would still be required. Option B5b is to have separate policies relating to biodiversity, air quality etc. It is suggested that option B5b is preferable – keeping the requirement for biodiversity net gain separate from other requirements will help provide clarity.</p>

	<p><i>To consider Environmental net gain as a new and pioneering approach to support nature's recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice. However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.</i></p> <p>Option B5b: Explore environmental net gain through separate policies <i>A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate policies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.</i></p> <p>Option B5c: None of these</p>	
<p>Q-B6:</p>	<p>Should the South Warwickshire Local Plan introduce Wildbelts designations? Yes No <u>Don't Know</u></p> <p><i>Designate areas of Wildbelt across the Local Plan Area to support nature's recovery and the Wildlife Trust's goal to have 30% of our land and sea managed for nature by 2030.</i></p>	<p>From the information provided it appears that these would also act as wildlife corridors and stepping stones, which the NPPF (paragraph 179) already encourages, alongside areas identified by national and local partnerships for habitat management, enhancement, restoration and creation – it therefore appears that the NPPF provides a policy hook for local policies aimed at achieving these objectives.</p>
<p>Q-B7:</p>	<p>Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?</p> <p><u>Yes</u> No Don't Know</p> <p><i>Where possible, the SWLP will seek to signpost to relevant policies in other documents, rather than duplicating or paraphrasing these policies. It is not within the scope of the SWLP to produce its own distinct policy regarding minerals. This approach also avoids difficulties of varying plan periods for different plans.</i></p>	<p>It is agreed that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP.</p>

<p>Q-B8.1:</p>	<p>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?</p> <p>Yes <u>No</u> Don't Know</p> <p><i>Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The 'best and most versatile' land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.</i></p>	<p>It is noted that the Government intends to produce a new suite of national development policies, and this may well be covered in there. The NPPF provides policy at paragraph 174b and a specific Local Plan policy that repeats national policy is not considered to be warranted.</p>
<p>Q-B8.2:</p>	<p>When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?</p>	<p>From the explanatory text in the I&O part of the driver for the question appears to be that the two existing local plans have similar policies with different wording. It makes sense to have one policy covering the different designations that are in the area, the degree of protection given to such sites would need to be consistent with paragraph 175 of the NPPF.</p>
<p>Q-B9:</p>	<p>Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.</p>	<p>Please see above response, the degree of protection given to such sites would need to be consistent with paragraph 175 of the NPPF.</p>

	<p>Yes No Don't Know</p> <p><i>Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non-designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.</i></p>	
Q-B10:	Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire	No comment
Chapter 12		
Q-P1.1:	<p>Do you agree with the proposed broad content of the Part 1 plan?</p> <p>Yes No Don't Know</p>	
Q-P1.2:	If no, please indicate why	<p>Please refer to detailed response. The vision is too narrowly focused on the main settlements and needs to ensure that a comprehensive vision for the plan area is included for which provides the basis for preparing Local Plan 2s (LP2s) for each district. A comprehensive vision that relates to the plan area as a whole should be one of the key drivers for preparing a Joint Local Plan.</p> <p>The discussion in relation to the spatial strategy in the I&O document is considered too limited in scope and overly focused on the main towns. It is also crucial that the Part 1 Plan provides a coherent strategy for LP2s and updates to Neighbourhood Plans, including infrastructure requirements.</p> <p>The vision and spatial objectives should be clear that the principle of the Green Belt remains, and it will continue to shape new development, especially with regard to its fundamental aim of preventing urban</p>

		sprawl by keeping land permanently open (NPPF paragraph 137).
Q-P1.3:	Do you agree with the selection of policies to be addressed in the Part 1 plan? Yes <u>No</u> Don't Know	
Q-P1.4:	If not, please indicate why	Please refer to detailed response. A general theme of the response is that the SWLP needs to be considered too limited in scope and overly focused on the main towns. It is also crucial that the Part 1 Plan provides a coherent strategy for LP2s and updates to Neighbourhood Plans, including associated a comprehensive vision, spatial strategy and supporting policies.
Q-P2.1:	Are there any areas where equality and inclusivity in planning needs further attention? <u>Yes</u> No Don't Know	
Q-P2.2:	If yes, please give further details	<p>Please refer to detailed response. It is crucial that the Part 1 Plan provides a coherent strategy for LP2s and updates to Neighbourhood Plans, rather than leaving it to Part 2 Plans to establish the strategy. The Adopted Stratford Core Strategy states (quoting the former Commission for Rural Communities:</p> <p>“Our challenge is to chart a course by which rural communities, equally with urban communities, can become more sustainable in the future”.</p> <p>P2.1 asks if there are any areas where equality and inclusivity in planning needs further attention. We suggest that this is the case for rural communities where issues such as housing affordability should be addressed via a clear spatial strategy that provides for the needs of rural areas as well as for urban areas.</p>

Appendix B

Land off Bush Heath Road, Harbury

Appendix B

Land off Bush Heath Road, Harbury: Concept Masterplan

1. Introduction

WSP Environment and Infrastructure Solutions UK Limited (WSP) has been instructed to prepare a concept masterplan scheme to illustrate the development potential of Land off Bush Heath Road, Harbury (the Site).

Harbury is a large village located approximately 6.8km to the south-east of Leamington Spa and 5.9km to the south-west of Southam. The village contains a range of facilities including a post office and local convenience stores, children's nursery, pre-school and primary school, village hall, scout hut, library, public houses, and several local businesses.

The following sections provide an overview of the site and details of known development opportunities and constraints that have inform a concept masterplan which illustrates emerging development proposals for the Site that help demonstrate how a sustainable, sensitively designed high quality new neighbourhood can be readily accommodated at the Site.

2. Site description and context

The site measures approximately 5.13ha and lies immediately adjacent to south-eastern edge of the village.

Two of the site's external boundaries are defined by hedgerows. The western boundary hedgerow is currently overgrown, includes mature trees and separates the site principally from land in use as public open space (Harbury Playing Field) and community allotments. Beyond the eastern boundary lies Bush Heath Road, and beyond that open countryside.

The site's northern boundary is defined by a mix of hedgerow and post and rail fencing, beyond which lies residential development. The southern boundary is partly defined by a hedgerow beyond which lies land currently used as a paddock for horses associated with the adjacent Pineham Farm. Within these boundaries the site is made up of four parcels of land each separated by hedgerows, some with trees. With the exception of the western most land parcel which is also in use as a paddock, all other land parcels are in agricultural use for the grazing of livestock.

A public footpath runs through along the Site's southern boundary and links into the wider public right of way network around the village. From this footpath access is possible into the village centre.

The adjacent Harbury Playing Field includes sports pitched, tennis courts, a skate park and bmx track, as well as children's play area, exercise equipment and car parking. Harbury Village Hall is situated at the entrance to the playing fields.

Topographically the site is relatively flat, with a gentle fall from the south-west corner towards the north-west.

A location plan and aerial image of the site are provided at **Appendix B1**.

Access and highways

There is an existing vehicular agricultural access into the Site off Bush Heath Road.

Where this access is located Bush Heath Road is subject to the national speed limit (60mph) and changes to 40 mph further north close to site's north-eastern corner as the road passes the built-up area of the village.

A public footpath along the highway terminates just past Percival Drive. Therefore, currently there is no public footpath extending to the Site along Bush Heath Road.

The closest bus stops to the Site are to the north on South Parade, the nearest of which is approximately 350m walking distance. This bus stop is served by services: 78, 501 and 665.

- 77/78 Stagecoach runs Sundays and bank holidays from Leamington Spa, Leamington Rail Station, Shires Retail Park, Warwick Gates, Bishops Tachbrook, Lighthorne Heath, Harbury, Bishops Itchington, British Motor Museum, Gaydon, Temple Herdewyke and Kineton.
- 501 Stagecoach runs Saturdays from Leamington Spa, Harbury, Bishops Itchington, Southam, Ladbrooke, Fenny Compton, Mollington, Little Bourton and Banbury.
- 665 Stagecoach runs Monday to Saturday between Leamington Spa, Harbury, Bishops Itchington, Southam and Napton On The Hill.

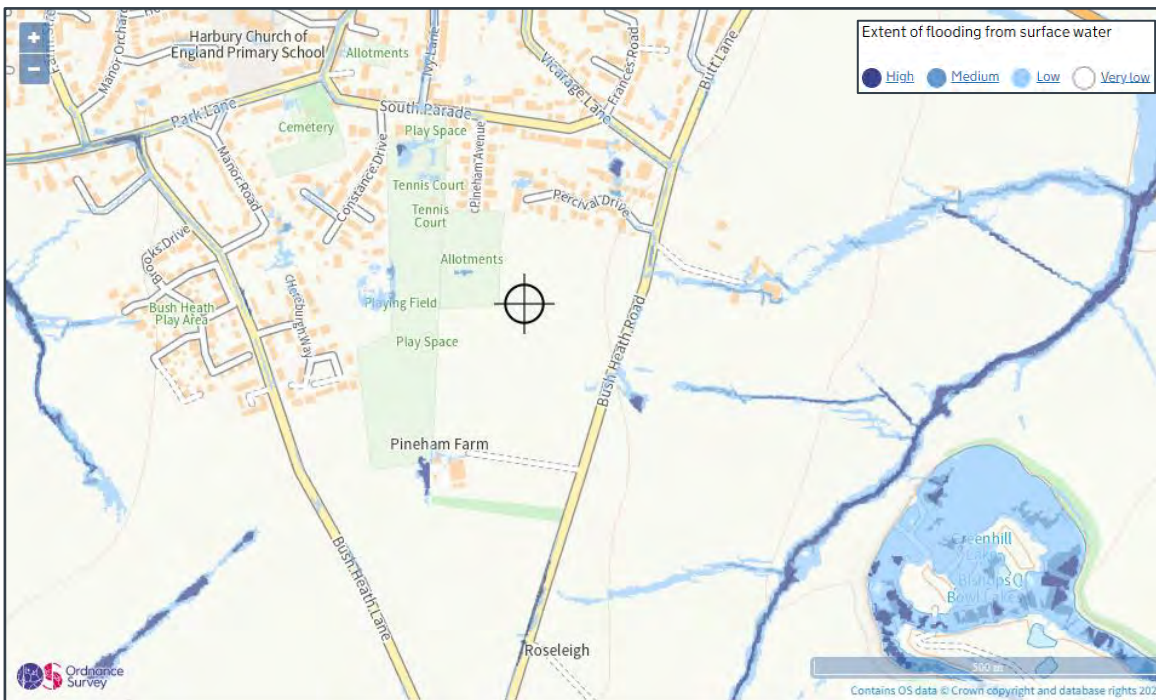
Flood risk and surface water drainage

Flood zones have been created by the Environment Agency to be used within the planning process as a starting point in determining how likely somewhere is to flood, and its suitability for different types of development.

Having regard to the Environment Agency's online flood mapping, the site lies within Flood Zone 1, which presents the lowest level of fluvial flooding risk from a river or stream with less than 0.1% chance of fluvial flooding in any year. Consequently, Flood Zone 1 is sequentially preferred over other flood risk zones as locations for proposed new development.

According to EA published data, the site is also at low very low risk of surface water flooding (refer Figure 1).

Figure 1 Surface Water Flood Risk



Source: <https://flood-map-for-planning.service.gov.uk/>

Landscape and visual

A review of Defra's Magic Map¹ application indicates that the Site is not covered by any landscape designations.

While the Site is bounded to the east and west by mature vegetation, as is half of the southern boundary, it is in a relatively visually sensitive location being situated on the edge of the village surrounded by public open space to the west and open countryside to the south and east. Visual impact considerations on sensitive visual receptors to the north and south of the site, plus from public vantage points to the east e.g. from the Public Right of Way, will therefore need to be considered carefully in any development proposals and suitable mitigation implemented where possible.

Heritage

A review of the Magic Map application indicates that there are no statutory or non-statutory historic assets within the vicinity of the site. The Site is located outside of designated village conservation areas and has no visual relationship with them due to intervening development.

Ecology and environment

From an initial review of the Site, it appears to be of little ecological value although mature trees and hedgerow surrounding the Site may provide potential for nesting birds and bats roosts or

¹ <https://magic.defra.gov.uk/magicmap.aspx>

foraging habitat. Surveys will be required to confirm the Site's ecological value and identify opportunities for potential mitigation.

The site is located within two SSSI Impact Risk Zones (IRZs) associated with Harbury Quarries SSSI situated approximately 0.52km to the south-east of the site and Harbury Railway Cutting SSSI situated approximately 0.69km to the north. The Harbury Quarries SSSI was designated because of its geological properties, with the Harbury Railway Cutting SSSI designated for being calcareous grassland and an important ecological habitat.

Although local planning authorities (LPAs) have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI, it is not envisaged that proposed residential development at this Site would be of concern to Natural England in terms of any potential negative impacts on the designated SSSIs. This, however, will need to be confirmed.

Ground conditions

From historic mapping, the Site appears to have remained in agricultural use and as a consequence it is not anticipated that there will any contamination risks associated with its proposed development.

Social and community infrastructure

Harbury benefits from several village facilities including a primary school, nursery, library, village hall, post office, foodstore Surgery (GP practice and in-house pharmacy), church, pubs/restaurants, cafe, allotments, bmx track and skate park.

The GP surgery forms part of the Warwickshire East Primary Care network, along with Southam and Kineton Surgeries. The PCN aims to bring local surgeries together to provide new and innovative services to patients that would otherwise not be possible when working as individual practices.

3. Development Opportunities and Constraints

In response to the findings in Section 2 a summary of potential development opportunities and constraints associated with proposed development of the Site for housing is provided in Table 3.1 and Table 3.2 below and highlighted on an Opportunities and Constraints Plan at **Appendix B2**.

In having regard to these opportunities and constraints, a draft concept masterplan for the site has been prepared and is presented in Section 4.

Development opportunities

The potential development opportunities outlined in the following table are not intended to represent a definitive list, but simply those potential opportunities which have so far been identified following initial survey work. The practicality of realising some of these opportunities will require additional technical work and engagement with relevant stakeholders.

Table 3.1 Development Opportunities

Potential Development Opportunities include:
<ul style="list-style-type: none"> • Provision of a new vehicular access and additional parking area for users of the adjacent sports pitches and community allotments. • Enhancement of the existing public footpath link between the Site and the village centre to provide safe and convenient access to social and community facilities, including the primary school. • Improved pedestrian and cycle links to the village centre via the Harbury Playing Field site. • Introduction of natural surveillance of adjacent skate park and bmx track facilities by removing some of the hedgerow and trees along the Site’s western boundary and incorporating these facilities within an area of public open space framed by new housing. • Retention and enhancement of hedgerows within a site-wide green and infrastructure framework. • An extension of the existing community allotments area into the Site to help meet existing and future demand for plots. • Potential to improve off-site social and community infrastructure within the village through financials contributions (s106 as appropriate), which could include improvements to the existing skate park and bmx track.

Development constraints

With the sole exception of being within a SSSI Impact Risk Zone, the site is free from any known physical, environmental or heritage constraints which would otherwise restrict or preclude development at this location.

Of the constraints highlighted below, a corresponding potential mitigation is also identified. In many cases mitigation can be addressed by applying appropriate masterplanning principles and through detailed design solutions.

Table 3.2 Potential Development Constraints and Potential / Proposed Mitigation

Constraint	Potential / Proposed Mitigation
<ul style="list-style-type: none"> • Existing speed limit on Bush Heath Road, implication for new site access 	<ul style="list-style-type: none"> • A Traffic Regulation Order (TRO) under Section 84 of the Road Traffic Regulation Act 1984, would be made to extend the 40mph zone to include all the road in front of the Site thus securing a safer access with appropriate suitable visibility splays.
<ul style="list-style-type: none"> • Lack of screening along some external boundaries. 	<ul style="list-style-type: none"> • Strategic landscape planting and /or screen fencing along the Site’s northern boundary to reduce visual impact and protect the amenity of adjacent residents. Along part of the southern

Constraint	Potential / Proposed Mitigation
	<p>boundary new hedgerow planting to complement what is already there and fill in the gap.</p> <ul style="list-style-type: none"> Some tree planting along the Site's eastern and southern boundary to soften the visual impact of the development and provide an enhanced 'gateway' feature into the village from this location.
<ul style="list-style-type: none"> Potential noise impact from the adjacent skate park and bmx track 	<ul style="list-style-type: none"> To safeguard the amenity of future residents of the proposed development, the front façade of houses would be set back a minimum of 30m from these noise sources. This buffer being the typical recommended buffer area around a MUGA without any intervening acoustic fencing or similar.
<ul style="list-style-type: none"> Potential noise and visual impact associated with the wind turbine if constructed on the adjacent site 	<ul style="list-style-type: none"> There is the potential for some impacts from the proposed community wind turbine (noise and shadow flicker). Although the scale of any impact is considered to be low, this will need to be confirmed and, if necessary, appropriate mitigation included within the scheme design.
<ul style="list-style-type: none"> Site is located within two SSSI Impact Risk Zones (IRZs) 	<ul style="list-style-type: none"> Although it is not considered that the Site's proximity to the SSSI will act as a constraint on proposed development, the need to formally demonstrate this can be addressed at the application stage.
<ul style="list-style-type: none"> Removal of some hedgerow to facilitate a main site access and internal road network Removal of hedgerow /hedgerow trees (near skate park and bmx track) 	<ul style="list-style-type: none"> Where the removal of hedgerow is required this will be minimised as much as possible with any loss mitigated through provision of new hedgerow planting along the Site's southern boundary. It is recognised that the loss of some trees along the Site's western boundary could be emotive within some sections of the local community, it is also known that has been concern over anti-social behaviour associated with skate park and bmx track, and as a result some existing village residents may consider a limited loss of trees and hedgerow an acceptable impact to improve natural surveillance and achieve a betterment in public safety. This design consideration can be considered in more detail at the application stage with key stakeholders.

4. Concept Masterplan

Initial Concept Masterplan

Drawing upon the assessment of development opportunities and site constraints, an initial Concept Masterplan has been prepared to illustrate how a sustainable, high quality residential development can be achieved that is sensitively designed to respect the Site's edge of village location. The Concept Masterplan is included at **Appendix B3**.

Land Use, Amount and Density

The Site extends to approximately 5.13ha. The net developable area shown on the Concept Masterplan 3.14ha which can accommodate around 104 dwellings at a density of 33 dwellings per hectare (dph). This will make an efficient use of the Site whilst retaining and incorporating existing hedgerows in a sitewide green infrastructure framework (c0.98ha), providing an area of accessible public open space (0.5ha) and a dedicated area for SuDS attenuation (0.35ha). Provision is also made for additional allotments (0.16ha) and additional car parking for users of the allotments and playing fields.

Access and Movement

It is proposed that a vehicular access to serve the development would be created off Bush Heath Road, just south of the existing agricultural access as this would facilitate a better internal road layout than having the access towards the northern part of the site. At this location the speed limit on Bush Heath Road is 60mph (national speed limit on single carriageway road).

A reduction in the highway speed limit on Bush Heath Road would be pursued via a Traffic Regulation by which the current 40 mph zone is extended south of Percival Drive to the proposed new site access. This would not only have the benefit of increasing the safety of drivers at this junction but also for pedestrians if the existing footpath was extended south of Percival Drive to the Site access. Alternative site access options are, however, possible. Under the Concept Masterplan pedestrian access to the village centre is proposed through the Site via a small section of new footpath on the western side of Bush Heath Road immediately adjacent to the development off Percival Drive.

Under the Concept Masterplan options, additional pedestrian / cycle path links to the village are included for, as well as with and through the development linking new housing with proposed open space areas. The PRoW within the Site would also be retained and incorporated within the scheme's design. The Site therefore performs well in terms of the connectivity analysis undertaken as part of the Settlement Analysis undertaken by the Councils to inform the South Warwickshire Local Plan. The site also performs well in terms of accessibility to local services, consistent with the 20-minute neighbourhood concept.

Within the development a parking area is proposed south of the allotments to help meet the needs of current and future allotments users and /or users of the sports pitches at the southern end of Harbury Playing Fields.

Green Infrastructure

Informal open space and planting would be provided throughout the development. An area of public open space is proposed adjacent to the eastern site boundary thereby offering an opportunity to physically connect with Harbury Playing Fields, and also visually connect if some of the intervening boundary planting were removed.

As noted under development opportunities, if some boundary planting were removed along the western site boundary and new housing designed to front on to the open space, natural surveillance could be achieved over the current skate park and bmx track. This would not only have safety benefits for users of these facilities and help reduce anti-social behaviour but would also help create a read focal point to the development.

Surface water attenuation infrastructure (balancing ponds) are proposed in the north-east corner of the site set within a multi-functional area of Green Infrastructure.

Some new structural planting is proposed along the site's eastern boundary to soften the visual impact of the proposed development on the wider countryside.

5. Delivery

Land off Bush Heath Road, Harbury provides a viable and sustainable opportunity to help the Council fulfil its housing needs, in addition to providing new public open space and ecological enhancements.

Our proposals for the Site have carefully considered the existing and emerging planning policy context and has responded to the findings of initial work which have highlighted key development opportunities and constraints.

Via this document and the Concept Masterplan it has been demonstrated how the Site has the potential to support a sustainable residential led development:

- The site is within a single ownership avoiding the need for complicated land assembly or delivery strategies.
- There are no technical impediments or environmental constraints that could not be addressed through a sensitive and successful design, to deliver a high-quality proposal in this location. The site is also not reliant on major infrastructure improvements for its delivery.
- The proposals also offer the opportunity to support Hanbury's future role as a rural service centre within a sustainable spatial strategy in the emerging South Warwickshire Joint Local Plan.


Appendix B1

Site Location Plan

H:\Projects\808687 WPDG Technical Support\Deliver Stage\Design_Technical\Drawings\InDesign\Site location Rev A.indd Originator: Bettina Bernard/Mike Rignall



Key

 Site boundary (Indicative)



Not to scale
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Client



Land off Bush Heath Road, Harbury

Site location

February 2023



Appendix B2

Opportunities and Constraints Plan

Appendix B3

Concept Masterplan



- ① New site access
- ② Legible and permeable block structure
- ③ Public open space
- ④ Additional community allotment plots
- ⑤ Dedicated parking for allotment users / sports pitch users
- ⑥ Surface water attenuation (SUDS) and amenity POS
- ⑦ Retained Public Right of Way (PRoW)
- ⑧ Retained and enhanced hedgerows
- ⑨ Proposed new hedgerow
- ⑩ Pedestrian links to village centre
- ⑪ Convenient access to local sport and recreation facilities
- ⑫ Sensitive design respecting amenity of adjacent residents

- Key
- Site boundary
 - Residential development
 - Green infrastructure, recreational footpaths and retained PROWs
 - SuDS and surface water attenuation area
 - Retained hedgerows
 - Additional allotment area with parking for allotments and POS
 - Proposed new hedgerow

0 m 50 m

Scale 1:1250 @ A3

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Client



Land off Bushey Heath Road, Harbury

Concept Masterplan

March 2023

