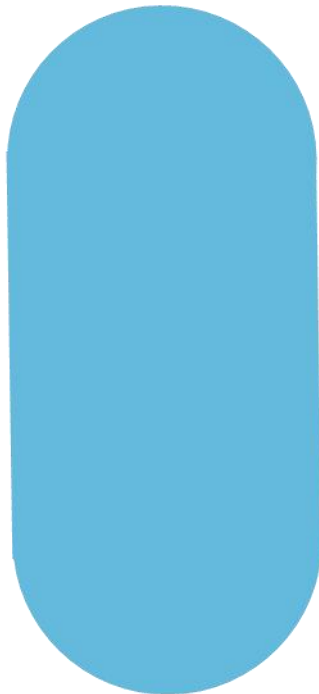


## Representations

South Warwickshire Local Plan Part 1 –  
Issues and Options Consultation

Rosconn Strategic Land Limited – Land south of Avon Way,  
Bidford on Avon

March 2023





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Rosconn Strategic Land Limited, in respect of their land interest south of Avon Way, Bidford-on-Avon (the site). The site was submitted through the initial Call for Sites process and has been recorded as Site 473 on the Interactive Map.
2. A summary of this representation has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the Development Framework Plan (FPCR, September 2020, drawing ref. 9702-L-03-B), a Transport Technical Note (Savoy Consulting, December 2020) and a Supporting Landscape Statement (FPCR, October 2020).

### Chapter 3 - Vision and Strategic Objectives

#### Q-V3.1: Vision for the Local Plan

3. Rosconn Strategic Land consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and Rosconn Strategic Land Limited consider it would be more appropriate to reference meeting unmet need from the wider Housing Market Areas.
4. Whilst Birmingham and the Black Country authorities are not neighbouring authorities of South Warwickshire, they do form part of the same Housing Market Area and therefore should not be excluded. South Warwickshire falls within both the Coventry and Warwickshire Housing Market Area and the Birmingham and Black Country Housing Market Area it is therefore imperative that the SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire.



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## Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

### Q-11: Sustainability Appraisal

5. The following comments are made in respect of the Sustainability Appraisal (SA) for Bidford-on-Avon.
6. The Small Settlement Location (SSLs) for Bidford-on-Avon includes Rosconn Strategic Land interest south of Avon Way, with the site abutting the built up area boundary to the north.
7. The SSL for Bidford-on-Avon covers a large area of land around all sides of the edge of the village. It is clear that certain parts of Bidford-on-Avon are more sensitive than others. Assessing the settlement edge as a whole does not allow for any distinction to be made between different areas for growth. It is difficult therefore to draw conclusions as to the appropriateness of the settlement to accommodate growth from this exercise alone.
8. It is clear from Table 5.1 that the only major adverse impact identified for Bidford-on-Avon relate to agricultural land classification. Agricultural land classification will of course be a factor that needs to be taken into consideration, but is not an overriding constraint upon the development of a site. It is significant to note that Bidford-on-Avon is the only SSL where there is not a major adverse impact in relation to landscape.
9. The SA demonstrates therefore that there are no in principle impediments to growth at Bidford-on-Avon and that it is considered as a suitable location for growth, with a good range of facilities available. The Councils will also be mindful that this is only one piece of evidence at a strategic level, and the HELAA and other evidence will need to inform the selection of allocations in due course.

### Option S2-C: Intensification

10. Intensification is a way to optimise brownfield land and realise its effectiveness. However, Rosconn Strategic Land consider that this matter should be dealt with by



the SWLP Part 2 Local Plan or Neighbourhood Plans if relevant, so that the implications of applying an intensification policy to a particular area can be assessed in terms of character and deliverability, which are key factors to consider.

11. Intensification is challenging and requires evidence around viability and deliverability before it can be considered to form part of the supply, and as such any intensification potential in the windfall allowance should be avoided.

#### Q-S3.1: Urban Capacity Study

12. The production of an Urban Capacity Study (UCS, October 2022) to support identification of brownfield land to help deliver the growth needs of South Warwickshire is in accordance with the NPPF<sup>1</sup>. The following points are made in relation to how the UCS considers housing supply in the urban areas. However, it should be noted that the UCS also discusses the SWLP housing requirement and representations are made on those points under Q-H1-1 & 2.
13. In relation to housing allocations from the adopted Local Plans, Rosconn Strategic Land consider that a comprehensive review of all outstanding allocations without planning permission is required to ensure that such sites still meet the definition of developable as set out in the NPPF<sup>2</sup>. In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will increase beyond what is included within the adopted Local Plan. That review and evidence must be published prior to the next iteration of the Plan to demonstrate the capacity from the allocations can be relied upon to meet the housing need.
14. The UCS also includes within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas, and are considered to be potentially suitable. As no formal assessment of these submissions has taken place, their inclusion will need to be reviewed once the Housing and Economic Land

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<sup>1</sup> Paragraph 119 of the National Planning Policy Framework (July 2021)

<sup>2</sup> Glossary of the National Planning Policy Framework (July 2021)



Availability Assessment (HELAA) is published. Any allowance for such sites must be deducted from the windfall allowance.

15. The UCS identifies an additional five sites on vacant land in the urban areas which have not yet been submitted to the Call for Sites process, but are considered potentially suitable for 328 dwellings. There is no certainty around the availability and deliverability of these sites to include them at this stage. Further, on assessment of these sites there are some serious concerns around their suitability in any case. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39 dwellings). As above, these sites have not yet been submitted to the Call for Sites process and so there is no certainty around delivery.
16. Finally, the UCS includes an assessment of the potential windfall supply with reference to the level of windfall delivery across South Warwickshire in the period 2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the sources of windfall supply, nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence as required by the NPPF<sup>3</sup>.

#### Q-S4.1: Growth of Existing Settlements

17. Yes, growth of existing settlements in South Warwickshire is imperative to deliver the overall growth targets, and achieve the Vision and overarching principles. The need for housing, affordable and specialist housing, green infrastructure, improved facilities and infrastructure is within the towns and villages. Those needs are best met sustainably adjacent to the settlements.

#### Q-S4.2: Settlement Analysis

18. The following comments are made in respect of Rosconn Strategic Land interest; south of Avon Way, Bidford (Site 473) which falls within Area 1 within the Settlement Design Analysis.

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<sup>3</sup> Paragraph 71 of the National Planning Policy Framework (July 2021)



19. In respect of connectivity, the Area has been assessed as 'D'. This is considered as having significant barriers that would be difficult to overcome. The commentary in the Settlement Analysis states that barriers to connectivity can only be overcome via the new development to the north of the site.
20. There is an agreement in place with Persimmon Homes to access the Site via the development to the north known as Bidford Meadows. The necessary space has been reserved to ensure a suitable vehicular and pedestrian access from Salford Road through Bidford Meadows / Avon Way.
21. The accompanying Transport Technical Note (Savoy Consulting, December 2020) demonstrates that the existing vehicular access onto Salford Road has sufficient capacity to accommodate traffic movements associated with both the existing Bidford Meadows development and the development of Land South of Salford Road.
22. There is therefore no significant barrier to connectivity, and the site should be assessed as 'A' in the next iteration of the Analysis.
23. In respect of Landforms, the Development Framework illustrates how the flood zones to the east and south can be avoided.
24. In respect of local facilities within 800m, Area 1 scores very well with the site scoring 4 out of 5, only marked down for healthcare facilities. It should however be noted that Bidford-on-Avon Health Centre is outside of the village, and so the majority of sites are beyond 800m.
25. Overall, Area 1 is therefore considered a suitable location to accommodate development as there are no barriers to connectivity to the village, no constraints, and the site is within 800m of a good range of local facilities.
26. It should also be highlighted that the Stratford on Avon District Council scored the site (BID.13) positively within the SHLAA 2021 update. The assessment concluded that the site is well related to housing development to the north and that the impact of further development could be effectively mitigated. Land south of Avon Way is



therefore considered to be capable of accommodating an appropriately designed residential development set within a robust GI framework as presented in the accompanying Development Framework Plan.

27. The Development Framework Plan illustrates how a new landscape and planting belt can be established to the southern and eastern boundaries of the site which will both screen the proposed built-form and create long-term defensible boundaries to the surrounding countryside as well as delivering a significant area of new open space. A Supporting Landscape Statement (FPCR, October 2020) has been completed which demonstrates that the site benefits from a high degree of visual containment within existing landscape and built features. The adjacent built-up area to the north significantly influences the character of the site with views available of these modern residential properties. Small Brook, a well-vegetated watercourse, runs adjacent to the site's western boundary, with the site's eastern boundary being partially enclosed by an established tree line. Whilst open countryside lies to the south and south east, the accompanying Development Framework Plan demonstrates how a strong landscape framework can be achieved along these boundaries.

28. Paragraph 141 of the NPPF states that before changes are made to Green Belt boundaries, the LPA will need to demonstrate that they have considered all other reasonable options for meeting its identified need for development. LPA's must therefore demonstrate that they have made use of suitable and underutilised land before Green Belt land is released. Land south of Avon Way, Bidford on Avon, should therefore be given priority as this land is outside of the Green Belt and is considered to be a deliverable site to help deliver homes within the plan period.

#### Q-S7.2: Refined Spatial Growth Options

29. Rosconn Strategic Land consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.

30. Firstly, the results of the high level testing of the five growth options in the supporting Sustainability Appraisal demonstrates that the options perform differently in different areas, with no one option standing out as the best performing option across all areas.



31. Secondly, it is important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.
32. Finally, given the significant level of growth the SWLP will need to accommodate (see response to Issues H1 and H4 below) this is unlikely to be able to be met sustainably through a single growth strategy.
33. Rosconn Strategic Land support the inclusion of Bidford-on-Avon in Options 2 (Sustainable Travel), 3 (Economy), 4 (Sustainable Travel and Economy) and 5 (Dispersed). It is inherently a suitable location for growth.

Q-S8.1: Settlement Threshold

34. Without knowing the chosen strategy, it is difficult to answer this question. However, yes, Rosconn Strategic Land agree that a threshold approach would be appropriate for any settlement listed within Option 5 not within the chosen strategy. This would ensure those settlements are able to plan for growth to meet their needs, particularly those settlements within designated neighbourhood areas in accordance with NPPF66.

Q-S8.1: Appropriate limit for individual sites

35. Any limit on the size of site should have regard to the factors set out in NPPF67, namely local housing need, population of the area, and the strategy for the area. Other factors should also be taken into account such as the size and availability of suitable land identified, and the level of facilities.

**Chapter 6 - Delivering Homes that meet the needs of all our Communities**

Q-H1-1 & 2: Providing the Right Number of New Homes

36. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, Rosconn Strategic Land reserve its





position in respect of whether this approach is reasonable for other authorities in Coventry and Warwickshire.

37. The NPPF sets out that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”<sup>4</sup>. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.
38. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.
39. The UCS suggests that the SWLP housing need equates to 30,750 dwellings, however this figure does not reflect the latest evidence within the HEDNA and needs updating. In addition, the UCS assumes a Plan period which commences in 2025, however this does not align with the base date of the HEDNA and as such a Plan period from 2022 is considered more appropriate to align with the evidence base.
40. On the basis of the above, we consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period.
41. In line with the NPPF<sup>5</sup>, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to set a higher housing requirement in line with national guidance<sup>6</sup>; for example in order to address a significant affordable housing shortfall, support economic development, or address strategic infrastructure requirements which are likely to increase the number of homes needed.

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<sup>4</sup> Paragraph 61 of the National Planning Policy Framework (July 2021)

<sup>5</sup> Paragraph 61 of the National Planning Policy Framework (July 2021)

<sup>6</sup> Paragraph 010 Reference ID 2a-010-20201216 of National Guidance



42. Further consideration will also need to be given to unmet needs within the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness<sup>7</sup>, which is explored in further detail in response to Issue H4 below.
43. Bringing together comments on the UCS and Unmet Needs under Q-H4.2, Rosconn Strategic Land consider that the SWLP will need to plan for a level of housing growth as set out in the below Table in the order of at least 43,000 dwellings.

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<sup>7</sup> Paragraph 35 a) of the National Planning Policy Framework (July 2021)



**Table – SWLP Housing Requirement and Supply Calculation**

<u>Housing Requirement</u>	
South Warwickshire Minimum Housing Need Derived from the HEDNA (1,679 x 28 Years)	47,012 dwellings
Uplift to Minimum Housing Need	TBC – further work required to determine whether an uplift is appropriate
Contribution Towards Unmet Needs of Coventry and Birmingham & Black Country	TBC – engagement with Birmingham/Black Country and Coventry required but suggest increase of at least 21,000 dwellings possible (circa 11,000 towards Coventry and at least 10,000 towards Birmingham)
<b>Total Housing Requirement</b>	<b>68,000 dwellings +</b>
<u>Housing Supply</u>	
Sites with Planning Permission at 1 <sup>st</sup> April 2022 (with 5% lapse rate applied)	14,360 dwellings
Outstanding Local Plan Allocations at 1 <sup>st</sup> April 2022	5,579 dwellings
Windfall Allowance	TBC – 4,840 dwellings assumed in line with UCS however this requires further justification / compelling evidence
<b>Total Housing Supply</b>	<b>24,779 dwellings</b>
<b>Indicative Housing Requirement to be found by the Plan</b>	<b>43,000 dwellings +</b>

Q-H4.2: Accommodating Housing Needs Arising from outside of South Warwickshire

44. It is imperative that that SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire, to ensure compliance



with the Duty to Cooperate and so the SWLP can demonstrate adherence with the positively prepared test of soundness set out in the NPPF<sup>8</sup>. It is recognised that national planning policy and law has the potential to change during the course of the preparation of the SWLP, including in relation to the Duty to Cooperate and replacement with an ‘alignment policy’, however there is no suggestion the requirement for local authorities to address unmet needs arising from within their Housing Market Areas will be removed.

45. We consider that there are two likely sources of unmet housing needs which require consideration in the development of the SWLP: Birmingham and Black Country and Coventry and Warwickshire.

*Birmingham and Black Country*

46. There are clearly significant unmet housing needs arising from the Birmingham and Black Country Housing Market Area which require addressing by this Plan.
47. Birmingham published a New Local Plan Issues and Options consultation document in October 2022. This identifies an overall housing need in Birmingham to 2042 (derived from the Standard Method) of some 149,286 dwellings, with total housing supply equating to just 70,871 – leaving a shortfall of some 78,415 dwellings.
48. There are significant limitations to the potential for such substantial unmet needs to be met by Birmingham’s neighbouring authorities due to lack of available land in the Black Country and significant Green Belt coverage in the Black Country and elsewhere (Bromsgrove, Solihull, North Warwickshire, and Lichfield). This was evident in the work undertaken in the now abandoned Black Country Local Plan Review, which was subject to Regulation 18 consultation in 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.
49. There are strong functional relationships between Birmingham and South Warwickshire, in terms of transport connections and commuting patterns, and development in South Warwickshire can contribute towards meeting unmet needs.

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<sup>8</sup> Paragraph 35 a) of the National Planning Policy Framework (July 2021)



50. The Councils clearly need to engage with Birmingham and the Black Country authorities and others to determine an appropriate level of unmet needs to be directed to South Warwickshire. That process needs to be transparent in accordance with paragraph 27 of the NPPF, and effective in accordance with paragraph 35 c) of the NPPF. The lack of any published Statement of Common Ground showing progress made so far by the Councils is a concern that needs to be addressed before the next round of consultation. The Councils need to properly grapple with this issue, and not allow the failings of the last round of Local Plans to be repeated.
51. It is noted that the SA has tested the effects of an additional 5,000 to 10,000 dwellings to accommodate Birmingham's unmet needs, however given the numbers discussed above Rosconn Strategic Land consider 5,000 dwellings to be at the lower end of what could be expected to be accommodated in South Warwickshire. At this stage of the process and in advance of those discussions, as a working assumption for the level of unmet need to be accommodated, the figure should be an additional 10,000 dwellings.

*Coventry and Warwickshire*

52. Although the question does not address Coventry's unmet needs, this cannot be ignored. Coventry has by far the greatest level of housing need across Coventry and Warwickshire as set out in the HEDNA, with a housing need calculation derived from the Standard Method of some 3,188 dwellings per annum, adjusted in the HEDNA trend-based approach to 1,964 dwellings per annum. Applying the housing need calculated in the HEDNA to the proposed SWLP Plan period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.
53. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development. This was reflected in the adopted Coventry Local Plan (December 2017), where the local housing need in Coventry in the period 2011 to 2031 was calculated at 42,400. The Coventry Local Plan set a housing requirement of just



24,600 (some 60% of its local housing need), leaving a shortfall of some 17,800 dwellings to be met elsewhere.

54. It is therefore highly unlikely that Coventry will be able to meet its local housing need identified in the HEDNA of 54,992 dwellings to 2050. Even assuming that Coventry can accommodate a proportion of its local housing need consistent with that set out in the adopted Coventry Local Plan (i.e. 60%), which is itself a challenge, Coventry could only accommodate 33,000 dwellings to 2050 leaving a shortfall of some 22,000 dwellings to be met elsewhere.

55. Given South Warwickshire's functional relationship with Coventry, and as South Warwickshire makes up around half of the population of Warwickshire according to the 2021 Census data early releases<sup>9</sup>, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This equates to approximately 11,000 dwellings and should be taken into consideration at this stage of the process as a working assumption for the level of unmet need to be accommodated.

Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan?

56. Yes, Rosconn Strategic Land support the allocation of other sites as necessary for short-term development.

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<sup>9</sup> [How the population changed where you live, Census 2021 - ONS](#)