

# **SOUTH WARWICKSHIRE LOCAL PLAN ISSUES & OPTIONS: PART 1**

on behalf of Taylor Wimpey (Coventry Road, Southam)

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## REPORT

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**Prepared by:**

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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 Taylor Wimpey ('TW') 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 TW's interests in land on the edge of Southam; described as 'Coventry Road, Southam'. TW 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, TW prepared a Vision Document for the Coventry Road, Southam. This has been updated to reflect the latest consultation stage and is appended to this submission (**Appendix A**). This document shows that the Coventry Road, Southam site is a suitable location for residential development which should be considered as part of the site selection process for the SWLP.

## 2 CHAPTER 3 – VISION AND OBJECTIVES

### Issue V3: Strategic Objectives

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

- 2.1 No.
- 2.2 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.
- 2.3 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.

## 3 CHAPTER 4 – DEVELOPMENT DISTRIBUTION STRATEGY FOR SOUTH WARWICKSHIRE

### Issue S2: Intensification

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

- 3.1 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.
- 3.2 National policy provides advice on achieving appropriate densities as part of the overall objective to make efficient use of land<sup>1</sup> or for optimising the density of development in city and town centres and other locations that are well served by public transport<sup>2</sup>. This includes taking into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change<sup>3</sup>, as well maintaining the viability of development<sup>4</sup>. 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 range<sup>5</sup>.
- 3.3 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.
- 3.4 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.
- 3.5 **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**

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<sup>1</sup> NPPF2021, paragraph 124

<sup>2</sup> Paragraph 108

<sup>3</sup> Paragraph 124d

<sup>4</sup> Paragraph 124b

<sup>5</sup> Paragraph 125b

**intensive or 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*

- 3.6 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.
- 3.7 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.
- 3.8 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 Southam .
  - 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.
- 3.9 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.

3.10 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.

3.11 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)

3.12 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.**

3.13 In addition, under the assessment of sites by settlement, the study identified one previously-developed site with an estimated capacity of 18 dwellings within Southam (Site ref. 512 – Land at Oxford Street) however the site is currently in retail use and therefore not available for development. No other potential development unconsented or unallocated sites have been identified within the settlement boundary. **Consequently, it is inevitable that additional growth at Southam will need to be allocated on the edge of the settlement.**

3.14 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 Southam, 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?*

- 3.15 Yes.
- 3.16 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.
- 3.17 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.
- 3.18 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 Southam. 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-I1.
- 3.19 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)*
- 3.20 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.

- 3.21 Based on the foregoing analysis, **RPS contends that focusing growth as part of the emerging development strategy on existing settlements, including Southam, 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)

- 3.22 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.
- 3.23 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*

- 3.24 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.
- 3.25 **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.

- 3.26 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 Government<sup>6</sup>, 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.
- 3.27 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 emission by 75% compared to current (2012) regulations.
- 3.28 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?*
- 3.29 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 2022<sup>7</sup>.
- 3.30 **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**

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<sup>6</sup> 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

<sup>7</sup> Stratford-upon-Avon Authority Monitoring Report 2021-22, Table 13

**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**

- 3.31 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 policy<sup>8</sup> 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.
- 3.32 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.
- 3.33 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 Southam, which is identified as a 'Main Rural Centre' in the adopted Stratford Core Strategy. It is also one of only eight Small Towns, as shown on existing key diagram for Stratford-upon-Avon. Southam therefore can make a valuable contribution towards the housing land supply requirements of South Warwickshire.

### **Issue S7: Refined Spatial Growth Options**

- 3.34 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
- 3.35 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 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.

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<sup>8</sup> NPPF 2021 paragraph 140

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

3.36 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.

3.37 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 2: Sustainable Travel*

3.38 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 Southam is identified as a potential growth location under this option.

3.39 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.

3.40 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 policy<sup>9</sup>. 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.

3.41 According to the Warwickshire Public Transport Map (September 2022)<sup>10</sup> higher frequency services run through Southam, identified as a main town within the existing Core Strategy. In particular, a high frequency route runs along the A426/A423 corridor between Leamington Spa and Rugby. This

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<sup>9</sup> NPPF 2021 paragraph 105

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

route is within walkable distance from the Coventry Road, Southam site, offering a public transport option for new residents.

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

*Option 3: Economy*

- 3.43 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.

- 3.44 RPS notes that Southam 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.

- 3.45 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*

- 3.46 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.

- 3.47 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.

- 3.48 RPS notes that Southam 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*

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

- 3.50 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 Southam is identified as potential growth locations 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.
- 3.51 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.
- 3.52 Consequently, it is entirely appropriate to direct a proportion of the area's overall growth needs to rural settlements, consistent with local and national policy<sup>11</sup> that seek to promote sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and support local services.
- 3.53 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 an infill development**

- 3.54 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.
- 3.55 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. 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.
- 3.56 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

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<sup>11</sup> NPPF 2021 paragraph 79

2 SWLP will need to ensure the settlement boundaries at for example Southam 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).

- 3.57 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:*

- 3.58 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.
- 3.59 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.
- 3.60 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).

- 3.61 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.

## 4 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

- 4.1 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).
- 4.2 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.
- 4.3 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

- 4.4 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.
- 4.5 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.
- 4.6 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.
- 4.7 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.
- 4.8 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.
- 4.9 **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?*

4.10 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 PPG<sup>12</sup>. 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

4.11 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**

	Net Rented Need	Adjusted Standard Affordable Method	% Standard Affordable Method	Standard Affordable Policy Requirement	Housing Provision to Meet 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

<sup>12</sup> PPG ID-2a-018 to 2a-024

- 4.12 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.
- 4.13 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)<sup>13</sup>, or 232 homes per annum.
- 4.14 **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 policy<sup>14</sup>. 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.**

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

<sup>14</sup> NPPF 2021, paragraph 20

## Issue H7: Other Comments

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

- 4.15 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.
- 4.16 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.**

## 5 SUSTAINABILITY APPRAISAL (ISSUE I1)

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

- 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 Regulations<sup>15</sup> (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.

### 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.

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<sup>15</sup> 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 is 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 Broad Locations: Southam

- 5.21 Chapter 4 of the IO SA appraises 32 alternative Broad Locations where up to 2,000 homes could be directed. RPS notes that locations around Southam have been identified as it is one of the 'Main Settlements' in South Warwickshire, which is welcomed. As shown in Figure 4.1 of the IO SA, four Broad Locations are assigned to Southam. Appendix B of the IO SA provides an individual appraisal of each of these Broad Locations. Of particular interest to TW is the BL 'Southam Northwest' which is appraised in B.22. This is because the Land off Coventry Road is located in this BL.
- 5.22 Section 4.11 of the IO SA provides a summary of the 'overall rank' of each BL at Southam. This indicates the 'Best performing' BL against each SA Objective. The IO SA concludes that the 'Northwest' BL is the best performing against one SA Objective (Human Health). However, the scoring of the BLs is largely the result of where the boundary lines are drawn, which has impacted on how the scoring has been applied.
- 5.23 For example, the boundary of the Northwest BL is drawn to include the route of the River Itchen and River Stowe and the associated areas of land in Flood Zone 2 and 3. On this basis, the Northwest BL scores '0' or 'Less than 10% of the BL coincides with Flood Zones 2 or 3' against SA Objective 2. However, in this instance, there is no reason to include this stretch of these River corridors within the Northwest BL because this land is clearly isolated from the existing settlement and therefore has no built development potential. Furthermore, the stretch of River Itchen is not being promoted by TW as part of the wider masterplan for Land off Coventry Road and so makes no sense to include it within this BL. If this extent of land is excluded from the boundary of the Northwest BL, the score would be '+' or 'Development proposals which are located wholly within Flood Zone 1 or which have less than 1% FZ1 or FZ2' consistent with the SA methodology.
- 5.24 Consequently, the overall score for Northwest BL against SA Objective 2 would be the best performing of all BLs at Southam (and not Northeast BL as suggested in the IO SA), and would elevate the Northwest BL in the overall scoring accordingly.
- 5.25 No explanation is provided for the size or extent of the Broad Locations at Southam, however this can impact on how the various locations might perform in sustainability terms. The arbitrary nature of the Broad Locations boundaries as drawn risks underplaying the potential for the Northwest BL to accommodate growth at Southam. This risk should be taken into account when determining the amount of growth to be directed to the BLs.
- 5.26 In addition, given the size of the Northwest BL, there are clearly parts of the BL that are more suitable for development than others, for example land that is contiguous with the existing settlement boundary, including Land off Coventry Road. Consequently, **RPS recommends that a finer grain of assessment should be carried out to inform consideration of the quantum growth to be assigned to each Broad Location, as well as consideration potential non-strategic site allocation options at Southam as part the Part 2 SWLP.**

## SA of New Settlement options

- 5.27 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.
- 5.28 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).
- 5.29 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.**
- 5.30 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

- 5.31 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.
- 5.32 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.

- 5.33 RPS has provided a response to the spatial growth options under separate submissions to this consultation, under Issue S7, in respect of the settlements and locations where sites being promoted by TW are located. The submissions highlight that Southam 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 Southam on sustainability grounds. To the contrary, directing growth to Southam would support a number of spatial options that are shown to perform relatively well in sustainability terms.**

## 6 EVIDENCE BASE: SETTLEMENT 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 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 Radford Semele, Shipston-on-Stour and Southam have been included in the report, which is welcomed.
- 6.3 RPS has reviewed the evidence in relation to these three particular settlements and provides comments on each as part of the submission. Here the focus is on Southam.

### 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 Southam

- 6.5 Appendix 3 of the report provides summary mapping and supporting commentary to illustrate the findings of the analysis for Southam settlement on Connectivity. An extract from the report for Southam is appended to this submission (**Appendix B**). The area to the north-western edge of the settlement is defined as 'Segment 9 (north-west)'.

### Southam (emphasis on our Site location)

- 6.6 In summary, the analysis shows that Segment 9 has an overall Connectivity Grade 'C'. According to Table 5 of the report, a 'C' score means any barriers 'may be overcome, but not easily'. In addition, the segments in this category either connect to existing Primary streets or Thoroughfares, or via an existing cul-de-sac and can secure active links. For Segment 9, RPS notes that the line on the map is drawn as far north as the service station (operated by BP) to the west of and fronting Coventry Road. However, the land between the service station and the existing urban area has predominantly been built out for residential development. This effectively means that the built-up area of Southam has been extended in a northward direction; however this is not shown on the map and is not reflected in the supporting commentary. As a result, **Segment 9 should be redrawn so it extends northwards beyond the recent housing development and the existing service station, in order to properly reflect the new settlement edge of Southam. In addition, the line of Segment 9 should be extended north to include the full extent of Land off Coventry Road that is being promoted for residential in this location on behalf of Taylor Wimpey. The supporting commentary should also be updated to reflect this change.**

### Landforms Analysis for Southam

- 6.7 Appendix 3 of the report provides summary mapping and supporting commentary to illustrate the findings of the analysis for Southam settlement on Landforms analysis. The outcome of the analysis is appended to this submission (**Appendix C**). Under this element, the analysis indicates the topography within Segment 9 as 'gentle'. 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 Southam

- 6.8 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 Southam are appended to this submission (**Appendix D**).
- 6.9 The results indicate that out of a score of five, Segment 9 scores four. The only negative score relates to proximity to healthcare facilities. It is noted that Segments 2, 4, 7 and 8 score five in terms of accessibility. However, some of these areas (2, 7 and 8) are recognised in the analysis as being associated with existing flood zones due to their proximity to the River Stowe. Flood risk is not an issue affecting Segment 9. In addition, Segment 4 scores 'D' in terms of connectivity, which is lower than Segment 9. On this basis, **Segment 9 performs relatively well when all analysis is considered in the round and so constitutes an appropriate direction for growth at Southam.**

### Density Analysis for Southam

- 6.10 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 Southam has been produced and is appended to this submission (**Appendix E**).

- 6.11 For Southam, the analysis is more mixed across the settlement. The areas abutting the current line of Segment 9 is defined as broadly 'Outer Suburb (approx. 20-40 dwellings per hectare)' and 'Inner Suburb (approx. 40-60 dph)'. RPS would suggest that consideration of density in this location should be informed by the prevailing density of existing development in this part of the town. This includes the 165-dwelling development recently delivered by Taylor Wimpey to the immediate south of the Petrol filling station off Coventry Road, which has been built out at roughly 30 dwellings per annum. 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 Southam 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**<sup>16</sup>.

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<sup>16</sup> 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 Southam, which is set out below.

### Identifying potential impacts of development – Southam

- 7.3 Southam has been sub-divided into four sub-areas (North, South, East 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 West sub-area as 'Red', and the other three sub-areas as 'Green'. According to the HSSA commentary, this is largely the result of the Conservation Area and open landscape associated with the valley of the River Stowe which also contains the Scheduled Monument of the Holy Well. However, whilst the HSSA provides detailed commentary on each sub-area, these sub-areas are not defined on a map or plan. This creates uncertainty for the reader in understanding how development on specific sites might impact on the sensitivity or susceptibility of heritage assets within those sub-areas. **RPS recommends that the HSSA is updated to provide an indication of the boundaries of each sub-area so the reader can properly interpret the information provided.**
- 7.5 That said, of particular interest is the sub-area North, which is assumed to cover the area that includes the Land off Coventry Road, which scores 'Green' in the RAG assessment. In respect of designated heritage assets, there are no known assets identified along the northern boundary of the settlement (see pdf page 190 of the HSSA for the mapping). In terms of the sensitivity and susceptibility of development in this sub-area, the HSSA acknowledges there are no designated assets present in this area and that the area comprises largely an agricultural and industrial landscape. In terms of potential impacts on heritage assets, the HSSA acknowledges that modern development to the north, south and east of the settlement has partially enclosed and eroded the

Conservation Area and its setting (pdf page 188). The HSSA also acknowledges that this sub-area may be able to accommodate development, and thus does not preclude it from coming forward.

- 7.6 The HSSA mapping (on pdf page 191) does indicate the presence of features on the Historic Environment Record (HER) and other non-designated assets to the North of the settlement, which covers the Land off Coventry Road. This is consistent with information provided in the updated Vision Document for the site (Appendix A) which identifies Ravenswood House (also known as Southam Fields Farm) as recorded on the HER, but in any event these buildings would be retained.
- 7.7 On this basis, **it is not anticipated that the development in this part of the sub-area, including the Land west of Coventry Road, would have an adverse impact on any designated heritage assets.**

### Recommendations

- 7.8 In light of the findings highlighted above, the HSSA recommends that development should be restricted to the North sub-area of Southam (and other sub-areas), whilst avoided in the West sub-area (see pdf page 189). RPS broadly concurs with these recommendations.
- 7.9 On this basis, **RPS broadly welcomes the conclusion that development has potential in the North sub-area (subject to confirmation that Land off Coventry Road being promoted on behalf of Taylor Wimpey is located within this sub-area) and that any potential impact on any designated or non-designated heritage asset can be suitably mitigated as part of the planning application process.**

# APPENDICES

## Appendix A

**Taylor**  
**Wimpey**

# Coventry Road, Southam

Vision Document

March 2023





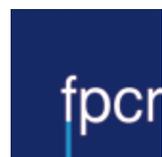
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# Executive Summary

**This document sets out the vision for the development of the site known as Coventry Road, Southam which is under the sole control of Taylor Wimpey. Taylor Wimpey's vision is to create a sustainable and attractive place where people will enjoy living, through a characterful new development within easy reach of the services and facilities of Southam.**

## Context

The site is located on the northern side of Southam adjacent to the proposed built-up area boundary of the settlement. It is 38.9 hectares in size and consists of arable fields which are typically bounded by hedgerows.

The emerging Stratford-on-Avon Site Allocations Plan and South Warwickshire Local Plan both present opportunities to allocate the site for potential development, as does the proposed Southam Neighbourhood Development Plan.

While the 2020 Strategic Housing Land Availability Assessment assessed part of the site as being not deliverable, it is suggested that this was due to a reliance on a now outdated Landscape Sensitivity Study prepared in 2011 which does not account for more recent development of the allocated site SOU.2 West of Coventry Road which lies immediately to the south of the site. In relation to access to services and facilities it is proposed that the site should be assessed as green rather than amber as it is within 400m of the day-to-day shopping facilities offered by the adjacent BP Petrol Station. Overall, it is suggested that the site should be assessed as potentially deliverable, particularly once mitigation is considered in relation to landscape sensitivity.

It is noted that other sites at Southam assessed as being potentially deliverable are proposed for identification by the emerging Site Allocations Plan as reserve sites and it is considered that the site should also be identified accordingly.



Constraints and Opportunities Plan



## Constraints and Opportunities

- Visually the site is well contained from the north, east and south due to a combination of the sloping topography of the site and immediate context combined with surrounding vegetation along Coventry Road, north of the site and adjacent to the Quarry to the east.
- Views from within Southam itself are limited due to the topography combined with existing intervening built form and vegetation. The clearest views of the site are from footpaths, residents and road users in closest proximity to the site including users of Coventry Road, the Public Right of Way that passes directly through the site and the residents to the south and residents of Southam Fields Farm within the site.
- Access into the development is proposed to follow the accepted strategy of the site to the south with the implementation of a priority-controlled ghost island junction.
- Access for non-motorised users along Coventry Road would be provided by extending new footways from the site access to connect with those existing at the petrol station to the south.
- The site is well located with day-to-day shopping services adjacent to the site at the BP Petrol Station and a range of services within a 2km walk of the centre of the site at Southam Town Centre.
- Southam, Long Itchington and Stockton are accessible via a 5km cycle journey. National Cycle Route 41 is located approximately 1.5km north of the site access and provides a mixture of on and off road cycle paths to Leamington Spa and Rugby.
- Local bus services can be accessed from stops on Coventry Road. These operate seven days a week, providing access to Leamington, Rugby, Daventry, Harbury and Banbury.
- Potential for a bus route to run through the site further improving access to public transport.
- High quality pedestrian and cycle connections would be provided throughout the site linking with the surrounding pedestrian infrastructure and improving it where possible. This will ensure that safe and suitable access is achievable for all users.
- The site consists of arable fields which are typically bounded by hedgerows.
- There are no internationally designated sites within 10km of the site and the nearest SSSI is 1.3km away.
- The size of the site means that ecological value can be retained and enhanced through careful and considered design. The Concept Masterplan has been designed in consultation with ecologists to work with the ecological value of the site and to achieve Biodiversity Net Gain.
- Retention of boundary trees and hedges will ensure that development has limited impact on the surrounding landscape and public views.
- The introduction of new tree planting will improve species diversity and thereby limit the potential impact of disease on the tree stock.
- Replacement tree planting will provide an overall improvement to the site in terms of increased species diversity, improved age structure and to replace inevitable tree losses due to age and condition.
- There are no designated heritage assets within the site, and it is not anticipated that the development of the site would have an adverse impact on any designated heritage impacts.
- The site is identified on the Warwickshire HER as being part of the possible location of the Civil War skirmish which took place 23 August 1642. Additional land to the north of the site is also included in this identification. It is not a Registered Battlefield and given the uncertainty of the location, the nature of the engagement and the limited sources, it is not anticipated that it would meet the criteria to be designated. It should also be noted that the form of the current agricultural landscape is not 17th Century.
- Proposed development of the site has been designed in such a way that if necessary, as a result of evidence being identified that provides greater certainty as to the location of the battlefield of Southam, that only the southern part of the site could be developed while the northern part of the site, and land to its north, remains undeveloped. If this were the case, there is the potential for improved interpretation and public access which could potentially be facilitated by the development of the southern part of the site.
- The site is in Flood Zone 1. An outline drainage strategy has been prepared which will ensure that there is no increase in flood risk downstream of the site or in adjacent areas as a result of its development.
- SUDS/water features are proposed which will provide multi-functional benefits by providing storage, water quality benefits, biodiversity and amenity.
- The site is within close proximity to established residential areas with existing infrastructure. There is therefore potential to be supplied with services from the existing network.
- No constraints to residential development at the proposed site in terms of air quality from the nearby A-road; however, the potential for adverse dust impacts from the nearby quarry may present some constraints to the development and will be considered early on (by way of a minerals dust impact assessment) during the master planning stage.



## Emerging Proposal

The character, context and existing site constraints have formed an integral part of the design process to ensure a sensitive design approach for the proposed development. Where possible existing features of value within the site will be retained and enhanced. Two vehicular access points are proposed off Coventry Road providing a loop through the proposed development. The Primary Street would provide a wide carriageway suitable for a bus route, with grassed verges and boulevard tree planting creating an attractive route through the site.

Option 1 provides approximately 17.2 Ha providing 600 dwellings at 35dph. Option 2 provides a reduced area of approximately 8.3 Ha of land proposed for residential development providing up to 300 dwellings at 35dph. Development parcels have been designed to ensure dwellings would front on to the Green Infrastructure. In total, the proposed development would see between approximately 300 and 600 dwellings on the site coming forward, dependent upon the scale of development.

A substantial proportion of the site is proposed for Green Infrastructure, including a linear park along the Itchen valley by the western edge of the site which creates an attractive green setting to the residential development. Swathes of open space will also permeate through the site with greenways centred upon existing hedgerows sub-dividing the new neighbourhoods and providing accessible greenspace for residents. New footpaths and cycleways will ensure that walkable neighbourhoods are well connected to focal areas of open space and recreational facilities including a sports pitch and children's play areas. Links to the adjoining public rights of way and highways network will create circular routes around the site and strengthen links both to the existing settlement and wider countryside.



**Option 1**



A high quality landscape frontage is proposed along Coventry Road, creating an impressive approach into Southam from the north. The new properties will sit at a similar elevation to existing built development and will appear as a logical extension to the existing settlement edge. Creation of an attractive soft edge to the residential development will be achieved through the retention of existing hedgerows, supplemented with new belts of woodland planting to create robust landscape buffers along the site perimeter. Proposed Development would be well integrated within the local landscape and create a cohesive settlement edge well related to the existing settlement edge. The proposals will follow best practice principles of climate change mitigation and adaptation into the development, including careful consideration of the location and orientation of properties to maximise the benefits of solar gain whilst balancing this with the risk of overheating. The range of planting proposed will increase tree cover on the site and include a mix of species to ensure resilience to the impacts of climate change.

Biodiversity Net Gain would be achieved through habitat creation in the form of new native species, broadleaved woodland, orchards and hedges, mixed species rich grassland habitats and SUDS. New connecting wildlife corridors would be created around the development, with new planting focused along the site boundaries and elsewhere within the site to reinforce the existing landscape features.

## Option 2

## Deliverability

As the site is within the control of Taylor Wimpey, a market leading housebuilder, it is clear that the site is available for development. It is located on the edge of the proposed adjacent settlement boundary and so would form a logical extension to the existing settlement. As such the site is suitable for development. There are no known fundamental constraints and so development of the site is expected to be viable. Accordingly, development of the site is achievable, and therefore the site is deliverable.



## Benefits

**The development of the site would deliver a range of benefits to the local community and area. Assuming the whole site is developed the following benefits would be achieved:**



Provision of around **600 new homes, including affordable homes**, helping local people to be able to afford to stay in the area.

### Social

Increase open space, community sport, leisure spending by **£179,314**



**New sports pitch and 2 new children's play areas.**

## Economic<sup>1</sup>

### Support the employment of 1,869 people

(combination of direct, indirect, and induced jobs) during the construction phase. **Provide 20 apprentices, graduates, or trainees.**



**Generate £7,267,959 in tax revenue,** including **£681,064 in council tax revenue** to Stratford-on-Avon District Council.

When complete the future occupiers will generate **£15.9m of expenditure** in local shops and services and a further **£3.25m spent to make these houses “feel like home”.**



**Generate £486,138 towards education** spending which could provide up to **229 classroom spaces.**

<sup>1</sup> Based on the findings of the Economic Footprint of House Building in England and Wales report, commissioned by the House Builders Federation. The report identifies some of the key benefits building new homes can generate for the national and regional economy as well as for a local community's wellbeing and sustainability.

## Environmental

**The proposals retain the majority of existing important trees and hedgerows.**



**The proposals create significant publicly accessible green space.**



**The layout protects and improves existing wildlife habitats, while creating new features to enhance local biodiversity.**





# 1.0 Sustainability



**Figure 1: Taylor Wimpey Sustainability Priorities, Objectives and Targets**

Our priorities	Strategic objectives	Supporting targets	
<p><b>Climate change</b> Protect our planet and our future by playing our part in the global fight to stop climate change.</p>	<p>Achieve our science-based carbon reduction target:</p> <ul style="list-style-type: none"> <li>– Reduce operational carbon emissions intensity by 36% by 2025 from a 2019 baseline</li> <li>– Reduce carbon emissions intensity from our supply chain and customer homes by 24% by 2030 from a 2019 baseline</li> </ul>	<ul style="list-style-type: none"> <li>– Reduce operational energy intensity by 32% for UK building sites by 2025</li> <li>– Purchase 100% REGO-backed (Renewable Energy Guarantees of Origin) green electricity for all new sites</li> <li>– Reduce emissions from customer homes in use by 75% by 2030</li> <li>– Reduce embodied carbon per home by 21% by 2030</li> <li>– Reduce car and grey fleet emissions by 50% by 2025</li> </ul>	<ul style="list-style-type: none"> <li>– Update our policies and processes to reflect the risks and opportunities from a changing climate by 2022</li> <li>– Make it easier for close to 40,000 customers to work from home and enable more sustainable transport choices through 36,000 EV charging points and 3,000 additional bike stands by the mid 2020s</li> </ul>
<p><b>Nature</b> Improve access to and enable enjoyment of nature for customers and communities by regenerating the natural environment on our developments.</p>	<p>Increase natural habitats by 10% on new sites from 2023 and include our priority wildlife enhancements from 2021.</p>	<p>Include our wildlife enhancements on all suitable new sites:</p> <ul style="list-style-type: none"> <li>– Hedgehog highways from 2021</li> <li>– Bug hotels (at least 20% of homes) from 2021</li> <li>– Bat boxes (at least 5% of homes) from 2022</li> <li>– Bird boxes (at least 80% of homes) from 2023</li> <li>– Wildlife ponds from 2024</li> </ul>	<ul style="list-style-type: none"> <li>– Reptile and amphibian hibernation sites from 2025</li> <li>– All new sites have planting that provides food for local species throughout the seasons</li> <li>– Help customers engage with nature and create 20,000 more nature-friendly gardens by 2025</li> <li>– 200 beehives on our sites by 2025</li> </ul>
<p><b>Resources and waste</b> Protect the environment and improve efficiency for our business and our customers by using fewer and more sustainable resources.</p>	<p>Cut our waste intensity by 15% by 2025 and use more recycled materials. By 2022, publish a ‘towards zero waste’ strategy for our sites.</p>	<ul style="list-style-type: none"> <li>– Engage with suppliers to meaningfully reduce plastic packaging on our sites by 2025</li> <li>– Help 20,000 customers to increase recycling at home by 2025</li> <li>– Reduce operational mains water intensity by 10% from a 2019 baseline by 2025</li> <li>– Make it easier for 20,000 customer households in water stressed regions to install a water butt by 2025</li> </ul>	<ul style="list-style-type: none"> <li>– Measure the environmental footprint of the key materials in our homes and set a reduction target</li> <li>– Measure air quality in our homes and on our sites by 2021</li> <li>– Give customers the information they need to maintain good air quality in their homes by the end of 2021</li> </ul>

# 1.0 Sustainability

**Taylor Wimpey's vision is to create a sustainable and attractive place where people will enjoy living, through a characterful new development within easy reach of the services and facilities of Southam which is located to the south of the site.**

**Taylor Wimpey oversee the entire process from start to finish and work with local people, community groups and local authorities to create the most mutually beneficial schemes. They seek to apply this approach to the scheme at Coventry Road which has the potential to provide approximately 600 dwellings on 38.9 hectares of land.**

**Located adjacent to Southam which is the main settlement in the east of Stratford-on-Avon District, the site is a sustainable location for development and Taylor Wimpey therefore hope to bring forward the site through the local plan process to respond to the future housing need of Stratford-on-Avon District.**

**This document brings together the technical and environmental studies of the site which have been undertaken by the Taylor Wimpey consultant team and demonstrates that the site is a sustainable site for future development.**

## Taylor Wimpey's Approach

Taylor Wimpey UK Limited has a strong track record in delivering high quality sustainable development in the West Midlands. As part of the planning process, they take seriously the need for meaningful engagement with local communities in order to shape the delivery of an appropriate development which responds to the specific needs of residents and is attractive to customers. Their projects are located throughout the country ranging from large urban extensions to smaller residential schemes

As a responsible business, Taylor Wimpey want to play their part in creating a sustainable future for everyone. Their purpose is to build great homes and create thriving communities. Taylor Wimpey's commitment to sustainability helps them to achieve their purpose by ensuring they design and build flourishing, inclusive places for their customers; operate responsibly; create a great place to work for their employees; and play their part in protecting the environment for future generations. Already **the first and only UK developer to achieve the Carbon Trust Standard for Carbon**, the company

released its new environment strategy, Building a Better World in March 2021, committing to create a greener, healthier future for its customers, colleagues and communities. To achieve this Taylor Wimpey have set ambitious quantitative targets to help drive progress in each of their priority areas, up to 2030.

In an industry-first partnership, Taylor Wimpey is working with national insect charity Buglife. Through support of the charity's B-Lines project, which is creating 'insect pathways' of pollinator-friendly habitats throughout the UK, the homebuilder will improve habitat for pollinating insects on its new housing schemes.

A new partnership with Hedgehog Street is seeing the developer integrate hedgehog highways across its new developments, with highways already in place on several sites.

Through these partnerships, and by providing free resources and information, Taylor Wimpey will also help its customers to create 20,000 nature friendly gardens by 2025. Wildlife enhancements such as bug hotels, bird and bat boxes and wildlife ponds will be added to all suitable new sites from this year.



The delivery of Coventry Road, Southam as a sustainable residential led development will be dependent on creating a developable and market facing masterplan. Sustainability will be at the heart of the development in terms of how the dwellings are to be constructed and how these will respond to the ever increasing and rigorous environmental and sustainability requirements being introduced by Government and implemented through Building Regulations.



**Taylor Wimpey** **2021 Building Regulations compliant home**

Photovoltaic Panels

Thermal Break Lintel

Wastewater Heat Recovery

Well Insulated Walls

Triple Glazing

Airtightness 4

Electric Vehicle Charger

Gas Boiler with Flue Gas Heat Recovery

\* This specification is based on our working assumptions from November 2021 and is subject to change.  
 \*\* Individual home specification may vary and could include some or all of these measures.  
 \*\*\* The Future Homes Standard is subject to further government consultation in 2023.

**Taylor Wimpey** **2025 Future Homes standard home**

Photovoltaic Panels

Wastewater Heat Recovery

Thermal Break Lintel

Well Insulated Walls

Smart Heating Controls

Underfloor Heating

Air Source Heat Pump

Triple Glazing

Airtightness 4

Electric Vehicle Charger

\* This specification is based on our working assumptions from November 2021 and is subject to change.  
 \*\* Individual home specification may vary and could include some or all of these measures.  
 \*\*\* The Future Homes Standard is subject to further government consultation in 2023.

TW are at the forefront of this and have been actively looking at how they can respond to the challenges posed by climate change by creating a greener, healthier future for their customers, colleagues and communities. As part of this, TW are committed to cutting down their own environmental footprint, reducing emissions and waste, conserving precious resources and regenerating the natural environment on their developments. Furthermore, as a company they are seeking a science-based carbon reduction target that will ensure they align our progress with the international Paris Climate Agreement.

TW will engage their supply chain, influencing positive change beyond the business and reducing the significant environmental impacts associated with the goods and services that it buys. Purchasers are wanting to live more sustainably so they are seeking to make the changes to their homes and developments that will enable their customers to achieve their aspiration of a greener and healthier lifestyle.

Notwithstanding the overall objective of addressing climate change and developing even more sustainable houses, TW are looking ahead to how it can achieve the 2025 Future Homes Standard which new dwellings here will need to achieve.

The graphic opposite highlights the key design measures and technologies that TW will seek to incorporate within the fabric of their dwellings in order to achieve the Future Homes Standard.



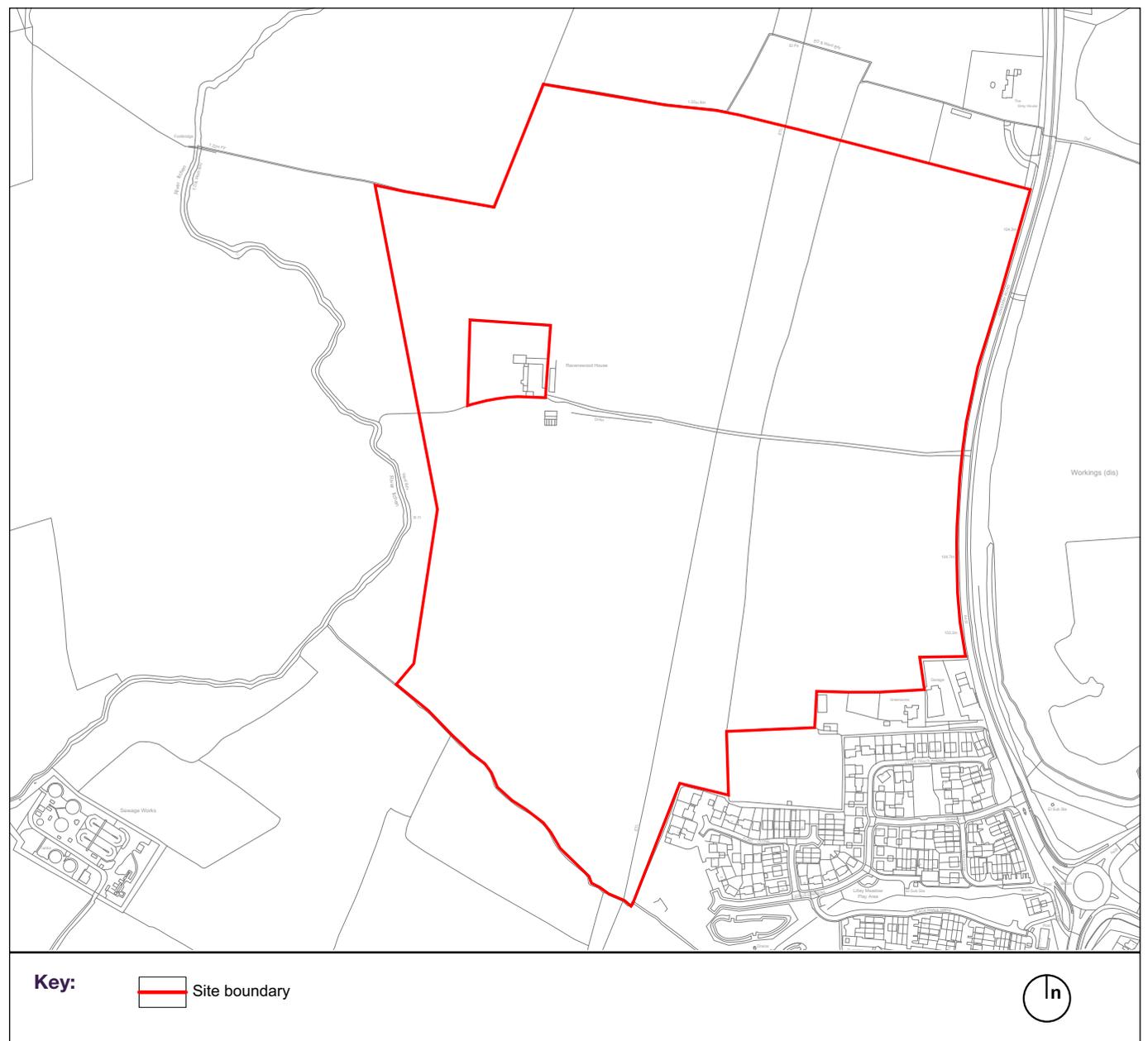
# 2.0 The Site



## 2.0 The Site

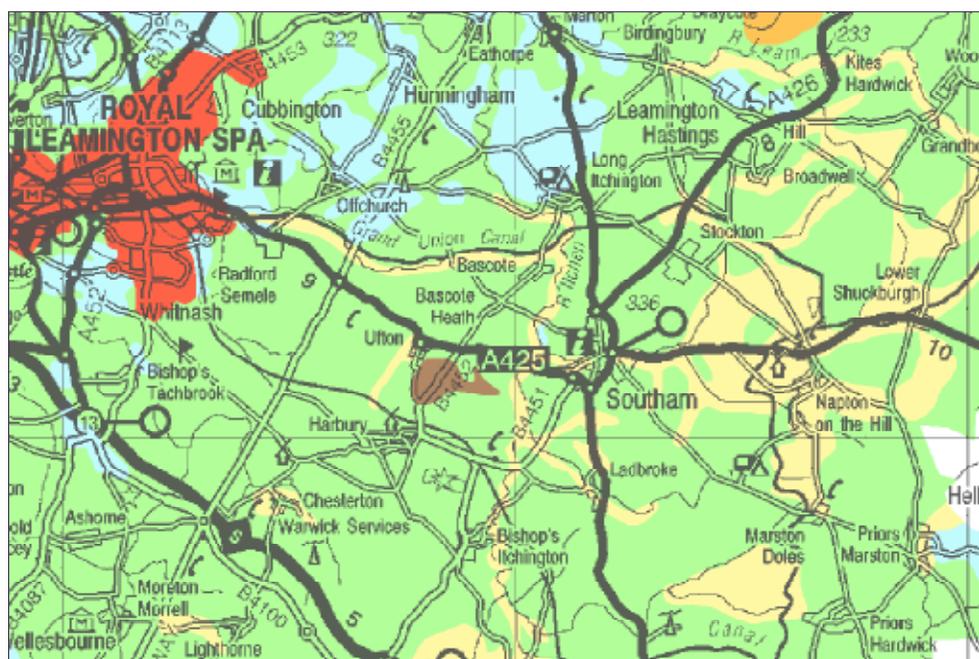
The site is located on the northern side of Southam and is adjacent to the settlement. The site consists of arable farmland split into 4 parcels bound by hedgerows and hedgerow trees. It covers a total area of 38.9 hectares. It is primarily bounded by Coventry Road (A423) to the east; existing development to the south; agricultural fields to the south west separated by hedgerows and trees; the River Itchen and it's floodplain to the west; and further agricultural fields separated by hedgerows and trees to the north.

Figure 2: Coventry Road Location Map





**Figure 3: Agricultural Land Classification Map West Midland (ALC004) Extract**



Southam Fields Farm, also known as Ravenswood House, is not included in the site, but is surrounded by the site and is located on the south eastern edge of the most north western field. An existing access to Southam Fields Farm runs from the Coventry Road and access to Southam Fields Farm will be maintained by the proposed development. To the south of the site lies a BP petrol filling station and a residential development being built by Taylor Wimpey. Further to the south and south east are further residential areas. East of the site on the opposite side of the Coventry Road lies Southam Quarry. Land to the north of the site consists of agricultural fields with the Model Village lying approximately 500m to the north. The settlement of Long Itchington lies further north beyond more agricultural fields. West of the site on the opposite side of the River Itchen the settlement of Bascote is separated from the site by agricultural fields. A sewage works is located approximately 300m south west of the site boundary.

The Agricultural Land Classification Map West Midlands Region (ALC004) indicates that the site falls within grade 3 (washed green) with possibly some land falling within grade 4 (washed yellow) adjacent to the River Itchen as shown on Figure 3. There is a Public Right of Way that enters the site at its most southern point before crossing the south western part of the site and then leaving the site on its western boundary. There is an overhead line running approximately north south through the site, which is proposed to be diverted.

The site is entirely within the control of Taylor Wimpey. There is a requirement to maintain access to Southam Fields Farm, however this can be accommodated as part of the proposed development of the site. Land to the south west of the site between the site boundary and the River Itchen is also within the control of Taylor Wimpey. This has been excluded from the land being promoted as it lies within flood zones 2 and 3 and if included would require a sequential test to be undertaken. There is the potential for improved recreational access to this land to be provided as part of the development.



3

# 3.0 Development Plan



## 3.0 Development Plan

Figure 4: Adopted Core Strategy Policies Map - Southam Inset Map

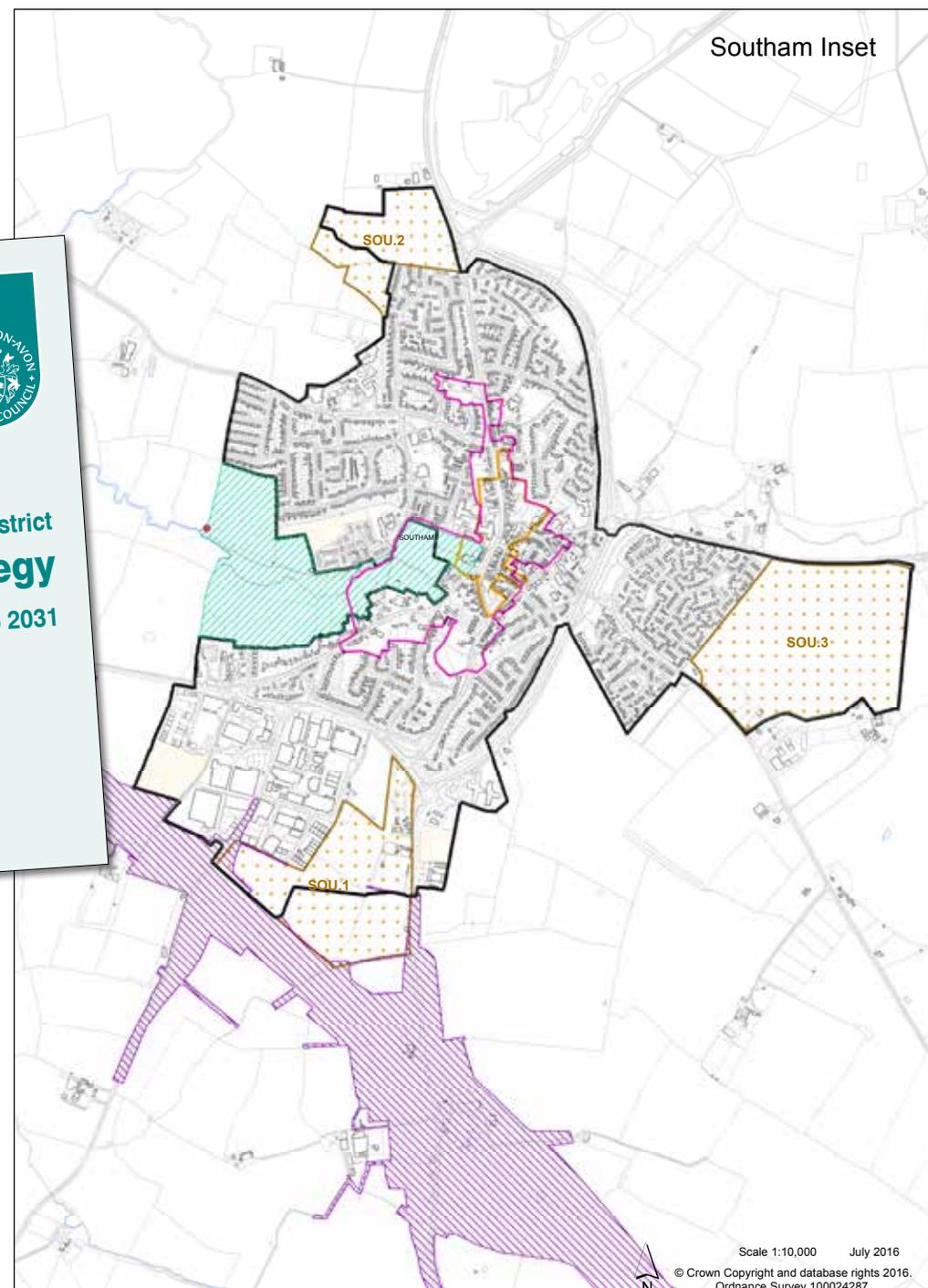
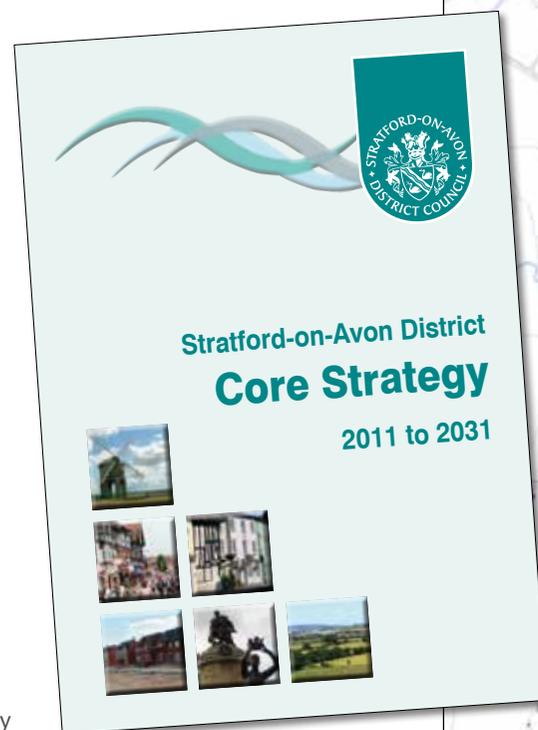
The site falls within Stratford-on-Avon District where the existing development plan comprises the Stratford-on-Avon District Core Strategy 2011 to 2031 (CS) (adopted 11th July 2016).

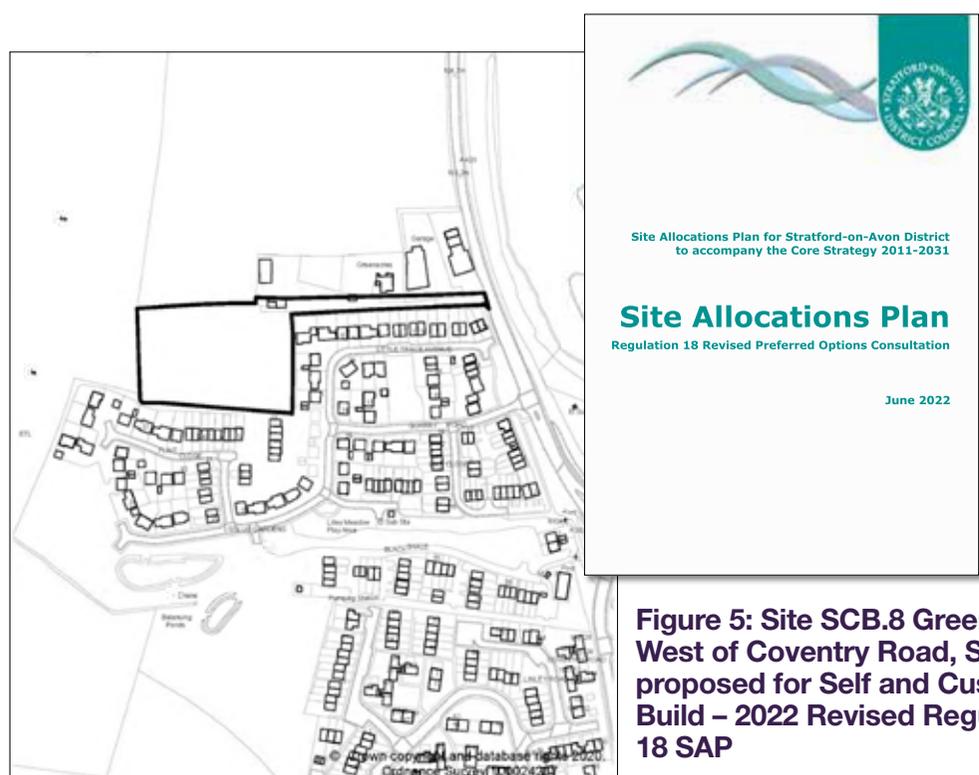
### Stratford-upon-Avon Core Strategy

The adopted CS allocated three sites for development at Southam with an indicative capacity of 865 homes including SOU.2 West of Coventry Road which is to the south of the site and has been built out and completed by Taylor Wimpey.

Paragraph 6.7.10 of the CS notes that development to the east of the bypass would exacerbate issues of severance, while the area hashed green on Figure 4 is an Area of Development Restraint due to being particularly sensitive in landscape terms.

Furthermore, the route of HS2 runs close to the southern edge of the town with the potential for issues associated with noise from passing trains. This suggests that beyond the already allocated sites and sites proposed to be identified as reserve sites by the emerging Site Allocations Plan that there are limited opportunities to identify future development opportunities elsewhere around Southam. As the site is unencumbered by these issues it presents one of the few realistic opportunities for accommodating future housing demand at Southam.





**Figure 5: Site SCB.8 Greenacres, West of Coventry Road, Southam proposed for Self and Custom Build – 2022 Revised Regulation 18 SAP**



**Figure 6: Proposed Built Up Area Boundary for Southam – 2022 Revised Regulation 18 SAP**



**Figure 7: Southam Reserve Housing Sites proposed for release – 2022 Revised Regulation 18 SAP**

## Stratford-on-Avon Site Allocations Plan

- Policy CS.16 of the CS requires the Council to identify reserve sites capable of accommodating 20% (circa 2,920 dwellings) of the housing requirement to 2031.
- Policy CS.17 notes that the CS will be reviewed if evidence demonstrates that significant housing needs arising outside the District should be met within the District and cannot be adequately addressed without a review.
- Stratford-on-Avon District Council are continuing to bring forward the Stratford-on-Avon Site Allocations Plan (SAP). A Revised Regulation 18 Preferred Options Consultation was undertaken between June and July 2022. This follows the earlier revoking of the Regulation 19 Proposed Submission Consultation held during autumn 2019 and the subsequent Preferred Options Consultation held during October and December 2020.
- The SAP is intended to satisfy the requirement of Policy CS.16 of the CS to identify reserve sites capable of accommodating circa 20% of the CS housing requirement.
- The 2022 Regulation 18 Consultation now identifies two reserve sites with a suggested capacity at 30 dwellings per hectare. As the principle settlement in the east of the District capable of accommodating growth it is clear that the Council continue to see Southam as an important location in helping to address any shortfall in housing if that were to occur in the District. As the principle settlement in the east of the District capable of accommodating growth.
- The SAP also identifies a site at Southam SCB.9 Greenacres, West of Coventry Road for around 15 Self-built and Custom-build housing plots. This site is located to the immediate south east of the site and lies between it and SOU.2 West of Coventry Road which has recently been completed by Taylor Wimpey.
- The SAP also identifies a new Built-up Area Boundary (BUAB) for Southam. The revised BUAB is immediately adjacent to the site, apart from the part of the site that abuts site SCB.9. However, the SAP explains that self-built and custom-build sites are considered to be within the built-up area boundary upon the material commencement of any associated planning permission. As such, there is a reasonable prospect that in the future all of the south eastern boundary of the site will be immediately adjacent to the BUAB.

TW has submitted representations at each stage of the SAP process and will seek to engage on the next round of consultation should this be progressed by the Council.

## South Warwickshire Local Plan

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.

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

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.

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.

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. TW 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 Southam.

In terms of distribution, the SWLP IO document also includes options for growth at existing settlements, including Southam. TW welcomes the intention to consider Southam as a potential location for growth, in particular the broad location (ref. 9c) to the north of the settlement (see Figure 9). Given the consents for residential development granted in recent years, and the designation of land as a Reserve Housing Site in the NDP, the land in the south-west quadrant clearly has merit for accommodating the future growth needs of the Plan area, in preference to other parts of the settlement.

Furthermore, other evidence set out in SWLP Urban Capacity Study shows that there very limited options for development within the existing urban area (see Figure 10). Two sites lying wholly within the settlement boundary were assessed in the study at Southam (Site ref. 7 and 512). However, Site 7 (Land on the north east side of Welsh Road East) already has planning consent, whilst Site 512 (Land at Oxford Street) is currently in retail use. Therefore, one site is already committed and so is accounted for in the current supply, whilst the other is not currently available. An existing car park site (Wood Street Car Park) was considered but this would involve the loss of valuable parking for local shoppers and other users of the local facilities. It is evident that growth will need to be focused on the edge of Southam that is suitably-located and accessible to the rest of the settlement. TW consider that Land off Coventry Road is an accessible location able to accommodate future growth without harming the character and appearance of the settlement.

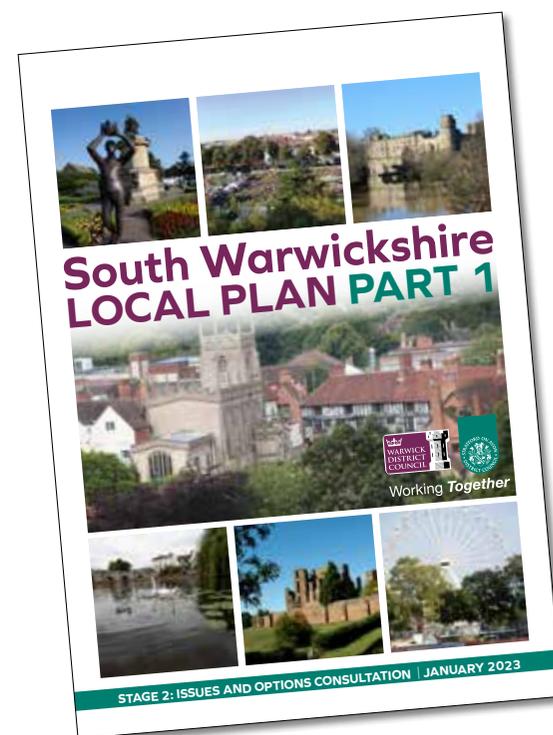
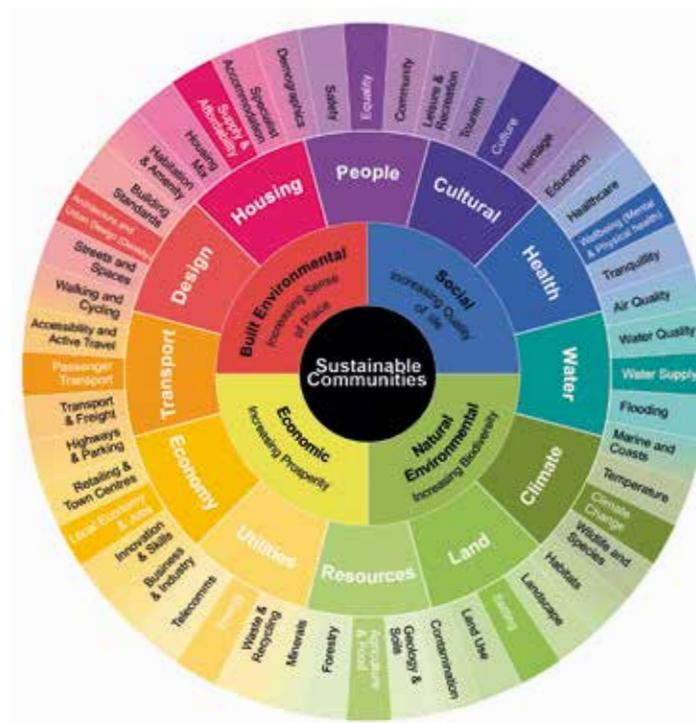


Figure 8: Wheel of Sustainability



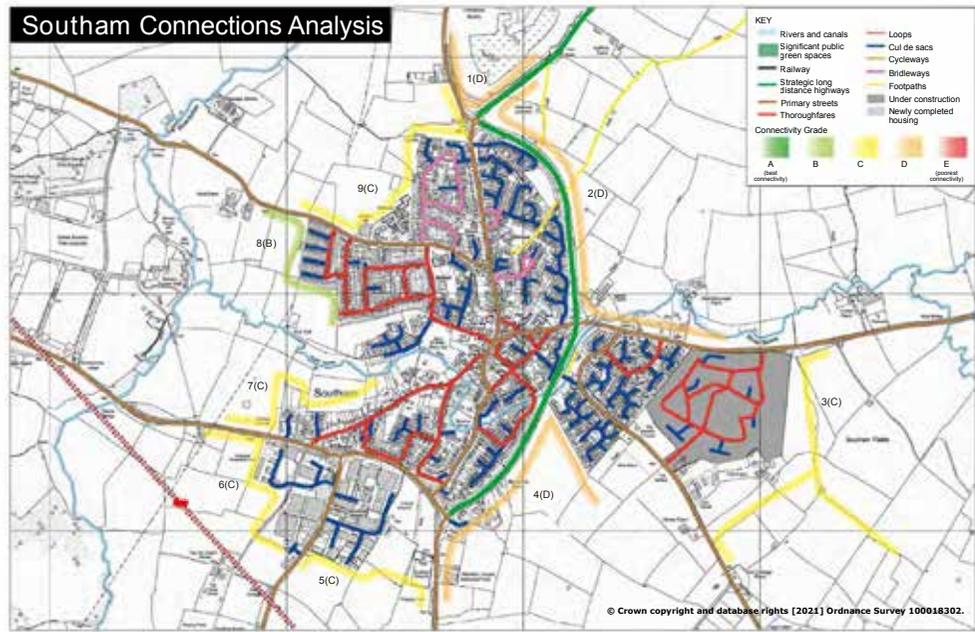


Figure 9: Connectivity Analysis for Southam

Figure 10: Urban Capacity Study

- Settlement Boundary
- Sites Assessed as Suitable
- Sites Assessed as Unsuitable



Figure 11: Southam Neighbourhood Development Plan (Pre-Submission)

## Southam Neighbourhood Development Plan

Following completion of the Regulation 16 (Formal Submission) consultation in December 2022, the Southam Neighbourhood Plan has now been sent for examination by an independent examiner. The NDP identifies existing committed housing sites, but does not allocate additional land for housing, though the need to identify reserve housing sites is recognised. The NDP is likely to be made in the near future and before the adoption of the SAP. Under these circumstances, its questionable whether the SAP will take forward any reserve sites at Southam. This makes it even more important to consider additional land for housing as part the SWLP process, which extends well beyond 2031 end date of the NDP.

It is proposed that rather than charge separate Community Infrastructure Levies, as is currently the case, that both authorities will operate the same Community Infrastructure Levy charging regime to ensure that growth is accompanied by the necessary infrastructure across South Warwickshire, and that it is funded in a coordinated and consistent way. The SWLP IO document sets out 12 key sustainability themes that the SWLP will seek to address. The development of the site would contribute towards addressing these themes as appropriate.

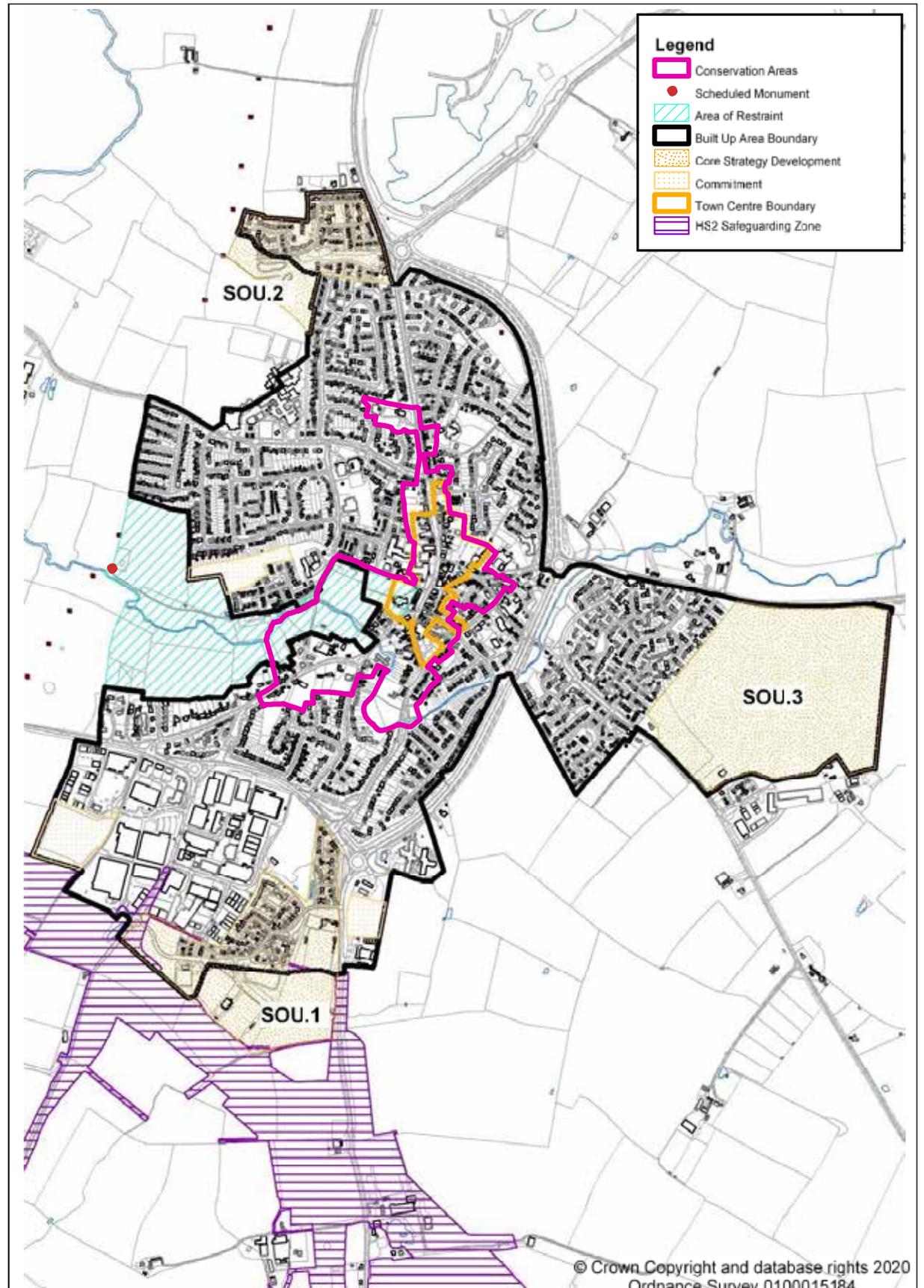
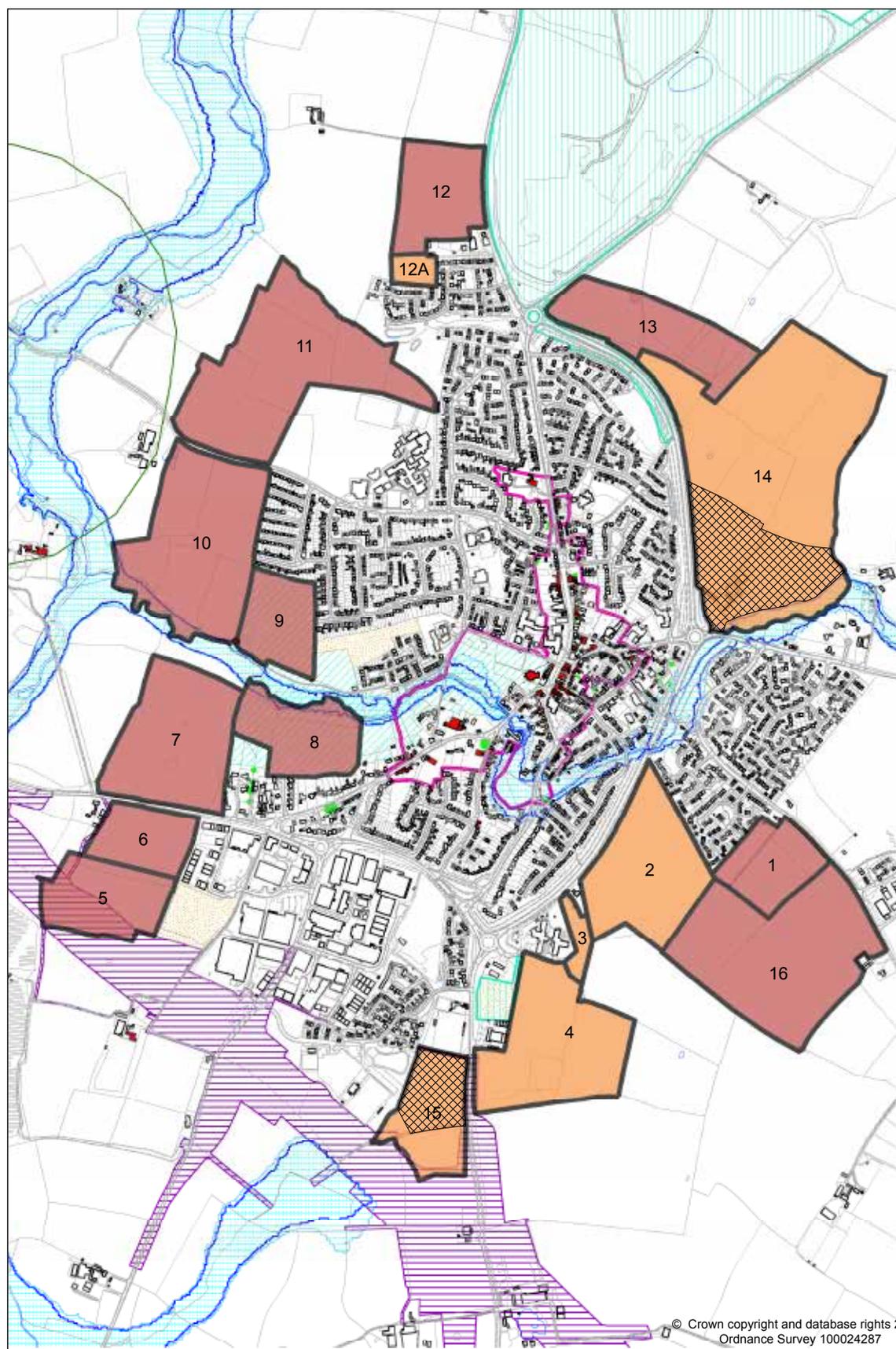


Figure 12: Southam 2020 SHLAA Sites



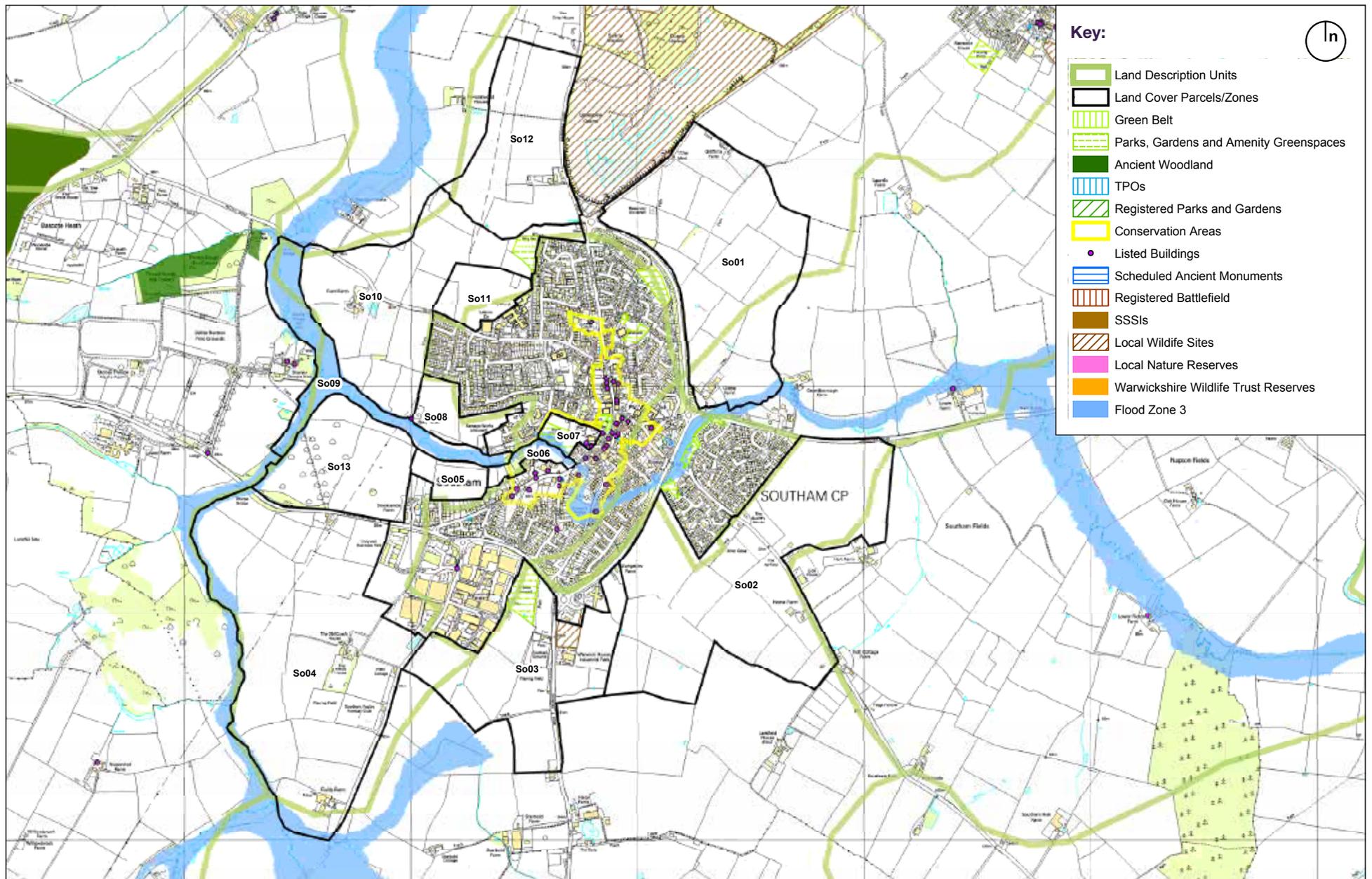
## Strategic Housing Land Availability Assessment 2020

Stratford-on-Avon District Council published a Strategic Housing Land Availability Assessment (SHLAA) in April 2020. The SHLAA assessed the south eastern part of the site as site SOU.12 as shown on Figure 12.

It should be noted that for 'Major Planning Considerations' the site was scored as green for all criteria except for minerals and waste for which it was scored amber. However, all sites assessed by the SHLAA at Southam were scored amber for this criteria, including sites that have since been identified for allocation through the emerging SAP suggesting that this is not considered to be a reason for sites to be identified as not deliverable.

In relation to accessibility to local services the 2020 SHLAA scores the site as amber which equates to being within a reasonable walking distance (less than 800m or 10 minutes) from local services (e.g. shop, school, doctor's surgery). However, the site is directly adjacent to a BP petrol filling station which also provides shopping facilities to meet the day-to-day needs of local shoppers. On this basis the site should be scored as green as it is within 400m or 5 minutes' walk of these facilities. The 2020 SHLAA scores the site as red in relation to non-designated heritage assets. As set out in the heritage section of this report the presence of Ravenswood House (also known as Southam Fields Farm) is a non-designated heritage asset which is located towards the western side of the site, but is not part of the site itself, and so is adjacent to the site. It is noted that the assessment in relation to landscape sensitivity, for which the SHLAA scores the site as red, is based on a 2011 Landscape Sensitivity Study (LSS) prepared by White Consultants. Part of the site was assessed as So12 as shown on Figure 12.

Figure 13: Extract from 2011 Landscape Sensitivity Study





The LSS considered that the development of the parcel would be inappropriate on the basis that, at the time it was produced, the parcel was considered to be prominent and separated from Southam. However, since 2011 development has taken place on land between Southam and the site, primarily on the allocated site SOU.2 West of Coventry Road which is being built out by Taylor Wimpey. This is reflected in the proposed revised BUAB for Southam set out in the emerging SAP which as noted earlier is adjacent to the site. Therefore, the issue of separation no longer applies to the site. Furthermore, issues of 'prominence' only relate to the zone as a whole and, because the LSS has not been updated to reflect the changes in settlement form from the development of the SOU.2 allocation, it does not allow consideration to be given specifically land adjacent to the settlement

boundary as it now exists. On this basis a score of amber at worst would be more reflective of the changes that have taken place since the LSS was produced in 2011.

SOU.12 was initially assessed as being not deliverable on the basis that it was unclear that the site was available and due to landscape impact. Potential mitigation was not considered as the site was identified as being not available. However, it is notable that sites that scored either similarly or worse than the site on various criteria were considered after mitigation to be likely to be deliverable and that these sites are now proposed for allocation through the emerging SAP. It is considered that effective mitigation of the landscape impacts of the development of the site are achievable and as such the overall assessment of the site should be that it is likely to be deliverable.



4

# 4.0 Landscape



## 4.0 Landscape

**The landscape and visual amenity of the site and its immediate landscape context have been reviewed. The site lies within a number of Landscape Character Areas/Types (LCA/LCT). At a National level the site lies within Natural England's National Character Area (NCA) 96 'Dunsmore and Feldon'. This NCA stretches from Coventry and Rugby in the north to Shipston-on-Stour in the south and therefore covers an extensive landscape area.**

The Warwickshire Landscape Guidelines was published in 1993. The Landscape Guidelines for Avon Valley, Feldon, Cotswolds subdivides the landscape into 3 Landscape Character Areas (LCA) and then further into Landscape Character Types (LCT). The site lies within the 'Lias Village Farmlands' LCT in the 'Feldon' LCA. The 'Feldon' description is as follows: "A lowland agricultural region strongly influenced by Tudor and Parliamentary enclosures, and characterised by heavy clay soils, and a nucleated settlement pattern of small rural villages."

The Character Map of the Stratford-on-Avon District divides the landscape into 5 character areas: Arden, Avon and Stour Valleys, Cotswold Fringe, Feldon and Ironstone Uplands, these are then sub-divided into sub Landscape Character Areas. The site lies within 'Lias Uplands'. The following extracts are of relevance for the site and immediate context and the proposed development:

- *"A varied rolling land form often associated with steep wooded scarp slopes, mostly draining to the Rivers Dene and Itchen without clearly defined basins;*
- *Many hedgerows and roadside trees; well defined geometric pattern of small to medium sized fields; disused quarries with semi-natural grassland and scrub*
- *Compact villages sited on hill and ridgetops, hill sides and along narrow valley bottoms;*
- *Main building materials are White Lias Limestone (now known as Langport Member Limestone), Blue Lias Limestone and brick;"*



The site comprises arable farmland split into 4 parcels bound by hedgerows and hedgerow trees. The site slopes from east to west and lies between approximately 100m AOD along Coventry Road and approximately 70m AOD along the western boundary with the River Itchen. The A423 Coventry Road forms the boundary to the east of the site with a BP garage and residential development to the south. Southam Fields Farm is located within the centre of the site, outside of the proposed development boundary, the access track to the farm splits the site in half north/south.

Visually the site is well contained from the north, east and south due to a combination of the sloping topography of the site and immediate context combined with surrounding vegetation along Coventry Road, north of the site and adjacent to the Quarry to the east. Views from within Southam itself are limited due to the topography combined with existing intervening built form and vegetation. The clearest views of the site are from footpaths, residents and road users in closest proximity to the site including users of Coventry Road, the Public Right of Way that passes directly through the site and the residents to the south and residents of Southam Fields Farm within the site. To the west there are some clearer views of the site from roads, footpaths and some residential properties, however there are also views of the chimney at the quarry and existing residential properties within Southam at a similar elevation to the site.



Site Photos - Taken 1 March 2023

The proposed development responds to the landscape and existing context of the site. Green infrastructure is proposed within the western part of the site along the Itchen, which will integrate the proposed development within the local landscape. Existing field hedgerows vegetation within the site and along the frontage with Coventry Road will be retained and enhanced with additional planting. Residential development is proposed adjacent to Coventry Road to the north of the existing residential development at Little Trace Avenue and Quarry Road. The new properties will sit at a similar elevation to the existing development and will appear as an extension to the existing built area. Woodland planting is proposed to wrap around the western and northern edges of the new residential area and in the long term the proposed tree belts will soften views of the houses and providing new habitat and amenity value for the site.



Site Photos - Taken 1 March 2023



# **5.0**

# **Access and Connectivity**

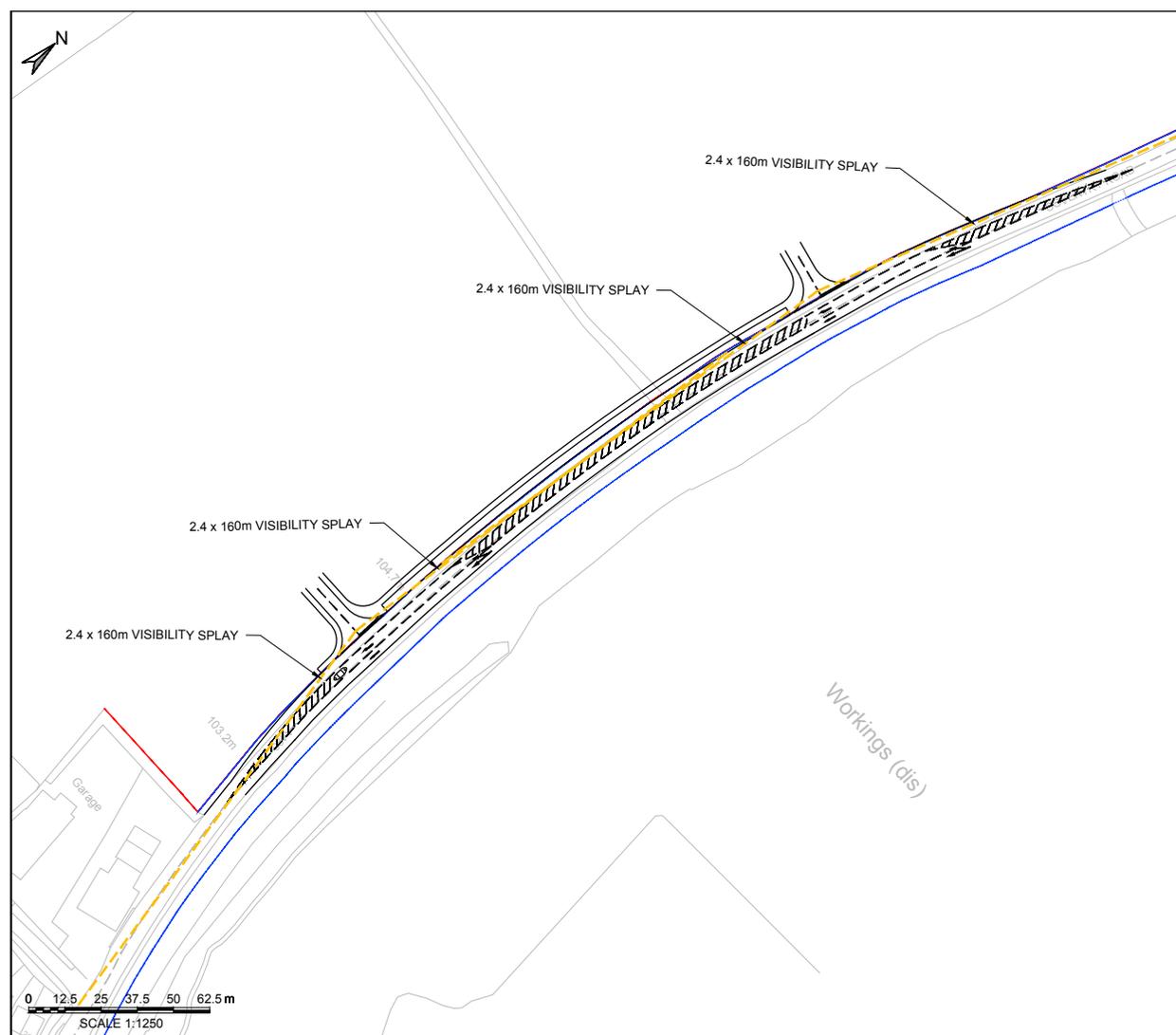


## 5.0 Access and Connectivity

The principle of residential development on Coventry Road is already established with the acceptance and build out of the residential sit to the south of the proposed development (Refs: 13/02947/OUT & 14/03407/REM). It would follow that the proposed development is in an acceptable location. Access into the proposed development is proposed to follow the accepted strategy of the site to the south with the implementation of a priority-controlled ghost island junction. Access for non-motorised users along Coventry Road would be provided by extending new footways from the site access to connect with those existing at the petrol station to the south.

Traffic impacts with the associated with the proposed development have also been examined by Tetrattech. Assessments have shown that the site access would operate within capacity when accommodating up-to 850 dwellings, so in excess of the proposals. The proposals will align with current and emerging policy by creating a sustainable development that does not adversely impact the local highway network. Parking and EV charging provision will be provided in line with the standards provided in the Development Requirements SPD.

Figure 15: Proposed Site Access Layout



**Key:**

- Red Line Boundary
- - - Adopted Highway Boundary
- - - 2.4 x 160m Visibility splay in line with DMRB standards

Figure 16: Amenities, Bus Stops and Public Rights of Way



## Key:

- Site Boundary
- 2km Catchment
- PROWs
- 🚏 Bus Stop
- 📮 Post Office
- 📖 Library
- 🏪 Pharmacy
- 🍷 Takeaway
- 🕌 Place of Worship
- 🏪 Convenience Store
- 🍷 Public House
- 👶 Nursery
- 🎓 Primary School
- 🎓 Secondary School and Sixth Form
- 🌳 Park

Southam Town Centre, and the amenities/facilities therein, is within 2km walk of the proposed development. This can be accessed using footways along Coventry Road or via the existing network of PROWs. Southam, Long Itchington and Stockton are accessible via a 5km cycle journey. National Cycle Route 41 is located approximately 1.5km north of the site access and provides a mixture of on and off road cyclepaths to Leamington Spa and Rugby. The site benefits from local bus services that can be accessed from stops on Coventry Road. These operate seven days a week, providing access to Leamington, Rugby, Daventry, Harbury and Banbury. There is the potential for a bus route to run through the site further improving access to public transport.



# 6.0 Ecology



## 6.0 Ecology

**A Phase 1 Habitat Survey walkover of the site was undertaken by an experienced ecologist, together with obtaining records of protected species and habitats with Warwickshire Biological Records Centre (WBRC). The aim was to identify potential ecological constraints to the layout and opportunities to maximize ecological gain.**

No internationally designated sites for nature conservation were recorded within 10km of the site. Long Itchington and Ufton Woods Site of Special Scientific Interest (SSSI) is located c. 1.3km away. Long Itchington Quarry Local Wildlife Site (also a Local Geological Site) is adjacent to the site to the east and is considered locally important for pioneer and developing habitats. River Itchen potential Local Wildlife Site is located adjacent to the site to the west and is an important river corridor supporting a range of plant and animal species. Stockton Reservoir Local Wildlife Site is located to the east of the site and important for calcareous grassland and scrub habitat. No Ancient Woodland was recorded on or adjacent to the site.

The site is dominated by arable fields containing wheat, with hedgerows with scattered mature trees. The River Itchen flows past the site on the western boundary and has suitability for kingfisher, otter, water vole and potentially crayfish. Several ponds are within the local landscape with some potential to support great crested newt. The mature trees within hedgerows offered potential for roosting bats as do farm buildings central to the site. The hedgerows on site were noted as mature and longstanding with a diverse species mix which would require further survey to determine their importance. Whilst further detailed surveys would be needed to refine ecological mitigation and enhancement, particularly in relation to bats, amphibians, reptiles, birds, otter, water vole and crayfish, the size of the site mean that ecological value can be retained and enhanced through careful and considered design.



The Concept Masterplan has been designed in consultation with ecologists to work with the ecological value of the site including strengthening. The Concept Masterplan has been designed in consultation with ecologists to work with the ecological value of the site including strengthening habitat corridors and enhancing the aquatic habitat through creation of new ponds and enhancing the river corridor. The Public Open Space has been designed to support habitat connectivity and the Local Wildlife Sites. Planting would include a wide range of native habitats including additional species rich hedgerow planting, native species rich grassland and nectar and pollen rich wildflower planting. The Concept Masterplan has been designed to achieve Biodiversity Net Gain and create a diverse and ecologically led space to live.



Figure 17: Green Infrastructure Proposals





# 7.0 Heritage



## 7.0 Heritage

**An initial review of potential heritage constraints and opportunities has been undertaken informed by a review of the HER, the NHLE, selected online sources, and a site visit. There are no designated heritage assets within the site, and it is not anticipated that the development of the site would have an adverse impact on any designated heritage impacts.**

Ravenswood House (also known as Southam Fields Farm) is located towards the western side of the site but is not part of the site. It is recorded on the HER. It has not been assessed in detail but could potentially be of some modest heritage interest, commensurate to a non-designated heritage asset. Development would alter its historic agricultural setting and might result in some harm to its significance. It is not anticipated that this would preclude development but, under the NPPF, harm to a non-designated heritage asset should be 'taken into account' in decision making.

Additionally, the site is identified on the Warwickshire HER as being part of the possible location of the Civil War skirmish which took place 23 August 1642. Additional land to the north of the site is also included in this identification. The Warwickshire HER also records Royalist burials at Southam Fields Farm, based on antiquarian sources.

There is a lot of uncertainty regarding the location of this skirmish which the HER records acknowledge, and it is possible that the battle took place further south; a cannon ball, recovered from a garden c. 400m south of the Site in the 1970s, may be associated with the engagement (HER ref. MWA771) and other accounts have suggested a location south-west of Southam. It is not a Registered Battlefield and given the uncertainty of the location, the nature of the engagement and the limited sources, it is not anticipated that it would meet the criteria to be designated. It should also be noted that the form of the current agricultural landscape is not 17th century.

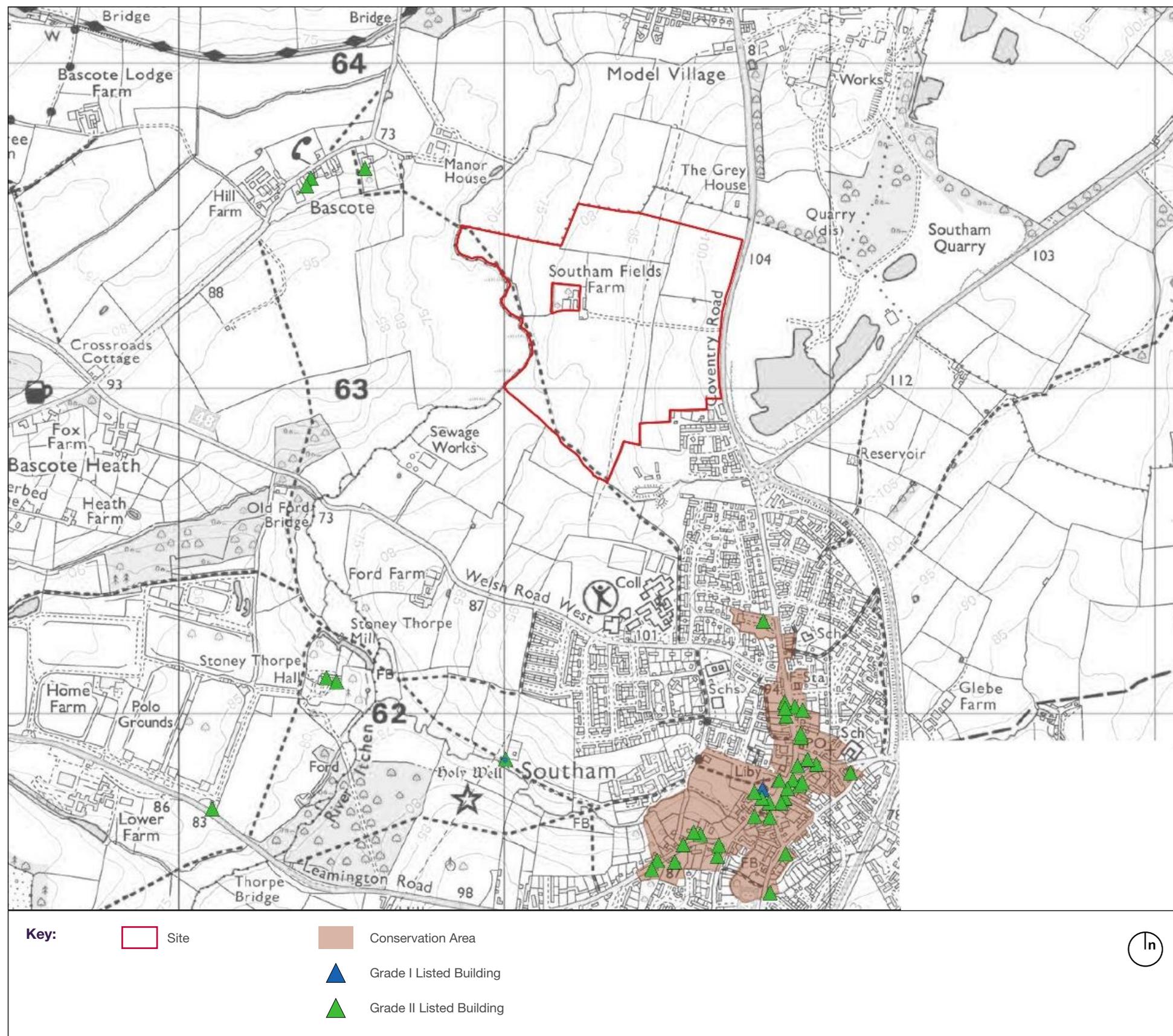
However, the proposed development of the site has been designed in such a way that if necessary, as a result of evidence being identified that provides greater certainty that only the southern part of the site could be developed while the northern part of the site, and land to its north, remains undeveloped. If this were the case there is the potential for improved interpretation and public access which could potentially be facilitated by the development of the southern part of the site.

The SWLP IO consultation is supported by a Heritage Sensitivity Assessment (HSA) intended to inform Strategic Site Allocations for the two districts, designed to assess the sensitivity to new development on the existing heritage and landscape character within a number of settlements within South Warwickshire, including Southam.

The Land off Hanson Avenue is located within sub-area 'North'. The HSA notes this sub-area as being a large area of agricultural and quarry landscape to the north of the settlement; potential for below ground archaeological deposits, but nonetheless an area that may be able to accommodate development. Consequently, the HSA concludes there may be scope for development in this area .

Figure 18 summarises the findings for Southam. The findings from the HSA do not indicate that heritage considerations would preclude development on the site. This is consistent with the initial assessment set out in this vision document.

Figure 18: Site Location and Designated Heritage Assets





# **8.0**

# **Flood Risk and Surface Water Drainage**



## 8.0 Flood Risk and Surface Water Drainage

An initial Flood Risk Assessment (FRA) and a high level Drainage Strategy (DS) have been undertaken in support of the masterplan and planning vision document for the site. The Flood Risk Assessment and outline drainage strategy has been undertaken in accordance with the NPPF (Chapter 14), PPG (Flood Risk and Coastal Change), Environment Agency Guidance and Guidance for Surface Water Drainage in Warwickshire. In summary the site is entirely within Flood Zone 1 and therefore at very low risk of fluvial flooding from Main Rivers.

Figure 19: Flood Map for Planning (Environment Agency, March 2021)

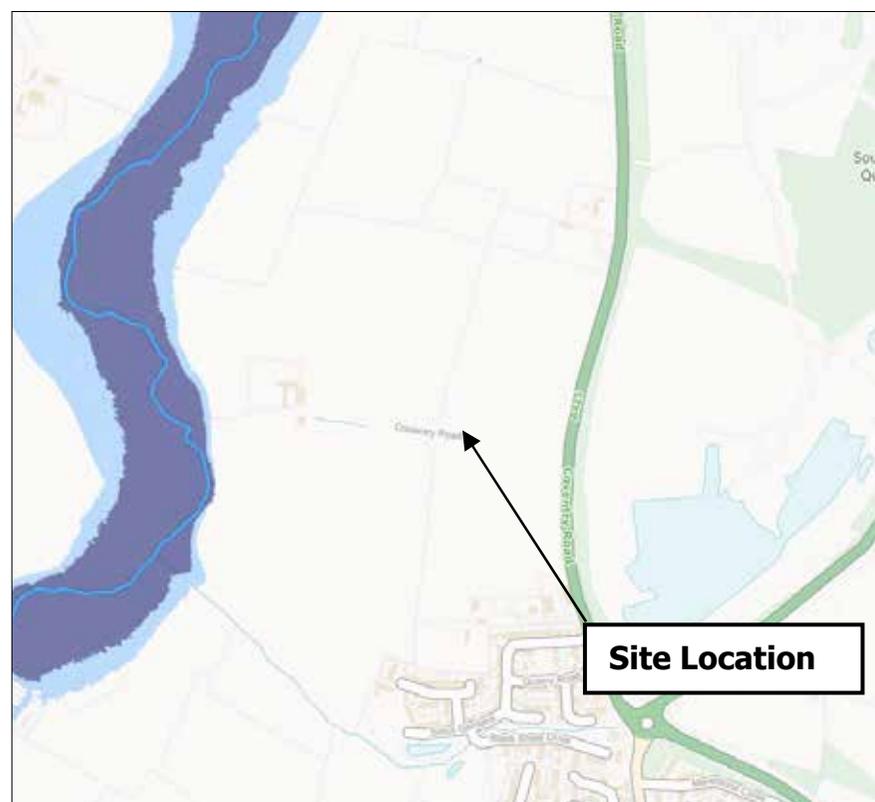


Figure 20: Flood Risk from Surface Water (Environment Agency, March 2021)

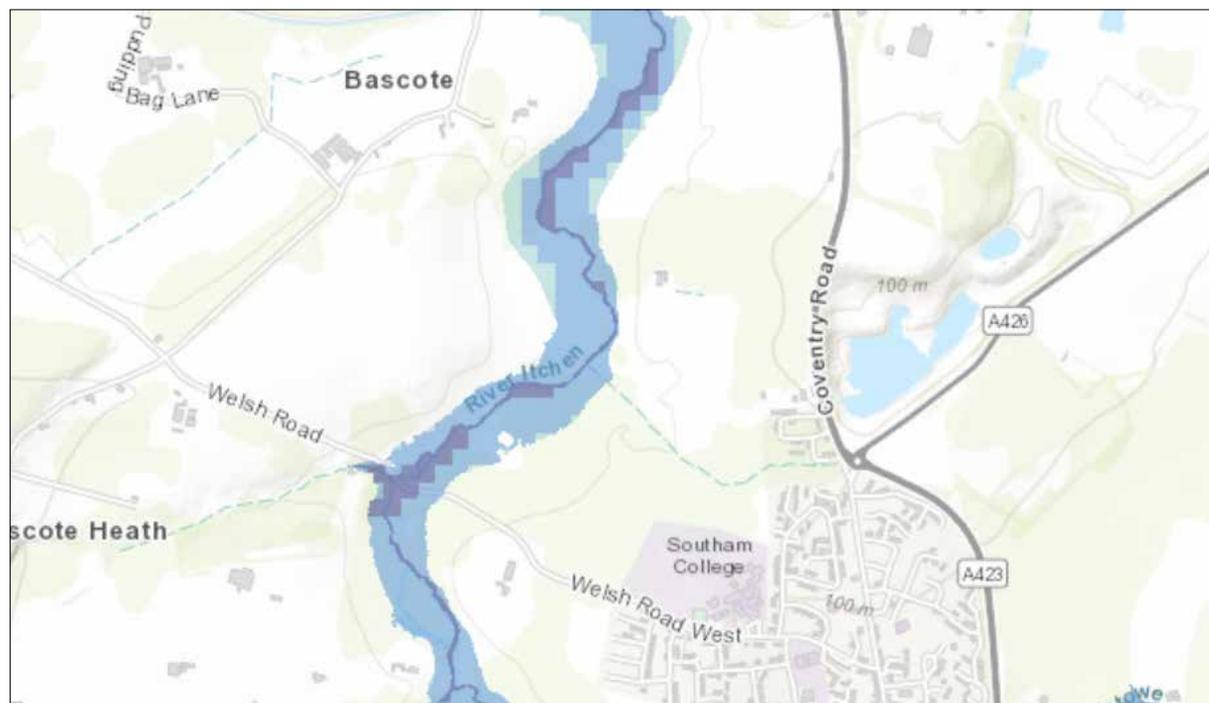


Key:  Low Risk  Medium Risk  High Risk

Table: Flood Risk Summary

Potential Flood Source	Overall Flood Risk				
	None	Very Low	Low	Medium	High
Tidal		X			
Fluvial			X		
Pluvial			X		
Groundwater			X		
Public Sewers			X		
Artificial Waterbodies	X				
Roads		X			

Figure 21: Preliminary Flood Risk Assessment (Environment Agency, December 2019)



As noted above there have been no recorded flooding events. Furthermore, the EA 'Risk of Flooding from Surface Water' map, Figure 21, shows that the majority of the site is at very low risk of surface water flooding, meaning it has less than a 0.1% annual probability of occurrence. However, there are some sections of the site where there is an area at higher risk of surface water flooding, with some other smaller areas at risk in the middle and the south eastern corner. The LIDAR survey shows these areas to be the lowest across the site, thereby facilitating the collection and ponding of surface water. These areas are expected to be levelled out during construction and a positive drainage system provided. On this basis, the risk of surface water flooding is considered to be low.

A summary of the potential flood risks has been tabulated in Table shown.

- The outline drainage strategy indicates that a surface water runoff rate which mimics the existing greenfield run-of rates is achievable to ensure that there is no increase in flood risk downstream of the site or in adjacent areas as a result of this development.
- It has been assumed the surface water runoff from the site will be discharged into the ordinary watercourse.
- The surface water run-off will be managed by a combination of oversized below ground pipes, swales and attenuation ponds.
- Attenuation will be provided on the site within three retention ponds, swales and permeable paving.
- SUDS/water features will provide multi-functional benefits by providing storage, water quality benefits, biodiversity and amenity. This will add to the overall aesthetic appeal and ensure biodiversity and ecological requirements are met.
- New climate change policies will be adhered to.



# 9.0

# Technical Considerations



## 9.0 Technical Considerations



### Services

The site is within close proximity to established residential areas with existing infrastructure. There is therefore potential to be supplied with services from the existing network. From our discussions with utility providers to date, no concerns have been raised about the ability to serve this site with high quality infrastructure, including high speed broadband. Offsite works have been identified to provide an electricity point of connection for the site, with the main point of connection identified to be at the Southam Local Primary Substation located further north on Southam Road, approximately 0.6km from the site. We would expect a minimum 180mm water main would be required to supply the site and therefore a point of connection would be appropriate to the 8" water main in Southam Road. Capacity in this main would need to be confirmed by Severn Trent Water. Openreach will offer a fibre to the premise connection as standard for a site of this size.

The site will fall under the new Future Homes Standard and as such houses will be subject to plans to reduce energy consumption by increasing the energy efficiency of the fabric and infrastructure servicing each plot. It is assumed that heating for the houses will be achieved using electric heat pumps and that there will be no gas requirements for domestic uses. Capacity for electric vehicle charge points has also been included.

Western Power Distribution have apparatus within the site boundary but we would expect that these overheads will be diverted to accommodate the masterplan. Any utilities connection to the existing property retained at the centre of the site will need to be maintained.

### Air Quality

Air quality at the development site is good, with background concentrations of nitrogen dioxide and PM10 both below the relevant UK Air Quality objectives across the entire site. The site is located adjacent to the A423; however, the emissions from traffic using this road is unlikely to provide any constraints to development, in terms of air quality, beyond a few metres from the roadside.

There are no Air Quality Management Areas (AQMAs) in the vicinity of the site. Measured annual mean nitrogen dioxide concentrations in the Stratford-on-Avon district were below the air quality objective in 2019 at every monitoring location. As such, there is the potential for the AQMA in Stratford-on-Avon town centre to be revoked if concentrations continue to decline. This AQMA, declared by Stratford-on-Avon District Council, is located over 20 km to the southwest of the development site. The nearest AQMAs to the site are both approximately 9 km from the site in Rugby and Leamington Spa. The proposed development will increase traffic on the local road network, which may affect air quality at existing properties. However, the development is very unlikely to significantly impact upon the good air quality in and around Southam. It is also very unlikely that any AQMA will be adversely affected by the operation of the development. There are a number of nearby sensitive ecological sites; however, it is judged very unlikely that these will be affected by the operation of the proposed development.

There is a large quarry – Griffin Quarry – located to the east of the development site which has the potential to generate dust which may impact upon future residents and users of the proposed development. It should be noted that national guidance published by the IAQM states that “adverse dust impacts from sand and gravel sites are uncommon beyond 250 m and beyond 400 m from hard rock quarries”; however, there may be some constraints relating to disamenity dust for sensitive development within these distances. To determine the extent of any constraints and additional mitigation required, a dust risk assessment would be carried out as part of the planning application, which would consider local conditions such as prevailing wind direction, historic complaints records, phasing of the development and extraction at the quarry, and the existing mature vegetation along the quarry boundary.

The development site is located approximately 300 m northeast of a small wastewater treatment works (WWTW). Whilst the WWTW has the potential to generate malodours, adverse odour effects over this distance are judged to be unlikely. Due to the topography of the site and to ensure effective drainage development is not proposed in the south western part of the site closest to the WWTW. Nevertheless, an odour risk assessment would be carried out confirm that there are no constraints to residential development.

Stratford-on-Avon District Council adopted an ‘Air Quality Planning Guidance’ Supplementary Planning Document (SPD) in 2019 which sets out the measures to improve the consideration of air quality and health impacts in the planning process, and outlines the required approach for air quality assessments for new developments. An air quality assessment will be produced to support the planning application for this development in accordance with the requirements of the SPD. In accordance with the SPD, the assessment will include a calculation of the air quality damage costs and a description of the mitigation to be provided by the scheme.



The proposed development will include a number of measures within its design which will minimise the air quality impacts on the local area. Some of these include:

- no gas supply to the development; the heating for all new properties will be provided by green, renewable measures with no local NOx or PM emissions;
- infrastructure for the National Cycle Network is in place to the north of the site providing connections with Leamington Spa and Rugby;
- provision of dedicated pedestrian access to the development;
- electric vehicle charging provisions to be provided in line with the standards set out in the Council's Development Requirements SPD; and
- the development site is in close proximity to the existing bus services which will reduce the number of private car trips to local amenities.

Based on current concentrations being below the air quality objectives and the anticipated continued reduction in future concentrations as a result of improvements in vehicle emissions it is anticipated that the overall impacts of the scheme on local air quality will be 'not significant'.

On the basis of the information provided above, there should be no constraints to residential development at the proposed site in terms of air quality from the nearby A-road; however, the potential for adverse dust impacts from the nearby quarry may present some constraints to the development and will be addressed (by way of a minerals dust impact assessment during the detailed planning stage).

## Arboriculture

A preliminary Arboricultural Assessment has been undertaken of the site. The trees surveyed composed predominantly of early-mature and mature native tree species situated within the field boundary, and native hedges, within and surrounding the site. Of the trees surveyed the majority were found to be in a fairly adequate condition.

Very limited past management is evident throughout the tree stock and the hedges are no longer cut annually due to current environmental schemes. The trees are considered unlikely to support bats but they may be used sporadically by single common bat species as transient roosts.

The majority of individual trees on site are Ash, Oak and Willow, situated within the field boundary hedges. The field boundaries are bounded by hedgerows of predominantly Hawthorn and Blackthorn and Elm. There are few trees of individual significance, however trees within groups and several individuals, towards the southern and westerly boundaries, provide some maturity and visual screening of the site. Other trees of significance within the site are the larger Ash within the field boundaries internally within the site. The native and ornamental trees within the garden of Ravenswood House are of significance but are not within the site itself. A couple of the Ash trees are in poor condition and are considered unsuitable for retention in a developed setting. Hedges within and bounding the site, provide screening and wildlife habitat, and might generally be retained in a developed setting. Future development might seek to retain as many of the existing trees and hedges as possible.

In terms of trees to be retained sufficient development offsets would be sought to ensure the protection of the retained trees from inappropriate working methods or a scheme which risks the failure or removal of the tree stock. The safeguarding of these trees will help to assimilate any new proposals into the existing context and enhance the general maturity of planting across the new scheme whilst limiting the alteration of the visual context or experience of the landscape. The site boundaries are made up of the hedgerows which provide visual amenity and wildlife habitat. Retention of boundary trees and hedges will ensure that development has limited impact on the surrounding landscape and public views.

The introduction of new tree planting within a developed setting would improve species diversity and thereby limit the potential impact of disease on the tree stock. Replacement tree planting will provide an overall improvement to the site in terms of increased species diversity, improved age structure and to replace the inevitable tree losses due to age and condition.



10

# 10.0 Proposals



# 10.0 Proposals

## Constraints & Opportunities

The character, context and existing site constraints have formed an integral part of the design process to ensure a sensitive design approach for the proposed development. This approach has entailed collaboration between landscape, urban design, transport, ecological, arboriculture, heritage, drainage, air quality and other professionals. A landscape led 'ground up' approach has been undertaken for the concept masterplan, which retains and protects the site's best assets.

### Key:

-  Site boundary
-  Individual tree with Root Protection Area (RPA)
-  Category A tree
-  Vegetation (including hedgerows & tree groups)
-  Contours (arrow indicated downward slope)
-  Overhead electric cables
-  Potential site access
-  Flood Zone 2
-  Flood Zone 3
-  Waterbodies
-  Public Right of Way (footpath)
-  Views
-  Development

Figure 22: Constraints & Opportunities



Figure 23: Concept Masterplan – Option 1



## Concept Masterplan (Options)

High quality residential development would extend the existing settlement at Southam.

**Option 1 provides approximately 17.2 Ha providing around 600 dwellings at 35dph.**

**Option 2 provides a reduced area of approximately 8.3 Ha of land proposed for residential development providing around 300 dwellings at 35dph.**

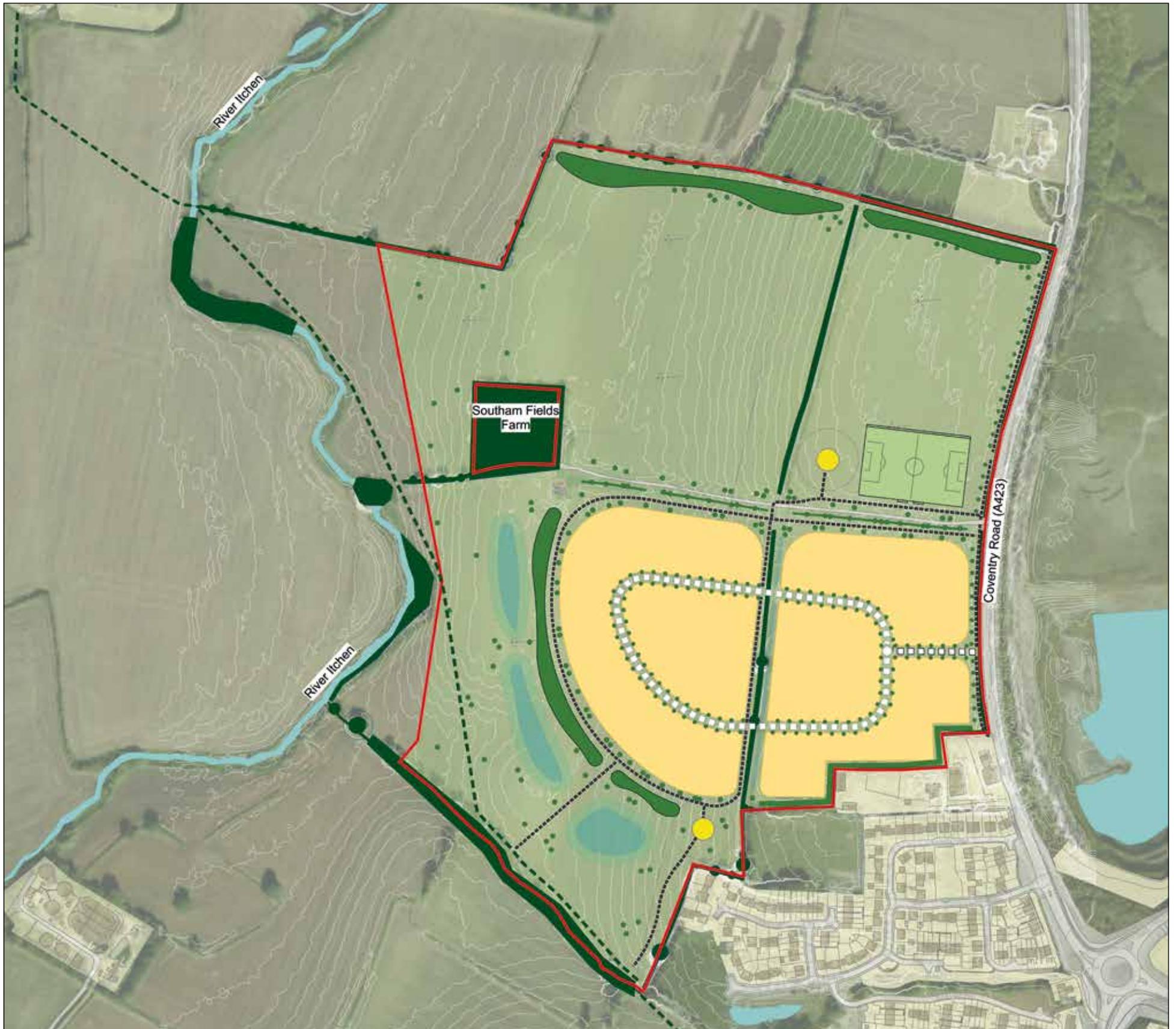
Key:

	Site boundary
<b>Existing</b>	
	Individual tree with Root Protection Area (RPA)
	Vegetation (including hedgerows & tree groups)
	Contours (arrow indicated downward slope)
	Waterbodies
	Public Right of Way (footpath)
	Development
<b>Proposed</b>	
	Residential development phase 1 (8.26Ha)
	Residential development phase 2 (8.97Ha)
	Main access road
	Public open space
	Vegetation
	SUDS attenuation
	Footpaths
	Play facilities
	Woodland
	Sports pitch



- Two vehicular access points are proposed off Coventry Road providing a loop through the proposed development. Only the southern access would be required for Option 2.
- The Primary Street would provide a wide carriageway suitable for a bus route, with grassed verges and boulevard tree planting creating an attractive route through the site.
- A substantial proportion of the site is proposed for Green Infrastructure, including a linear park along the Itchen valley by the western edge of the site which creates an attractive green setting to the residential development.
- Swathes of open space will also permeate through the site with greenways centred upon existing hedgerows sub-dividing the new neighbourhoods and providing accessible greenspace for residents.
- New footpaths and cycleways will ensure that walkable neighbourhoods are well connected to focal areas of open space and recreational facilities including a sports pitch and children's play areas.
- Links to the adjoining public rights of way and highways network will create circular routes around the site and strengthen links both to the existing settlement and wider countryside.
- A high-quality landscape frontage is proposed along Coventry Road, creating an impressive approach into Southam from the north.
- Existing hedgerows will be retained and enhanced with distinctive avenue tree planting. Residential development will be set back from Coventry Road behind the green infrastructure.

Figure 24: Concept Masterplan – Option 2



**Key:**

	Site boundary
<b>Existing</b>	
	Individual tree with Root Protection Area (RPA)
	Vegetation (including hedgerows & tree groups)
	Contours (arrow indicated downward slope)
	Waterbodies
	Public Right of Way (footpath)
	Development
<b>Proposed</b>	
	Residential development (8.26Ha)
	Main access road
	Public open space
	Vegetation
	SUDS attenuation
	Footpaths
	Play facilities
	Woodland
	Sports pitch

The new properties will sit at a similar elevation to existing built development and will appear as a logical extension to the existing settlement edge. Building heights for the development would mostly be at 2 storeys and in keeping with the residential character of the area. Selective use of 2.5 storey dwellings would be introduced at key locations to enhance the streetscene.

Development parcels will front on to the Green Infrastructure ensuring that the focal areas of public space are actively overlooked by new dwellings. Creation of an attractive soft edge to the residential development will be achieved through the retention of existing hedgerows, supplemented with new belts of woodland planting to create robust landscape buffers along the site perimeter.

Proposed Development would be well integrated within the local landscape and create a cohesive settlement edge well related to the existing settlement edge. Buffer planting will filter views of the new development, with proposed properties carefully design to retain privacy of existing residents.

The proposals will follow best practice principles of climate change mitigation and adaptation into the development, including careful consideration of the location and orientation of properties to maximise the benefits of solar gain whilst balancing this with the risk of overheating. The range of planting proposed will increase tree cover on the site and include a mix of species to ensure resilience to the impacts of climate change.

Biodiversity Net Gain would be achieved through habitat creation in the form of new native species, broadleaved woodland, orchards and hedges, mixed species rich grassland habitats and SUDS. New connecting wildlife corridors would be created around the development, with new planting focused along the site boundaries and elsewhere within the site to reinforce the existing landscape features.

Attenuation basins are proposed within the lower elevations of the site close to the River Itchen, with swales in between development parcels, providing new habitats, amenity value and collecting water run-off from the proposed development areas.



# 11.0

# Conclusion



## 11.0 Conclusion



**Paragraph 67 of the NPPF advises that Local Planning Authorities should have a clear understanding of housing needs in their area and that they should establish realistic assumptions about the availability, suitability and likely economic viability of housing sites. In relation to the site, these three components are addressed opposite.**

### Availability

- For the purposes of demonstrating the availability of a site, the Council must be confident that there are no legal ownership problems and that it is controlled by a housing developer that has expressed an intention to develop, or the landowner has expressed an intention to sell.
- As the site is within the control of Taylor Wimpey, a market leading housebuilder, it is clear that the site is available for development.





## Suitability

- NPPG advice on assessing the availability of housing land provides clarity on demonstrating suitability with respect to policy restrictions, physical problems or limitations, potential impacts and environmental conditions.
- In respect of policy restrictions, the site is located adjacent to the proposed built-up area boundary for Southam.
- Sites outside of existing settlement boundaries will need to be identified for development to meet the housing requirements of the district, as was the case for the previous plan.
- Development of the area would bring opportunities for improvements such as improving the habitat and wildlife value of the site, linking areas of vegetation, creating green corridors, connecting existing movement routes and providing much needed housing and providing areas of public open space.



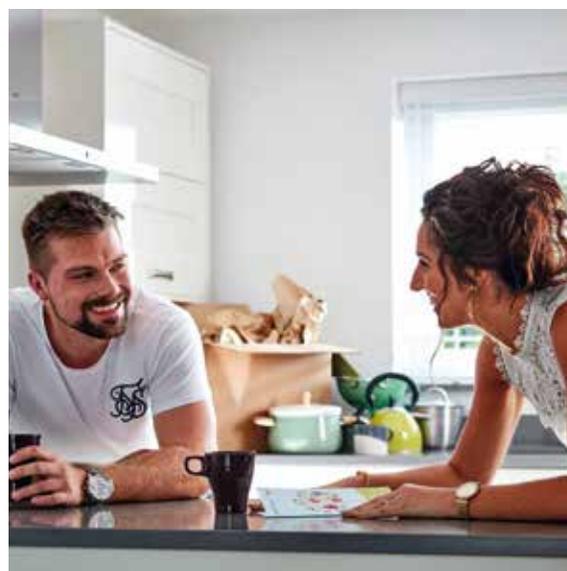
## Likely Economic Viability

- The site is not affected by any known significant constraints that might affect its viability, such as ground stability or significant contamination.
- Based on Taylor Wimpey's significant experience of delivering similar sites within both Stratford-on-Avon District and the wider West Midlands it is therefore considered that the development of the site is economically viable.



## Achievability

- To be considered achievable the Council can be confident that there is reasonable prospect that housing will be delivered. The site does not present any barriers to development as proposed, nor are any issues expected that will delay the overall implementation of development on the site. It is therefore achievable.





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# 12.0

# About Us



## 12.0 About Us

**Taylor Wimpey is one of the leading national housebuilders operating across the UK and is responsible for building and selling over 13,000 houses in 2022 alone. Taylor Wimpey has extensive experience across the Midlands, with a strong track record of delivering high quality, sustainable developments across the region.**

Taylor Wimpey is a dedicated FTSE 100 developer and homebuilder with over 125 years of experience and an unparalleled record in our industry. We aim to be the homebuilder and developer of choice for our customers, employees, partners, shareholders and the communities in which we operate.

We have expertise in strategic land, land acquisition, home and community design, urban regeneration and supporting infrastructure which focus on the customer's quality of life and adds value to their homes and community. We draw upon our expertise as an established house builder to innovate and adapt to changing customer requirements, to provide homes of the highest quality, meeting and exceeding the expectations of the purchaser, whilst setting new high standards of customer care in the industry.

The HBF 5 star award is awarded to housebuilders that achieve at least 90% by customers who would recommend their developer 8 weeks after they have legally completed on the purchase of their new home. At Taylor Wimpey we are always looking at how we can improve the service that we provide to our customer, we send a HBF customer satisfaction survey to all of our customers and request feedback on our performance and customer service at 8 weeks and 9 months.

We then use this information to look for trends in feedback and then work with the wider business unit to deliver an improvement plan. Our Year To Date performance for these metrics (95.5% for 8 weeks and 86.6% for 9 months) see us rated as a 5 star build by the NHBC.

Our 24 regional businesses across the UK give our operations significant scale and a truly national coverage, combining the strengths of a national developer with the focus of a smaller local business. We operate under a framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major PLC. We have a strong business culture of doing the right thing which underpins our purpose and strategy.

We deliver homes and communities across all market segments tailored to local needs. We provide high quality places to live with appropriate facilities and infrastructure, an attractive environment and sense of place. Each of our regional businesses develop sites of varied scale and character and build a range of homes, from one-bedroom apartments and starter homes to large, detached family homes. We are committed to creating places, delivering homes for the open market alongside supporting infrastructure and providing affordable housing, in partnership with local authorities, Registered Providers and a variety of Government bodies, such as Homes England.

We seek to add social, economic and environmental value to wider communities. Our experience and heritage in collaboration and engagement with all stakeholders ensures we deliver to local requirements with a sustainable mix of housing types and tenures. Public and stakeholder engagement underpin our approach.

With unrivalled experience of building homes and communities, Taylor Wimpey is at the forefront of the industry in placemaking, design, build quality, health and safety, customer service and satisfaction. This is underpinned by our financial strength and funding capability.



**Taylor**  
**Wimpey**

**Coventry**  
**Road,**  
**Southam**

**Vision Document**

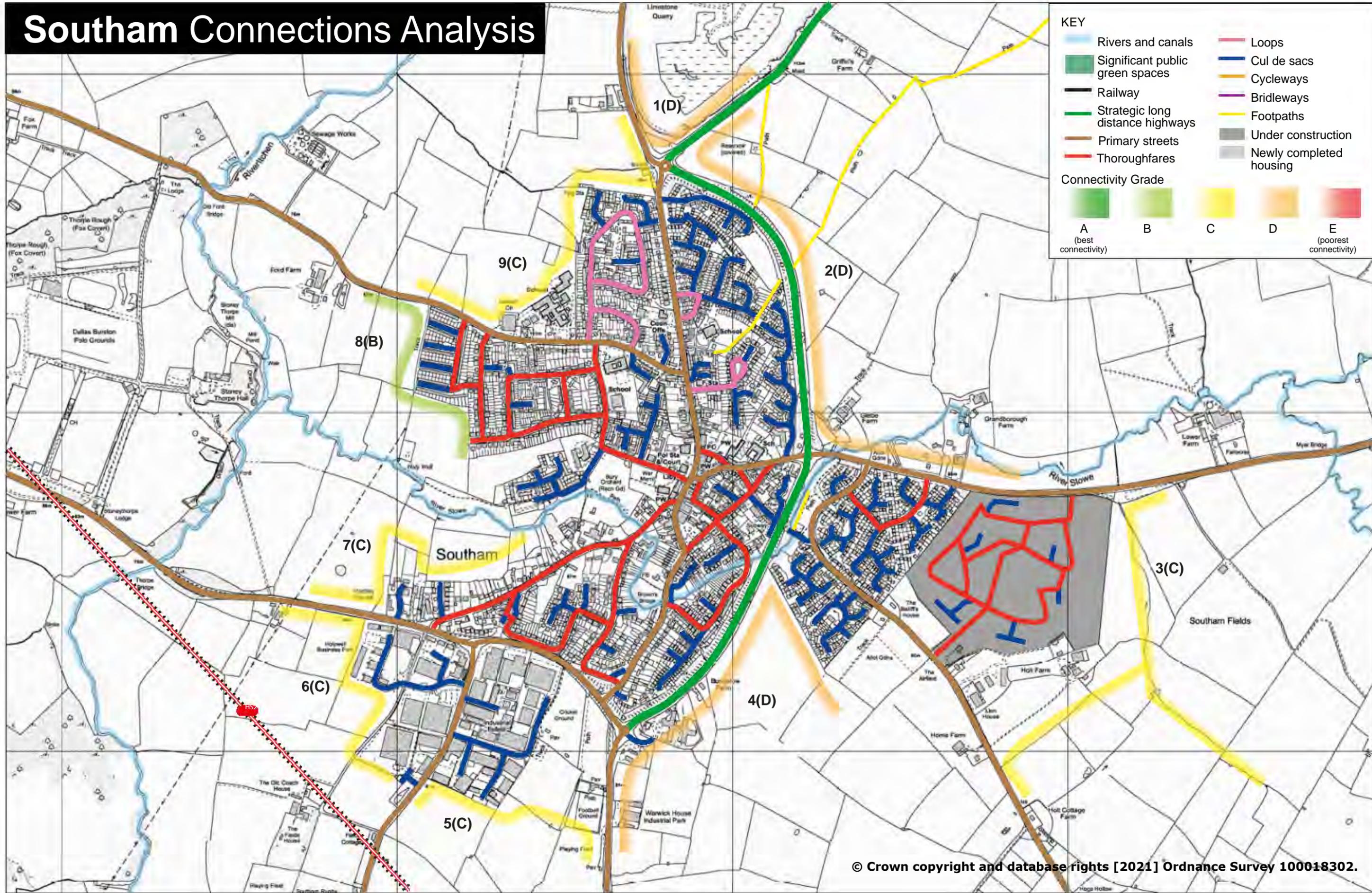
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## Appendix B

Southam

# Southam Connections 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  
0 100 200 300 400 500 m

SCALE: 1:10000 @ A3

Connectivity Grade Analysis: Southam

Area / segment reference	No. brown routes	No. red routes	Active links	Barriers	Comments	Connectivity Grade
1 (north)		1	0			
				0 1) This segment is enclosed in a 'V' shape by two roads which are strategic in nature. Travelling north from Southam, the highway design, including busy roundabouts would act as a barrier to non-vehicular movement. 2) The land appears to be/have been a quarry. There is a significant body of water at the southern end of this segment, which could form an additional barrier to creating a joined up movement (non-vehicular) network toward the town.	The land form slopes away from this segment to both the east and the west. This segment falls between C and D connectivity grades. A judgement has been made to categorise as grade D due to the enclosure of the site by significant highways, and the limited integration potential (of this area in isolation) with the edge of the existing settlement.	
2 (north-east)	1		0 3 (x2 identified 'paths' on the OS map, plus the River Stowe)	1) The A423 is a vehicle only road, complete with bunding on the side. In its current arrangement it is a hostile environment for non-vehicular travel, and would be challenging to cross. 2) Whilst the A425 Daventry Road is categorised as a brown route, the river Stowe runs alongside it to the north, and with the associated slopes and flood plains creates a potential barrier to access, as well as an opportunity for an active travel corridor.	Significant barriers considered challenging to overcome	D
3 (east)	2 ?		?	Watercourse running north-south close to the extent of ongoing development.	There is ongoing development on the edge of Southam in this location at the time of assessment. This appears to be up to the edge of the watercourse which runs between Daventry Road and Welsh Road East. Whilst 2 brown routes enclose this area, substantial development would be needed to benefit from both potential access points (bigger than the ongoing development sites), so in practice care should be cautioned if this direction is further examined.	D
4 (south-east)	2		0 1 - potentially from existing green space adjacent to the A423 which is immediately north of this area.	A423 forms a significant barrier on the western edge of this area, with associated bunding.	On balance graded D, as although 2 brown routes exist, to realise the benefit substantial development would need to be realised. No other straightforward connections appear in this area and the A423 and associated bunding represent a significant barrier.	C
5 (south)	2		0 1 - path indicated on OS base adjacent to cricket ground.	Fragmented route structure with significant loops and cul-de-sacs through an industrial estate, meaning that connecting back to the town via means other than the existing brown routes would be difficult. Cricket and football grounds also located here.	HS2 is currently being delivered around this southern side of Southam. Potential space for development in this direction is therefore highly restricted, as it is considered extremely unlikely that growth would extend beyond the HS2 line.	D
						C

6 (south-west)	2	0	0	Leamington Road is a busy through route, though crossing opportunities do exist. The existing route network relates to an industrial and business area and fragmented and highway led.	HS2 is currently being delivered through this segment, and limits the extent of potential development space.		
7 (west)	1	1	1	1 - along the River Stowe	This area could be accessed via Leamington Road, though much of the area would extend behind existing development, offering limited connection opportunities to the established street network. The River Stowe flows to the north of this segment with associated flood zones, though may facilitate an active link toward the town centre.	Initially this area was considered in combination with segment 8, though given the dissection of the area by the River Stowe, it was subsequently decided to separate these two areas out. If larger scale development were considered within segments 7 and 8, this may impact the overall connectivity assessment.	C
8 (west)	1	1	1	1 - along the River Stowe	The River Stowe runs along the south of this segment, with associated flood zones.	Welsh Road West provides a 'brown route' link, and Holywell Road appears to also provide some potential to connect into this area. 4 cul de sacs to the north east provide further potential points of connection.	C
9 (north-west)	2	0	0	0	School site and leisure centre would prevent direct access to the existing street network for anything behind them. Houses fronting Mayfield Road turn their backs to this area. Only potential links through existing cul de sacs in this northern area.	Although 2 brown routes are noted, substantial development would need to be realised to benefit from both of these, so caution should be exercised in considering this area further.	B
							C

## Appendix C

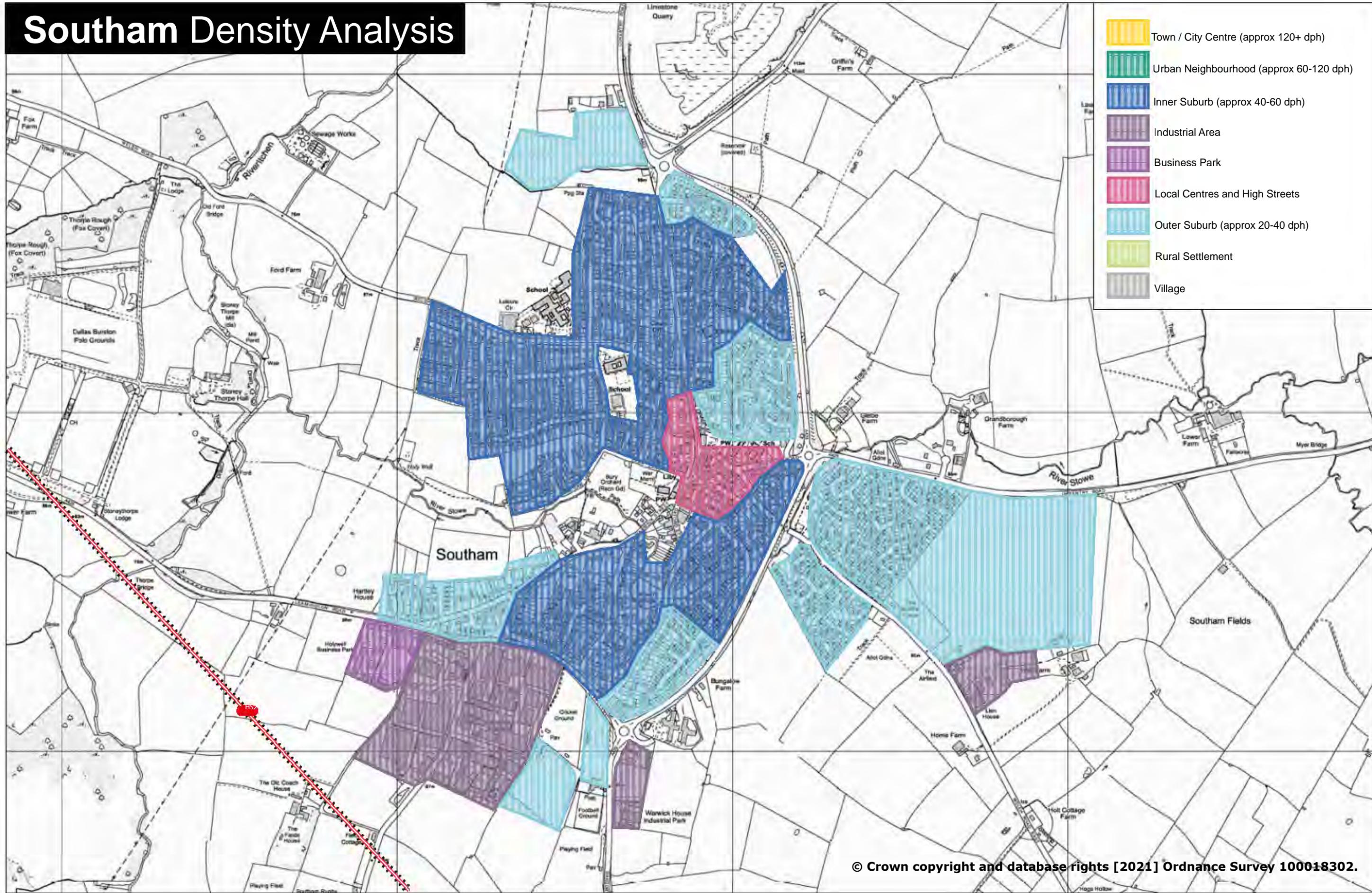


## Appendix D

<b>Local facilities within 800m: Southam</b>						
<b>Area number</b>	<b>Retail, Jobs and Economy</b>	<b>Places to meet</b>	<b>Open space, leisure, recreation - wellbeing</b>	<b>Healthcare</b>	<b>Education</b>	<b>Total number of categories</b>
1	1	1	1	0	1	4
2	1	1	1	1	1	5
3	0	1	1	0	0	2
4	1	1	1	1	1	5
5	1	0	1	1	0	3
6	1	0	1	1	0	3
7	1	1	1	1	1	5
8	1	1	1	1	1	5
9	1	1	1	0	1	4

## Appendix E

# Southam Density Analysis



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Scale  
0 100 200 300 400 500 m

SCALE: 1:10000 @ A3

