

SOUTH WARWICKSHIRE LOCAL PLAN: ISSUES & OPTIONS

On behalf of Miller Homes
Kings Meadow Phase 2, Bidford-on-Avon, Stratford-on-Avon

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REPORT

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[Paul Hill]

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Prepared by:

RPS

Prepared for:

Miller Homes

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1 INTRODUCTION

- 1.1 This submission is in response to the South Warwickshire Local Plan ('SWLP') Issues and Options consultation January-March 2023, referred to hereafter as 'IO document'. It has been prepared on behalf of Miller Homes who has land interests across the Plan area.
- 1.2 The comments set out in this submission seek to address issues of a plan-wide nature but have also been prepared in the context of Miller Homes interests in land on the edge of Bidford-on-Avon; described as 'Kings Meadow Phase 2, Bidford-on-Avon' ('the site'). Miller Homes has promoted this land parcel as part of consultations on various emerging plans in Stratford-on-Avon, the latest being the SWLP Scoping consultation during 2021. That consultation was supported by a call for sites submission, which should also be taken into account as the SWLP moves forward.
- 1.3 As part of previous submissions, Miller Homes prepared a Vision Document for Kings Meadow Phase 2, Bidford-on-Avon. This has been updated to reflect the latest consultation stage and is appended to this submission (**Appendix A**). This document shows that the Kings Meadow Phase 2, Bidford-on-Avon site is a suitable location for residential development which should be considered as part of the site selection process for the SWLP.

2 THE SITE AND PROPOSALS

- 2.1 It is acknowledged that the Part 1 SWLP is unlikely to allocate sites of the scale of Kings Meadow Phase 2, however for information set out below is a brief summary of the emerging proposals for the site, with further detail set out in Appendix A. The site has previously been identified as a reserve site in the emerging Site Allocations Plan being prepared by Stratford-on-Avon District Council.
- 2.2 The site is adjacent to the northern settlement edge of Bidford-on-Avon, less than 1 km from the village centre and adjoins Miller Homes Phase 1 site which is currently being built out for 200 new homes. Bidford-on-Avon is situated approximately 10 km to the west-south-west of Stratford-upon-Avon, 6 km to the south of Alcester and 10 km to the north east of Evesham. Bidford-on-Avon is located immediately north of a meander on the River Avon and to the East of the River Arrow Valley.
- 2.3 The site consists of a single field, currently in agricultural use, that is adjacent to an unnamed track to the northern boundary of the site, that links to Victoria Road / Bidford Road to the west of the Site. A watercourse, Small Brook, runs adjacent to the track and is a tributary of the River Avon. An established hedgerow separates the track from the Small Brook. The southern boundary of the site adjoins the Miller Homes Phase 1 site currently under construction. The western boundary adjoins the edge of a recently completed residential development at Jacksons Meadow. The eastern boundary of the site adjoins the garden of a residential property. The site is shown below and its relationship to the development at Jacksons Meadow and its relationship with the Miller Homes Phase 1 development to the south.

Figure 2.1 - The site and relationship to phase 1 Miller Homes development to south



- 2.4 Development has built up along the B439 Stratford Road that runs east-west, just north of the town centre. Development is also situated along two roads running north from there: Victoria Road to the

west and Waterloo Road to the east. The Site sits between these two roads. Existing residential development at Bidford-on- Avon is situated on land between 25m AOD and 52m AOD.

2.5 As set out in the accompanying vision document (Appendix A) the vision for the Site is to deliver an attractive development offering a choice of high quality affordable and market new homes to meet local needs and being fully integrated with, and complementary to, the village of Bidford-on-Avon. Miller Homes has developed an illustrative concept masterplan which reflects the opportunities and constraints that have been identified through the evidence base for the application on the land to the south, and subsequent further technical work on landscape and highways. It is intended that the illustrative masterplan shown below is used as a starting point to inform discussions on the Site and that the plans will evolve further following consultation with the local community, the Council and any other key stakeholders.

Figure 2.2 - Illustrative Masterplan



2.6 Vehicular access would be provided towards the south eastern corner of the Site, linking directly into the wider Miller Homes site to the south, ultimately linking the site to Waterloo Road to the east. The illustrative masterplan shows how access to the land to the east of the Site, which is outside of the control of Miller Homes, could be provided through the Site linking it to the larger Miller Homes site to the south.

2.7 The illustrative concept masterplan demonstrates that a significant amount of green infrastructure could be provided within the Site as part of the proposed development. In particular areas of green, open space, are shown within the illustrative masterplan to the eastern and southern boundaries of the Site that would enable the development to seamlessly integrate with the approved development to the south. The scheme has taken account of the work undertaken as part of the Landscape and

Visual Assessment and substantial hedgerow and tree planting would be provided across the Site, within both public areas and private gardens, to ensure a high-quality form of development that reflects its location. Whilst further details would be provided at the application stage, the proposals allow for a strong landscape barrier to the north of the site to ensure that a strong, defensible barrier, can be created.

- 2.8 The illustrative concept masterplan demonstrates that the site can accommodate up to 90 dwellings at a density of approximately 30 dwellings per hectare. This ensures that the development would reflect the general character and density of development within the surrounding area and that it would protect the residential amenity of the occupiers of existing and proposed residents alike.

3 CHAPTER 3 – VISION AND OBJECTIVES

Issue V3: Strategic Objectives

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

- 3.1 No.
- 3.2 It is noted that under the heading 'Meeting South Warwickshire's Sustainable Development Needs' there is an objective relating to 'delivering homes that meet the needs of all our communities'. However, this objective only relates to addressing local housing need but does not include any reference to addressing development needs from neighbouring areas. This is despite the accepted position that South Warwickshire straddles two market areas; Greater Birmingham and the Black Country, and Coventry & Warwickshire. Both of these market areas have a history of unmet need which, in Birmingham's case, has never been fully addressed and which is now worse (c. 78,000 dwellings) compared to the shortfall in adopted Plan (37,500). In Coventry, it is likely that their future needs will not be accommodated in full within their area due to its tightly-drawn boundary and so support will be required from neighbouring areas within the wider market area, including South Warwickshire. Notably, the IO document makes reference to two options for contributions towards these wider needs; 5,000 and 10,000 homes.
- 3.3 On this basis, RPS recommends that the objectives of the SWLP should be updated to reflect the emerging position regarding future (unmet) need across the wider market areas within which South Warwickshire is located and which make a clear commitment to assisting in addressing those needs.

4 CHAPTER 4 – DEVELOPMENT DISTRIBUTION STRATEGY FOR SOUTH WARWICKSHIRE

Issue S2: Intensification

Q-S2: Please select all options which are appropriate for South Warwickshire

- 4.1 Under this issue, the IO document does not pose any specific questions, but instead identifies three options for developing a policy to support the intensification of existing areas.
- 4.2 National policy provides advice on achieving appropriate densities as part of the overall objective to make efficient use of land¹ or for optimising the density of development in city and town centres and other locations that are well served by public transport². This includes taking into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change³, as well maintaining the viability of development⁴. It is also advised that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range⁵.
- 4.3 In this context, it is clearly the case that some localities more central to existing built-up areas may be more predisposed to accommodate more intensive development than other locations. Nonetheless, delivering development at increasingly higher densities will inevitably lead to potential impacts on the prevailing character and setting of existing settlements. Therefore, whilst increasing densities could increase the supply of housing, this should not be seen as the only option. In this context, there is clearly a role for development that is brought forward on the edge of existing settlements that can be designed in order to integrate with existing areas but also help to create distinctive places in their own right.
- 4.4 Consequently, RPS recommends a design-led approach to establishing strategies on density. Density is a function of good design and there is no reason to take an alternative approach when devising local policy through the SWLP. On this basis, any policy approach should be informed by an assessment of the character of different areas because character is not uniform across the plan area. This is in preference to any blanket or an 'in-principle' approach. Similarly, there should not be any overarching priority to intensify or densify existing urban areas because other evidence, principally the Urban Capacity Study, shows that the development needs of the SW area will not be met through urban-focused / brownfield growth alone. This is discussed in the response to Issue S3 below.
- 4.5 RPS therefore would favour Option S2a, which would direct any policy response to localities where intensification is considered to be appropriate, but which recognises that less intensive or

¹ NPPF2021, paragraph 124

² Paragraph 108

³ Paragraph 124d

⁴ Paragraph 124b

⁵ Paragraph 125b

development at relatively lower (but compatible or complimentary) densities are also acceptable if designed sensitively.

Issue S3: Using Brownfield Land for development

Q-S3.1: Please add any comments you wish to make about the Urban Capacity Study

- 4.6 An Urban Capacity Study for South Warwickshire, dated October 2022, has recently been undertaken to inform the Local Plan. Its purpose is to identify the potential for residential development on brownfield land within the settlements in South Warwickshire. As pointed out in section 1.1 of the study report, a review of housing capacity has been undertaken in order to minimise the amount of development outside of existing urban areas.
- 4.7 The IO document goes on to state that the study has been undertaken as a theoretical exercise and is not intended to conclusively establish the urban capacity of South Warwickshire over the period to 2050, but rather to indicate potential untapped urban capacity within these identified settlements, subject to the application of policy and the conclusions of more detailed subsequent evidence work. That said, there are some important conclusions in the study that need to be emphasised at this stage as the study will form part of the evidence to underpin the development strategy in the SWLP.
- 4.8 The study has applied a number of important assumptions, as listed here:
- The base date for the study and the conclusions around potential urban housing capacity is 1st April 2021
 - The study assumes that all of the sites considered will be developed as 'conventional' dwellinghouses in Use Class C3 (not specialist housing i.e. student accommodation or older persons housing).
 - Capacity was measured on sites located in 23 settlements across the SW area, including Main Rural Centres defined in the Stratford-upon-Avon Core Strategy, and Growth Villages as defined in the Warwick Local Plan. **This includes sites located in Bidford-on-Avon.**
 - The Urban Capacity Study does not represent a HELAA-level consideration of suitability, availability and achievability, it is important to note that it will be for the forthcoming HELAA to establish whether these sites are actually deliverable or developable in practice.
- 4.9 Section 4.6 of the study provides a summary of the overall potential urban housing capacity across South Warwickshire:
- Total housing assumed over SW area for the 2025-2050 plan period is **30,750** dwellings, using the baseline figures based on the standard method
 - Total potential baseline housing supply for this period is **19,950** dwellings
 - Only **6,145** (31%) dwellings would be located within existing urban areas, the rest is located elsewhere

- Reliance in the supply (24%) predicted on sites not yet identified (windfall sites) totalling **4,840** dwellings
- Suggested there some potential to increase densities on some sites
- Potential yield of 3,400 dwellings by redeveloping public car parks, but this would necessitate a significant programme of intervention and management in order to be realised.

4.10 The study therefore identifies a significant shortfall in the potential for new housing to be accommodated on previously developed land. The shortfall is currently 10,800 dwellings. This should be taken as a minimum shortfall, as not all sites with potential will actually be deliverable or developable once a full assessment has been carried out.

4.11 Based on these findings, the study concludes that:

“whilst the measures considered through this study could allow the SWLP to get a reasonable way towards meeting housing needs through urban sites and existing commitments, we consider it impossible to meet development needs without significant greenfield development.”

(RPS emphasis)

4.12 Furthermore, the shortfall is set against the standard method housing need figures (1,230 dpa across the whole area over 25 years). However, the IO document advocates for the use of an alternative ‘trend-based need for South Warwickshire, which gives a need for 1,679 dpa. Against this figure, the total need between 2025-2050 increases to **41,975** dwellings, thus increasing the shortfall to **22,025** dwellings. **This clearly demonstrates that the focusing policy objectives on previously developed land will not deliver anywhere close to the projected needs of the SW area, and therefore planning for development on greenfield land in sustainable locations must form part of development strategy for the SWLP.**

4.13 In addition, under the assessment of sites by settlement, the study identified one possible employment area in Bidford-on-Avon that merited consideration for housing development, namely Waterloo Industrial Estate / Bidavon Industrial Estate. However as set out in Table 9 on page 27 of the study it is noted that given high levels of occupancy, away from a small area currently being redeveloped for housing adjacent to Waterloo Road, potential for further residential development is limited. No other unconsented or unallocated potential development sites have been identified within the settlement boundary. **Consequently, it is inevitable that additional growth at Bidford-on-Avon will need to be allocated on the edge of the settlement.**

4.14 The suitability of the site for development has already been identified in the emerging Site Allocations Plan, which has identified the site as a reserve site, **indicating that both further development at Bidford-on-Avon is appropriate and also that the site itself is suitable for development.**

4.15 The IO document presents three options under this issue. On the basis of the current evidence provided on housing capacity, RPS would recommend that development on previously-developed land is supported only where sites are shown to be viable and deliverable, as well as being sustainably located. However, **given the paucity of the overall supply from sites within urban**

areas, notably Bidford-on-Avon, it is not considered reasonable to prioritise brownfield development ahead of other, greenfield locations as a matter of principle as this would put at grave risk the ability of the SWLP to meet the identified needs of the area. On this basis, RPS would not support Option S3.2a or S3.2b (and thus supports Option S3.2c).

Issue S4: Growth of existing settlements

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

- 4.16 Yes.
- 4.17 There are a number of national and local factors that clearly demonstrate the appropriateness of a strategy which directs future growth to existing settlements within South Warwickshire.
- 4.18 Paragraph 69 of the NPPF recognises the important contribution that small and medium-sized sites can make to meeting the housing requirements of an area, which can be built out relatively quickly. This provides clear support for directing future growth to appropriately-sized sites on the edge of existing settlements and which can deliver sustainable development. And paragraph 85 also provides support for sites and locations that can meet the community (and business) needs of rural areas adjacent to or beyond existing settlements, and where sites are physically well-related to settlements such opportunities should be encouraged where suitable. Consequently, national policy clearly provides sufficient support and policy direction for focusing growth at or around existing settlements.
- 4.19 At the local level, RPS notes Table 2 of the IO document which lists a number of existing settlements identified in adopted plans across South Warwickshire. These include Bidford-on-Avon. The settlement has been subjected to separate connectivity, accessibility and density analysis, which RPS responds to question Q-S4.2 under section 6 of this submission. Sustainability Appraisal (SA) has also been carried out on the broad locations within which the settlement is situated, and a response to the SA is provided in section 5 of this submission to question Q-11.
- 4.20 The IO document hints at what the emerging development strategy might comprise based on commentary set out in the second paragraph under this issue (on page 43). This states that the SWLP will seek to:
- “...maximise the capacity of its existing urban areas in order to meet our development needs to 2050 (see Issue S2). However, in deciding upon the best distribution strategy for new development within South Warwickshire it is important for the Local Plan to consider the potential for growth around the edges of the existing settlements, potentially alongside and in combination with other options such as new settlements (see Issue S5).” (RPS emphasis)*
- 4.21 In light of the findings of the Urban Capacity Study as discussed under Issue S3 of this submission, even when the capacity within existing urban areas on previously-developed land has been assessed it is clear that this will not be sufficient to meet the needs of the South Warwickshire District in the long term. It is therefore inevitable that development around the edges of existing settlements

will be required, given these provide opportunities to deliver sustainable development on largely unconstrained land which can be built out quickly, or where larger sites are concerned these can deliver a steady quantum of development over a period of time in order to help maintain delivery against the targets in the SWLP.

- 4.22 Based on the foregoing analysis, RPS contends that focusing growth as part of the emerging development strategy on existing settlements, including Bidford-on-Avon, aligns with national policy and offers clear potential to meet the development needs of the area, in light of the acknowledged constraints on land supply within settlements. The strategy should therefore incorporate locations for growth around and on the edge of existing settlements where local services and facilities are already available in close proximity to communities in order to achieve wider sustainable development objectives.

Issue S5: The potential for new settlement(s)

- 4.23 The IO document now identifies a number of potential locations for new settlements across South Warwickshire. These have been derived from a two-part process; part 1 seeks to identify 'areas of search' based on existing or potential access to rail services outside existing urban areas. Based on the approach, seven areas (A-G) have been identified, illustrated on Figure 12 of the document. These comprise broad areas that do not specify sites or specific locations; part 2 applies a 'very high-level assessment' of the areas of search, from which seven potential new settlement locations have been identified. A summary of the assessment of each location is shown in Table 6 of the IO document. Each of these seven locations has also been subjected to Sustainability Appraisal (see RPS responses under Issue I1) and Climate Change Emissions Estimation modelling.
- 4.24 Whilst some assessment work has been undertaken to date, the IO document acknowledges that further detailed work is required before any preferences for any particular new settlement location can be made, or whether a new settlement is suitable, viable and deliverable in principle. RPS broadly agrees with this point.

Q-S5.1: Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options

- 4.25 As part of the evidence to inform the Local Plan, an operational carbon model has been developed to assess carbon emissions at a strategic level to test how the development of the seven potential new settlement locations perform in terms of carbon emissions. RPS notes the model is based on current Government and existing Local Plan policies. Further information on the modelling work is set out in *Estimation of emissions for proposed growth options and new settlements* study dated November 2022. RPS has reviewed this study and wishes to raise a number of points on the approach.
- 4.26 **Firstly**, paragraph 1.1 of the study states that the options tested in the modelling all assume **35,000** dwellings will be delivered between 2025 to 2050. This differs from the level of growth assumed under the 'trend-based' projected need for South Warwickshire, which RPS calculates at **41,975**

dwellings over this period (applying the 1,679 dpa taken from Table 9 of the IO document). However, the study does not include any testing against the preferred housing need scenario. Whilst the projected emissions are likely to be sensitive to higher levels of growth, it is nevertheless important that there is consistency across the analysis to ensure the policy choices are properly informed.

4.27 And **secondly**, chapter 5 of the study provides some commentary on the methodology underpinning the modelling of the options. Sub-section 5.3.2 lists a number of 'key inputs' for the site related modelling. This includes specific reference to '*Energy efficiency benchmarks such as Part L 2013, Interim Future Homes Standard 2021*' (RPS emphasis). However, as outlined by the Government⁶, from 2025 new homes built to the Future Homes Standard will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards, and all homes will be 'zero carbon ready', becoming zero carbon homes over time as the electricity grid decarbonises, without the need for further costly retrofitting work. Whilst the study refers to current building regulations standards under interim changes to Part L introduced in 2021, the study will need to reflect on the further tightening of the regulations and the move to the full Future Homes and Future Buildings Standards that are expected in 2025.

4.28 The introduction of the 2025 Future Homes Standards is expected to improve energy efficiency, reducing the demand for energy and so reduce carbon emissions in residential buildings. RPS recommends that the study is updated to reflect projected reduction of emissions by 75% compared to the 2013 Building Regulations.

4.29 For these reasons, RPS recommends that the Climate Change Emissions study should be updated to properly reflect the growth aspirations for South Warwickshire as well as reflect the broad direction of travel on tackling carbon emissions regarding future changes to building regulations and the impending implementation of the Future Homes and Buildings standards.

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

4.30 RPS wishes to reiterate its position that it does not object to new settlements forming part of the development strategy in principle. Nonetheless, RPS suggests that caution should be applied in considering new settlements as part of a broader strategy for distributing growth in South Warwickshire. This is because unforeseen issues can occur that can delay progress on new settlement / strategic allocations, for example in Stratford-upon-Avon. In this case, the Core Strategy allocated two new settlements at Gaydon/Lighthorne Heath (2,300 homes) and Long Marston (2,100 homes), 30% of the adopted housing requirement of 14,600 dwellings. However, since 2011 (the base date of the current plan) these two new settlements have only delivered 343 dwellings, just 3.4% of the total housing delivered in the district up to April 2022⁷.

⁶ The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings Summary of responses received and Government response, January 2021

⁷ Stratford-upon-Avon Authority Monitoring Report 2021-22, Table 13

4.31 The distribution strategy should therefore also ensure that the needs of local communities can be met through smaller development directed and brought forward at established sustainable settlements that can be delivered relatively quickly, and thus a greater mix of different sized sites should be encouraged to deliver a significant proportion of the required growth in the SW area over the plan period.

Issue S6: A review of Green Belt boundaries

4.32 RPS notes that the IO document does not include any specific question regarding potential for changes to the Green Belt in South Warwickshire. Nevertheless, national policy⁸ makes provision for alterations to existing Green Belt boundaries through the updating of plans where the need for changes to Green Belt boundaries is established in the strategic policies. This is normally done through a Green Belt review to inform the development of the spatial strategy and identification of site allocations.

4.33 In this respect, the IO document makes clear that to achieve a growth strategy that addresses the vision and strategic objectives for the Plan, a Green Belt study to review the existing Green Belt boundaries would inform and help to refine the growth options that are set out within the issues and options consultation to enable a preferred approach for South Warwickshire to be established.

4.34 Nevertheless, regardless of whether any Green Belt is released is taken forward, there are opportunities outside the Green Belt where growth can be directed, this includes at Bidford-on-Avon, which is identified as one of the eight 'Main Rural Centres' in the adopted Stratford-on-Avon Core Strategy. Bidford-on-Avon therefore can make a valuable contribution towards meeting the housing land supply requirements of South Warwickshire.

Issue S7: Refined Spatial Growth Options

4.35 The IO document now proposes five 'spatial growth' options, which are as follows:

- Option 1: Rail Corridors
- Option 2: Sustainable Travel
- Option 3: Economy
- Option 4: Sustainable Travel and Economy
- Option 5: Dispersed

4.36 RPS notes that 38% of respondents to the previous Scoping stage consultation in 2021 indicated a preference for a 'hybrid' approach, which broadly correlates with the preference set out by RPS in submissions made as part of that consultation. This has resulted in a reduction in spatial options

⁸ NPPF 2021 paragraph 140

down from seven to five. The move to five spatial options is supported by Sustainability Appraisal and analysis set out in the Climate Change Emissions Estimation (CCEE) study.

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

4.37 RPS has highlighted a number of issues with the CCEE study at a broad level in separate response to Issue S5, which are equally applicable to the assessment of emission estimates for each spatial growth option. That said, the IO document makes specific reference to the CCEE study findings which predicts Option 4 as having the lowest final annual emissions in 2050 and in the preceding years compared with the alternative options, whilst the Dispersed option (Option 5) has the highest emissions. RPS note that Bidford-on-Avon is identified in the indicative list of settlements and locations that may feature in Option 4.

4.38 On this basis, the CCEE would point to Option 4 as offering a good option for reducing carbon emissions over the longer-term which would fit with the longer plan period to 2050.

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

Option 1: Rail Corridors

4.39 The IO document notes that the Rail Corridors option was previously consulted on at the scoping stage.

4.40 RPS notes the summary of findings in relation to this option set out in Appendix 2 of 'Evolving the Spatial Growth Options – the story so far' topic paper. In particular, this option would have implications for the Green Belt. RPS agree that based on our experience business cases for new rail stations are complex and would add that such a process can be lengthy, potentially restricting the delivery of housing if an over reliance is made on a strategic approach that requires the delivery of new stations.

4.41 RPS suggest that while some growth could be accommodated around Rail Corridors that it can't be at the expense of existing settlements that have a high level of services and facilities such as Bidford-on-Avon with excellent access to public transport using buses. Indeed, the potential for buses to utilise alternative fuel sources such as electricity or hydrogen presents the opportunity for highly sustainable modes of travel. Therefore RPS recommend that a hybrid strategy, such as that explored under Option 2 would bring additional benefits as suggested by feedback to the Scoping Consultation and by officers.

Option 2: Sustainable Travel

4.42 The IO document presents the 'sustainable travel' option as a 'hybrid' of two options ('rail corridor' and 'bus corridor') previously consulted on at the scoping stage. RPS notes that the settlement of Bidford-on-Avon is identified as a potential growth location under this option.

4.43 The reasons given for creating a sustainable travel hybrid approach is briefly referenced in Appendix 2 of the 'Evolving the Spatial Growth Options – the story so far' topic paper. These point towards

taking a 'more holistic view' regarding sustainable travel as part of the evolving strategy as being a 'logical route' forward. On this basis, this hybrid approach would aim to focus strategic growth to support existing sustainable transport provision and potentially expand the services where appropriate.

- 4.44 RPS would broadly support the overarching intentions of this approach which offers the opportunity to integrate the provision of homes and transport by directing growth to locations that are or can be made sustainable, which accords with national policy⁹. This is reflective of the predominantly rural nature of South Warwickshire where bus travel is the only viable public transport option available to local communities. In this context, RPS would recommend that the distribution of growth should be, as part of the overall spatial strategy, directed to settlements that already support relatively higher frequency bus services. 'Higher Frequency' means those routes served by daytime hourly services or better. Promoting additional growth in these locations can be an effective means to help support the viability of existing public transport services.
- 4.45 According to the Warwickshire Public Transport Map (September 2022)¹⁰ higher frequency services run through Bidford-on-Avon, identified as a main town within the existing Core Strategy. A regular route runs through Bidford-on-Avon onto Stratford-upon-Avon, linking to further services onto Warwick, Royal Leamington Spa, and Coventry to the north east. This route also provides a service to Evesham to the south west. This route, previously known as the X18, now known as the 28 between Evesham and Stratford-upon-Avon, provides linkages to railway stations in all of these major settlements. Furthermore, the Bus Accessibility Mapping published as part of the Technical Evidence accompanying the IO consultation clearly demonstrates that for a range of different key facilities and services **Bidford-on-Avon benefits from access via bus in no more than 30 minutes, and in many cases in no more than 15 minutes.**
- 4.46 RPS note the findings of the Settlement Design Analysis on connectivity for the Kings Meadow Phase 2, Bidford-on-Avon site, which suggests that it has relatively poor connectivity. However, for the avoidance of doubt and as noted under the active links heading as a potential; this site can and would benefit from links through the existing phase 1 Kings Meadow scheme currently being delivered by Miller Homes immediately to the south of the site. Given that this land is under the control of Miller Homes the delivery of connectivity to the red route is easily overcome. Similarly access onto the Heart of England way, a segregated walking and cycling route, would also be facilitated through the existing Miller Homes development. This suitability of the site's access was identified by the Inspector who allowed the appeal for the existing Miller Homes development. At paragraph 114 of their report the Inspector states:

⁹ NPPF 2021 paragraph 105

¹⁰ <https://api.warwickshire.gov.uk/documents/WCCC-222510381-290>

“...while for many people the appeal scheme would be towards the upper limit of acceptable walking journeys to some local services, there would be opportunities for journeys to be made on foot (or cycle) and these are likely to increase.”

4.47 It is noted that walking via the phase 1 Kings Meadow development from the site is likely to be a little over the preferred maximum distance of 800m to the bus stop for the 28 service. However, there are bus stops on Waterloo Road nearer the site. Although the current services from Waterloo Road are less frequent currently, the completion of the phase 1 Kings Meadow development, plus the further development of the site may assist in supporting further service provision particularly at peak times for residents.

4.48 On this basis, Option 2 is considered to be appropriate as part of the overall spatial development strategy for South Warwickshire.

Option 3: Economy

4.49 The Economy Option is another hybrid; this time the ‘socio-economic’ and ‘enterprise’ hubs growth options presented in the Scoping Consultation. The reasons given in the evolving topic paper suggest that neither option, in isolation, will be able to accommodate the quantum of growth needed in South Warwickshire by 2050 and so are not considered to be realistic options alone, but are realistic in combination. This hybrid option is also most focussed on economic drivers, and aims to locate homes close to existing jobs and potential new job locations; and to tackle socio-economic disadvantage through the benefits development can bring.

4.50 RPS notes that Bidford-on-Avon is identified as a potential growth location under this option. This is considered to be a reasonable approach given that the settlement is classed as a Main Rural Centre in the Stratford-upon-Avon Core Strategy and are important locations in providing local housing and jobs for the rural hinterland, as well as affordable housing for those rural households in need.

4.51 Consequently, RPS would suggest that Option 3 (Economy) should be considered alongside other options in order to ensure that a balanced distribution of growth is achieved that will help stimulate these areas.

Option 4: Sustainable Travel and Economy

4.52 The ‘Sustainable Travel and Economy’ is a hybrid of options 2 and 3 set out in the IO document. The evolving strategy topic paper describes this option as a ‘super-hybrid’, assumed to be because it responds to the preference for hybrids in general, and specifically includes original options A (rail), B (bus), and D (Enterprise) consulted on at the Scoping stage, according to the Officer conclusions.

4.53 The IO document states this option provides a balance of growth at existing main settlements, some growth at new settlement scale on the rail lines, and more modest growth in smaller settlements, which can contribute to enhancing the viability of village centres and provide affordable housing. Similarly, the document makes clear that the growth assigned under this option is balanced between Green Belt and non-Green Belt locations, but even so it should be recognised that it relies on the release of significant amounts of Green Belt land.

4.54 RPS notes that Bidford-on-Avon is identified as a potential growth location under this option. In this context, RPS broadly supports this option as being appropriate as part of the mix of options that should inform the preferred spatial development strategy.

Option 5: Dispersed

4.55 The IO document has brought forward this option from the Scoping Consultation essentially unchanged.

4.56 Under this option, growth would be focused in and around all those settlements identified in the existing Local Plans as being suitable locations for development because it could help sustain and revitalise a number of rural communities. RPS notes that Bidford-on-Avon is identified as a potential growth location under this option. In this context, RPS broadly supports this option as being appropriate as part of the mix of options that should inform the preferred spatial development strategy.

4.57 Whilst not reflected in the commentary which supports this option in the SWLPS, the inclusion of a 'dispersal' strategy is broadly consistent with the 'managed dispersal' approach that underpins the adopted Stratford Core Strategy. This option reflects the number and range of sustainable settlements that exists across South Warwickshire and which recognises that the area is a semi-rural but nonetheless accessible location.

4.58 Consequently, it is entirely appropriate to direct a proportion of the area's overall growth needs to rural settlements, consistent with local and national policy¹¹ that seek to promote sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and support local services.

4.59 Similarly, it is worth pointing out that whilst progressing this option would assist in directing growth to locations that would support rural communities, Option 5 has clear links with other options that would focus growth on or along transport corridors (Option 1). Therefore, progressing this option presents the opportunity to bring together a wide range of options and thus increase the overall sustainability of the strategy. **RPS therefore supports the inclusion of this Option 5 as part of the preferred spatial development strategy for the SWLP.**

Issue S9: Settlement Boundaries and infill development

4.60 Under this issue, the IO document indicates that there may be a need to alter existing settlement boundaries to take account of a new growth strategy up to 2050. National policy provides limited assistance to local planning authorities or stakeholders in how to deal with setting or amending settlement boundaries.

4.61 The IO document presents two options. Option S9a would save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.

¹¹ NPPF 2021 paragraph 79

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

- 4.62 The IO document makes clear that this plan review relates to part 1 strategic policies only, including strategic allocations and / or new settlement locations, and not non-strategic policies and allocations. On this basis, RPS would favour Option S9a – settlement boundaries should be reviewed at the Part 2 review stage. Given this option refers to the ‘emerging SAP’ RPS assumes that the SAP is still likely to be progressed and adopted including alterations to some settlement boundaries, prior to an immediate review of those boundaries in short order in the Part 2 SWLP. This is logical as the Part 2 SWLP will need to ensure the settlement boundaries at for example Bidford-on-Avon is suitably robust to allow growth to be accommodated up to 2050, as opposed to the SAP which only addresses development needs up to 2031 (and only for Stratford-upon-Avon district).
- 4.63 RPS have previously submitted responses on behalf of Miller Homes to various consultations on the emerging SAP in relation to their interest in the site, most recently in July 2022 in response to the Revised Preferred Options Consultation. Whilst it is noted that the IO consultation is not considering boundaries in detail RPS maintain the position set out in those representations that the entirety of the site has development potential.
- 4.64 Furthermore, in order to provide sufficient clarity and to reduce the risk of ambiguity in the Part 1 version, the next iteration of the SWLP (the preferred option draft plan) should make clear which settlement boundaries will need to be reviewed in light of the quantum of growth to be directed to each respective settlement (to deliver the spatial development strategy) and the capacity of those settlements to suitably accommodate that growth within the existing boundaries.

Issue S10: Any other development strategy issues

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

- 4.65 The preamble states that Chapter 4 of the IO document sets out various options as to how the development needs to 2050 (e.g. infrastructure, jobs and housing) might be met. The approach to doing this is split into two sub-sections covering 15 ‘issues’ across both topics; on relating to ‘Development Requirements’ and the other ‘Development distribution strategy’ for the area.
- 4.66 Paragraph 16 of the National Planning Policy Framework (NPPF) requires that plans contain policies that are ‘clearly written and unambiguous’. In order to establish a clear and unambiguous plan it is critical that the approach to strategic policies follow a logical process. Whilst the title of this chapter may refer to ‘needs’ scant reference is made here to the nature or scale of development needs that should be addressed in the SWLP. Specifically, there is very little, if any, consideration at the top of the document to the growth needs of the area in terms of the level or scale of growth to be planned for in the SWLP. Instead, after setting out the draft vision and objectives in chapter 3, the IO document moves straight into considering issues that have a very limited relationship to the growth needs of the area. RPS would suggest that the five issues identified under ‘Development

Requirements' are generic topic-based factors that do not inform the identification of the growth needs for the area or the requirements or targets that might be necessary to address those needs. It is therefore unclear why these considerations have been given such elevated status at the beginning of the document.

- 4.67 RPS notes that issues relating to the number of homes and jobs that might be required, and the evidence base to justify the approach, is set out in chapter 5 of the IO document (RPS responds to this under separate questions). Whilst providing some clarity, RPS would suggest that given the importance of setting out the growth strategy (or options at this stage) a more sensible and logical approach would be to consider the issues relating to the overall development needs of the area in quantum terms first, before then moving on to consider what the requirement should be in light of the various 'issues' i.e. constraints, as identified here. This then provides a clearer and more logical basis for considering the spatial distribution of growth (and options) considered later on (Issue S7).
- 4.68 At present, therefore, the way the IO is structured is illogical and confusing and does not help the reader to understand the approach being proposed. RPS therefore recommends that the next iteration of the SWLP is reorganised to provide a clear position on the growth strategy at the outset, including the scale of need and the requirements defined to meet that need. This will provide a coherent basis for the spatial distribution strategy, taking into account the various issues identified.

Chapter 6 – Delivering Homes that meet the needs of all our communities Issue H1: Providing the right number of homes

Q-H1-1 Response to Issue H1: Providing the right number of new homes - 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?

Local Housing Need

- 4.69 As part of the emerging evidence, the IO document refers to an updated Housing and Economic Development Needs Assessment (HEDNA) that has been produced for the whole of Coventry and Warwickshire Housing Market Area (C&WHMA) using the latest information from the 2021 Census. As rightly stated, the HEDNA uses as the starting point for assessing housing need the standard method set out in Planning Practice Guidance (PPG).
- 4.70 The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire. Nonetheless, the HEDNA has modelled an alternative approach based on the Census 2021 early data releases from June 2022, based on apparent issues with estimating and projecting the population in Coventry, particularly relating to potential discrepancies in the estimates of the population that have informed the 2014-based household projections. The alternative need figure is 4,906 dwellings annually across the sub-region.

4.71 Table 9 of the IO document (and Table 15.1 of the HEDNA) shows a breakdown of the overall housing need for each constituent local authority. This is reproduced below for reference.

Table 4-1 Local Housing Need – Coventry & Warwickshire

LPA	2014-based projection	Trend-based projection
Coventry	3,188	1,964
North Warwickshire	176	119
Nuneaton & Bedworth	435	409
Rugby	516	735
Stratford-on-Avon 868	564	868
Warwick	675	811
Housing Market Area	5,554	4,906

Source: C&W HEDNA 2022

4.72 RPS notes that under the alternative ‘trend-based’ (‘revised standard method’) projection the need is higher for both SW authorities compared to the standard method need figures (1,679 dpa under the alternative projection, versus 1,239 dpa using the standard method), an extra 440 homes per annum across the SW area. The trend-based projection is also higher in Rugby, but lower in North Warwickshire and Nuneaton & Bedworth, and substantially lower in Coventry.

4.73 The HEDNA goes to great lengths to explain why an alternative approach to the standard method for estimating local housing need across the sub-region is justified on the basis of ‘exceptional circumstances’, which is required to meet the policy test set out at paragraph 61 of the NPPF. In a nutshell, when looking at population change over the preceding period (2011-2021) the HEDNA claims that a discrepancy exists between the population (mid-year) estimates devised by ONS, and those derived from the Census 2021 population count.

4.74 Table 5.2 and 5.3 of the HEDNA seeks to illustrate this discrepancy. These tables show that population across the sub-region was substantially lower in the Census (942,100) compared to the mid-year estimates (963,173), largely as a result of an over-estimate in the population for Coventry. However, it is also notable that the Census output shows a higher population for both Stratford-upon-Avon and Warwick districts, a total difference of 6,316 extra people residing in South Warwickshire in 2021. This additional number of people will clearly have an impact on future population estimates for the SW area when properly accounted for in future projections.

4.75 On this basis, paragraph 5.105 explains the HEDNA proposes a trend-based projection taking account of the 2021 Census, more recent data around fertility and mortality, analysis of recent migration trends, from which household estimates are then derived (using the 2014-based household formation rates). The remodelled household projections are then fed back into the

standard method through the application of the affordability adjustment, to generate the overall housing need figures for each area.

- 4.76 The local housing need derived from the trend-based projections is provided at Table 5.33 of the HEDNA. Whilst the overall approach is broadly understood, reference is made at paragraphs 5.149-5.150 of the HEDNA to a ‘further adjustment to deal with any suppression of household formation within the projections’ and ‘part return to trend’ analysis based on a refinement of the 2014-based household representative rates (HRRs). The results from the adjusted HRRs are shown in Table 5.34. The figures show an increase in household growth across the sub-region (by +3,000) compared to baseline trend-based projection, and increased household growth for Stratford-upon-Avon and Warwick districts. However, the HEDNA does not consider any further what implications this adjustment might have for the estimate of overall housing need across the sub-region, or for the SW area specifically.
- 4.77 RPS recommends that the adjustment for household suppression presented in the HEDNA is reasonable and consistent with national policy and guidance and so should be taken into account in determining the scale of housing need in the SW area.

Issue H2: Affordable Housing

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

- 4.78 Chapter 8 of the HEDNA includes an analysis of affordable housing need in Coventry & Warwickshire, which is claimed to follow the methodology set out in the PPG¹². Table 10 of IO document summarises the assessment of need for the SW authorities (drawn from Table 8.45 of the HEDNA) which is presented below.

Table 4-2 Net Affordable Housing Need (per annum) – South Warwickshire only

	Rented Affordable Need	Affordable Home Ownership Need	Total Affordable Need
Stratford-upon Avon	419	129	547
Warwick	582	258	839
SW area	1,007	378	1,385

Source: SWLP IO Jan 2023, Table 10; HEDNA Table 8.45; RPS

- 4.79 It is recognised in the published evidence base that affordable housing need is ‘high’ relative to the overall housing need across the C&WHMA (paragraph 4.4 of the HEDNA). RPS agrees. Table 8.14 of the HEDNA illustrates this point when comparing affordable need (rented need only) to the trend-based projections for each authority, including Stratford-upon-Avon and Warwick. The table showing the need across all C&WHMA authorities is represented below.

Table 4-3 Net Affordable Housing Need (per annum) – C&W HMA

¹² PPG ID-2a-018 to 2a-024

	Net Rented Need	Adjusted Standard Method	Affordable % Standard Method	Affordable Housing Policy Requirement	Notional Provision to Meet Rented Affordable Need in Full
Coventry	1,887	1,964	96%	25%	7,548
North Warwickshire	131	119	110%	30-40%	374
Nuneaton & Bedworth	407	409	100%	25%	1,628
Rugby	407	735	55%	20-30%	1,628
Stratford-on-Avon	419	868	48%	35%	1,197
Warwick	582	811	72%	40%	1,455
Warwickshire	1,946	2,942	66%		6,282
C & W	3,833	4,906	78%		13,830

Source: C&W HEDNA Table 8.14

4.80 The figures show that the rented affordable need as a proportion of the overall need for housing in the SW authorities is between 48-72% (or 60% across the two combined). Across the C&WHMA as a whole, the proportion is 78%. When adding in the affordable home ownership need, the proportions increase from 60 to 82% for the SW area, and from 78 to 91% for the C&WHMA. It is clear that the proposed policy targets will only deliver a fraction of the homes needed even if the policy requirements are met in full (which is unlikely). Affordable housing need therefore represents a significant proportion of overall need which needs to be addressed in the SWLP, and across the HMA as a whole, when considering future housing targets for the area. This is particularly the case in Warwick but is nonetheless still an important factor in Stratford also.

4.81 In addition, the scale of affordable need as a proportion of total need shown above is, to a large extent, due to the need emanating from Coventry, which is 96%. The HEDNA (at paragraph 8.72) recognises that, in setting overall housing targets, the viability of development and the availability of funding are realistically constraints on the level of provision which can be achieved. If Coventry is to make any significant contribution towards meeting its own housing needs, of all tenures, then additional allocations will be needed. This will require a considerable focus on delivering more housing on previously developed sites within the city’s boundaries and the push for higher policy targets. However, the focus on brownfield land and higher policy standards will inevitably raise concerns with the viability and deliverability of lower value housing. This is evident because Coventry has failed to deliver its affordable housing policy targets since 2011, achieving 2,562 affordable homes against a policy target of 3,828 (2011-2022)¹³, or 232 homes per annum.

¹³ Coventry City Authority Monitoring Report 2021/22 Published 21st November 2022, Figure 9

- 4.82 On this basis, in devising an overall housing requirement in the SWLP, if the SW authorities are serious about addressing affordable housing delivery, then consideration should be given to how the delivery of affordable can be maximised across the C&WHMA in order to deliver sufficient affordable homes to meet local needs, in line with national policy¹⁴. The best way to increase the supply of affordable housing across South Warwickshire is therefore simply to allocate more land in sustainable locations within the area. This is best achieved through the development of mixed-tenure private sector-led development in areas where viability is less of a problem, notably in South Warwickshire, relative to metropolitan areas such as Coventry.

Issue H7: Other Comments

Q-H7 Response to Issue H7: Please add any comments you wish to make about delivering homes in South Warwickshire

- 4.83 This chapter of the IO document provides a commentary on a range of factors relating to policies for the provision of housing, including the scale (or need), type, size, and tenure of new homes to meet the needs of local communities.
- 4.84 As a general comment, this chapter is the first point at which the overall growth strategy for housing is considered in any detail in the IO document. This is after the IO document has already considered the spatial options for growth in chapter 4 (under Issue S7). This approach runs the risk of predetermining the distribution of growth before establishing the level or scale of growth that should be planned for. As highlighted in response to Issue S10, **RPS recommends that the SWLP considers a different approach to devising the strategic policies relating to planning for the growth needs of the area by presenting the case for growth before considering distribution, rather than the other way round. This will ensure the SWLP is presented in a logical and coherent manner where distribution of development is properly considered in light of the scale of growth needed in the area.**

¹⁴ NPPF 2021, paragraph 20

5 SUSTAINABILITY APPRAISAL (ISSUE I1)

- 5.1 The Planning and Compulsory Purchase Act requires a sustainability appraisal to be carried out on development plan documents in the UK. Additionally, the Environmental Assessment of Plans and Programmes Regulations¹⁵ (SEA Regulations) require an SEA to be prepared for a wide range of plans and programmes, including local plans, to ensure that environmental issues are fully integrated and addressed during decision-making.
- 5.2 It should also be noted that SA is an iterative process and, as such, should be undertaken alongside development of the SWLP as it moves forward through the various stages in order to maximise its sustainability credentials. This includes taking into account responses made by stakeholders to the SA and SWLP consultations as part of the plan-making process, including those submitted by local and national house builders. In this context, the IO document explains (page 26) that the SA process will take on board any comments on the SA and use them to furnish the next report with greater detail and accuracy.
- 5.3 RPS has reviewed the Sustainability Appraisal of the South Warwickshire Local Plan Regulation 18: Issues and Options Stage ('IO SA') and provide a response to the question below.

Q-11: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

General Comments

- 5.4 The IO document explains under Issue I1 that the IO SA has been prepared to support the Issues and Options Consultation which explores the following reasonable alternatives as part of the plan making process:
- 5 Growth Options which provide details about where development should be distributed at a strategic scale across the South Warwickshire area
 - 7 New Settlement Locations for large-scale development of not less than 6,000 new homes and associated infrastructure
 - 32 Broad Locations which represents options for up to 2,000 homes located around the main settlements for medium scale development and associated infrastructure in any one Broad Location
 - 22 Small Settlement locations for intermediate scale development for between 50-500 homes in any one location, typically associated with smaller settlements and villages; and
 - 88 Policy alternative options for shaping the relevant policies. Subjects include for example climate change, tourism and health.
- 5.5 The IO SA also includes an 'assessment' of two housing number options, presented at Chapter 9 (Volume 2), but these are not listed in the IO document alongside the alternatives shown above.

¹⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (No. 1633)

- 5.6 The Sustainability Appraisal Framework and methodology is set out in Appendix A of the IOSA. The SA Framework comprises 13 SA Objectives, decision-making criteria (in the form of specific questions) and indicators used to appraise the sustainability performance of the reasonable alternatives as identified in the IO document.
- 5.7 Further detailed guidance is then provided in the form of ‘topic-specific methodologies’ for each SA Objective in sections 2.4-2.16 of the IO SA. The IO SA states (at para 2.3.3, volume 2) that these have been established which reflect the differences between the SA Objectives and how each receptor should be considered in the appraisal process. Having reviewed the detailed appraisals in the appendices, it appears that the topic-specific methodologies form the basis for the detailed appraisals of each option. However, none of these methodologies are referred to specifically in the SA Framework. **It is therefore unclear how the SA Framework has been devised or how it has been applied in appraising each option, given there is scant reference to it in the evaluation of options or the detailed commentary in the supporting appendices.**
- 5.8 Similarly, the SA Framework is highlighted in some chapters as being used to appraise some options, but not others. This lack of consistency suggests an arbitrary approach has been taken as a basis for the IO consultation and which adds further to the confusion as to how the SA Framework has been devised and then applied in the appraisal of options at this stage. **This lack of clarity and consistency in how the SA Framework has been applied undermines the transparency in the SA process, which is critical to ensure the appraisal is both robust and credible.**
- 5.9 This is evident when considering the approach to SA applied across different categories of options. Notably, this is of concern regarding how the housing number options have been assessed and presented in the IO SA, which is explained further in the next section.
- 5.10 In addition, Schedule 2, paragraph 7 of the SEA Regulations specifies that the Environmental Report (effectively the IO SA report at this stage) must include ‘*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.*’ Section 2.17 of the IO SA provides a brief commentary on how potential offsetting (or ‘mitigation’) of significant effects has been considered at this stage based on a mitigation hierarchy (see Table 22.15 of the IO SA for details). **However, whilst some initial mitigations have been suggested for some categories of options, none have been identified for the generic policy options (see IO SA Appendix E) nor, importantly, for the housing number options (in Chapter 9). There are no reasons given in the IO SA for why potential mitigation hasn’t been identified for these options. This again points to a lack of clarity and consistency in how the options have been appraised which further undermines the transparency in the process.**
- 5.11 Lastly, the IO document provides a commentary on the potential of the SWLP to accommodate unmet needs from the wider Birmingham and Black Country HMA, under Issue H4. Page 112 of the IO document states that ‘*For the purposes of the accompanying Sustainability Appraisal we have tested the effects of an additional 5,000 and 10,000 homes*’ as possible contributions towards any unmet need. However, the IO SA has not appraised any such contribution, or undertaken any

appraisal of possible locations where such unmet could be accommodated. This brings into play consideration of other locations which are located in close proximity to the local authorities with the Greater Birmingham and Black Country HMA, notably on the edge of Redditch. Consequently, **the potential contributions of 5000 or 10,000 dwellings to address unmet need as outlined in the IO document, and the spatial options to accommodate this need, represent reasonable alternatives that should be considered through the SA process for the SWLP. This should be undertaken and presented in the next iteration of SA, and a suitable policy response should also be presented in the draft (preferred options) version of the SWLP.**

SA of Housing Number Options

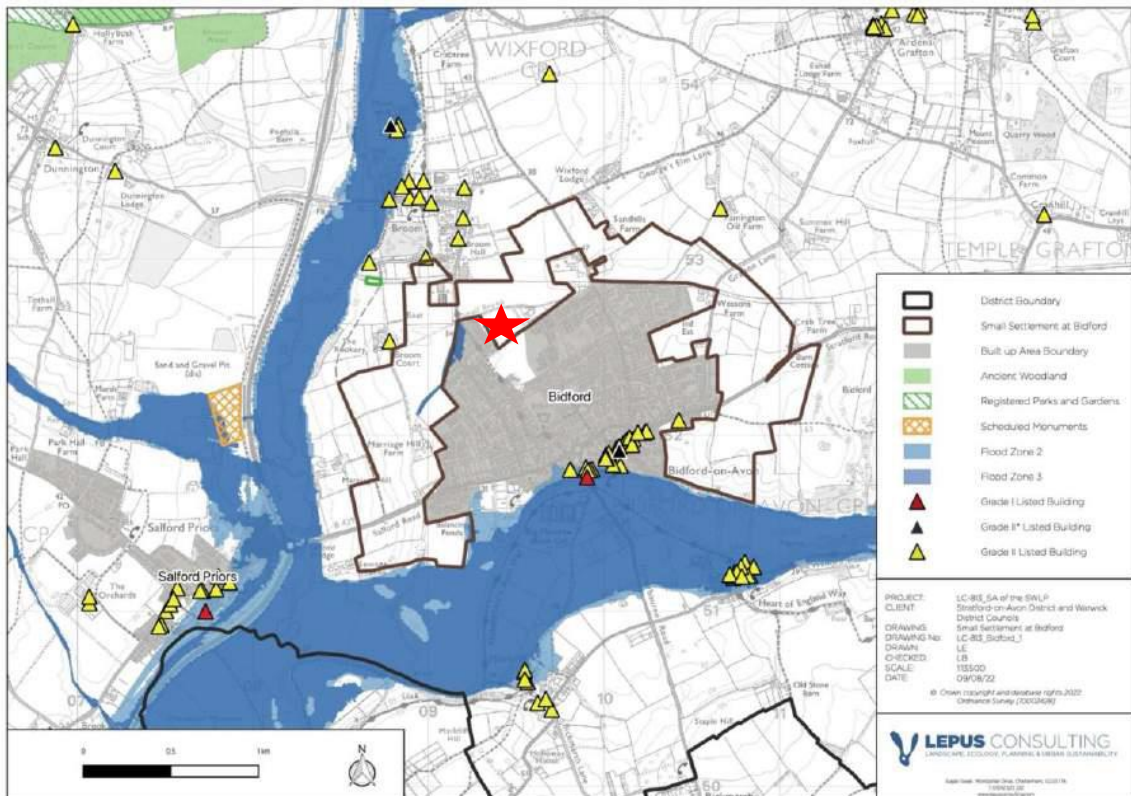
- 5.12 Figure 3.2 of the IO SA identifies two housing number options. These options are derived from the updated Coventry & Warwickshire Housing and Economic Needs Assessment (HEDNA) 'trend-based' projection (Option I); and the Government's standard methodology for calculating housing need in South Warwickshire as set out in the Planning Practice Guidance (Option II).
- 5.13 The two housing number options are as follows:
- **Option I:** The HEDNA trend-based projections point to a need for 4,906 dwellings annually across the whole sub-region with 868 dwellings per annum in Stratford-on-Avon and 811 dwellings per annum needed in Warwick. Combined total of 1,679 per annum.
 - **Option II:** The Standard Method calculation identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, but with 564 dwellings per annum in Stratford-on-Avon and 675 dwellings per annum needed in Warwick. Combined total of 1,239 per annum.
- 5.14 The extent of the appraisal of these two options is set out in Chapter 9 of the IO SA. RPS raises two broad concerns regarding the approach taken in the IO SA. **Firstly**, it is clear that the appraisal of the housing numbers has been carried out differently to the appraisal of the other options. For example, the appraisal of the housing numbers has been described as an 'option assessment', whereas the appraisal of the other options is described as an 'evaluation'. This suggests a separate approach has been taken in the appraisal of the housing number options. Similarly, there is also a distinct lack of detail underpinning the specific scoring of each housing number option against the SA Objectives (summarised in section 9.1 of the IO SA) with only a very brief commentary in Chapter 9 stretching to just one and a half pages; whereas the appraisal of other options is presented in considerably more detail in individual appendices (B to E) alongside specific chapters for each category of options in the main report (Ch 4 to 8). In contrast, there is no separate appendix which fully explains the scoring for the housing number options.
- 5.15 Determining the overall scale of housing growth to be planned for in South Warwickshire is a key requirement of the local plan process, a process that should be underpinned by a rigorous testing of all reasonable alternatives. However, no explanation is provided for why a different approach is merited for the housing number options. This again points to a lack of consistency and transparency in approach across the various options appraisals, which risks undermining the SA process.

- 5.16 **Secondly**, as explained the IO SA has identified and appraised two housing number options. Nonetheless, there is at least one other option for the housing requirement that has not been considered in the IO SA. This additional alternative option relates to a 'part-return-to-trend' analysis of projected household change set out in the HEDNA (see paras 5.149 to 5.152) and which is summarised for the Coventry & Warwickshire authorities in Table 5.34 of that document. This is a matter RPS has raised in separate submissions under Issue H1.
- 5.17 The HEDNA analysis points to different, higher household growth projection for the South Warwickshire authorities which takes into account past suppression in household formation and which should be addressed in the SWLP and, as such, supports the wider SA Objective for housing (SA Objective 9). However, these alternative growth projections have not been included in the IO SA report. **In RPS' view, the 'part return to trend' projections for the South Warwickshire authorities constitute reasonable alternatives that should be tested through the SA process. RPS recommends that the alternative household growth projections set out in Table 5.34 of the updated HEDNA should be incorporated into the appraisal of reasonable options as part of the next iteration of the SA.**
- 5.18 In terms of the actual assessment of the two housing number options, the IO SA (paragraph 9.1.3) acknowledges that '...using the HEDNA figure should more accurately represent local housing needs than the Standard Method and therefore Option I should meet the accommodation needs of the various members of the community more successfully'. RPS broadly agrees with this position.
- 5.19 Nonetheless, the IO SA claims (at paragraph 9.1.4) that the housing number options could have negative impacts on SA Objectives 1, 3, 6 and 7 including 'major negative impacts' on climate change and on biodiversity. However, no account is taken here of the likely positive climate impacts expected once the Government introduces changes to building regulations on carbon emissions from new residential buildings through the Future Homes and Buildings programme by 2025. Nor does the appraisal reflect the implementation of Biodiversity Net Gain (BNG), which will become increasingly important in delivering well-designed and environmentally sensitive housing development over the coming years and decades in South Warwickshire, and across the country. **The measures introduced through Future Homes and BNG are likely to place a downward pressure on climate impacts from new development during the plan period to 2050. The SA of housing number options should be adjusted to take these factors into account.**
- 5.20 In addition, the IO SA (at paragraph 9.1.4) does acknowledge that the loss of agricultural land cannot be avoided in addressing future housing growth needs. This is evidenced in the Urban Capacity Study, which RPS has been commented on elsewhere in this submission (under Issue S4). It is worth reiterating again that the published evidence shows a significant shortfall in land availability within existing urban areas across South Warwickshire that will need to be tackled as the SWLP process moves forward. RPS broadly agrees with this position.

SA of Small Settlement Locations

5.21 Chapter 5 of the IO SA appraises 22 alternative Small Settlement Locations where between 50 and 500 homes could be directed. RPS notes that locations around Bidford have been identified as reasonable alternative small settlement locations, which is welcomed. As shown in Figure 5.1 of the IO SA and in more detail in Appendix C of the IO SA in Figure C.3.1 which is shown below, the site is included within the area identified as potentially suitable for development. Appendix C of the IO SA provides an individual appraisal of all of the land identified as being potentially suitable as a small settlement location at Bidford, with the approximate location of the Kings Meadow Phase 2 site indicated by a red star

Figure 5.1 - Area assessed as Potential Small Settlement Location at Bidford-on-Avon



5.22 Whilst RPS recognise that the IO SA is an early stage in the overall SA process it is not clear, apart from reducing the workload of the team preparing the SA, what the value is of 'lumping together' for the purposes of assessment various potential sites at locations considered potentially suitable for accommodating small settlement locations. In particular, the performance of individual parcels of land will differ against the SA objectives. Notably the Settlement Design Analysis document included within the Technical Evidence for the IO consultation considers individual sites on a more granular basis.

5.23 Specifically in relation to the Kings Meadow Phase 2 site and the assessment of all potential sites at Bidford-on-Avon a number of the conclusions drawn for the wider area are not applicable to the site in isolation. Furthermore, RPS contend that in some aspects the scoring of the general options is inaccurate. Set below is further commentary on each objective.

SA Objective 1: Climate Change

- 5.24 It is unclear that the general assessment for this objective has taken into account the forthcoming introduction of the Lifetime Homes Standard in 2025. RPS suggest that when this is considered that rather than scoring as a minor adverse affect that new developments should be assessed as being neutral. RPS note as well that in principle the delivery of new homes built to the updated standards is preferable to the alternative of potential overcrowding of existing homes built to less stringent standards in the past that perform poorly in terms of energy efficiency.

SA Objective 2: Flood Risk

- 5.25 RPS note that settlements where all of the land considered falls within Flood Zone 1 have been assessed to have a positive impact on flood risk, whereas locations where some land falls within Flood Zones 2 or 3 are considered to have a negligible impact on flood risk. The Kings Meadow Phase 2 site is solely located in Flood Zone 1 and so on this basis when assessed alone should score as having a positive impact on flood risk.
- 5.26 On page 15 of the Officers Report for the phase 1 scheme to the south of the site in relation to flood risk it states:
- “The site is located within Flood Zone 1 (lowest risk of flooding) where residential development is considered acceptable in principle by the NPPF in relation to flood risk.”*
- 5.27 The NPPF continues to support residential development on land within Flood Zone 1.

SA Objective 3: Biodiversity

- 5.28 The assessment for Bidford-on-Avon set out in Appendix C to the IO SA highlights that there are Local Wildlife Sites within the wider area assessed as a potential Small Settlement Location. RPS have reviewed the digitally mapped Local Wildlife Sites available as additional information on the interactive ‘Call for Sites’ map¹⁶. There is a Local Wildlife Site that is associated with Small Brook, which runs along the northern boundary of the site. It is clear that development of the site could be undertaken in such a way as to not adversely impact on this Local Wildlife Site, and in fact could offer opportunities for it to be improved.
- 5.29 The other factor cited under this objective set out in Appendix C to the IO SA relates to priority habitats. RPS have used DEFRA’s magic maps¹⁷ service to undertake a desktop assessment of whether there are any priority habitats identified on the site. As is shown below, there are no priority habitats identified on the site.

¹⁶ [South Warwickshire Local Plan \(arcgis.com\)](https://www.arcgis.com)

¹⁷ [Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk)

Figure 5.2 - Priority Habitats



5.30 RPS consider that the development of the site in isolation should be assessed against this objective as a minor positive.

SA Objective 4: Landscape

5.31 As set out in the accompanying vision document (see Appendix A) the Council’s 2011 Landscape and Visual Impact Assessment indicates that

“...Housing development could be accommodated south of Small Brook in order to be screened from the wider landscape and to be consistent with the existing housing edge...”

5.32 In this regard, the Kings Meadow Phase 2 site is located to the south of Small Brook and in a location which has therefore been assessed as being able to accommodate future growth without further landscape evidence being required. This is in contrast to other sites assessed collectively as the Small Settlement Location which include areas of land that have been assessed as being of ‘high - medium’ landscape sensitivity, and which could lead to coalescence if not developed sensitively. Given that this does not apply to the Kings Meadow Phase 2 site RPS suggest that a neutral assessment against this objective is appropriate.

5.33 The Officers Report for the planning application for the phase 1 development states on page 12:

“I concur with the findings of the Landscape Sensitivity Assessment that long distance views of the site are limited and that development of the land will have limited impacts on the landscape character of the area with medium scale visual impacts, subject to appropriate structural landscaping along boundaries of the site, which the submitted Parameters Plan achieves. I also take note of the comments of the MADE Design review Panel who consider that if there is to be more development in Bidford it makes sense to build in the gap formed by the ribbon developments of Waterloo Road and Victoria Road, and that the proposals would have the advantage of creating a much better northern edge to the settlement.” (RPS emphasis)

5.34 It is suggested that these comments on landscape are also relevant to the site.

SA Objective 5: Cultural Heritage

- 5.35 The Small Settlement Location at Bidford-on-Avon includes land that if developed could have impacts upon:
- A Grade I Listed Building
 - A Grade II Listed Building
 - A Conservation Area
 - A Scheduled Ancient Monument
- 5.36 However, the development of the Kings Meadow Phase 2 site would not have any adverse impacts on any of the designated heritage assets as they are screened from the Site by intervening built development and the local topography. The development of the land to the south of the Site has further lessened any potential impacts on the Listed Buildings and Conservation Area to the south. RPS consider that a neutral assessment against this objective is appropriate for the Kings Meadow Phase 2 site.

SA Objective 7: Natural Resources

- 5.37 RPS note that as set out at paragraph 5.9.2 of the IO SA that the loss of more than 20 ha of Best and Most Versatile land would be considered to be a major adverse impact. However, in isolation the development of the site would be just 4.2 ha meaning that it follows that the assessment of the site should be minor adverse against this objective.

SA10: Health

- 5.38 RPS note the variability of assessment of the Small Settlement Locations against this objective. However, it is unclear how Hatton Station, which only have a positive impact against a single criteria can be scored the same as Bidford-on-Avon, which receives a number of minor positive assessments against different sub criteria, as well as a major positive against one sub criteria. It is suggested that Hatton Station should not be scored so favourably against this objective.
- 5.39 Bidford-on-Avon scored three minor positive assessments as well as one major positive and one neutral against the sub criteria for this objective. In contrast it was only given two minor negative assessments. On balance it is suggested that overall a minor positive assessment is a more appropriate assessment of Bidford-on-Avon.

SA11: Accessibility

- 5.40 It is assumed that the Settlement Design Analysis has been used to inform the assessment against the sub criteria for connectivity. As set out earlier the assessment for the Kings Meadow Phase 2 site is contested as it does not account for access via Miller Homes' phase 1 development to the south. The site has good connectivity when this is taken into consideration.
- 5.41 It is suggested that a minor positive assessment is appropriate for the Kings Meadow Phase 2 site in isolation.

Overall Assessment of Kings Meadow Phase 2 in isolation

- 5.42 Set out below is RPS' overall assessment of Kings Meadow Phase 2 in isolation compared to the assessment of the combined sites at Bidford-on-Avon as a Small Settlement Allocation.

Figure 5.3 - Assessment of Kings Meadow Phase 2 vs Bidford

Assessment	SA1: Climate Change	SA 2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
IO SA of Bidford	-	0	-	-	-	-	--	-	++	-	-	-	+
RPS of Kings Meadow Phase 2	-	+	+	0	0	-	-	-	++	+	+	-	+

- 5.43 When considered in isolation the Kings Meadow Phase 2 site performs far more positively than when considered as part of the wider Small Settlement Location at Bidford-on-Avon.
- 5.44 RPS recommends that a finer grain of assessment should be carried out to inform consideration of the quantum growth to be assigned to each ‘Small Settlement Location’, as well as consideration of potential non-strategic site allocation options at Bidford-on-Avon as part the Part 2 SWLP.

SA of New Settlement options

- 5.45 RPS has made separate submissions on the seven potential new settlement location options identified in the IO document under Issue S5. Details of the SA assessments of these locations are set out in Chapter 6 and Appendix D of the IO SA.
- 5.46 Paragraph 3.8.1 of the IO SA states that the seven new settlements locations have been identified by the two Councils. The commentary in the IO document under Issue S5 (on page 49) points to these seven locations being drawn from seven larger areas that are simply based on the rail corridors outside of existing urban areas. These areas and locations are shown in Figure 12 of the IO document. The IO SA (3.8.1) then clarifies that the SA Team has prepared a ‘spatial expression’ of each New Settlement using a ‘crude 250ha area of search in a circular search area’ around the approximate location provided by the Councils in the IO document (which RPS assumes to be taken from the elements shown in Figure 12).
- 5.47 This appears to be the sum total of information and evidence that has informed the identification and selection of these locations as potential new settlements up to this point. Significant uncertainty remains as to where these locations might be located or their full extent. In this regard, RPS notes a significant lack of progress in developing the evidence base required since the Scoping Consultation in 2021. Therefore, there remain substantial doubts as to the suitability or deliverability of any of these potential locations as being able to deliver a new settlement. Consequently, **a significant measure of caution must therefore be applied to any of the outputs from the SA**

process at this stage, until the vacuum in the evidence base to support these new settlement locations is prepared and made available to the public.

- 5.48 That said, the findings summarised in Table 6.1 of the IO SA indicate that all seven new settlement options would have significant negative effects across a range of sustainability criteria. Added to this the need for a considerable amount of work required to inform a suitable policy framework to guide their development, **there is no confidence that any of these locations are capable of being delivered as new settlements based on the current position.**

SA of Spatial Options

- 5.49 Details of the SA assessments of the five spatial growth options are set out in Chapter 7 of the IO SA. RPS notes there is no accompanying detailed appraisal in the SA appendices.
- 5.50 Table 7.1 of the IO SA (and Table 7 of the IO document) provides a summary of the appraisal findings for each option. As stated on page 59 of the IO document, the various growth options are not materially different from one another, with the exception of 'Dispersal' option, which scores slightly lower in terms of sustainability performance against some SA Objectives. The IO document also points out that detailed locational information has not been taken into account at this stage, which means there is uncertainty regarding the nature and significance of the effects at this stage. It is therefore important that the findings from the SA are considered in the round alongside other relevant evidence regarding the suitability of specific locations and settlements in supporting the delivery of the spatial development strategy.
- 5.51 RPS has provided a response to the spatial growth options, under Issue S7, in respect of Bidford-on-Avon where Kings Meadow Phase 2 is being promoted by Miller Homes. The submissions highlight that Bidford-on-Avon is identified under the 'Sustainable Travel', 'Economy' and 'Sustainable Travel and Economy' options, as well as the 'Dispersal' option. In this context, **there is nothing presented in the IO SA which indicates that growth should not be directed to Bidford-on-Avon on sustainability grounds. To the contrary, directing growth to Bidford-on-Avon would support a number of spatial options that are shown to perform relatively well in sustainability terms.**

6 EVIDENCE BASE: SETTLEMENT DESIGN ANALYSIS (ISSUE S4)

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.

- 6.1 Alongside the IO document, a 'Settlement Design Analysis' evidence base report (referred to here as 'the report') has been prepared to help identify opportunities and constraints to growth in and around the edges of a number of settlements and locations across South Warwickshire. The analysis in the report focuses on three factors; Connectivity, Accessibility, and Density. A primary purpose of the report, as stated at paragraph 2.1 of the report, is to aid understanding of the potential to achieve the '20-minute neighbourhood' concept in those settlements identified, and is designed to support the development of the spatial strategy for South Warwickshire. **Page 44 of the IO document also points to 'other factors' outside the scope of this analysis relating to the potential for growth. However, the report does not identify those here or explain how these will be taken into account in determining where growth will be directed. RPS seeks further clarification on this as the SWLP moves forward.**

Settlement Selection

- 6.2 The settlements included in the analysis are listed in Table 2 of the IO document. These, the IO document claims, have been selected based on their status in the existing Local Plans and those that fall within certain growth options. Section 3 of the report provides some commentary on the reasoning behind the selection process. RPS notes that Bidford-on-Avon has been included in the report, which is welcomed.
- 6.3 RPS has reviewed the evidence in relation to Bidford-on-Avon and provides comments on this below.

Connectivity Analysis

- 6.4 The report (at paragraph 2.4) defines 'Connectivity' as '*the physical connectivity of the existing street pattern, and any physical barriers which limit route/connection options*'. In this context, the analysis considers the extent to which a particular route is connected to others within the network. To do this, the evidence on Connectivity is further broken down into three sub-elements; Settlement Structure Analysis, Landform Analysis, and Connectivity Grade Analysis. The report states (at paragraph 4.11) that the evidence gathered and analysed enables comparison of different directions for potential growth around settlements, in terms of their ability to connect into the established 'structure' of the settlement, and the opportunities and constraints in this respect.

Settlement Structure Analysis for Bidford-on-Avon

- 6.5 Appendix 2 of the report provides summary mapping and supporting commentary to illustrate the findings of the analysis for Bidford-on-Avon settlement on Connectivity. An extract from the report

for Bidford-on-Avon is appended to this submission (**Appendix B**). The Kings Meadow Phase 2 site is identified as area / segment 6

Bidford-on-Avon (emphasis on our area / segment 6 location)

- 6.6 In summary, the analysis shows that Segment 6 has an overall Connectivity Grade 'D'. According to Table 5 of the report, a 'D' score means there are 'significant barriers which would be difficult to overcome'. In addition, the segments in this category either connect to green route, loops or cul-de-sacs only, with limited or no potential to connect these into new red route with limited or no potential active links e.g. via green / blue infrastructure or other active links. For Segment 6, RPS notes that under barriers it is suggested that access would have to be via either farm track or extending neighbouring cul-de-sacs. Whilst this is true, what is not acknowledged is that in the specific case of Kings Meadow Phase 2 the cul-de-sacs are being delivered by the same developer and as such in this case there are no barriers whatsoever as access to Kings Meadow Phase 2 will be 'designed in' by Miller Homes through land it already controls via their recently completed Phase 1 (as addressed in the site specific section of these representations and the accompanying Vision Document).
- 6.7 The supporting commentary should also be updated to reflect this specific circumstance.

Landforms Analysis for Bidford-on-Avon

- 6.8 Appendix 3 of the report provides summary mapping to illustrate the findings of the analysis for Bidford-on-Avon settlement on Landforms. The outcome of the analysis is appended to this submission (**Appendix C**). Under this element, the analysis that no specific landforms of relevance have been identified for segment 6. This indicates that **topography in this part of the settlement edge will not impact on the deliverability of development in this location.**

Accessibility Analysis for Bidford-on-Avon

- 6.9 Under this element, the analysis measures proximity of each segment to nearby local services and facilities (across five categories of facility) using a threshold of 800 metres to represent a 10-minute journey on foot. The findings for Bidford-on-Avon are appended to this submission (**Appendix D**).
- 6.10 The results indicate that out of a score of five, Segment 6 scores five indicating access to all types of infrastructure. On the basis of a revised connectivity score as suggested above, **Segment 6 performs well when all analysis is considered in the round and so constitutes an appropriate direction for growth at Bidford-on-Avon.**

Density Analysis for Bidford-on-Avon

- 6.11 For this part of the analysis, density maps prepared for each settlement give an indication of the prevailing densities in these locations, which may then inform assumptions about typical density ranges that may appropriately be applied to any growth in the locality if relevant to [preferred] spatial options, and therefore the approximate capacity of different areas of land. A Density Analysis map for Bidford-on-Avon has been produced and is appended to this submission (**Appendix E**).

6.12 For Bidford-on-Avon, the analysis indicates a general pattern of relatively denser development categorised as 'Inner Suburb' (approximately 40 -60 dph) in the centre of Bidford-on-Avon. To the north and west densities are generally lower and primarily classed as 'Outer Suburb' (approximately 20 – 40 dph). This includes the phase 1 of Kings Meadow immediately to the south / south east of the site which is being delivered by Miller Homes at approximately 30 dph. Consequently, given the analysis is based on 'prevailing' densities, rather than a precise measure of density (paragraph 4.26 of the report confirms this) **RPS would recommend that density thresholds being considered in the SWLP should be applied flexibly to specific sites in Bidford-on-Avon, in order that any prescribed standards reflect the accessibility and potential of different areas rather than one broad density range, in line with national policy**¹⁸.

¹⁸ NPPF 2021 paragraph 125

7 EVIDENCE BASE: HERITAGE ASSESSMENT (ISSUE D5)

Q-D5: 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?

- 7.1 The IO document highlights that a heritage evidence base is being prepared to support the SWLP, titled '*Heritage and Settlement Sensitivity Assessment for Warwick and Stratford-on-Avon Local Plan (SWLP)*' dated September 2022 ('HSSA'). This is one of a number of technical documents that will help inform the choice of a single spatial option (or 'preferred option') to be consulted on at the next stage.
- 7.2 The IO document states that the HSSA has been prepared to determine the impact development may have on the heritage assets within various settlements and will be used when determining the growth strategy (for the draft plan). Section 3 of the HSSA also states that the assessment will inform strategic site allocations and broad locations for growth within the development strategy for the Local Plan, but initially supporting the Issues and Options stage. Whilst the IO document has not requested any responses specifically on the HSSA, RPS has nonetheless reviewed the assessment with respect to Bidford-on-Avon, which is set out below.

Identifying potential impacts of development – Bidford-on-Avon

- 7.3 Bidford-on-Avon has been sub-divided into five sub-areas (North-west, North-east, East, South and West). The HSSA provides a table (not numbered in the report) which summarises the scores, based on a 'RAG' rating system, broken down by these sub-areas. The full assessment is provided at section 10.21 of the HSAA, alongside a number of supporting plans.
- 7.4 In summary, the HSSA scores the North-west and South sub-areas as 'Red', and the other three sub-areas as 'Green'. According to the HSSA commentary, for the North-west this is largely related to concerns regarding the potential impact of large scale development on the conservation area and listed buildings at Broom. However, the assessment was undertaken on a desktop basis as set out in section 4 of the report under 'Data collation'. Furthermore, the urban extent that has been used to apply the buffer does not include the phase 1 Kings Meadow development, despite this being located within the Bidford-on-Avon Village Boundary as defined in the Bidford-on-Avon Parish Neighbourhood Plan, and the report stating that Neighbourhood Development Plans were included in the information sources that informed the assessment.
- 7.5 It is clear that a very simplistic approach has been taken, without consideration of land form beyond a very cursory reference to the general character of the landscape. Furthermore, what constitutes 'large-scale' development is not defined in the report.
- 7.6 RPS suggest that very little weight should be attached to the findings of this assessment in relation to identifying the development capacity of Bidford-on-Avon. It is also recommended that that when non-strategic scale development opportunities are considered at Bidford-on-Avon in due course as part of the part 2 SWLP, that a more detailed assessment is undertaken. RPS note that the emerging

Site Allocations Plan has not identified any heritage concerns in relation to the development of Kings Meadow Phase 2.

APPENDICES

Appendix A
Vision Document



millers homes

**KINGS MEADOW PHASE 2, BIDFORD-ON-AVON
VISION DOCUMENT**

March 2023



Site

Land at Waterloo Road
(under construction)

Aerial Site Location Plan



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1. INTRODUCTION

- 1.1 Miller Homes Limited ('Miller Homes') is one of the UK's leading housebuilders, being responsible for the delivery of over 100,000 homes since 1934. The projects are located throughout the country and range from sustainable urban extensions to residential schemes of around 30 dwellings. Within Stratford-upon-Avon Miller Homes has commenced construction of 200 new homes on land at Waterloo Road, Bidford-on-Avon on land adjacent to the southern site boundary. Miller Homes is committed to engaging with stakeholders to shape developments so that they best meet local needs and requirements and as such seek to work very closely with local communities, Planning Officers and local Councillors to create the most mutually beneficial schemes. Miller Homes is seeking to apply this approach to this Site at Waterloo Road in Bidford-on-Avon.
- 1.2 Miller Homes Phase 2 Site at Kings Meadow extends to around 4.2 hectares located adjacent to the north west of the current Phase 1 development referred to above. Bidford-on-Avon is a sustainable location for development. The village is classed as one of eight Main Rural Centres in the adopted Core Strategy and incorporates a range of services and facilities including regular public transport services to Stratford-upon-Avon and beyond as confirmed by the Planning Inspectorate when allowing an appeal on the adjacent land. This document seeks to bring together the initial technical and environmental studies of the Site which have been undertaken by Miller Homes consultant team and includes an illustrative masterplan that has been informed by that initial evidence base. What is presented in this document is not

intended to be a fully worked-up scheme but has been prepared for illustrative purposes to be used as the basis for discussions with key stakeholders, including the local community and the Council.

- 1.3 The purpose of this document is to support the promotion of the site as part of the emerging Site Allocations Plan and South Warwickshire Local Plan and to demonstrate that the Site is available now, is a suitable location for development and is achievable and that consequently, the Site is a deliverable one that should be allocated for housing development to meet the future needs of the area.

The consultant team comprises:

 miller homes

 RPS MAKING COMPLEX EASY

 TG Tyler Grange

 David Tucker Associates
TRANSPORT PLANNING CONSULTANTS

2. THE SITE AND SURROUNDING AREA

- 2.1 Miller Homes Phase 2 Site is adjacent to the northern settlement edge of Bidford-on-Avon, less than 1 km from the village centre and adjoins Miller Homes Phase 1 site which is currently being built out for 200 new homes. Bidford-on-Avon is situated approximately 10 km to the west-south-west of Stratford-upon-Avon, 6 km to the south of Alcester and 10 km to the north east of Evesham. Bidford-on-Avon is located immediately north of a meander on the River Avon and to the East of the River Arrow Valley.
- 2.2 The Site consists of a single field, currently in agricultural use, that is adjacent to an unnamed track to the northern boundary of the site, that links to Victoria Road / Bidford Road to the west of the Site. A watercourse, Small Brook, runs adjacent to the track and is a tributary of the River Avon. An established hedgerow separates the track from the Small Brook. The

southern boundary of the Site adjoins the Miller Homes Phase 1 site currently under construction. The western boundary adjoins the edge of a recently completed residential development at Jacksons Meadow. The eastern boundary of the Site adjoins the garden of a residential property. Figure 1 overleaf shows the Site and its relationship to the development at Jacksons Meadow and its relationship with the Miller Homes Phase 1 development to the south.

- 2.3 Development has built up along the B439 Stratford Road that runs east-west, just north of the town centre. Development is also situated along two roads running north from there: Victoria Road to the west and Waterloo Road to the east. The Site sits between these two roads. Existing residential development at Bidford-on-Avon is situated on land between 25m AOD and 52m AOD.



Street scenes from land at Waterloo Road site (Phase 1)



Figure 1: Site and adjacent sites

The Suitability of Development at this Location

2.4 As indicated above, Miller Homes site represents an extension of its existing Phase 1 site, which is currently being delivered for 200 dwellings. The decision to approve the Phase 1 site, was made by an independent Planning Inspector in 2016, following his full consideration of all the issues during a two week long public Inquiry. Given the Phase 2 site physically adjoins the Phase 1 site, uses the same access and is controlled by the same developer, the issues addressed by the Inspector are highly relevant to the consideration of the Phase 2 site. A few key points from relevant paragraphs of the Inspector's decision are addressed opposite:

- **The provision of land for housing at Bidford (para 22)** – additional housing delivery would help to provide the significant boost in housing supply sought by Framework paragraph 47;
- **Affordable Housing (para 30)** - *The scale of that underprovision and the associated number of households on this Council's Housing Register ensures that the provision of affordable homes attracts significant weight in favour of the current appeal scheme;*
- **School Provision (para 85)** - *Accordingly, there is no evidence that demonstrates children from the proposed development would be likely to travel out of the village due to an inability for them to be accommodated at Bidford Primary School;*
- **Health Care Provision (para 91)** - *The education and healthcare contributions within the executed s.106 agreement would be expected to provide accessible local services that would support a strong, vibrant, healthy and inclusive community;*
- **Suitability of this Location (para 101)** - *During the inquiry the Council accepted that the proposed site, whilst larger than the strategic reserve within the draft NDP, is in the optimum location to extend the village;*
- **Accessibility (para 114)** - *while for many people the appeal scheme would be towards the upper limit of acceptable walking journeys to some local services, there would be opportunities for journeys to be made on foot (or cycle) and these are likely to increase; and*
- **Sustainable Development (para 144)** - *in this case I have found the proposal to represent sustainable development. It is clear that the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits of the appeal scheme when assessed against the development plan, and Framework planning policies, taken as a whole.*

3. PLANNING POLICY

Stratford-on-Avon Planning Policy: Core Strategy

- 3.1 The Development Plan for the District is the Stratford-on-Avon District Core Strategy that was adopted in July 2016 and covers the period from 2011 to 2031. This establishes the overall spatial vision for the District. Stratford-on-Avon District Council is currently progressing the preparation of a Site Allocations Plan that will form part of the Development Plan for the district alongside the adopted Core Strategy. Whilst the Core Strategy allocated strategic sites (above 500 dwellings) none were allocated at Bidford-on-Avon.
- 3.2 The Vision of the Core Strategy states that the settlement pattern comprising the main town of Stratford-upon-Avon, eight Main Rural Centres, that includes Bidford-on-Avon, and a wide range of Local Service Villages will have been reinforced. Core Strategy Policy CS.15 (Distribution of Development) states that between 2011 and 2031 the distribution of development will be based on a pattern of balanced dispersal. The rest of the hierarchy includes New Settlements, Local Service Centres, Large Rural Brownfield Sites, all other settlements and finally Local Needs Schemes. Bidford-on-Avon is therefore towards the top of the adopted hierarchy.
- 3.3 Core Strategy Policy AS.3 relates specifically to Bidford-on-Avon and sets out a number of environmental, social and economic principles that will be taken into account in the consideration of development proposals. These include the protection of the historic core of the village, the preservation of the riverside setting of the village, the improvement of sports and social facilities, the

support and the enhancement of the role of the village centre as a focus of shops and services to attract more customers. The supporting text to the Policy states that there is a reasonable range of shops and services in the village centre although the provision has declined in recent years. The village has a primary school which meets the needs of local residents and those within surrounding villages. A frequent (half-hourly) bus service runs through the village linking with Evesham and Stratford-upon-Avon and there is a daily service that links the village to Redditch and Evesham.

Stratford-on-Avon Planning Policy: Site Allocation Plan

- 3.4 The Council is currently preparing a Site Allocations Plan, a commitment within the Core Strategy, to identify reserve housing sites to provide housing delivery flexibility to ensure that the District can meet its full housing requirement. The Revised Preferred Options Consultation Version of the Site Allocations Plan was published in June 2022. It identifies the southern part of the Site as a proposed reserve site with a net developable area of 3ha and an indicative capacity of up to 90 dwellings, Miller Homes emerging proposals for the Site demonstrate that it would be an entirely appropriate 'reserve site' and that it would be capable of contributing positively to meeting the housing needs of the area. As demonstrated through this document due to the lack of any inhibiting infrastructure or technical obstacles to delivery, the site is available now and can be 'called on' for delivery as soon as is



Figure 2: Site Allocations Plan Bidford Reserve Housing Sites Plan

required. Furthermore, as set out in Miller Homes' representations to the most recent consultation on the Site Allocations Plan, the whole of the Site is suitable for development not just the southern half.

South Warwickshire Local Plan

- 3.5 In January 2021 Stratford-on-Avon District Council commenced a review of its Core Strategy, working with Warwick District Council to prepare the South Warwickshire Local Plan (SWLP). The SWLP will set out the strategy and identify sites to meet future development needs in terms of housing, jobs, infrastructure and open spaces to 2050. It will do this in the context of addressing the important issues of climate change, wellbeing, connectivity, and biodiversity. It will also set out the planning policies that the two Councils will use to assess applications for development. It will replace certain key policies in the existing Stratford-on-Avon District Council Core Strategy and Warwick District Council Local Plan, but other policies in these documents will remain in force.
- 3.6 The Issues and Options (IO) Consultation Document, published in January 2023, proposes that the plan-making process consist of at least two separate parts:
- Part 1: Growth Strategy and Strategic Policies
 - Part 2: Detailed Policies and specific site allocations, and (potentially) revised settlement boundaries
- 3.7 The IO document considers a wide range of issues relating to the overall scale of growth needed up to 2050 and how this might be distributed across the SW plan area.

- 3.8 Under Issue H1, as a minimum the housing need for South Warwickshire calculated using the current version of the standard methodology is a minimum of 1,239 new homes per year which equates to a figure in excess of 35,000 new homes by 2050 (assuming a base date of 2021). The IO document notes that there continue to be high levels of housing unaffordability across South Warwickshire (Issue H2). As such the Councils are considering how best to address this problem. It also notes that there may be a requirement to meet unmet housing need arising from other authorities such as Coventry, Birmingham, or the Black Country. The development of the site would contribute towards meeting housing need and also provide affordable housing.
- 3.9 In this context, the IO document proposes a move away from the standard method as a basis for identifying local housing need and to inform the housing requirement for South Warwickshire. This 'trend-based' approach would result in a local need of 1,679 homes per annum. Miller Homes is broadly supportive of any policy measures that lead to an increase in the planning and delivery of new housing across the Plan area, which would provide further impetus to identify additional land in sustainable locations including Bidford-on-Avon.

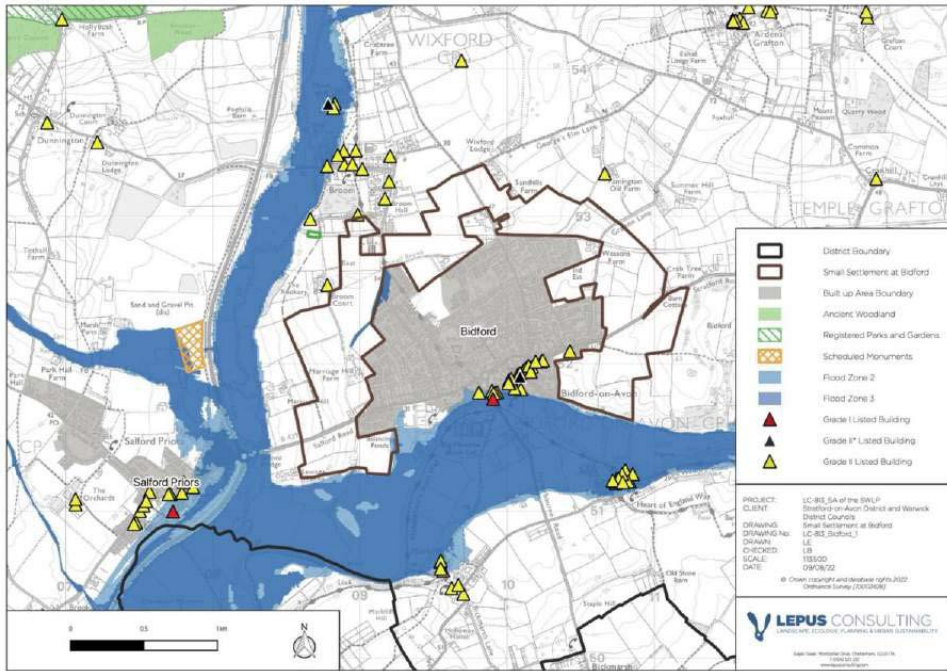
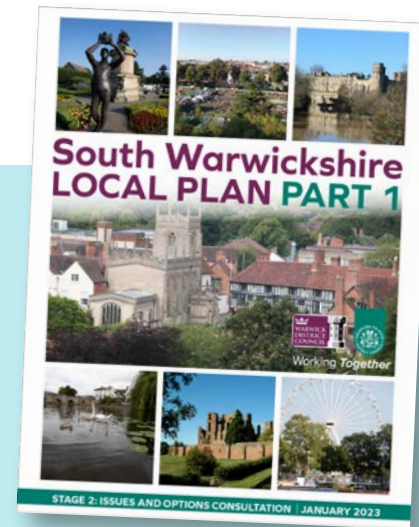


Figure 3: Area at Bidford assessed as a potential Small Settlement Allocation

3.10 The IO document identifies Bidford-on-Avon as a potential location for growth. In particular the accompanying Sustainability Appraisal identifies land to the north, east and west of Bidford-on-Avon, including the Site, as a potential location for a Small Site Allocation of between 50 and 500 homes. Miller Homes welcome the consideration of Land at Bidford-on-Avon for future development. However, the assessment of the Site as part of a wider parcel by the Sustainability Appraisal has meant that it has been given a less positive assessment than would be the

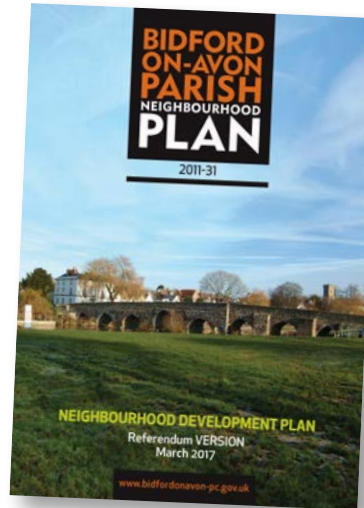
case if the Site was considered in isolation. Miller Homes encourage the Councils to consider the Site in its own right when preparing the Part 2 SWLP given that the SAP has identified the Site as being suitable for development and the indicative capacity of the Site being above the lower threshold for a Small Site Allocation.



Bidford-on-Avon Parish Neighbourhood Plan

3.11 The Bidford-on-Avon Parish Neighbourhood Plan (NP) was 'made' on 17 July 2017 following a referendum in March 2017. The NP includes a plan (Figure 3) showing the boundary of the village and the housing commitments that were shown in the Core Strategy Proposals Map (with an adjustment to enlarge the Millers Home development to the south of the Site to reflect the scale of the approved development. No housing allocations are included within the NP.

3.12 The NP states that it cannot prevent development and that it plans positively to support local development in line with local wishes. Policies H1 (Village Boundary) and H2 (Rural Exception Housing) seek to ensure that new housing development is directed within the defined village boundary and that only limited exceptions will be supported outside of this. More than two years have passed from when the NP became part of the development plan and, as stated above, the NP does not contain any policies or housing allocations to meet an identified (affordable) housing requirement. Whilst the Site is currently outside of the village boundary defined within the NP this would not prevent a future allocation of the Site, or the approval of a planning application, should the planning balance weigh in favour of such a proposal.



National planning policy

3.13 National Planning Policy is set out in the National Planning Policy Framework (NPPF) and the associated on-line Planning Policy Guidance (PPG). Paragraph 59 of the NPPF states that it is important that a sufficient amount and variety of land can come forward in order to support the Government's objective of significantly boosting the supply of housing. Local Planning Authorities are required to identify a sufficient supply and mix of housing sites, taking into account their availability, suitability and likely economic viability and planning policies should identify a supply of specific, deliverable sites for the first five years of the plan period, specific, developable sites, or broad locations for growth for years six to ten and, where possible, for years eleven to fifteen (NPPF Paragraph 67). The purpose of the Site Allocations Plan is to ensure that the Council can identify sufficient housing land for the medium to longer term and the Miller Homes site represents an appropriate opportunity for further residential development in a sustainable location within one of the few Main Rural Centres within the District that can accommodate housing growth.

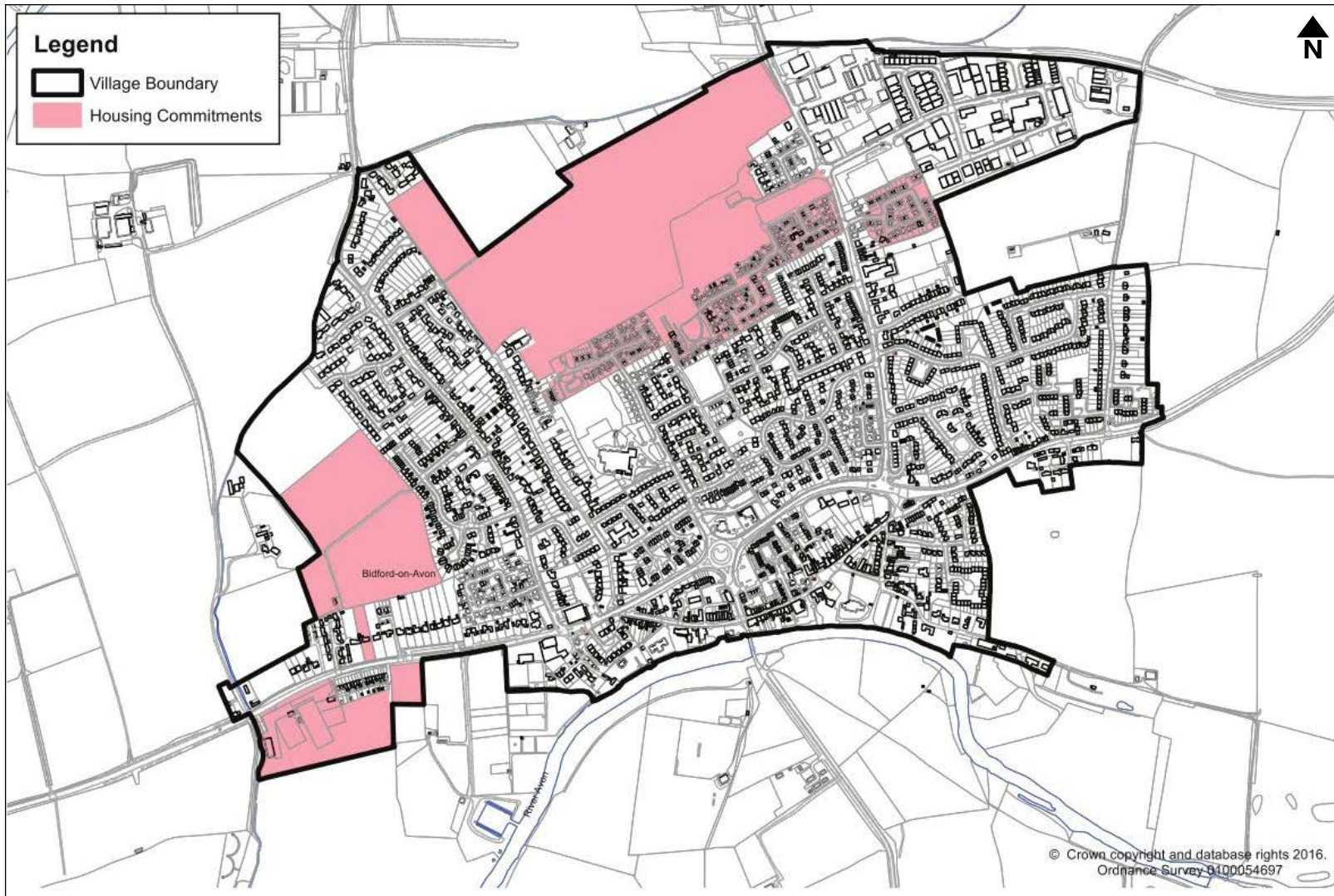


Figure 4: Bidford-on-Avon Parish Neighbourhood Plan Map

4. TECHNICAL ASSESSMENTS

4.1 To demonstrate that the development proposals for the Site are truly deliverable and to ensure that the illustrative layout takes account of the necessary opportunities and constraints an appropriate evidence base for the Site has been assessed. This includes documentation that formed part of the planning application for the adjacent land to the south of the Site, other publicly available information and additional assessments that have been commissioned specifically to support the promotion of the site and to inform the evolution of the illustrative masterplan.

Transport and Access and Accessibility

4.2 Vehicular access would be provided towards the south eastern corner of the Site, linking directly into the wider Miller Homes site to the south, ultimately linking the site to Waterloo Road to the east. No objections were raised by the Highway Authority to the design of that access and it was concluded that it would represent a safe and suitable access.

4.3 In order to inform the proposed illustrative masterplan a Highways Technical Note has been prepared by DTA Transport Planning Consultants that provides an appraisal of the potential traffic impact of the proposed development. That appraisal has taken account of the approved dwellings within the larger Miller Homes site to the south and to the planning application for 50 dwellings on land to the corner of Waterloo Road and Wellington Road, that has previously benefited from planning permission for a retail store.

4.4 The appraisal has considered the impact of an additional 90 dwellings on the operation of the Waterloo Road / Tower Hill junction, along with the additional developments referred to above. The assessment concludes that the junction will operate effectively in the future with committed traffic and that from the proposed development. No further mitigation measures would be required to accommodate the level of development proposed.

Landscape and Visual Impact

4.5 A Landscape and Visual Technical Assessment (LVTA) has been prepared by Tyler Grange on behalf of Miller Homes to consider the landscape and visual context within which the Site is located. This assessment has taken account of the 2011 Landscape Sensitivity Assessment (LSA) produced on behalf of Stratford-upon-Avon District Council as part of the evidence base for the adopted Core Strategy and additional commitments which have taken place since.

4.6 The Site lies within the Severn and Avon Vales National Character Area (NCA 106) and within the Avon Valley regional character area. Within the Avon Valley regional character area, the Site is located within the terrace farmlands where the overall character and qualities are described as flat, open, intensively farmed landscape. The 2011 LSA considered the Site as part of a wider parcel of land (B03) that was assessed as having a medium sensitivity to housing development. This wider parcel also included the land to the south and west of the Site, which have subsequently been granted planning permission for housing.

The 2011 LSA indicates that housing development within the Site (B03) could be accommodated to the south of Small Brook.

- 4.7 Whilst development of the Site would introduce built form onto a site currently undeveloped, the Site has few landscape features and a sensitively designed landscaped scheme, with enhancements to the existing vegetation to the northern boundary of the Site, could assimilate a residential development with its surroundings and not result in a material change to the character and appearance of the area. The LVTA (LVTA) states that the flat topography of the Site means that built form and intervening vegetation restricts views and middle-distance views are further restricted by the settlement edge of Bidford-on-Avon to the south and west of the site. The LVTA concludes that the Site can accommodate residential development without resulting in undue negative landscape or visual effects.

Flood Risk and Drainage

- 4.8 The Environment Agency (EA) Flood Map for Planning illustrates that the site is within Flood Zone 1, the lowest classification for flood risk (see Figure 4). There is a watercourse, the Small Brook, to the north of the site and the River Arrow lies 1 km to the west of the site. Both of these are tributaries of the River Avon that lies 850m to the south. The development would ensure that any discharge rates are restricted to greenfield run off rates in accordance with best practice for Sustainable Drainage Systems (SuDS). On site attenuation, has been included within a masterplan layout to ensure there is no detriment to downstream recipients of surface water, both in terms of water quality and quantity.

- 4.9 A detailed Flood Risk Assessment was undertaken in support of the planning application for Phase 1 south of the Site and concluded that the development of the site would be safe, without risking flood risk elsewhere. No objections were raised by the Environment Agency.

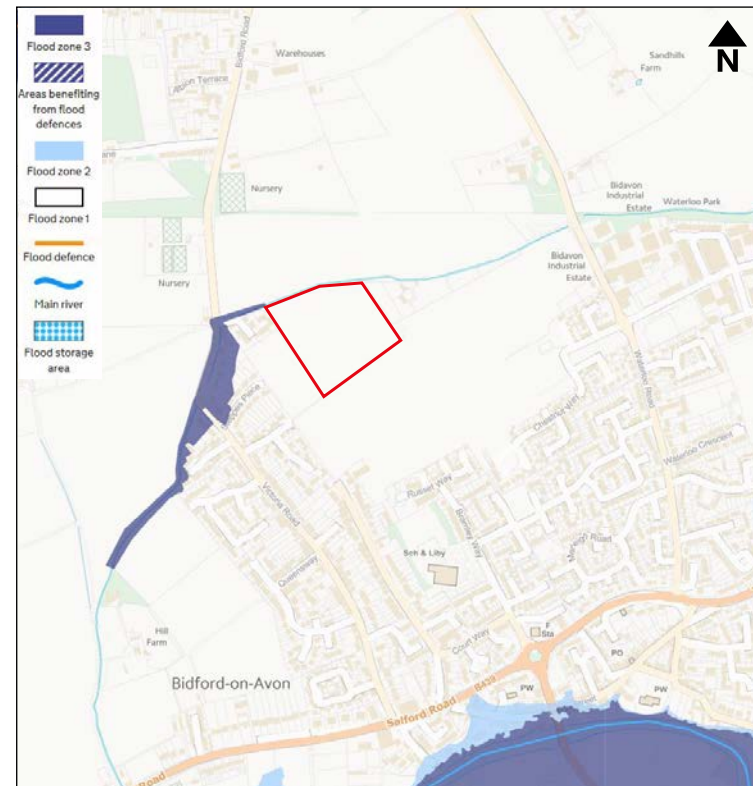


Figure 5: Environment Agency Flood Map

Ecology

- 4.10 There are no International or European nature conservation sites within 10 km of the Site or any other nature conservation sites within 2 km of the Site. There are eighteen non-statutory nature conservation sites within 2 km of the site, the nearest being a disused section of Broom railway junction, 250m north west of the site. The limited zone of influence of impacts from construction and operation of a development at the Site would not impact on upon those non-statutory nature conservation sites.
- 4.11 The detailed Phase 2 survey work that has been undertaken in relation to Badgers, Bats, Reptiles and Birds demonstrates that there would be no overriding ecological constraints to the principle of development of the Site. Ecological enhancements can be provided in the site, as with the development of the land to the south, to ensure that ecological improvements can be made in comparison to the existing situation. Such improvements could take the form of habitat creation, enhancement of hedgerows and the inclusion of bird and bat boxes on dwellings to provide a net-gains in biodiversity, consistent with paragraph 170 of the NPPF.

Arboricultural

- 4.12 The site is an agricultural field and there no trees within the site. A tree survey has been undertaken of the site. This identified a group of Silver Birch to the western boundary, a field hedge to the northern boundary and a mixed group of trees to the north / eastern boundary within Category B or C. The illustrative

masterplan demonstrates that there would be no requirement to remove boundary trees or hedgerows in order to develop the site. In addition, the masterplan shows that additional tree and hedgerow planting could be incorporated across the Site, including along the northern boundary.

Cultural Heritage

- 4.13 An initial heritage assessment has been undertaken which indicates there are no designated or non-designated heritage assets on the Site and that the development of the Site would not result in any direct or indirect impacts on Scheduled Ancient Monuments, Conservation Areas or Listed Buildings as they are screened from the Site by intervening built development and the local topography. The development of the land to the south of the Site has further lessened any potential impacts on the Listed Buildings and Conservation Area to the south.
- 4.14 A geophysical survey was also undertaken of Phase 1 and the data from that assessment demonstrated that there is the potential for buried remains of archaeological interest within the site. A planning condition was attached to the planning consent for Phase 1 requiring the submission of a written scheme of archaeological investigation to be submitted prior to the commencement of development and the subsequent archaeological investigation work was undertaken by Archaeology Warwickshire. It is considered that this is the most appropriate course of action to address potential archaeology and that this does not represent a constraint on the development of the Site.

Ground Conditions

4.15 A Phase 1 Geo-Environmental Assessment was undertaken in support of Phase 1. The assessment concluded that no contaminative land uses were identified at the site. A condition (No.18) was attached to the planning permission to require the submission of a detailed site investigation prior to the commencement of development which did not identify any issues with the development of the site, the findings of which were accepted by the Council.

Agricultural Land

4.16 The Site is Grade 2 Agricultural Land, as was the land immediately to the south of the Site. Stratford-on-Avon District

Council did not raise any concerns relating to this as part of the appeal relating to the land to the south and the Inspector concluded that land of lower agricultural value in the area is associated with the floodplain and that homes could not therefore be provided in such close proximity to the settlement on suitable sites of poorer land quality.

Other technical Issues

4.17 There are no known technical issues relating to other matters which would prevent the Site from coming forward, although it is accepted that any future planning application would enclose a full suite of technical reports to demonstrate the suitability of the development proposal.



View of the site from Small Brook

5. VISION FOR THE SITE

Masterplanning

5.1 Miller Homes vision for the Site is to deliver an attractive development offering a choice of high quality affordable and market new homes to meet local needs and being fully integrated with, and complementary to, the village of Bidford-on-Avon. Miller Homes has developed an illustrative concept masterplan which reflects the opportunities and constraints that have been identified through the evidence base for the application on the land to the south, and the more recent Landscape and Visual Technical Note and Highways Technical Note. It is intended that the illustrative masterplan is used as a starting point to inform discussions on the Site and that the plans will evolve further following consultation with the local community, the Council and any other key stakeholders.

Access

5.2 Vehicular access would be provided towards the south eastern corner of the Site, linking directly into the wider Miller Homes site to the south, ultimately linking the site to Waterloo Road to the east. In order to inform the proposed illustrative masterplan a Highways Technical Note has been prepared by DTA Transport Planning Consultants that provides an appraisal of the potential traffic impact of the proposed development. That appraisal has taken account of the approved dwellings within the larger Miller Homes site to the south and to the planning application for 50 dwellings on land to the corner of Waterloo Road and Wellington Road, that has previously benefited from planning permission for a retail store.

5.3 The appraisal has considered the impact of an additional 90 dwellings on the operation of the Waterloo Road / Tower Hill junction, along with the additional developments referred to above. The assessment concludes that the junction will operate effectively in the future with committed traffic and that from the proposed development. No further mitigation measures would be required to accommodate the level of development proposed.

5.4 The illustrative masterplan shows how access to the land to the east of the Site, which is outside of the control of Miller Homes, could be provided through the Site linking it to the larger Miller Homes site to the south. If this access is not required this would result in a minor increase in the developable area of the Site

Green Infrastructure

5.5 The illustrative concept masterplan demonstrates that a significant amount of green infrastructure could be provided within the Site as part of the proposed development. In particular areas of green, open space, are shown within the illustrative masterplan to the eastern and southern boundaries of the Site that would enable the development to seamlessly integrate with the approved development to the south. The scheme has taken account of the work undertaken as part of the Landscape and Visual Assessment and substantial hedgerow and tree planting would be provided across the Site, within both public areas and private gardens, to ensure a high-quality form of development that reflects its location. Whilst further details would be provided at the application stage, the proposals allow for a strong landscape barrier to the north of the site to ensure that a strong, defensible barrier, can be created.



Figure 6: Illustrative Concept Masterplan

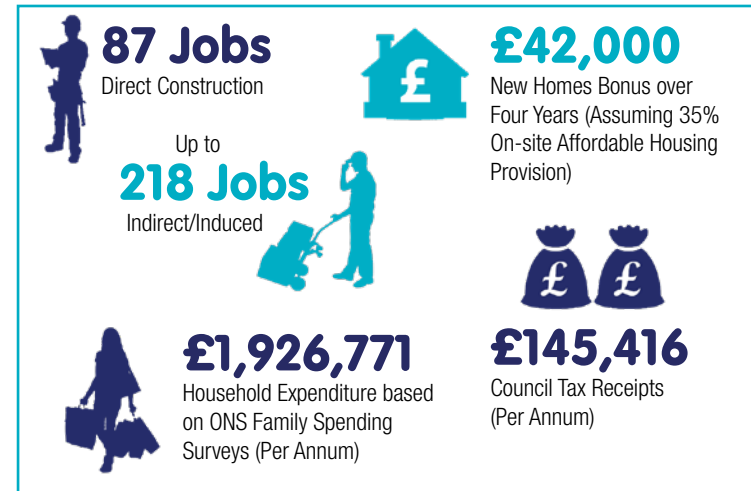
Development Quantum

5.6 The initial evidence base referred to above has been utilised to prepare an initial illustrative concept masterplan for the Site that demonstrates how it could be developed, taking account of the opportunities and constraints of the Site identified above. The illustrative concept masterplan demonstrates that the site can accommodate up to 90 dwellings at a density of approximately 30 dwellings per hectare. This ensures that the development would reflect the general character and density of development within the surrounding area and that it would protect the residential amenity of the occupiers of existing and proposed residents alike.

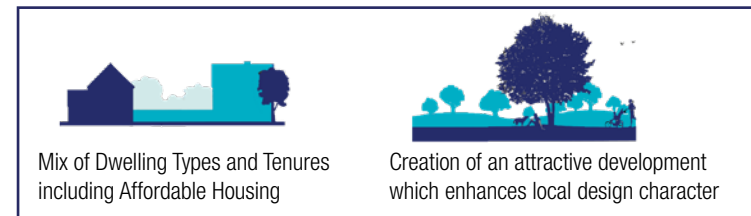
Benefits of the Site

5.7 The development of new homes at the Site would result in economic benefits through the economic activity associated with their construction and occupation. This would include the provision of construction jobs and expenditure within the local area from future occupiers of the houses. This is particularly relevant as the Core Strategy identifies that although there is a reasonable range of shops and services in the village centre their provision has declined in recent years. The provision of both affordable and market housing would result in social benefits that meet the objectives of the NPPF and local housing needs on an unconstrained site that is outside of the Green Belt.

An Economic Role



A Social Role



An Environmental Role

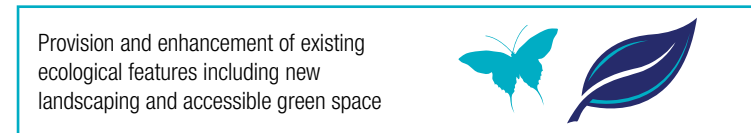


Figure 7: Economic and Social Sustainability at Land off Kings Meadow, Bidford-on-Avon

Its Suitability at Bidford-on-Avon

- 5.8 The development strategy within the adopted Core Strategy seeks to distribute development throughout the district based on a pattern on balanced dispersal. Stratford-upon-Avon is identified as the Main Town that is the focus for housing and business development. The eight Main Rural Centres (MRCs), that includes Bidford-on-Avon, are within the next level of settlement hierarchy and are identified as suitable locations for housing and business development and the provision of local services. There are significant constraints present across the MRCs that limit where growth can be carried out. Three of the eight MRCs are constrained by the Green Belt. Other designations that act as a constraint to development include areas of Special Landscape Value, Flood Zones 2 and 3, Scheduled Ancient Monuments, a Registered Battlefield and Areas of Restraint that is regarded as making an important contribution to the character of the settlements.
- 5.9 As indicated above the site (Phase 1) was acknowledged at the planning appeal to represent the optimum location to expand Bidford-on-Avon. There are significant constraints affecting large areas of land on the edge of the village. All the southern edge of the village, along the Avon valley, is affected by flood risk and is also designated as an Area of Restraint, within which the open nature of the landscape should be protected. The 2011 Landscape Sensitivity Assessment Study (prepared by White Consultants on behalf of Stratford-on-Avon District Council) identifies the land to the south of the village as having a high

landscape sensitivity to housing development and land to the east and west of the village as having a high/medium sensitivity to housing development. In contrast the Site is identified as having only a medium sensitivity, along with the Miller Homes land to the south and the recently constructed Jacksons Meadow site to the west.

- 5.10 The constraints on potential future development are highlighted in the assessments undertaken by the Council in the 2021 Strategic Housing Land Availability Assessment (SHLAA). The Council's assessment concludes that of the 117 sites assessed at the MRCs only 34 are 'likely to be deliverable' when mitigation is considered with all of the other sites considered to be 'not deliverable'.
- 5.11 The Site is part of one of six of the 16 sites at Bidford-on-Avon that was assessed as being 'likely to be deliverable'. As with all the other proposed reserve sites at Bidford agricultural land value is identified as a concern, with the site being on land rated as being of high agricultural land value, although as previously noted this was also the case with the land to the immediate south. The Site is located within a mineral safeguarding area, as are all the other proposed reserve sites at Bidford. Given the size of the Site and its proximity to existing homes it is not expected to be practical or viable to extract minerals from the Site. Issues relating to access to the site and the relationship to the highway, public transport, landscape sensitivity and accessibility to local services are identified as other planning considerations.

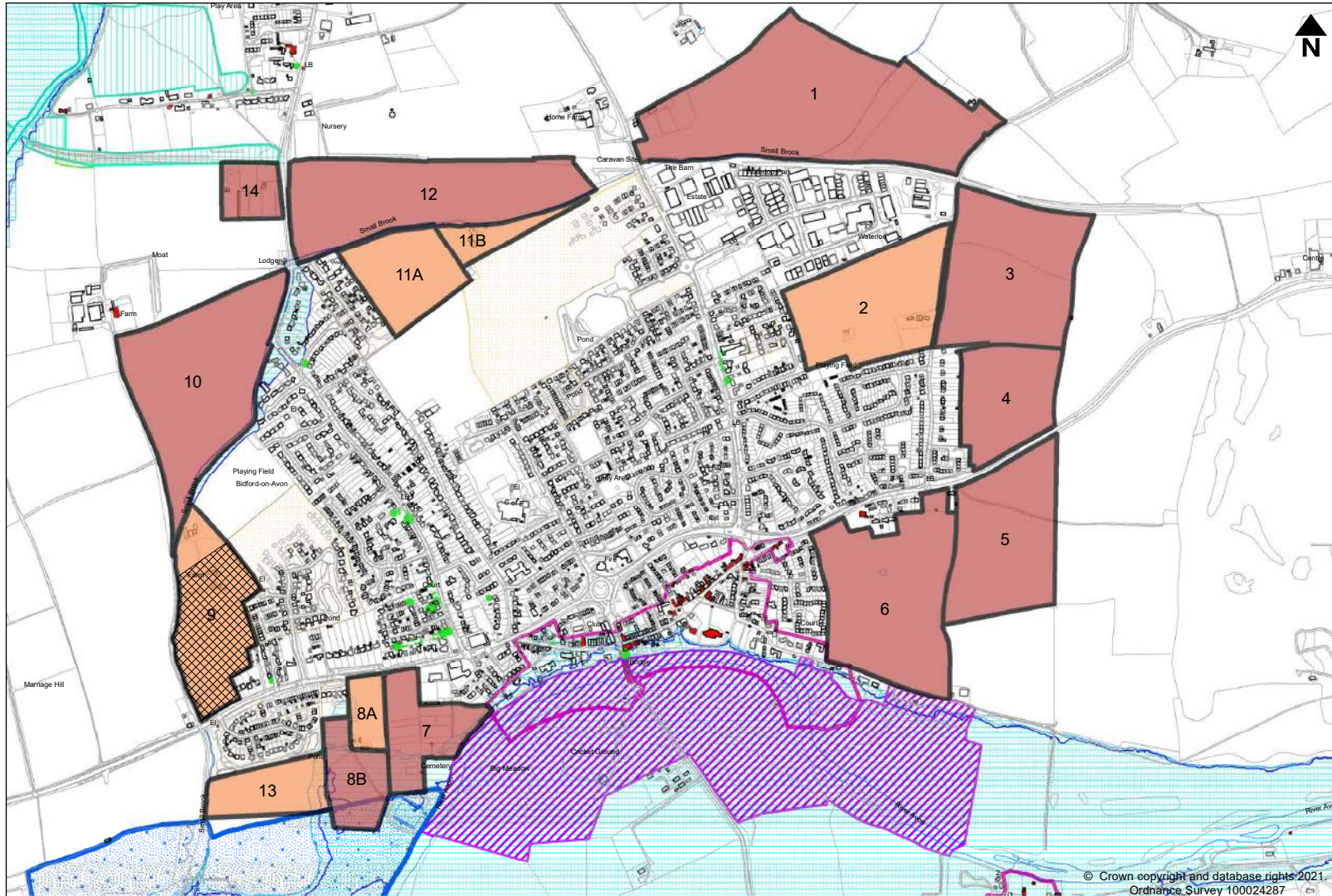


Figure 8: Strategic Housing Land Availability Assessment Map

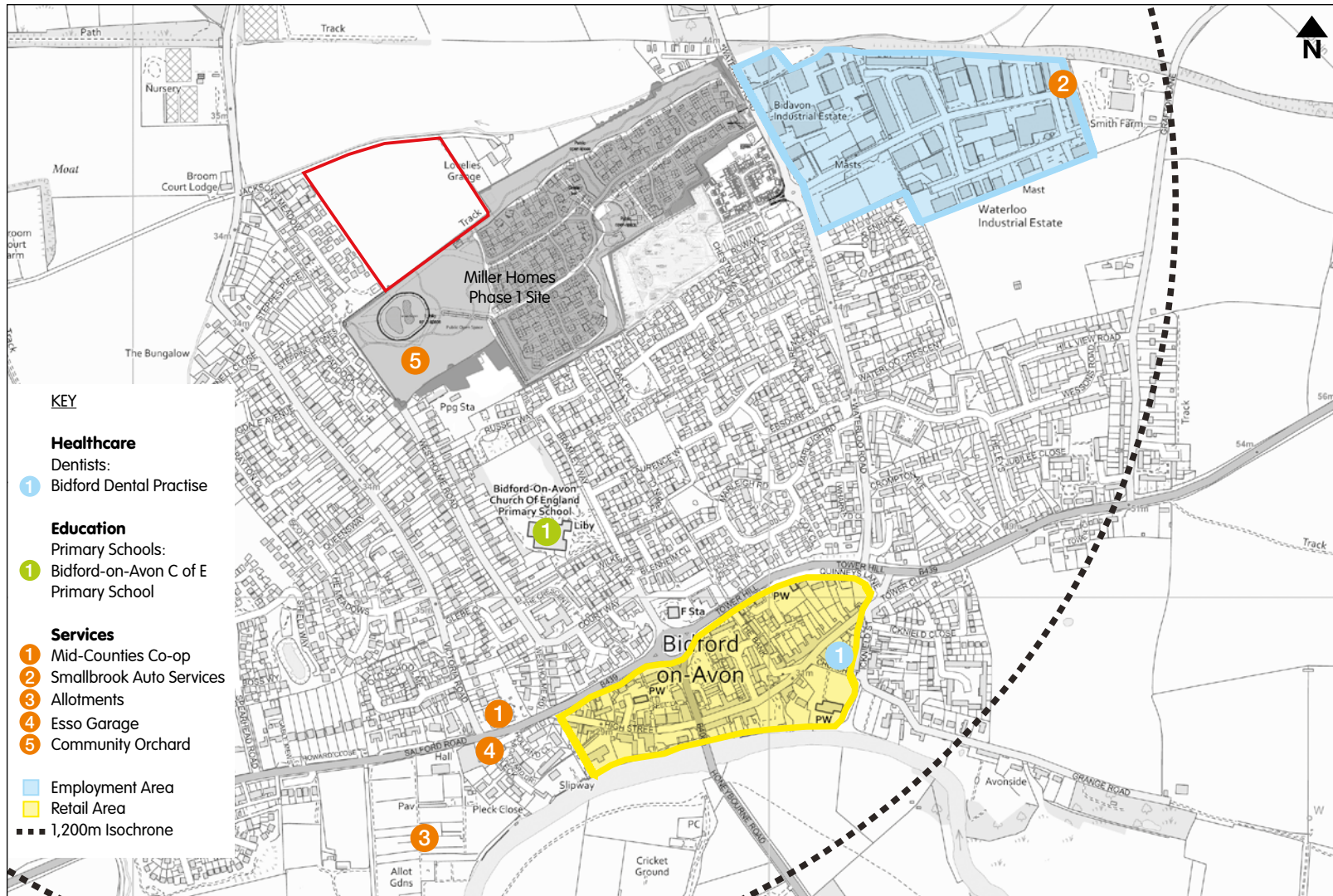


Figure 9: Accessibility Plan

5.12 As demonstrated through the technical transport work as summarised in this Vision Document the site is deliverable from both a highway perspective and public transport perspective and as confirmed by the appeal Inspector for Phase 1 is accessible to services and facilities. There are also no ownership constraints, with the Site and road access being under the sole control of Miller Homes. There are also no issues over site viability.

5.13 As demonstrated above the Site will be accessed through Phase 1 and would utilise the new vehicular access point constructed on Waterloo Road. The appeal relating to the land to the south concluded that the level of public transport provision in Bidford reflects that available within the other MRCs and that public

transport is available to access locations within Bidford and beyond, including Stratford-upon-Avon and Evesham. It was also concluded that land to the south would be near to the industrial estate on Waterloo Road and to other shops, services and job opportunities in Bidford-on-Avon and that there would be opportunities for journeys to be made on foot or cycle. That assessment equally applies to the Site. As set out in Section one the Site is wholly controlled by Miller Homes who are currently delivering new homes on Phase 1. The Site would form a natural extension to that development of that site and would build on, and contribute to, that scheme.



6. DELIVERY

Available now

6.1 The Site is under the control of Miller Homes, a national housebuilder who are currently constructing high-quality new homes on Phase 1, who are committed to delivering a sustainable residential community on the Site. As demonstrated above, a suitable vehicular access can be provided on land owned by Miller Homes. There are no legal or ownership constraints which would prevent the Site from being delivered. The technical evidence prepared in support of this document, and the more detailed work associated with the planning application and the subsequent discharge of conditions on the land to the South, show that there are no physical or technical constraints to the Site and that it could come forward in the short to medium term.

Suitable

6.2 The Site is not within the Green Belt and is located within a sustainable location on the edge of Bidford-on-Avon, one of the Main Rural Centres within the District. Recent housing development in close proximity to the Site, and the significant constraints on development that exist to boundaries of other parts of the village, demonstrates that this is a suitable and logical area for future residential development.

Achievable

6.3 National planning policy and guidance state that sites should be regarded as achievable where there is a reasonable prospect that the development will be developed on the site at a particular point in time. This includes a judgement about the economic

viability of the site and the capacity of the developer to complete the development over a certain period of time. Bidford-on-Avon is a sustainable village that has a relatively strong housing market. The Site is greenfield and is unlikely to be subject to any major remediation or site preparation costs. Miller Homes are currently constructing new homes on adjacent land and consider that the residential development of this would be economically viable. In terms of delivery timescales, the Site, if allocated as a reserve site within the Site Allocations Plan, or as a site through the Part 2 SWLP could come forward as a natural extension to the current development on the land to the south and available for immediate delivery, due to the presence of existing infrastructure already available from Phase 1.



7. CONCLUSIONS

- 7.1 Miller Homes emerging proposals at Kings Meadow, that would link, and form a natural extension to, their current Phase 1, would be capable of contributing positively to meeting the housing needs of the area in a sustainable manner.
- 7.2 There would be easy access to the existing facilities within Bidford-on-Avon on foot and by bicycle, including the industrial estate on Waterloo Road, the Public Open Space within the Site to the south, and to other shops, services and job opportunities in Bidford-on-Avon. The level of public transport provision in Bidford-on-Avon reflects that available within the other Main Rural Centres within the district and public transport is available to access locations within Bidford and beyond. A new bus stop on Waterloo Road was provided as part of the development to the south of the site. Vehicular access into the Site would be taken from the new development to the south and the new junction provided onto Waterloo Road to serve that development. Footpath/cycle links could also be provided to connect to the Site and to the wider area.
- 7.3 There are no insurmountable physical constraints to the development of the Site for up to 90 dwellings as set out in the 2021 SHLAA and as illustrated in this document. There would be the opportunity to provide for a range of dwelling types and sizes at a density that respects the adjacent pattern of development and the site's location on the edge of Bidford. A landscape-led approach to the initial masterplanning of the Site has ensured the existing boundary vegetation is retained and enhanced. Strong vegetated boundaries are proposed to ensure that the Site

would not be visually intrusive within the wider landscape setting of Bidford when viewed from the surrounding countryside. The flat topography enhances this screening effect by not offering any elevated platforms from which to view the Site from. The evidence base relating to matters such as heritage, landscape, ecology, drainage, flooding and transport confirm the absence of any constraints that would prevent the development from coming forward.

- 7.4 Miller Homes is continuing with its evidence base work which is likely to lead to refinement of these initial proposals for the site. Miller Homes is committed to working with the local community and Stratford-upon-Avon District Council and other relevant stakeholders, to design a high-quality and sympathetic development which delivers significant benefits to the village and the district. This document will be used to inform further discussions with the Council and to support the promotion of the site for allocation either as a reserve site within the emerging Site Allocations Plan or as a site in the forthcoming Part 2 SWLP.



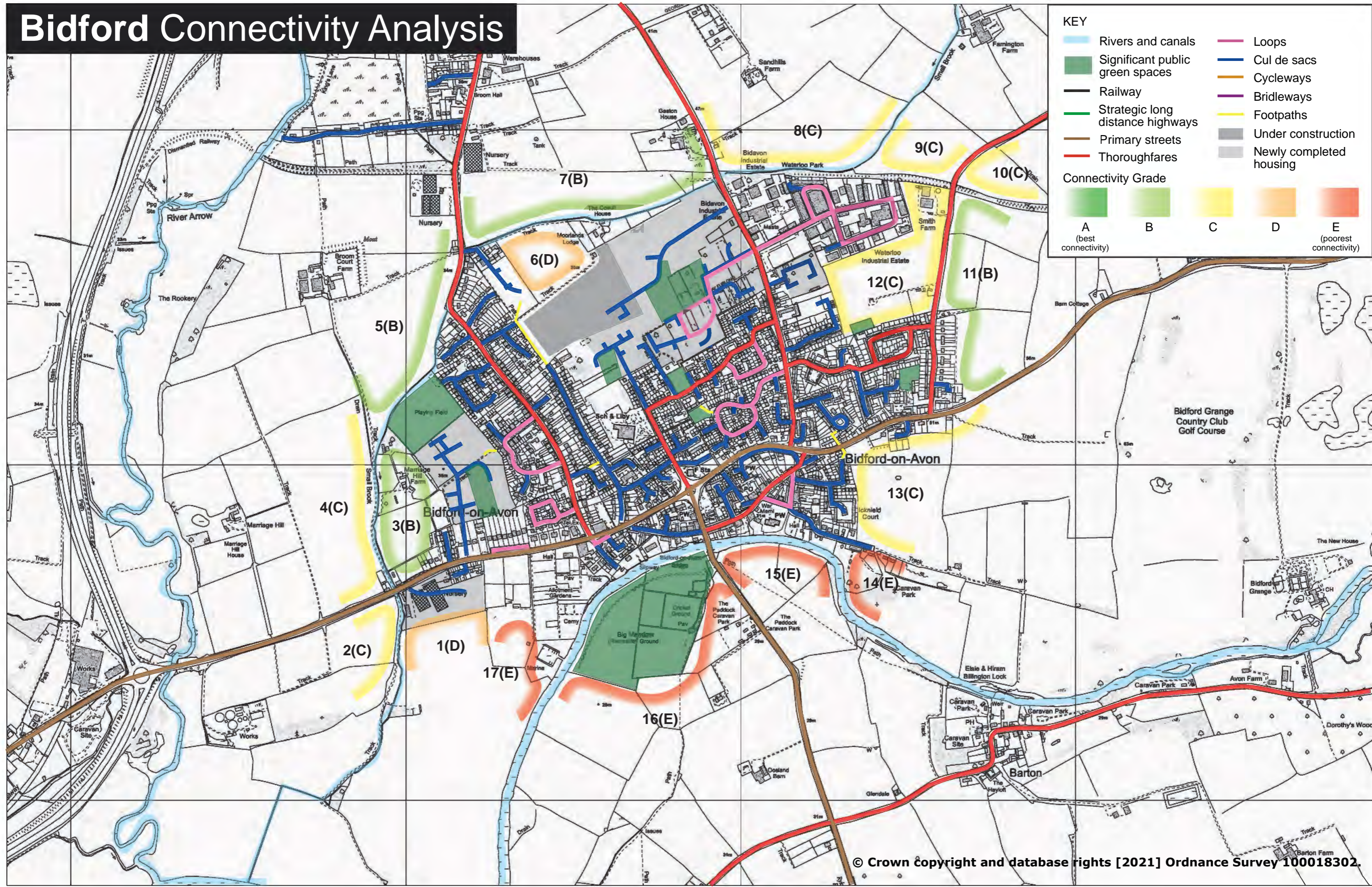
Miller Homes

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Appendix B

Bidford-on-Avon Connectivity Analysis

Bidford Connectivity Analysis



KEY

- Rivers and canals
- Significant public green spaces
- Railway
- Strategic long distance highways
- Primary streets
- Thoroughfares
- Loops
- Cul de sacs
- Cycleways
- Bridleways
- Footpaths
- Under construction
- Newly completed housing

Connectivity Grade

A (best connectivity)	B	C	D	E (poorest connectivity)

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Scale
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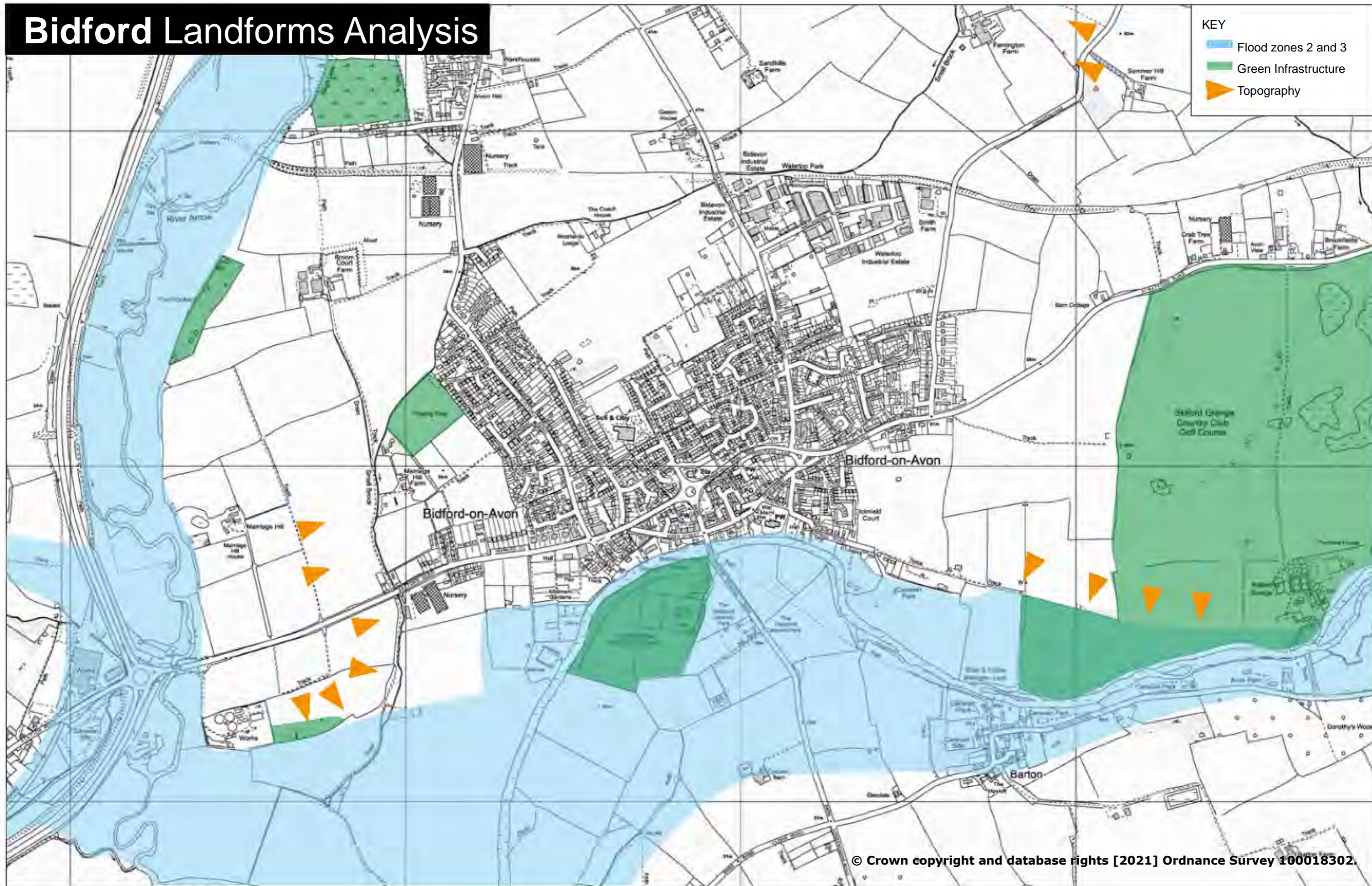
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Connectivity Grade Analysis: Bidford-on-Avon

Area / segment reference	No. brown routes	No. red routes	Active links	Barriers	Comments	Connectivity Grade
1	0	0	Potential for riverside access	Floodplain and river to south and east, watercourse to west	Only viable access would be via new development to the north	D
2	1	0	Potential link along watercourse. Recreation ground to north east	Moderately steep slope to east and south. Sewage works. Watercourse separates site from neighbouring development	This hill acts as natural enclosure to the village	C
3	1	0	Potential link along watercourse. Bridlepath to the west of site	Watercourse to west	Possible link to red route if developed in combination with area 5	B
4	1	0		Watercourse to east. Sloping site	This hill acts as natural enclosure to the village	C
5	0	1	Recreation ground to south	Broom Court moat to east of this area	Possible link to brown route if developed in combination with area 3	B
6	0	0	Potential links through POS on neighbouring site (under construction) and potential connections to near by PROW	Access either via farm track or extending neighbouring cul-de-sacs		D
7	0	2	Potential east/west route through site along dismantled railway	Watercourse along southern site boundary	Development here would remove the separation between Bidford and Broom. Grade B is reliant on any development linking the red routes at each end of this area	B
8	0	1	Potential link along watercourse / dismantled railway to south of site	Watercourse to south. Industrial estate to south		C
9	0	1	Potential link along watercourse to west and dismantled railway to south	Watercourse to west, industrial estate to south		C
10	0	1	Potential link along dismantled railway to south			C
11	1	1	Potential link along dismantled railway to north			B
12	0	1	Potential link along dismantled railway to north	Connections to neighbouring residential areas to south and west would be difficult	Possible connection through industrial estate loop, making it a red route	C
13	1	0	2 PROW, one through site, one along site boundary	Steep slope down to floodplain to the south. Neighbouring residential roads to west are narrow and unlikely to support new connections		C
14	0	0	Potential link along PROW to north, potential link along river to south	Significant area of floodzone		E
15	1	0	Potential further link along PROW across this area and river	Significant area of floodzone. Narrow bridge access		E
16	1	0	Recreation ground to north with riverside path	Significant area of floodzone. Narrow bridge access		E
17	0	0	Potential link along river and through allotments	Significant area of floodzone		E

Bidford-on-Avon Landforms Analysis

Bidford Landforms Analysis



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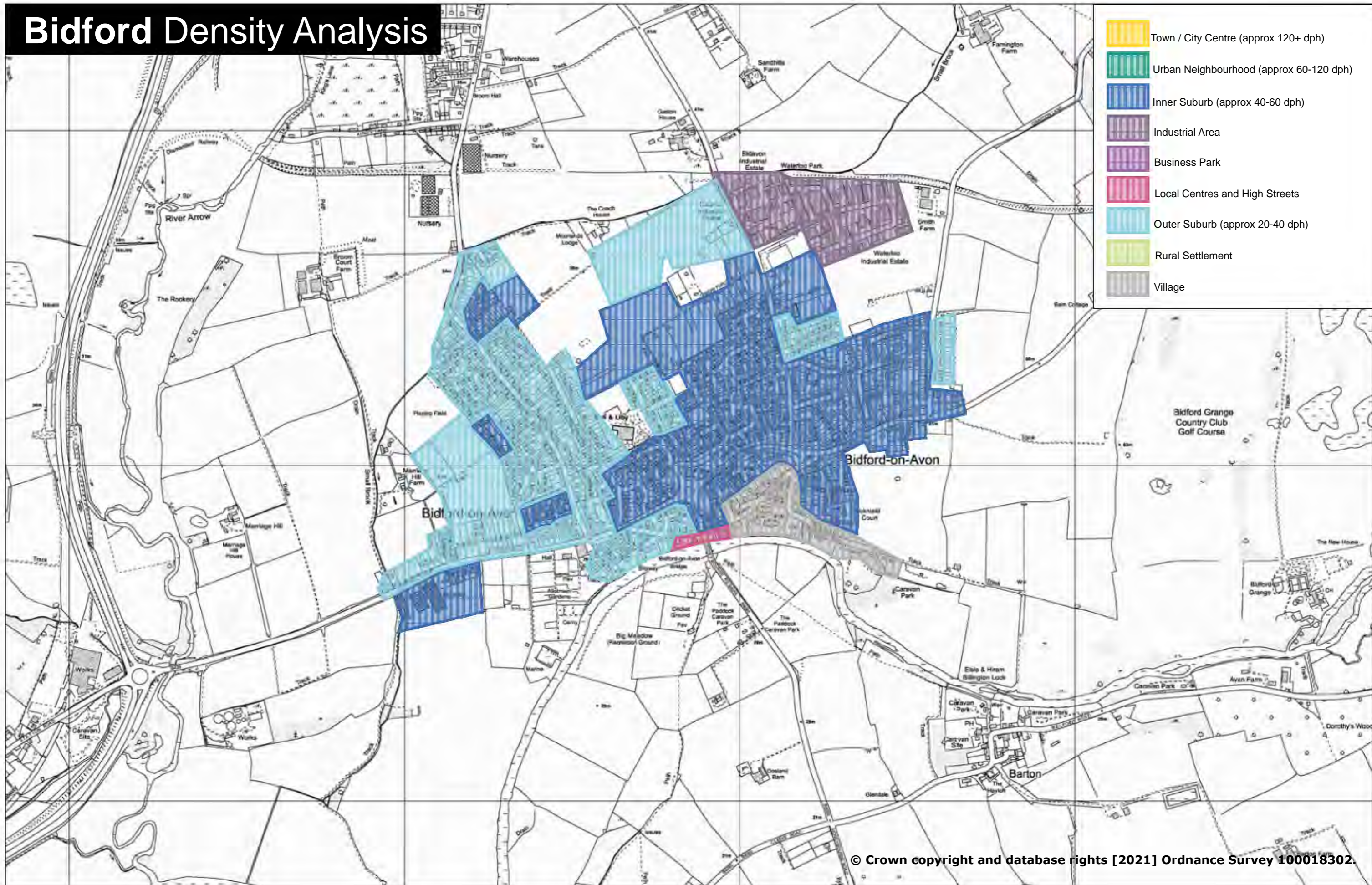
Bidford-on-Avon Accessibility Analysis

Local facilities within 800m: Bidford-on-Avon						
Area number	Retail, Jobs and Economy	Places to meet	Open space, leisure, recreation -	Healthcare	Education	Total number of categories
1	1	1	1	0	1	4
2	1	1	1	0	0	3
3	1	1	1	0	1	4
4	1	1	1	0	1	4
5	1	1	1	0	1	4
6	1	1	1	1	1	5
7	1	1	1	0	1	4
8	1	0	1	0	1	3
9	1	0	1	0	1	3
10	1	0	1	1	1	4
11	1	1	1	1	1	5
12	1	1	1	1	1	5
13	1	1	1	1	1	5
14	1	1	1	1	0	4
15	1	1	1	1	1	5
16	1	1	1	1	1	5
17	1	1	1	1	1	5

Appendix E

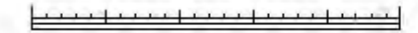
Bidford-on-Avon Density Analysis

Bidford Density Analysis



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Scale
0 100 200 300 400 500 m



SCALE: 1:10000 @ A3



