

SOUTH WARWICKSHIRE LOCAL PLAN ISSUES & OPTIONS: PART 1

On behalf of Taylor Wimpey (Haye Lane, East of Redditch)

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REPORT

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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 South Warwickshire lying close to the administrative boundary of Redditch; described as 'Haye Lane, East of Redditch'. 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 Haye Land, East of Redditch site. This has been updated to reflect the latest consultation stage and is appended to this submission (**Appendix A**). This document shows that the Haye Lane, East of Redditch 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 land¹ or for optimising the density of development in city and town centres and other locations that are well served by public transport². This includes taking into account the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change³, as well maintaining the viability of development⁴. It is also advised that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range⁵.
- 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, equally, recognises that less**

¹ NPPF 2021, paragraph 124

² Paragraph 108

³ Paragraph 124d

⁴ Paragraph 124b

⁵ Paragraph 125b

intensive 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.
 - 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
- It is suggested there is 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 conducted.

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 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, 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 S5: The potential for new settlement(s)

3.14 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.

- 3.15 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

- 3.16 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.

- 3.17 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.

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

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

3.19 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.

3.20 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?

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

3.22 On this basis, **the development strategy should not place undue reliance on new settlements to deliver the future growth needs of the area given the recent poor performance of other large-scale standalone allocations in delivering the homes needed in the area.**

Issue S6: A review of Green Belt boundaries

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

3.24 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

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

⁸ NPPF 2021 paragraph 140

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.

- 3.25 RPS agrees and welcomes this assessment of the need for a Green Belt review in South Warwickshire. As highlighted in the IO document, Green Belt boundaries should only be altered where exceptional circumstances exist to justify such changes once all reasonable alternative options for accommodating future growth have been explored. This includes the use of brownfield land, optimising density and engaging with neighbouring authorities about accommodating any development needs, and the need to promote sustainable patterns of development⁹. Factors such as the lack of available and deliverable land within existing urban areas, and the extent of unmet need emanating from outside of South Warwickshire in neighbouring areas and elsewhere in the two HMAs that overlap the area, clearly point to exceptional circumstances that justify alterations to the Green Belt in this area. The land at Mappleborough Green offers a clear opportunity to release Green Belt in order to meet those wider needs and can deliver sustainable development in this part of the plan area.

Issue S7: Refined Spatial Growth Options

- 3.26 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

- 3.27 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.

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

- 3.28 RPS has highlighted a number of issues with the CCEE study at a broad level in separate responses 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

⁹ NPPF 2021 paragraph 141-142

years compared with the alternative options, whilst the Dispersed option (Option 5) has the highest emissions.

- 3.29 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

- 3.30 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 Mappleborough Green / East of Redditch is identified as a potential growth location under this option.

- 3.31 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.

- 3.32 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 policy¹⁰. This is reflective of the predominantly rural nature of South Warwickshire where bus travel is often the only viable public transport option available to local communities. RPS would recommend that the distribution of growth should be, as part of the overall spatial strategy, directed to locations that are capable of supporting relatively higher frequency bus services; routes served by daytime hourly bus services or better. According to the Warwickshire Public Transport Map (September 2022)¹¹ higher frequency services run through or close by the settlement of Mappleborough Green, connecting Stratford-on-Avon and Redditch via the A435. In this context, there is clear opportunity to enhance accessibility to public transport services by supporting growth at the Haye Lane, East of Redditch whereby new housing can help increase patronage of these services and thus can be an effective means to help support their future viability.

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

Option 3 Economy

¹⁰ NPPF 2021 paragraph 105

¹¹ <https://api.warwickshire.gov.uk/documents/WCCC-222510381-290>

3.34 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.

3.35 RPS notes that Mappleborough Green and its hinterland is not identified as a potential growth location under this option. Nonetheless, the Haye Lane, East of Redditch site lies in close proximity to Redditch and is accessible to the nearby settlement of Studley and Alcester, and thus it is close to local employment opportunities. The scale of development that could be achieved on the site (c. 560 dwellings) would also make a significant contribution towards the need for affordable housing in the area. This location is therefore consistent with this option and should be assessed as a reasonable alternative site as the SWLP moves forward.

Option 4: Sustainable Travel and Economy

3.36 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.

3.37 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.

3.38 RPS notes that the settlement of Mappleborough Green / East of Redditch 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.**

3.39 In this context, RPS is cognizant of the fact that delivering growth under this option will require some Green Belt release, including Haye Lane, East of Redditch being promoted on behalf of TW. Nonetheless, consistent with submissions made to Issue S6, the identification of this land as a broad location in Part 1 of the SWLP would assist greatly in addressing the wider cross-boundary issues regarding unmet need from neighbouring areas within the two HMAs that South Warwickshire straddles, notably the Greater Birmingham HMA. **It is therefore considered that release of land in Green Belt to address these strategic issues is wholly consistent with national policy¹²**

¹² NPPF 2021 paragraphs 21, 24 and 35

governing the content of plans and specifically strategic policies governing the future direction of growth.

Option 5: Dispersed

- 3.40 The IO document has brought forward this option from the Scoping Consultation essentially unchanged.
- 3.41 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 the settlement of Mappleborough Green / East of Redditch is identified as 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.
- 3.42 Whilst not reflected in the commentary which supports this option in the SWLP, 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 the South Warwickshire area and as commented above, recognises that the area is a semi-rural but nonetheless accessible location.
- 3.43 Consequently, it is entirely appropriate to direct a proportion of the area's overall growth needs to rural settlements, consistent with local and national policy¹³ that seek to promote sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and support local services.
- 3.44 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 Option 5 as part of the preferred spatial development strategy for the SWLP.**

(New) Option 6: Addressing wider housing needs from outside South Warwickshire.

- 3.45 As explained elsewhere in this submission, the IO document references two potential contributions (5000 and 10,000 dwellings) towards the wider unmet needs from the Greater Birmingham and Black Country and Coventry & Warwickshire HMAs. RPS has highlighted in this submission deficiencies in the IO document given the lack any sustainability appraisal of these options in the IO SA. Similarly, the IO document identifies housing needs arising from outside of South Warwickshire as an issue for the SWLP to address (under Issue S4).
- 3.46 Reference is also made in the IO document to the fact that South Warwickshire straddles these two HMAs and is strongly related to Coventry but also shares a boundary and inter-relationship with

¹³ NPPF 2021 paragraph 79

Redditch. This is clearly an issue that has spatial implications for the SWLP as it moves forward. However, whilst the commentary in the IO document reflects on this issue, it falls short of proposing any spatial growth options to address it through the SWLP. This includes the current evidence in the GBHMA Strategic Growth Study (2018), which points to an area east of Redditch as offering a potential location to accommodate a proportion of any unmet need arising from outside the wider HMA. This broad location would logically include the Haye Lane, East of Redditch site, given its close proximity to Redditch.

- 3.47 Consequently, **RPS recommends that an additional growth option (or options) should be devised and taken forward to the next iteration of the SWLP focused on options for accommodating wider housing needs. In spatial terms, this option would include the Haye Lane, East of Redditch which is considered to be a viable and deliverable option to accommodate any identified housing shortfall. This option should then be tested through the SA process and issued for public consultation at the next stage of the SWLP.**

Issue S9: Settlement Boundaries and infill development

- 3.48 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.
- 3.49 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.
- 3.50 The IO document makes clear that this plan review relates to part 1 strategic policies only, including strategic allocations and / or new settlement locations, and not non-strategic policies and allocations. On this basis, RPS would favour Option S9a – settlement boundaries should be reviewed at the Part 2 review stage. Given this option refers to the ‘emerging SAP’ RPS assumes that the SAP is still likely to be progressed and adopted including alterations to some settlement boundaries, prior to an immediate review of those boundaries in short order in the Part 2 SWLP. This is logical as the Part 2 SWLP will need to ensure the settlement boundaries , including any detailed boundary for Haye Lane, East of Redditch 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).
- 3.51 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:

- 3.52 The preamble states that Chapter 4 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.
- 3.53 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 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.
- 3.54 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).
- 3.55 **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 the 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 welcomes the preference for the alternative ‘trend-based’ projection set out in the HEDNA, which underpins the local housing need figures set out in the IO document. Nonetheless, 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 PPG¹⁴. 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	8407	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

¹⁴ PPG ID-2a-018 to 2a-024

Source: C&W HEDNA Table 8.14

- 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)¹⁵, 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 policy¹⁶. The best way to increase the supply of affordable housing across South Warwickshire is therefore simply to allocate more land in sustainable locations within the area. This is best achieved through the development of mixed-tenure private sector-led development in areas where viability is less of a problem, notably in South Warwickshire, relative to metropolitan areas such as Coventry.**

Issue H4: Accommodating housing needs arising from outside of South Warwickshire

Q-H4-1: Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?

- 4.15 No.

¹⁵ Coventry City Authority Monitoring Report 2021/22 Published 21st November 2022, Figure 9

¹⁶ NPPF 2021, paragraph 20

- 4.16 The approach set out in the IO document, in point 1 of this issue, concerning the period to 2031 focuses solely on the 37,900 dwellings shortfall emanating from the Greater Birmingham and Black Country HMA. This shortfall was confirmed through the adoption of the Birmingham Development Plan (BDP) in January 2017. Reference is also made to an updated HMA position statement addendum published by the 14 constituent local planning authorities that is dated December 2021¹⁷. These documents formed the basis for the proposed allocation of five reserve housing sites in the Stratford-upon-Avon Site Allocations Plan (SAP) Preferred Options document issued in June 2022 as a contribution towards this shortfall. The total contribution proposed could see potentially 530 dwellings being released under the SAP were all these sites to come forward by 2031.
- 4.17 However, events have now moved on since the SAP was last consulted on. As a prelude, as of January 2022 the BDP reached its five-year anniversary and so became more than five years old. This meant the adopted housing requirements in the BDP need to be reviewed to judge whether they remain up to date (This was confirmed in the BDP Local Plan Review Assessment, dated April 2021)¹⁸. Birmingham City Council (BCC) published its own Issues and Options consultation, in October 2022¹⁹, after the consultation on the SAP. Evidence prepared in support of this consultation identifies a housing shortfall for the city totalling around 78,400 dwellings between 2020 and 2042, nearly double the previous shortfall and which includes the period 2020-2031.
- 4.18 The Issues and Options and evidence base supporting the plan review in Birmingham comprises new evidence that supersedes the adopted BDP and which should be taken into account in the preparation of the SWLP; it is therefore of key relevance to the setting of the housing requirement up to 2031 for the SWLP, which has 8 years to run until that point and so there is window of opportunity to plan for some of this housing shortfall during this time period.
- Q-H4-2: Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan*
- 4.19 RPS notes the reference to potential contributions that the SWLP could make towards the wider needs of the GBBCHMA up to 2050; 5,000 or 10,000 dwellings set out under point 2 of this issue. RPS welcomes the inclusion of contribution options towards addressing this need, though it is important that the quantum and distribution of this additional growth to the SWLP is appraised in an integrated manner given there are likely to be different spatial options available to accommodate the overall number of homes across the SW area, in preference to identifying an essentially arbitrary number first before then seeking to allocate sites to meet this. **In summary, RPS would be supportive of the higher figure (10,000) as this is likely to reflect the increased scale of unmet**

¹⁷ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum, December 2021

¹⁸ Birmingham Local Plan Review Assessment Report April 2021

¹⁹ Our Future Birmingham City Plan Birmingham Local Plan Issues and Options, October 2022

need emanating from Birmingham as well as potential for additional unmet need from other areas, for example the Black Country and Redditch.

- 4.20 In contrast, RPS notes that question H4-2 does not mention the potential for the SWLP to address the wider needs of the C&WHMA. The IO document, under point 3 of this issue, refers to working with colleagues in Coventry to identify how much need can be met in the city and then working with other colleagues across the HMA to agree how the shortfall is best accommodated. Despite there being no details as yet regarding the scale of any shortfall from Coventry, the IO document speculates that this might be 'relatively modest'. However, the trend-based need figure for Coventry is 1,964 dpa, which is still substantially higher than the adopted capped housing requirement of 1,230 (average) dpa for the city. **Consequently, it is therefore more likely that the shortfall from Coventry will be considerable and will need to be accommodated elsewhere, including in South Warwickshire.**

Q-H4-3: If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?

- 4.21 RPS welcomes the view expressed on page 109 of the IO document recognising that '*...any additional needs can be accommodated outside of any protected areas...*' which is clearly reflective of the size and extent of the SW geographic area. RPS also welcomes the inference to the potential for Green Belt release where '*...such locations were considered suitable, appropriate, and necessary as part of the wider development strategy*' which broadly accords with paragraph 140 of the NPPF and the provision for Green Belt alterations were established in strategic policies.
- 4.22 The IO document also advises '*...that if homes are being provided to meet needs arising in Coventry and Birmingham, then those homes should be located as close as possible to the source of those needs in order to minimise travel*'. Under this approach, there is clearly potential to direct a suitable amount of new development to the north-west of the plan area to assist in meeting unmet need in close proximity to Birmingham and the Black Country and, potentially, Redditch; and to the north-east of the plan area on land close to Coventry in order to help address their unmet needs. This would be consistent with South Warwickshire, which straddles two HMAs (Coventry & Warwickshire HMA, and Greater Birmingham and Black Country HMA).
- 4.23 In terms of potential location(s), RPS has submitted responses to the Scoping consultation in 2021 on this matter. It is therefore worth reiterating those points in the context of this question. Notably, **RPS would caution against pursuing a strategy that relies on delivering new settlements and which ignores other viable and deliverable opportunities that exist elsewhere in the area.** This is clearly evident in Stratford, where housing delivery at the two new settlements identified in the Core Strategy has fallen way short of expected levels. Notably, the latest annual monitoring figures indicate that only 13 dwellings have been completed across the new settlements from the start of the plan period (2011) to end of March 2020²⁰.

²⁰ Stratford-on-Avon District Authority Monitoring Report 2019-2020 March 2021, Appendix 2

- 4.24 A more appropriate strategy would be to explore potential options in sustainable locations that are in close proximity to where the need arises and that can be expedited in a timely manner. This includes location currently within the Green Belt. This would fit with the IO document which has reference Green Belt review as a mechanism for addressing future needs, which would offer potential to support growth over the longer-term. This in the context of the challenge facing the two HMAs due to the future unmet housing need that is likely to emerge from elsewhere in the HMA including Birmingham and the Black Country, but also Coventry, whilst Redditch will face continued pressure to address its own needs within its own boundaries.
- 4.25 In Redditch, an area that shares a boundary with Stratford District, there are ongoing difficulties in the ability of the Borough to identify sufficient land to meet its local need, with reliance on Bromsgrove to accommodate the majority of its housing need up to 2031, totalling some 3,400 out a total need of 6,400 dwellings required in the area. Whilst the local housing need figure may be lower (currently 165 dwelling per annum), it is unclear at present how future needs beyond 2031 will be met within Redditch's own boundary. It is also not clear at this point whether Bromsgrove would continue to take a share of the Redditch need in the future if required, given the constraints on that area caused by the Green Belt. Nonetheless, RPS expects the forthcoming new Local Plan for Redditch to confirm that Redditch Borough will again require neighbouring authorities to accommodate a proportion of their housing need. An ongoing shortfall in housing delivery within the Borough provides a further indication that housing delivery to meet its own needs will remain a key challenge in Redditch.
- 4.26 Previous evidence published in the Greater Birmingham and Black Country HMA Strategic Growth Study (2018) assessed the potential for releasing Green Belt around the edges of the West Midlands conurbation and the major towns located within the GBBC HMA area, including land lying on the edge of Redditch but within Stratford-on-Avon District. The study found that land around the eastern edge of Redditch only performed a 'supporting' and not a 'principal contribution' to the Green Belt in this location. The SGS then went on to identify 24 'areas of search for strategic development', including an area of search referred to in Table 5 of the report as *Southeast of Redditch, Stratford-on-Avon District*, for an urban extension (in the general location of Area 18). This is represented below in Figure 2.1 (taken from Figure 38 of the SGS report) for ease of reference.

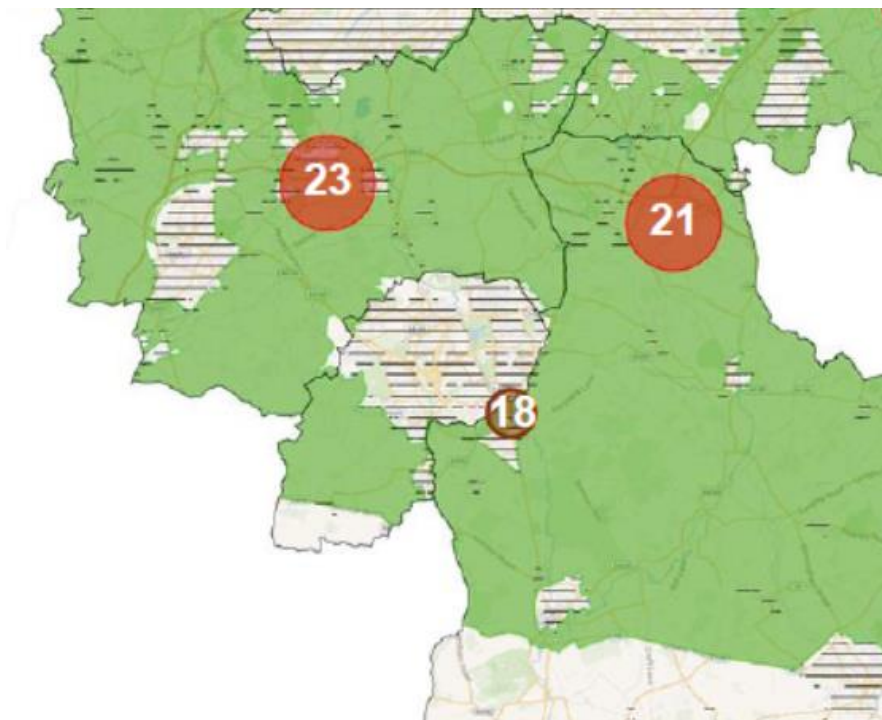


Figure 4-1 Extract from Greater Birmingham HMA Strategic Growth Study 2018 – ‘ Areas of Search 18’

4.27 With regard to the south-east of Redditch (Location UE5), the report states:

“Bordering open countryside to the southeast, development would have no effect on the strategic function of the Green Belt. Whilst largely being defined by the A435, the urban edge in this location is somewhat fragmented with various examples of historic and more modern development intruding into the rural hinterland. An appropriate scale of extension is uncertain at this stage and in any case would require the definition of an external boundary to limit sprawl into open countryside and potential issues with local coalescence (such as with Studley) to be addressed” (paragraph 8.112):

“This area is not constrained by any nationally significant constraints, aside from a section of land covered by Flood Zone 3. There are a small number of Scheduled Ancient Monuments in close proximity to the Area of Search. The area is situated on the urban edge of Redditch, in line with the development model criteria set out in Table 43, which provides a range of existing facilities” (paragraph 8.113).

4.28 The evidence base at the sub-regional (GBBCHMA) level suggests that greater consideration should be given to the area of land lying on the edge of Stratford-on-Avon that is in close proximity to Redditch administrative boundary, particularly as the SGP identified the area of search (Area 18) as a **Reasonable Alternative**. This would include on the eastern edges of Redditch town as potential location for further housing provision to address the future needs of the Redditch and the wider GBBC HMA. RPS welcomes the recommendation in the IO document to undertake a Green Belt Review to support the preparation of the SWLP. On the basis of available information, Green Belt release in the SW area is clearly a reasonable option that should be explored as part of the wider strategy based on enabling both local needs and the wider needs from outside the SW area to be addressed in a comprehensive manner

4.29 Consequently, land on the eastern side of the town is strategically placed in order to address the unmet needs of Birmingham, the Black Country, and Redditch, being located in close proximity to

Redditch and the West Midlands conurbation, and which could also provide the opportunity to deliver new or enhanced infrastructure and other facilities on a more comprehensive basis, but also provide opportunity for shared service provision to meet the needs of new residents. Consistent with the responses above, RPS recommend that the SW authorities and must consider this a **Reasonable Alternative** through the SA a Broad Location for Growth and a new Option (6) for meeting cross boundary HMA development requirements. The full extent of Redditch's development requirements are subject to testing through its emerging local plan and subsequent Examination and so to rule potential growth out on the Eastern boundary of Redditch is not only inconsistent with the findings of the 2018 Strategic Growth Study but would also be failing legal SA of considering all suitable and reasonable alternatives.

Issue H7: Other Comments

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

- 4.30 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.
- 4.31 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 Regulations²¹ (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 provides 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.

²¹ 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 of the 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 as not appraised any such contribution, or undertaken any

appraisal of possible locations where such unmet could be accommodated, despite the area's clear identification as Redditch's principal area of search (site 18) in the Strategic Growth Study (2018) as referenced above. This brings into play consideration of other locations, notably Haye Lane, East of Redditch 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 constitutes a 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. **These 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 commented on elsewhere in this submission (under Issue S4). It is worth reiterating again however that the published evidence this 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 New Settlement options

- 5.21 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.
- 5.22 Paragraph 3.8.1 of the IO SA states that the seven new settlement's 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).
- 5.23 This appears to be the sum total of information or 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.**
- 5.24 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 evidence.**

SA of Spatial Options

- 5.25 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.
- 5.26 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.

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 Nonetheless, it is also noted that a small number of additional 'settlements' have been further identified and assessed here, listed at paragraph 3.3 of the report. This includes the location 'South of Coventry'. Whilst RPS does not object to including this area in the analysis, there is another location elsewhere which has been excluded but which is suitably located in close proximity the neighbouring town of Redditch, notably the area 'Haye Lane, East of Redditch'. The area East of Redditch is identified in a number of spatial growth options in the IO document, alongside the area South of Coventry. RPS sees no reason to exclude one area, whilst including the other. **The Settlement Analysis should therefore be updated to include the area East of Redditch to ensure the evidence is based on a consistent choice of locations.**

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.
- 7.3 The HSSA does not include an appraisal of Haye Lane, East of Redditch site or its environs. Nevertheless, the Vision document appended to this submission (**Appendix A**) includes an initial review in relation to archaeology, built heritage and historic landscape. The review did not identify any designated heritage assets within the site. Two designated assets were identified approximately 130m north of the site. Whilst there was some potential for non-designated heritage assets to be present on the site, it is not anticipated that this would necessarily preclude development. Furthermore, any potential impact on the setting of any nearby assets (designated or non-designated) could be suitably addressed through appropriate mitigation as part of the overall masterplan.
- 7.4 In this context, **RPS considers the Haye Lane, East of Redditch site would score either 'Green' or 'Amber' against the HSSA methodology as any potential heritage impacts can be suitably mitigated, as evidenced in the updated Vision Document submitted for the site (Appendix A).**

APPENDICES

Appendix A

Taylor
Wimpey

Haye Lane, East of Redditch

Vision Document

March 2023





Taylor Wimpey

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Executive Summary

This document sets out the vision for the development of the site known as Haye Lane on the edge of Redditch 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 Redditch.

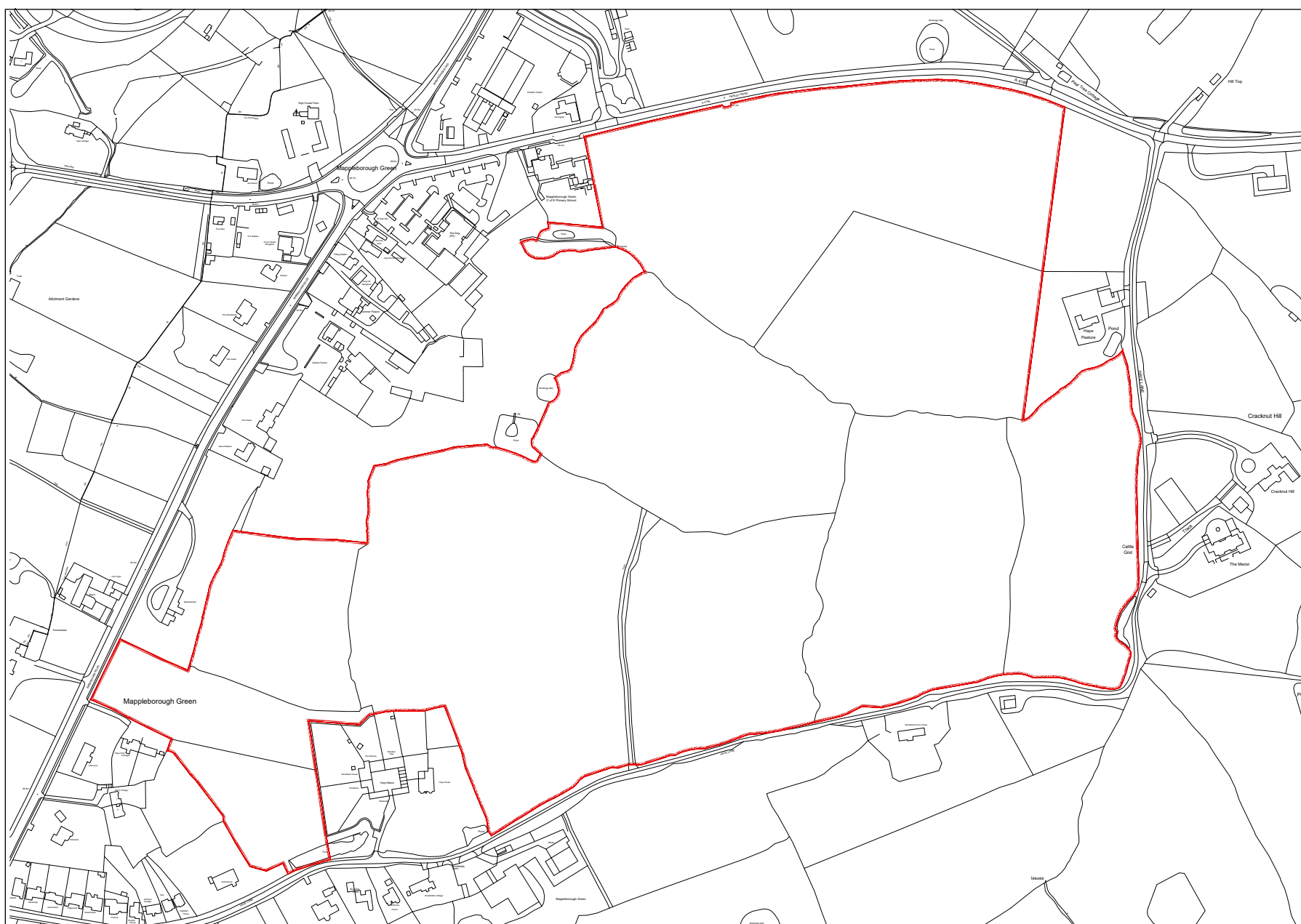


Context

The site is located on the eastern side of Redditch and is well located in relation to the urban boundary of the settlement. It is 37 hectares in size and consists of a mixture of arable and pastoral fields which are typically bounded by hedgerows.

While the site is located within Stratford-on-Avon District it is near to the border with Redditch Borough and as such is well positioned to make a contribution towards meeting the need for new housing for residents of both local authority areas. The Greater Birmingham Housing Market Area Strategic Growth Study considered the area that the site lies within as a broad location for a potential sustainable urban extension. While this study did not identify this area as a preferred option this was due to the study focusing on addressing unmet need arising from Birmingham, as at the time unmet need from Redditch had recently been addressed through the adoption of the Bromsgrove Local Plan. Notably, this was the only location around Redditch that was considered by this study as having the potential to accommodate a sustainable urban extension.

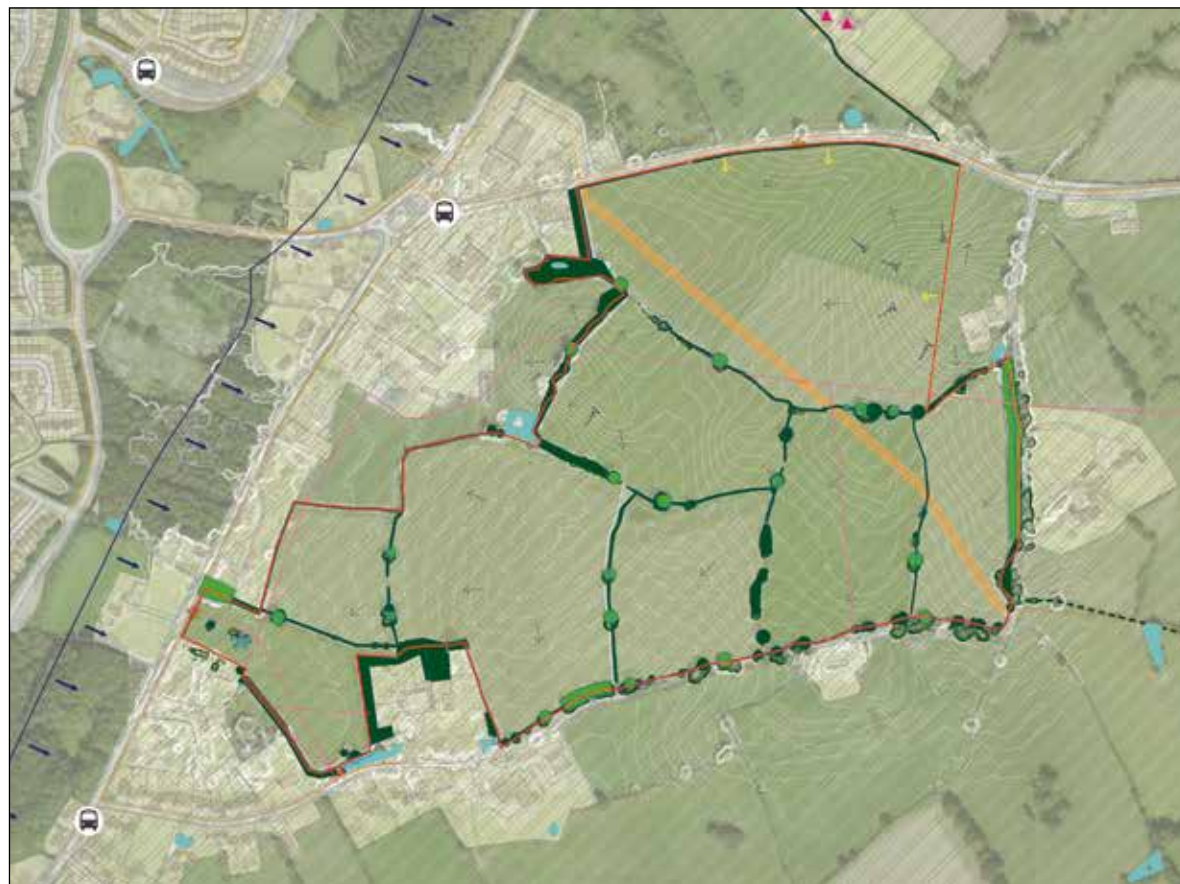
The emerging Stratford-on-Avon Site Allocations Plan and South Warwickshire Local Plan both present opportunities to allocate the site for development. The forthcoming new Local Plan for Redditch is expected to confirm that Redditch Borough will again require neighbouring authorities to accommodate a proportion of their housing need, as was the case with the recent Borough of Redditch Local Plan No. 4 for which over half of the objectively assessed need was accommodated by neighbouring authorities. An ongoing shortfall in housing delivery within Redditch Borough provides a further indication that this will again be the case in the future.



Site Boundary Plan

Constraints and Opportunities

- Located within the Green Belt.
- A Green Belt Assessment undertaken on behalf of Taylor Wimpey found that the site made only a limited contribution to openness and the five purposes of the Green Belt, and as such removal of the site from the Green Belt would not undermine the overall purposes and integrity of the Green Belt.
- Visually reasonably well contained due to undulating topography combined with mature vegetation both within and surrounding the site.
- Access into the proposed development will primarily be from Henley Road with a secondary access on Birmingham Road.
- The site is well located with a range of services within a 2km walk of the centre of the site.
- Residential areas of Redditch to the east and south are within a 5km cycle from the centre of the site. Sustainable modes of transport would be promoted at the proposed development.
- Potential to incorporate a bus route through the site providing easy 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.
- The site consists of a mixture of arable and pastoral fields which are typically bounded by hedgerows.
- There are no internationally designated sites within 10km of the site and the nearest SSSI is 800m 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.
- Nearest designated heritage assets are the Grade II listed Common Farmhouse and associated Grade II listed stable and barn which are located approximately 130m north of the site. The provision of open space in the north eastern part of the development will help to ensure that changes to the wider agricultural setting of these buildings is mitigated and so any harm would be less than substantial.
- Views exist to the west from higher ground in the eastern area of the site, including views towards the historic core of Redditch and the spire of the Grade II listed Church of St Stephen, located within Church Green Conservation Area. However, it is not anticipated that residential development of the site would adversely impact distant designated heritage assets.
- Current evidence does not suggest below-ground remains are likely to be present which would preclude development across the wider site area. Hay Farm is a potential non-designated heritage asset.
- The site is in Flood Zone 1. There are no recorded flooding events from all sources including groundwater, rivers and watercourses (fluvial), overland rainfall runoff (pluvial) or artificial sources such as overloaded or blocked public sewer networks.
- An outline drainage strategy has been prepared which indicates that a surface water runoff rate which mimics the existing greenfield run-of rates is achievable. This will ensure that there is no increase in flood risk downstream of the site or in adjacent areas as a result of its development.



Constraints and Opportunities Plan

- SUDS/water features are proposed which will provide multi-functional benefits by providing storage, water quality benefits, biodiversity and amenity.
- 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 concerns have been raised from discussions with the utility providers about the ability to serve this site with high quality infrastructure, including high speed broadband.
- In accordance with the forthcoming Future Homes Standards 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.
- A 700mm clean water aqueduct crosses through the site from north west to south east. Due to cost and the strategic nature of the main to Severn Trent it is anticipated that diversion will not be possible, so the masterplan has been designed to maintain it in its current location within a central green corridor.
- No constraints to residential development at the proposed site in terms of air quality beyond the setting back of sensitive development from the adjacent A-roads.
- 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.

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 Henley Road and Birmingham Road providing a Primary Street through the proposed development. Access for non-motorised users along Henley Road would be accommodated by extending footways at the site access west to connect with those that already exist at Mappleborough Green Primary School.

Approximately 16 ha of land is proposed for residential development providing up to 560 dwellings at 35dph. An extension to the existing school adjacent to the site is proposed off increasing capacity for the school and providing sports facilities including sports pitches. A small local centre is also proposed to service the new development and existing nearby residents.

A substantial proportion of the site would be retained for Green Infrastructure with provision of a new community park for residents



Concept Masterplan

Deliverability

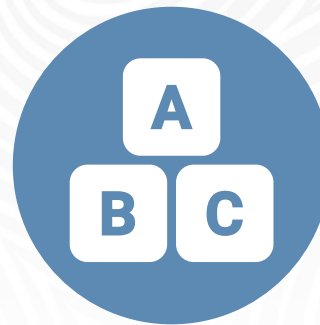
As the site is within the control of Taylor Wimpey, a market leading housebuilder, it is clear that the site is available for development. Although the site is currently located within the Green Belt and a Special Landscape Area, its release for development would not have a detrimental impact on land beyond the site that has been designated for these purposes. It is located on the edge of the 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 including:

Social

Provision of up to **560 new homes, including affordable homes**, helping local people to be able to afford to stay in the area.



Proposed **expansion of primary school** and provision of new community facilities.

Potential for circa 2.2 hectares of **new sports pitches.**



Increase open space, community sport, leisure spending by **£166,527**



Economic¹

Support the employment of 1,736 people

(combination of direct, indirect, and induced jobs) during the construction phase. **Provide 19 apprentices, graduates, or trainees.**



Generate £6,749,680 in tax revenue, including **£632,497 in council tax revenue** to Stratford-on-Avon District Council.

When complete the future occupiers will generate **£14.7m** of expenditure in local shops and services and a **further £3m** spent to make these houses “feel like home”.



Generate £451,472 towards education spending which could provide up to **212 classroom spaces.**

¹ 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. <https://www.hbf.co.uk/policy/policy-and-wider-work-program/hbf-housing-calculator/>

Environmental

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

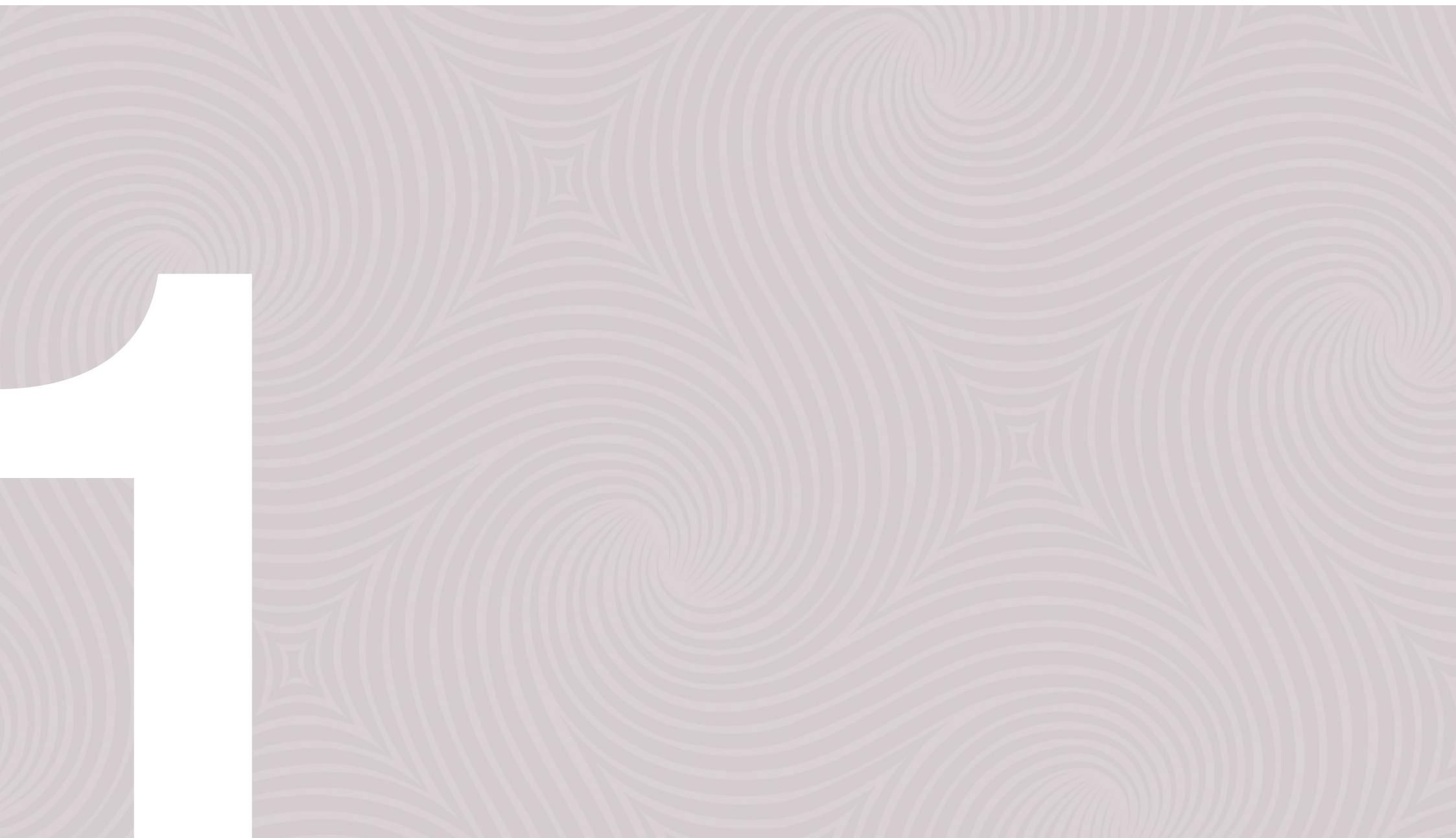


The proposals create significant publicly accessible green space.



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>Climate change 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"> – Reduce operational carbon emissions intensity by 36% by 2025 from a 2019 baseline – Reduce carbon emissions intensity from our supply chain and customer homes by 24% by 2030 from a 2019 baseline 	<ul style="list-style-type: none"> – Reduce operational energy intensity by 32% for UK building sites by 2025 – Purchase 100% REGO-backed (Renewable Energy Guarantees of Origin) green electricity for all new sites – Reduce emissions from customer homes in use by 75% by 2030 – Reduce embodied carbon per home by 21% by 2030 – Reduce car and grey fleet emissions by 50% by 2025 	<ul style="list-style-type: none"> – Update our policies and processes to reflect the risks and opportunities from a changing climate by 2022 – 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
<p>Nature 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"> – Hedgehog highways from 2021 – Bug hotels (at least 20% of homes) from 2021 – Bat boxes (at least 5% of homes) from 2022 – Bird boxes (at least 80% of homes) from 2023 – Wildlife ponds from 2024 	<ul style="list-style-type: none"> – Reptile and amphibian hibernation sites from 2025 – All new sites have planting that provides food for local species throughout the seasons – Help customers engage with nature and create 20,000 more nature-friendly gardens by 2025 – 200 beehives on our sites by 2025
<p>Resources and waste 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"> – Engage with suppliers to meaningfully reduce plastic packaging on our sites by 2025 – Help 20,000 customers to increase recycling at home by 2025 – Reduce operational mains water intensity by 10% from a 2019 baseline by 2025 – Make it easier for 20,000 customer households in water stressed regions to install a water butt by 2025 	<ul style="list-style-type: none"> – Measure the environmental footprint of the key materials in our homes and set a reduction target – Measure air quality in our homes and on our sites by 2021 – Give customers the information they need to maintain good air quality in their homes by the end of 2021

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 Redditch which is located to the east 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. We seek to apply this approach to the scheme at Haye Lane which has the potential to provide approximately 560 dwellings on 37 hectares of land.

In close proximity to Redditch, 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 both Redditch Borough and 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 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, we 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. Our projects are located throughout the country ranging from large urban extensions to smaller residential schemes.

As a responsible business, Taylor Wimpey want to play our part in creating a sustainable future for everyone. Our purpose is to build great homes and create thriving communities. Taylor Wimpey's commitment to sustainability helps us to achieve our purpose by ensuring we design and build flourishing, inclusive places for our customers; operate responsibly; create a great place to work for our employees; and play our part in protecting the environment for future generations. Already the first and only UK developer to achieve the Carbon Trust Standard for Carbon, Taylor Wimpey 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 our 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 Haye Lane, East of Redditch 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 we 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 our own environmental footprint, reducing emissions and waste, conserving precious resources and regenerating the natural environment on our developments. Furthermore, as a company we are seeking a science-based carbon reduction target that will ensure we align our progress with the international Paris Climate Agreement.

TW will engage our 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 we 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

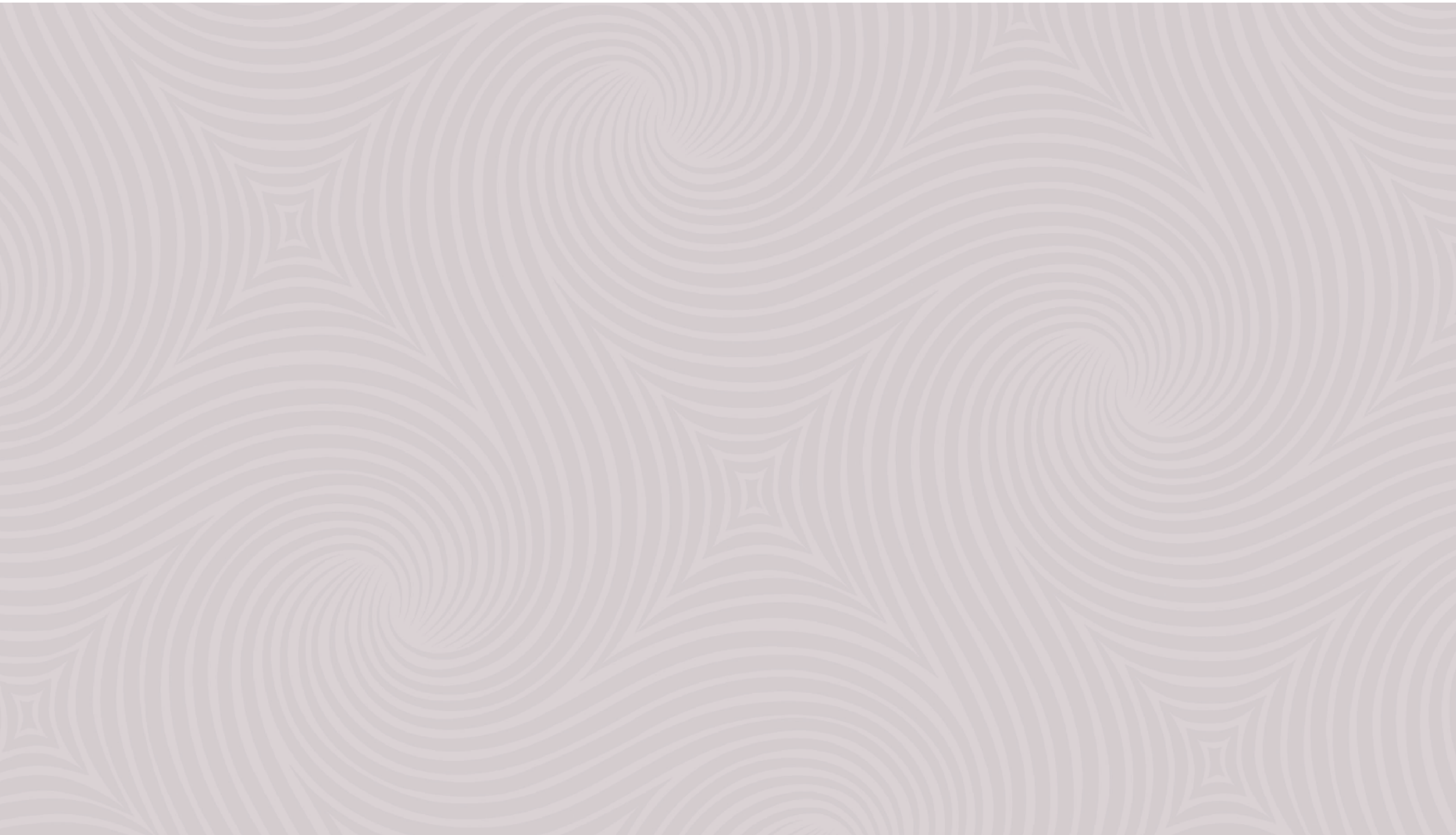
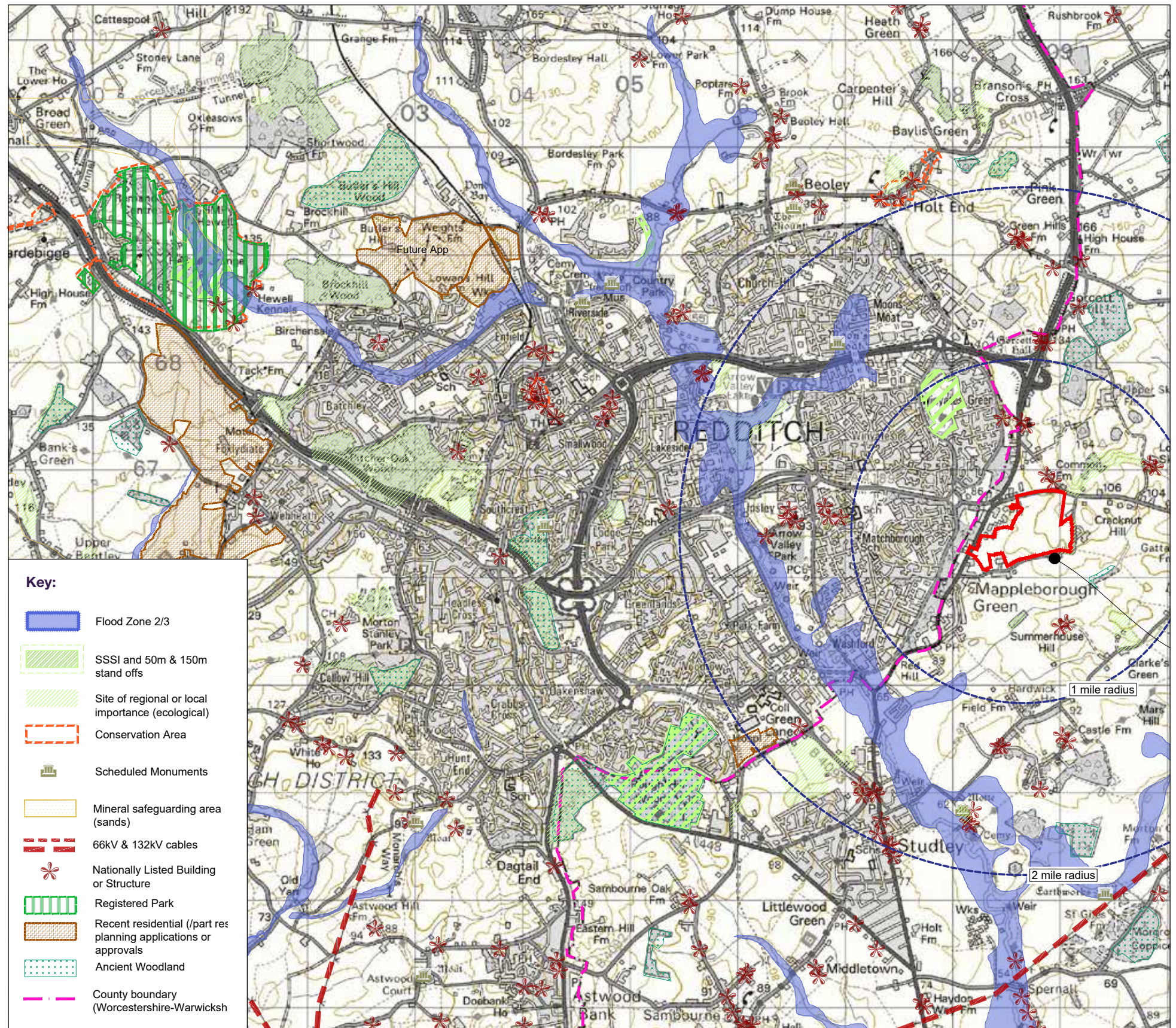


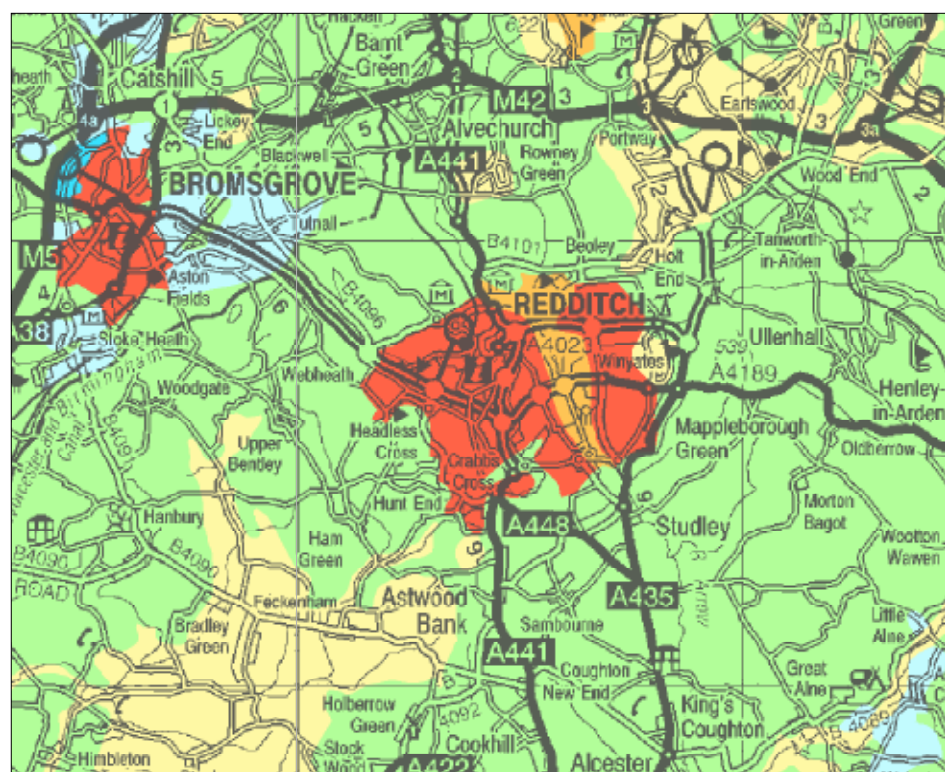
Figure 2: Location and Context



2.0 The Site

The site is located on the eastern side of Redditch and well located in relation to the urban boundary of the settlement.

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



The site consists of a mixture of arable and pastoral fields which are typically bounded by hedgerows. It covers a total area of 37.41 hectares. It is primarily bounded by Henley Road (A4189) to the north; Haye Lane to the east and south; and Birmingham Road (A435) and a mixture of community and commercial uses that front onto Birmingham Road to the west and north west.

Mappleborough Green Church of England Primary School is located adjacent to the site on its north western boundary forming a part of a cluster of community and commercial uses that abut the site. Other uses in this area include a garden centre, petrol station, takeaway, butchers, and public house.

To the south of these community and commercial uses, either side of the part of the site that adjoins Birmingham Road, are a number of residential properties located along both Birmingham Road and Haye Lane. At the eastern end of this group of residential properties on the opposite side of Haye Lane there is a business that sells and maintains agricultural machinery.

Excluding the residential and commercial land uses, the majority of land to the north, east and south of the site consists of agricultural fields, with a few isolated dwellings located along Haye Lane. Further west of the site beyond a wooded area bound by Birmingham Road and Claybrook Drive lies the town of Redditch, while to the south west of the site lies the settlement of Mappleborough Green.

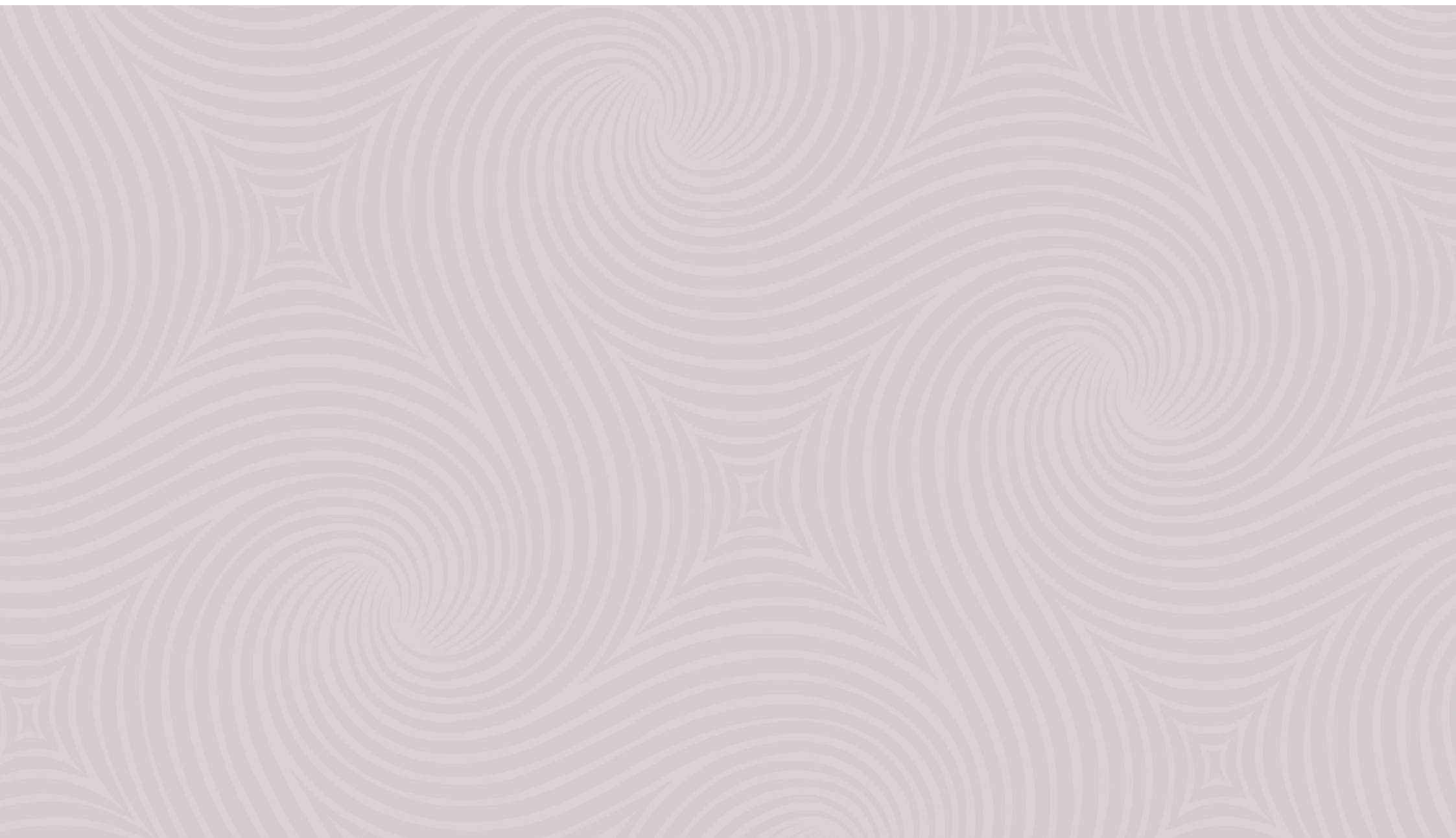
The Agricultural Land Classification Map West Midlands Region (ALC004) indicates that the land to the east of the A435 within the vicinity of Redditch, including the site, falls within grade 3 (washed green) as shown on Figure 3.

There are no Public Rights of Way crossing the site, although the development of the site could provide the opportunity to improve accessibility and connect with existing public footpath routes. There is a brook that runs through part of the centre (broadly east to west) of the site and a pond. There are high voltage and local voltage lines running through the site, which are proposed to be diverted.

The site is entirely within the control of Taylor Wimpey.



3.0 Planning



3.0 Planning

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). The CS includes a housing requirement of 14,600 new homes over the plan period. The CS includes 10 strategic housing allocations as well a further allocation of 2,000 new homes across the Local Service Villages.

Although the site is located within Stratford-on-Avon District it is also on the edge of Redditch and so it is being promoted for cross boundary growth.

Borough of Redditch Local Plan

The site is located adjacent to the boundary of the borough of Redditch. The current development plan for Redditch is the Borough of Redditch Local Plan No. 4 (adopted 30th January 2017) which covers the period 2011 to 2031. There is currently no timetable for the review of this, however on 16th November 2020 authority was granted to officers to begin the creation of a new Local Plan for Redditch.

The Borough of Redditch Local Plan No. 4 did not meet the full objectively assessed need for housing arising from Redditch due to a lack of suitable development sites within the borough. This meant that more than half of the housing need arising from Redditch (circa 3,400 homes) was exported to nearby authorities. As a tightly bound Local Planning Authority area it is expected that Redditch will again need to export some of its housing requirement unless significant levels of supply can be identified from currently unknown sources.

Housing delivery against the adopted housing requirement for Redditch is currently running at a shortfall of 1,300 homes as of 2020/21 according to the Housing Land Supply in Redditch Borough 2011-2022 report prepared by Redditch Borough Council dated April 2022. The same report expects to deliver 1,550 dwellings in Redditch during the next five years (2022-2027) at an average of 310 completions per annum (see Figure 4). This represents a significant uplift in the rate of delivery seen in recent years (2020/21, 127 dwellings). Despite this, expected delivery against the local housing need of 156 dpa would still leave an ongoing shortfall of at least 770 dwellings in Redditch by 2027.

The site's proximity to Redditch means that it is particularly well placed to contribute towards addressing any unmet need that may arise from Redditch through the next round of plan making.

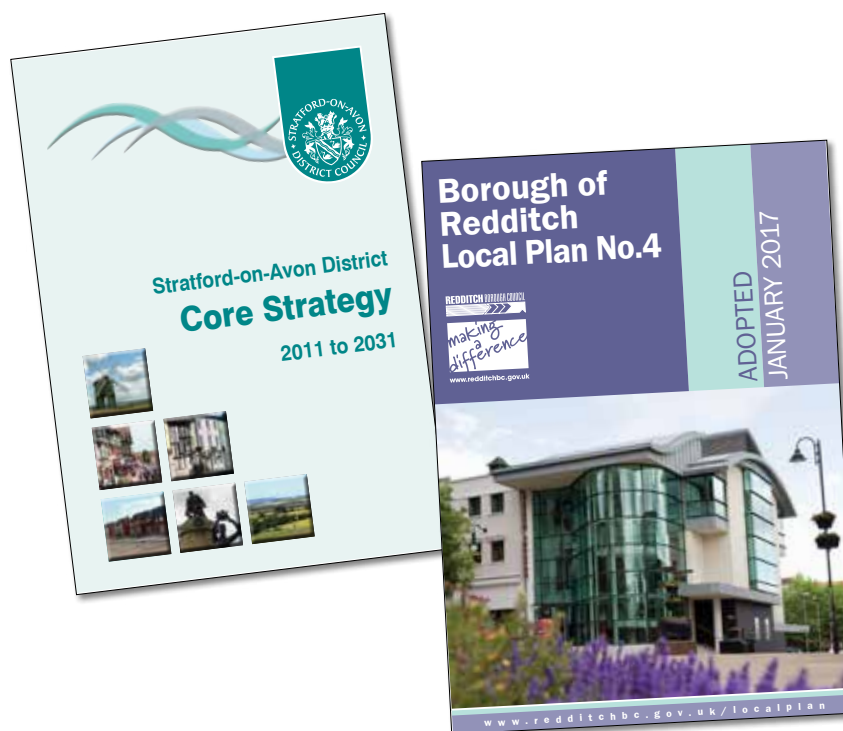


Figure 4: Redditch Borough Housing Trajectory

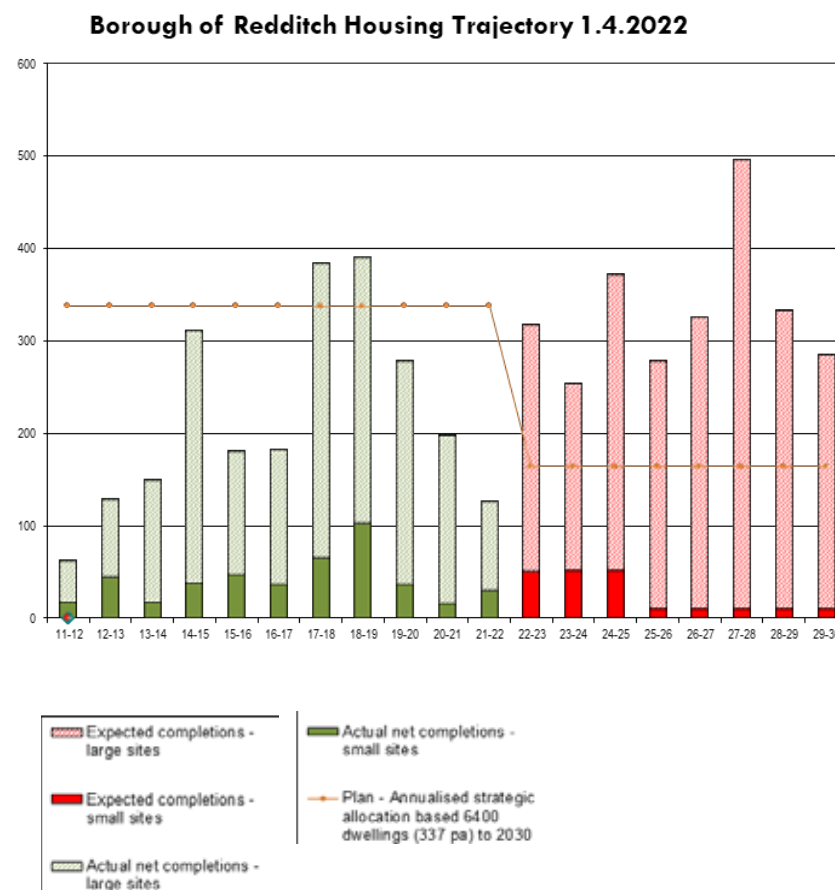
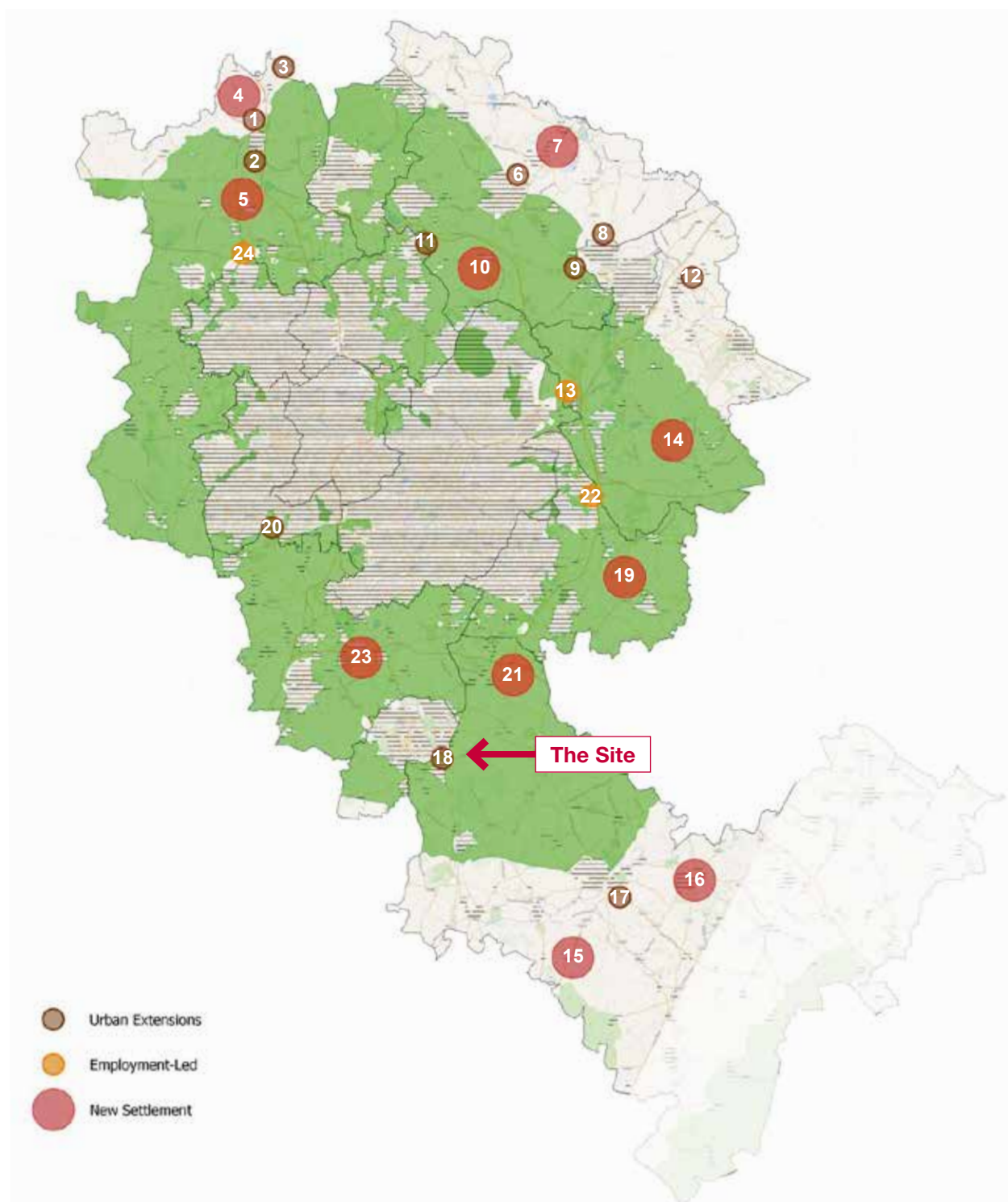


Figure 5: SGS Areas of Search – Beyond Green Belt & Green Belt



Greater Birmingham Housing Market Area Strategic Growth Study

The Greater Birmingham Housing Market Area Strategic Growth Study (SGS) (September 2018) was prepared by GL Hearn and Wood and was jointly commissioned by the local authorities within the Greater Birmingham and Black Country Housing Market Area (HMA) to further consider strategic development options to meet a shortfall in housing provision across the HMA, arising primarily at the time from the inability of Birmingham to accommodate all of its housing need.

The report focuses on “areas of search which could potentially (subject to further investigation) support development of 1500+homes” and with regard to new settlements, it considers options for accommodating 10,000+ homes. The Study identifies 24 areas of search for strategic development, including an area of search referred to in Table 5 of the report as ‘(Area) 18 South east of Redditch, Stratford-on-Avon District’, for an urban extension. The site is located within this area. Notably, this was the only location around Redditch that was considered as having the potential to accommodate a sustainable urban extension.

In seeking to address the shortfall in housing need across the HMA, a strategic review of the Green Belt was undertaken. The high-level study analyses the form and strategic function of the Green Belt against the purposes of Green Belt policy set out in the NPPF. It divides the Green Belt into parcels which are then broadly described and their contribution to the purposes of the Green Belt is assessed.

The site is located within Green Belt parcel 38, the north western part of which is considered by the SGS to help safeguard from encroachment as shown on Figures 4 and 5. The report sets out that the strategic function of the Green Belt in this sector “principally relates to a combination of containing the south-westward and south extension of the Birmingham conurbation through containing sprawl and maintaining the separate identify of the towns to the south” (paragraph 8.27)

Figure 6: SGS Meeting of Green Belt Purposes Plan

Key:

- Green Belt
- Green Belt Parcels
- Local Authority boundaries
- HMA boundary
- Area not assessed
- Railway
- HS2 route
- Containment of sprawl
- Strategic separation
- Local separation
- Safeguarding from encroachment
- Setting of historic towns

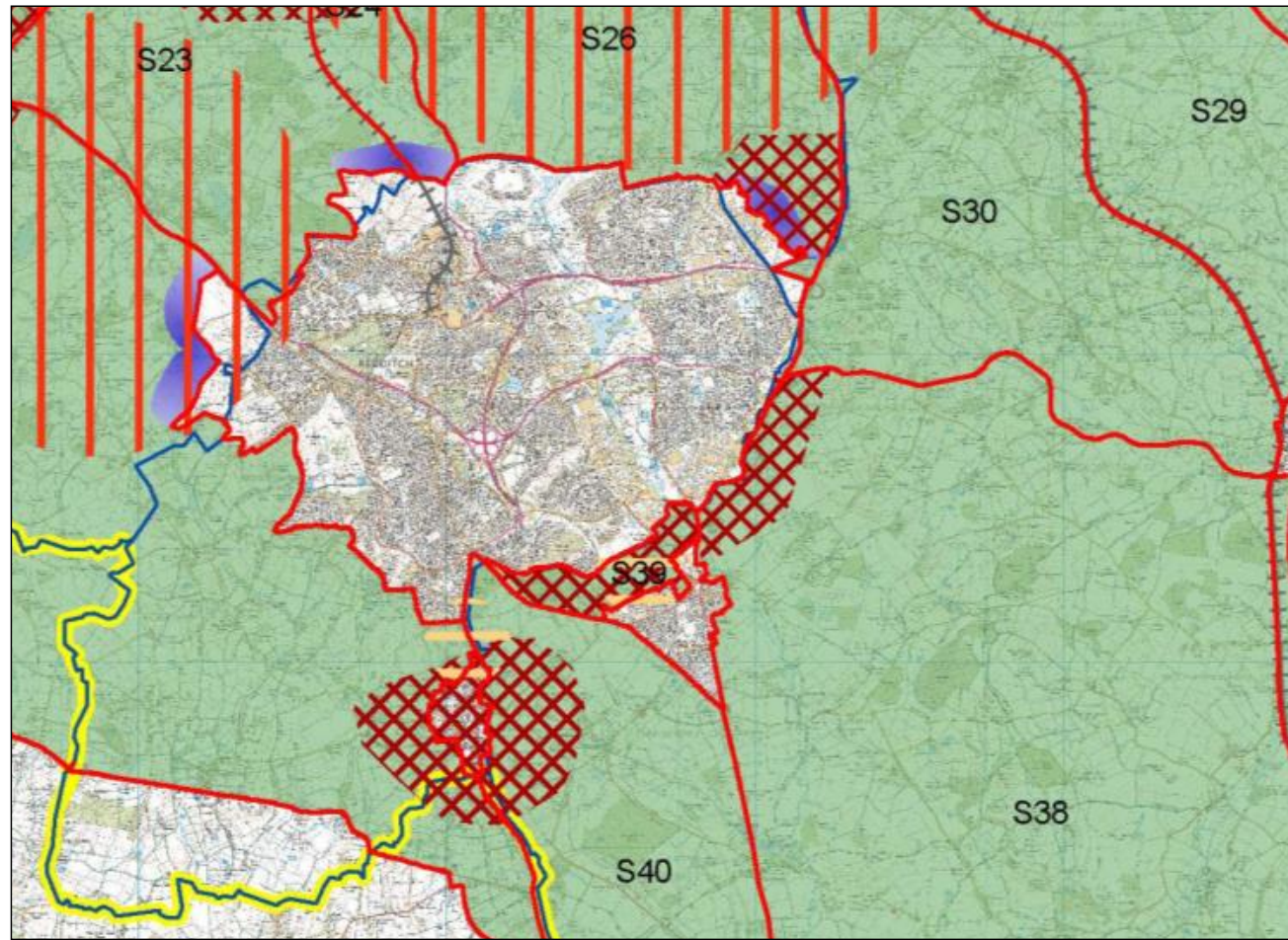
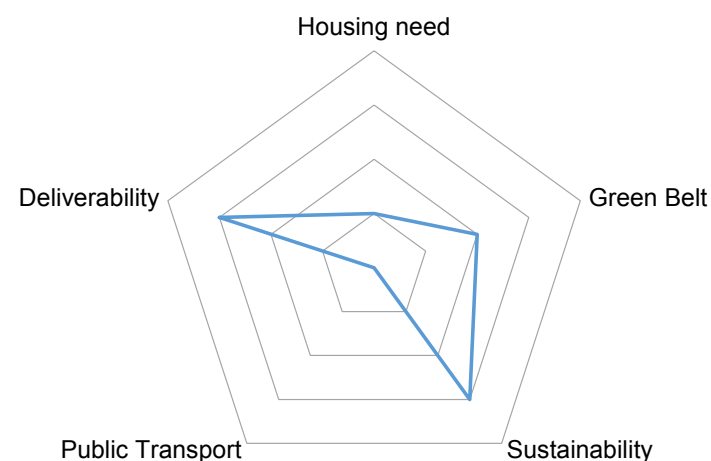


Figure 7: Results of the SGS Sustainability Appraisal of the Urban Extension Areas of Search

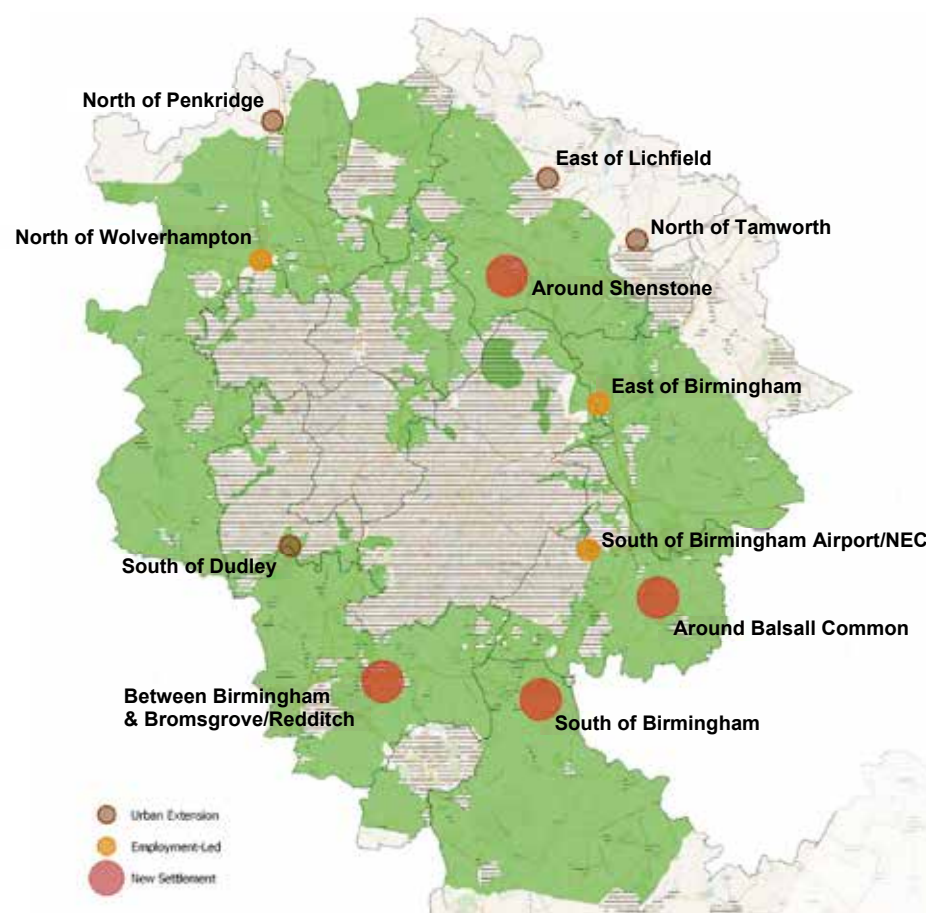
SA Objective	North of Penkridge	South of Penkridge	South of Stafford	East of Lichfield	North of Tamworth	North West of Tamworth	North of Walsall around Brownhills	East of Polesworth	South of Stratford-upon-Avon Town	South East of Redditch	South of Dudley
Natural Resources and Waste	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
Contribute to Climate Change Mitigation	++	++	++	++	++/?	++/?	++	++	++/?	++	++
Adapt to the Effects of Climate Change	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
Transport, Connectivity and CO ₂ Emissions	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
Historic Environment, Landscape, Biodiversity and Geodiversity	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
Pollution	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-	++/-
Economic Growth	++/-	++/-	++	++/-	++	++/-	++/-	++/-	++/-	++	++/-
Communities, Healthy Lifestyles and Equality	++	++	++	++	++	++	++	++	++	++	++
Housing	++	++	++	++	++	++	++	++	++	++	++

Figure 8: South East of Redditch Venn Diagram



“Bordering open countryside to the southeast, development would have no effect on the strategic function of the Green Belt. Whilst largely being defined by the A435, the urban edge in this location is somewhat fragmented with various examples of historic and more modern development intruding into the rural hinterland. An appropriate scale of extension is uncertain at this stage and in any case would require the definition of an external boundary to limit sprawl into open countryside and potential issues with local coalescence (such as with Studley) to be addressed” (SGS paragraph 8.112) . “This area is not constrained by any nationally significant constraints, aside from a section of land covered by Flood Zone 3. There are a small number of Scheduled Ancient Monuments in close proximity to the Area of Search. The area is situated on the urban edge of Redditch, in line with the development model criteria set out in Table 43, which provides a range of existing facilities” (SGS paragraph 8.113).

Figure 9: SGS Preferred Options



Whilst development associated with Redditch is largely contained to the east beyond the A435, the land which is part of wider open countryside to the east (parcel S38) exhibits some evidence of incremental change (particularly at the junction of the A435 and the A4189 Henley Road), and risk of additional change, kept in check by Green Belt policy which maintains a reasonably clear distinction between town and country in this location” (SGS Appendix, Emphasis added).

- A strategic sustainability appraisal framework matrix scored new towns / settlements as the development model making the most significant contribution to meeting the housing needs of the HMA.
- The area south east of Redditch scored positively in the appraisal of the broad areas of search (Figure 7).
- The SGS utilised a series of Venn diagrams to visually indicate the relative merits and performance of different options for strategic development (Figure 8).
- The area south east of Redditch was not identified as a preferred option, but this was due to a preference for options outside of the Green Belt or more closely located to Birmingham as the SGS was seeking to address unmet need arising from Birmingham (Figure 9).
- The study did not consider unmet need from Redditch due to the adoption of the Bromsgrove District Plan 2011-2030 on January 17th 2017, 21 months prior to the publication of the SGS, which addressed unmet need arising from Redditch at the time.
- Should there be future unmet need arising from Redditch, the SGS suggests that the area south east of Redditch would be the only suitable location for a new sustainable urban extension within the vicinity of Redditch.
- As it is located adjacent to Redditch this location would be preferable to meet unmet need arising from Redditch than more remote locations further away.

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 SAP maintains that reserve housing sites will be released should one or more circumstances set out in the Policy SAP.1 be triggered.
- Policy SAP.4 proposes the immediate release of four reserve housing sites to address wider unmet needs of the Greater Birmingham and Black Country Housing Market Area (HMA), including one site at Mappleborough Green settlement (see Figure 10) west of the Birmingham Road for 25 dwellings. This site (MAPP.A) is located close to the edge of Redditch built-up area, but would, conversely, represent a natural extension to Mappleborough Green.
- The proposed release of this site for residential development indicates that development in locations close to Redditch, but on the edge of Mappleborough Green is acceptable in principle as a contribution towards wider unmet need.
- In addition, the SAP proposes revisions to the Built-Up Area Boundary of Mappleborough Green (see Figure 11), which extends in part eastwards along Haye Lane and Henley Road. The Haye Lane, East of Redditch site would largely sit contiguous with the and within the confines of the newly-drawn settlement boundary between these routes, thus facilitating the appropriate integration of development into the existing development.

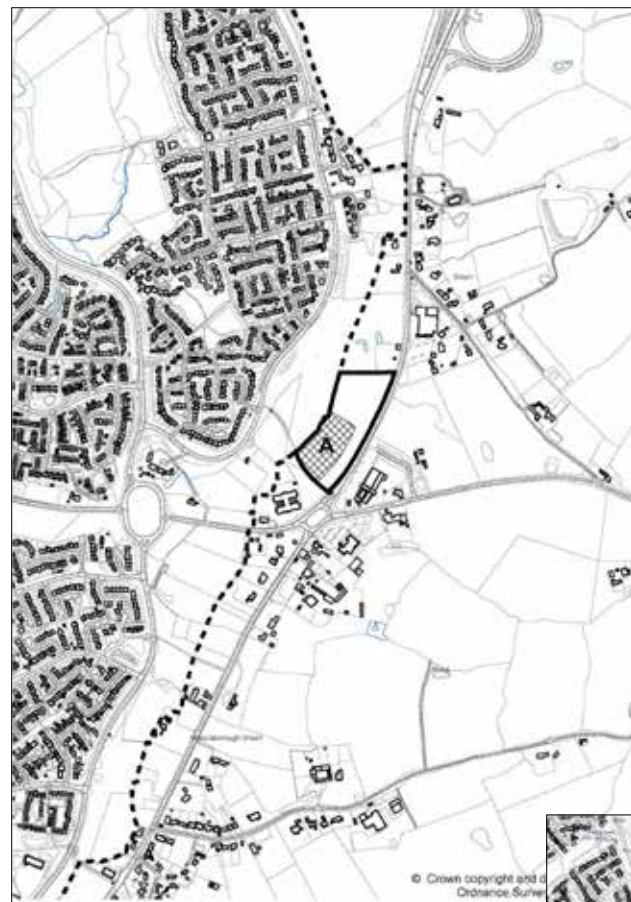


Figure 10: Mappleborough Green Reserve Housing Sites proposed for release – 2022 Revised Regulation 18 SAP

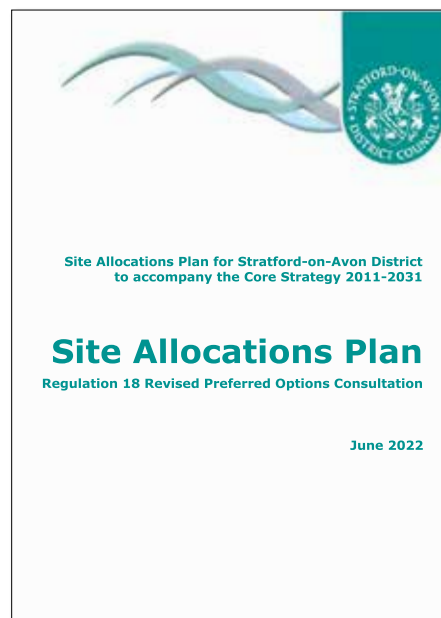


Figure 11: Mappleborough Green Revised Built-Up Area Boundary – 2022 Revised Regulation 18 SAP



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.

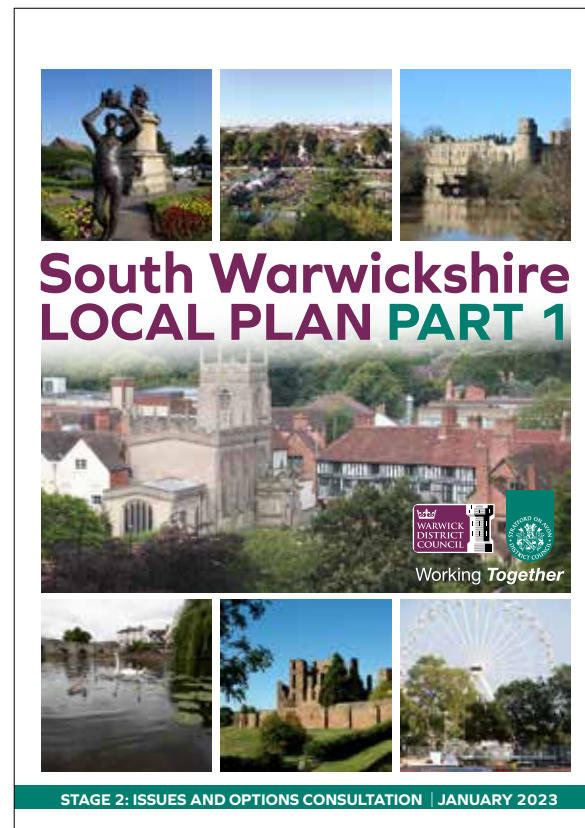
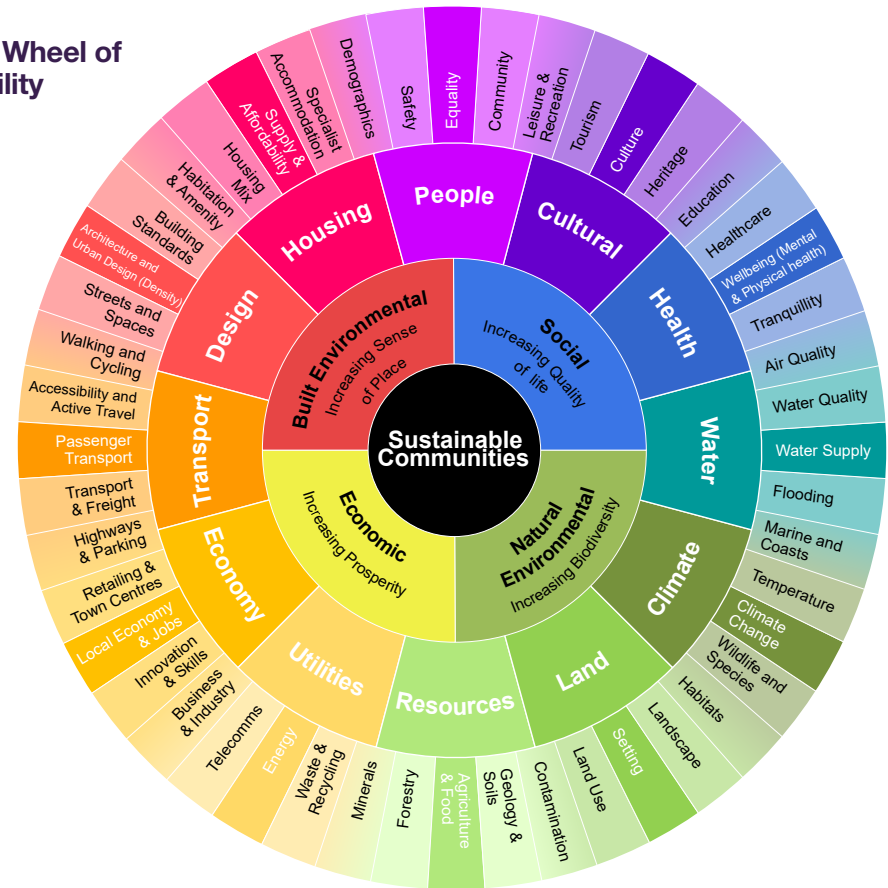
The Issues and Options (IO) Consultation Document, published in January 2023, proposes that the plan-making process consist of at least two separate parts:

- 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.

Figure 12: Wheel of Sustainability



Strategic Housing Land Availability Assessment 2021

Stratford-on-Avon District Council published a Strategic Housing Land Availability Assessment (SHLAA) in April 2020. The SHLAA did not assess the site. However, it did assess a number of sites located on the opposite side of Birmingham Road to the west of the site. As shown on Figure 13.

With regards to environmental suitability the sites to the west of the site were all assessed by the SHLAA as red indicating a major impact or constraint. The reasons given for this were:

- Landscape impact (All sites shown on extract);
- Impact on landscape character (MAPP.01A and MAPP.01B);
- Impact on settlement character (MAPP.02, MAPP.03, MAPP.04, MAPP.05 and MAPP.06);
- Coalescence with Redditch (All sites shown except MAPP.01C);
- Impact on TPO (All sites shown on extract); and
- Impact on listed buildings (MAPP.05)

For technical suitability the sites to the west of the site were assessed as either amber, indicating a constraint that is considered able to be overcome, or red indicating a major impact or constraint.

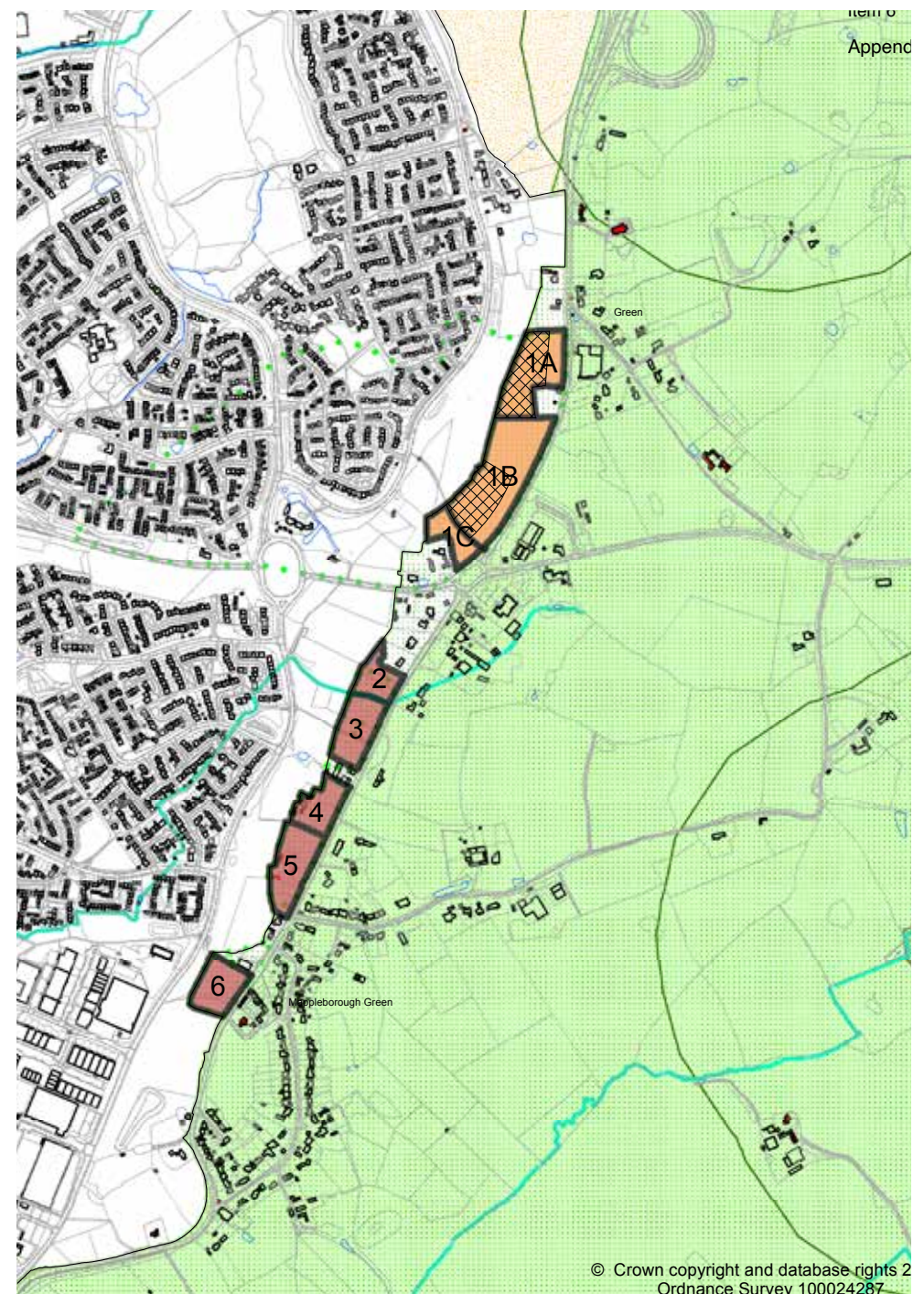
MAPP.01A, MAPP.01B, and MAPP.01C were given an amber rating. Each site was considered to have potential issues with the provision of vehicular access and for site MAPP.01C noise from the road was also identified as a potential concern. Whereas the other sites were all assessed as red due to concerns about provision of vehicular access.

The scope for mitigation was also assessed. For MAPP.01A, MAPP.01B, and MAPP.01C their proximity to housing allocations in Redditch was noted and the SHLAA concluded that there is the scope for a comprehensive scheme incorporating a modest development on these sites together with extensive open space and landscape planting. Overall, these sites were assessed as being likely to be deliverable.

However, the other sites were considered to not have any scope for mitigation as they formed part of a swathe of land west of the A435 Birmingham Road and south of the A4189 Warwick Highway which provides a narrow gap between Mappleborough Green and the edge of Redditch and that development would erode and undermine this important feature. Overall, these sites were assessed as being not deliverable.

It is considered that unlike the sites MAPP.02 to .06 that the presence of these sites and the wooded area to their west provides appropriate separation between Mappleborough Green and the edge of Redditch and as such the development of the site would not erode or undermine this important feature.

Figure 13: 2021 SHLAA extract







4

4.0 Green Belt



Figure 14: Coventry and Warwickshire Joint Green Belt Study Overall Assessment Findings – Stratford-on-Avon

4.0 Green Belt

The site lies within the Green Belt on the edge of Redditch.

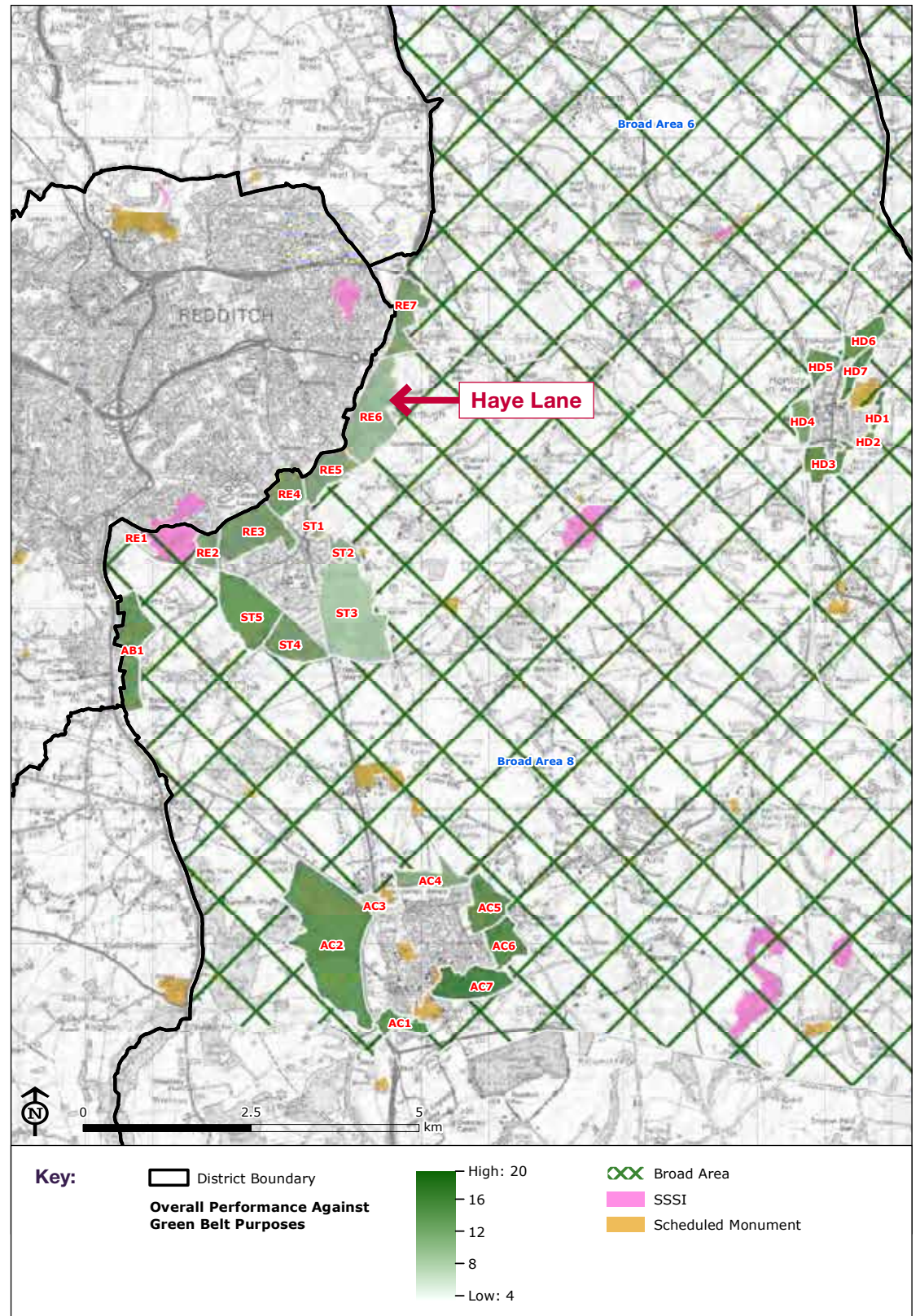
The Coventry and Warwickshire Joint Green Belt Study (April 2016) provides an assessment of Green Belt land within the administrative areas of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council.

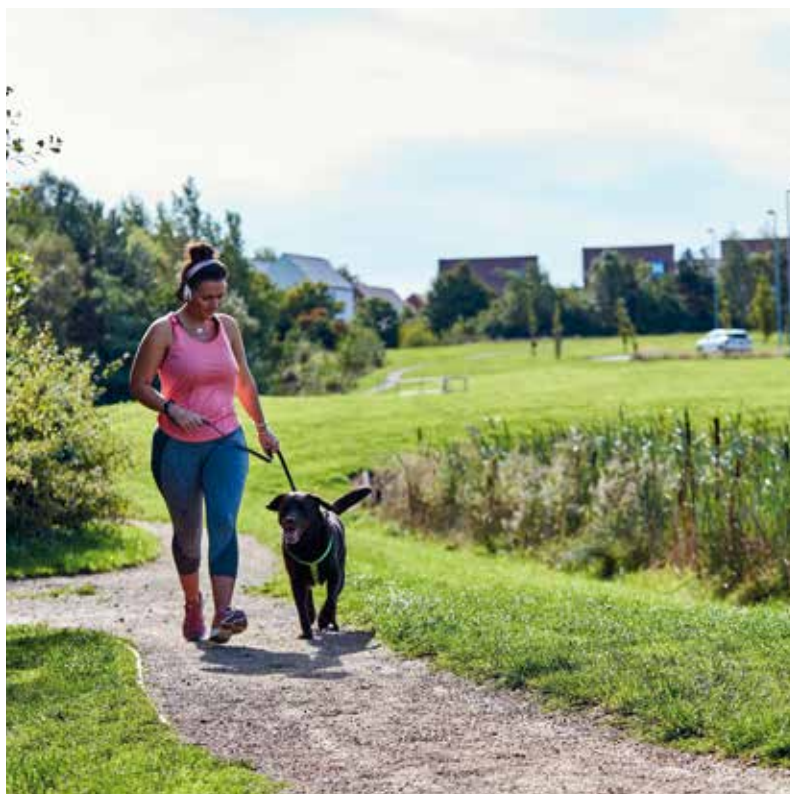
The site lies within two areas of the study. The west of the site lies within land parcel 'RE6' and the east of the site within broad area 8.

Broad area 8 includes the following description:

“Broad area 8 lies between the historic towns of Stratford-upon-Avon and Henley-in-Arden to the south east and north east respectively, Redditch to the north west and Alcester to the south. In addition, Studley lies to the south of Redditch in the north western corner of the area. The area contains several historic villages, including Billesley, Coughton and Aston Cantlow, each of which have scheduled monuments and grade I listed buildings. Woodland dominates the centre of the broad area and there are several large ancient woodlands within the area, including Bannam’s Wood, Aston Grove & Withycombe Wood, Copmill Hill and Rough Hill & Wirehill Woods all of which are designated as SSSIs. The broad area makes a considerable contribution to all the purposes of Green Belt”.

Land parcel 'RE6' received a total score of 10/20 for contribution to the purposes of the Green Belt. The following extracts provide further details and description of the parcel in relation to the 5 purposes of the Green Belt.





Issue 1a - Ribbon development

“The parcel contains a significant proportion of the village of Mappleborough Green to the east of Redditch. The parcel plays a significant role in preventing the eastward sprawl of Mappleborough Green along the northern and southern sides of Haye Lane which cuts through the centre of the parcel. The northern edge of the parcel follows Henley Road; however, ribbon development has already occurred along the part of the road which falls within the parcel. Therefore, the parcel is not considered to be preventing further sprawl in this portion of the parcel.”

Issue 1b – Openness

“The majority of the parcel is made-up of open agricultural fields; however, the parcel contains a significant proportion of the village of Mappleborough Green, including an area of retail and restaurant buildings at its northern end. The buildings and structures associated with these developments compromise the openness of the Green Belt within their immediate vicinity.”

Issue 2a - Location of parcel and distance between neighbouring settlements

“The parcel sits between Mappleborough Green on the edge of Redditch to the west and the Henley-in-Arden to the east. Measured through the centre of the parcel along Haye Lane, the distance between these two settlements is roughly 7.5km.”

Issue 3a - Significance of existing urbanising influences

“The majority of the parcel is made-up of open agricultural fields; however, the parcel contains a significant proportion of the village of Mappleborough Green, including an area of retail and restaurant buildings at its northern end. The lit residential streets, carparks and commercial buildings have an urbanising influence on the countryside within the western half of the parcel.”

Issue 3b - Significance of boundaries / features to contain development and prevent encroachment

“A small brook (a tributary of the river Arrow to the west) flows along the southern half of the south eastern edge of the parcel. There are no other significant or less significant boundaries within or in close proximity to the parcel. In isolation the brook plays an insignificant role in protecting the countryside to the south from encroachment.”

Issue 4a - Parcel forms an historical and/or visual setting to the historic town

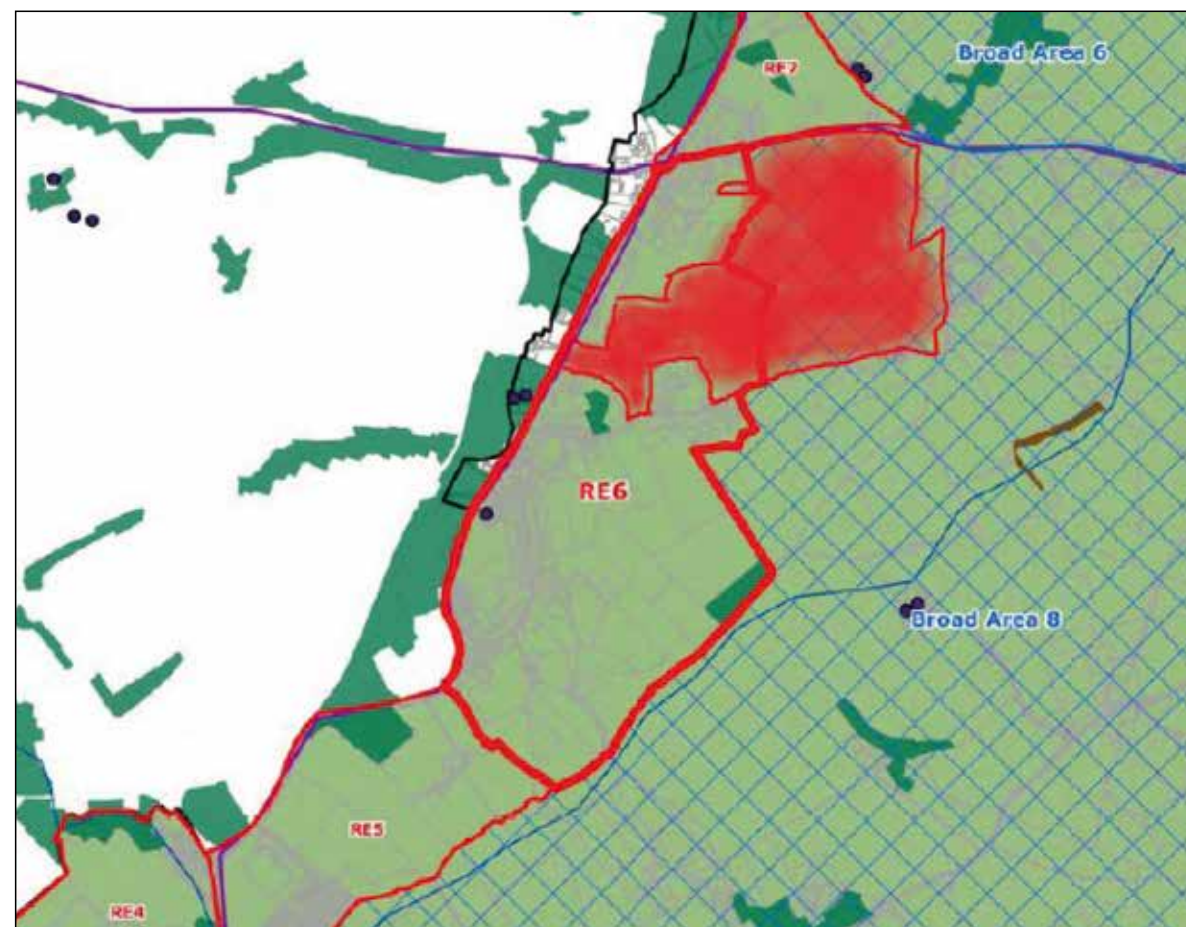
“The parcel does not overlap with a Conservation Area within a historic town. In addition, there is no intervisibility between the historic core of a historic town and the parcel.”

Issue 5a - The need to incentivise development on derelict and other urban land within settlements

“All parcels make an equally significant contribution (+4) to this purpose.”

As can be seen from this map extract, when compared to the surrounding areas RE6 scores relatively low on its contribution towards the Green Belt which indicates that it would be potentially one of the more favoured areas for development. The document states that area RE6 “scores relatively low due to the limited contribution the parcel makes to purpose 2”. The parcel not only contains a significant proportion of Mappleborough Green but is also roughly 7.5km away from Henley on Arden. Therefore, the document concludes that “the lit residential streets, carparks and commercial buildings have an urbanising influence on the countryside within the western half of the parcel” and that the area does not contribute to the setting or special character of a historic town.

Figure 15: Extract from Coventry and Warwickshire Joint Green Belt Study with site area overlaid





Site-Specific Green Belt Appraisal

Parcel RE6 covers a much wider area than the site. FPCR, on behalf of Taylor Wimpey has therefore undertaken an Appraisal of the site alone against the five purposes of Green Belt (as defined within NPPF), based upon the methodology and assessment criteria set out within the Coventry and Warwickshire Joint Green Belt Study (April 2016). The assessment concludes:

Purpose 1 (to check the unrestricted sprawl of large built-up areas)

The site is greenfield and doesn't include built development, therefore technically in Green Belt terms it performs a role in checking the unrestricted sprawl of adjacent settlement and contributes to 'openness'. However, the site is reasonably well contained due to the undulating topography combined with mature vegetation both within and surrounding the site. Rising landform at the eastern edge of the site provides substantial physical containment between the site and wider Green Belt to the east, and this would prevent future sprawl beyond the site should it be released from Green Belt. (RE6 score 3, Site score 3)

Purpose 2 (to prevent neighbouring towns merging into one another)

The site sits adjacent to the eastern edge of Mappleborough Green on the edge of Redditch. The nearest settlement of Henley-in-Arden is approximately 7.5km to the east. The scale of the site involved would have no perceived impact on the merging of neighbouring towns. (RE6 score 0, Site score 0)

Purpose 3 (to assist in safeguarding the countryside from encroachment)

The site is made up of agricultural fields and contains no built development. It is however bordered by the "lit residential streets, car parks and commercial buildings" at Mappleborough Green which are acknowledged within the 2016 Green Belt Study as having an urbanising influence on the west. Along this edge there is no continuous natural or man-made boundary that would prevent encroachment of the ribbon development at Mappleborough Green into the site. In contrast the site is bordered by roads, including the A4189 along its northern boundary, in combination with a ridge of land to the east, which means it is well screened from the wider landscape and therefore presents the opportunity to set a clearly defined future Green Belt boundary that would prevent encroachment beyond the site in the long term. (RE6 score 3, Site score 3)

Purpose 4 (to preserve the setting and special character of historic towns)

Neither parcel RE6 nor the site overlap with a Conservation Area within a historic town, and there is no intervisibility between the historic core of a historic town and the site. (RE6 score 0, Site score 0)

Purpose 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land)

The 2016 Green Belt Study gives all assessed parcels an equal score for this purpose as it is difficult to differentiate their contribution, therefore the same approach has been applied for the site. (RE6 score 4, Site score 4)

In summary, the FPCR Green Belt Appraisal found that the site made only a limited contribution to openness and the five purposes of the Green Belt, reflective of that assessed in the 2016 Green Belt Study for the wider parcel (RE6). Additionally, there are clear features on the ground against which revised Green Belt boundaries can be drawn and further reinforced through new green infrastructure planting. As such removal of the site from the Green Belt would not undermine the overall purposes and integrity of the Green Belt.



5.0 Landscape

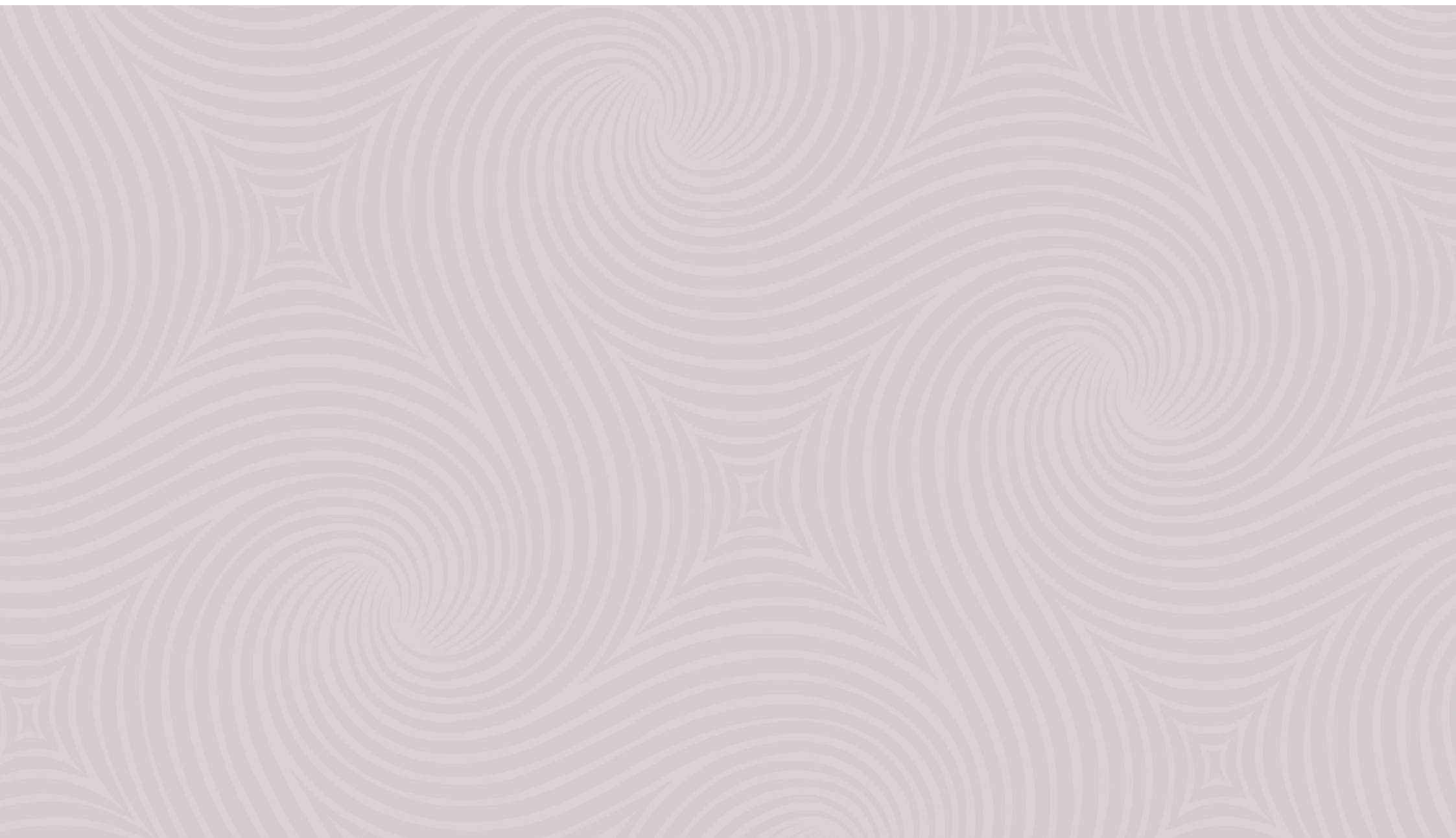


Figure 16: Aerial Photograph



5.0 Landscape

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) 97 'Arden'. This NCA stretches from Coventry in the east to Kidderminster in the west and encompasses Birmingham, Redditch and Warwick and therefore covers a very 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 'Ancient Arden' LCT in the 'Arden' LCA. The 'Arden' description is as follows: "An historic region of former wood pasture and heath characterised by ancient woodlands, mature hedgerow oak, and a dispersed settlement pattern of brick and half-timbered farmsteads and wayside cottages."

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 'Ancient Arden'. The following characteristics are described for the LCA:

- "Varied undulating land form with occasional steep scarp slopes, principally draining to the River Alne without a clearly defined basin;
- Hedgerow and roadside oaks; an ancient irregular pattern of small to medium sized fields; field ponds associated with permanent pasture;
- A network of winding lanes and trackways often confined by tall hedgebanks; many scattered hamlets and farmsteads, mostly on slope sides with larger villages or towns on hilltops or valley bottoms;
- Main building materials are timber frame and brick with some Arden Sandstone and Blue Lias Limestone;"

The Stratford-on-Avon District Special Landscape Areas Study (June 2012) was produced to review the Special Landscape Areas (SLA) for the district and put forward candidate SLAs to be considered by the district Council for inclusion within planning policies.

This report outlines candidate SLAs, for the District Council to then make a decision on whether these are then included in planning policy for the district. The Core Strategy 2011-2031 was subsequently adopted in July 2016 and has included the site within the 'Arden' Special Landscape Area.

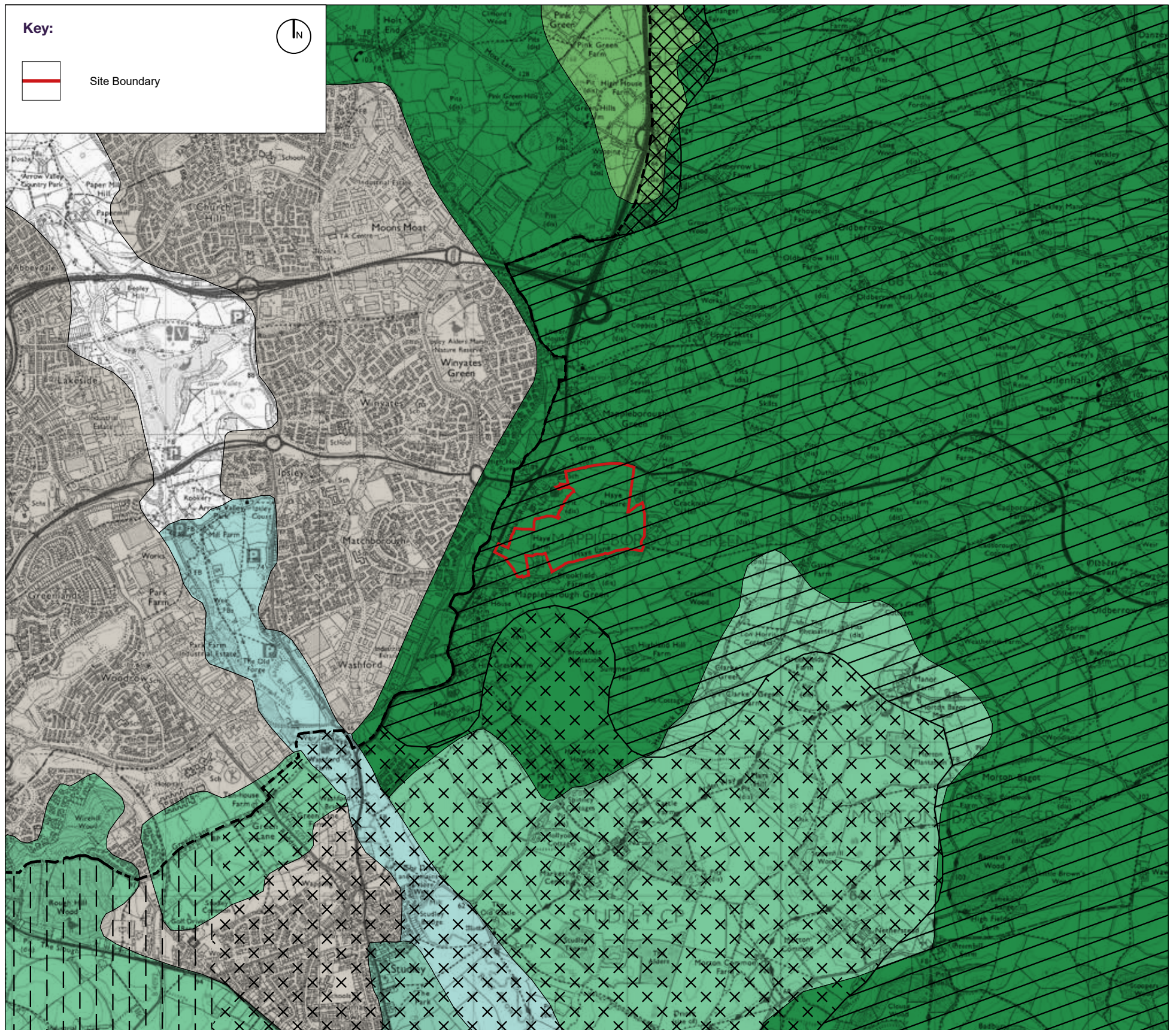
Policy CS.12 'Special Landscape Areas' of the Core Strategy is as follows:

"The high landscape quality of the Special Landscape Areas, including their associated historic and cultural features, will be protected by resisting development proposals that would have a harmful effect on their distinctive character and appearance which make an important contribution to the image and enjoyment of the District. The cumulative impact of development proposals on the quality of the landscape will be taken into account.



View from Haye Lane

Figure 17: Landscape Character Areas





View from Birmingham Road



View from Haye Lane

The following Special Landscape Areas are identified, and their extent is shown on the Policies Map:

- Arden
- Cotswold Fringe
- Feldon Parkland
- Ironstone Hills Fringe

Development proposals relating to settlements that lie within a Special Landscape Area must respect the current and historic relationship of that settlement within the landscape.”

The ‘Arden’ SLA includes a number of settlements including Henley-in-Arden, Studley and Alcester and therefore new development would not be out of context within the area. The proposed masterplan has been informed by management recommendations to maintain and enhance the key qualities of the SLA. A high proportion of Green Infrastructure is proposed to provide accessible and attractive greenspace for the new residents. The new Green Infrastructure will conserve existing landscape features, including the

characteristic pattern of field hedgerows and mature oak trees. These will be set within an enhanced Green Infrastructure with native broadleaf tree and woodland planting, attenuation basins and orchards providing a rich, high-quality landscape which integrates the new development within the Arden landscape.

The site encompasses a parcel of land of approximately 38 ha to the east of Redditch in Warwickshire. The site is located on the edge of an existing settlement and is bound to the north by Henley Road, south and east by Haye Lane and to the west by residential properties, retail development and Birmingham Road. In addition to the existing detached residential properties, garden centre, pub and petrol station, a primary school is situated by the junction of Birmingham Rd & Henley Rd. The site is influenced by the proximity of the existing settlement and the countryside to the east and south.

The majority of the site comprises arable and pastoral farmland with 9 irregular fields bound by hedgerows with hedgerow trees. The landform is sloping and undulating across the site and immediate context with localised hills within the site with a high point to the north east by

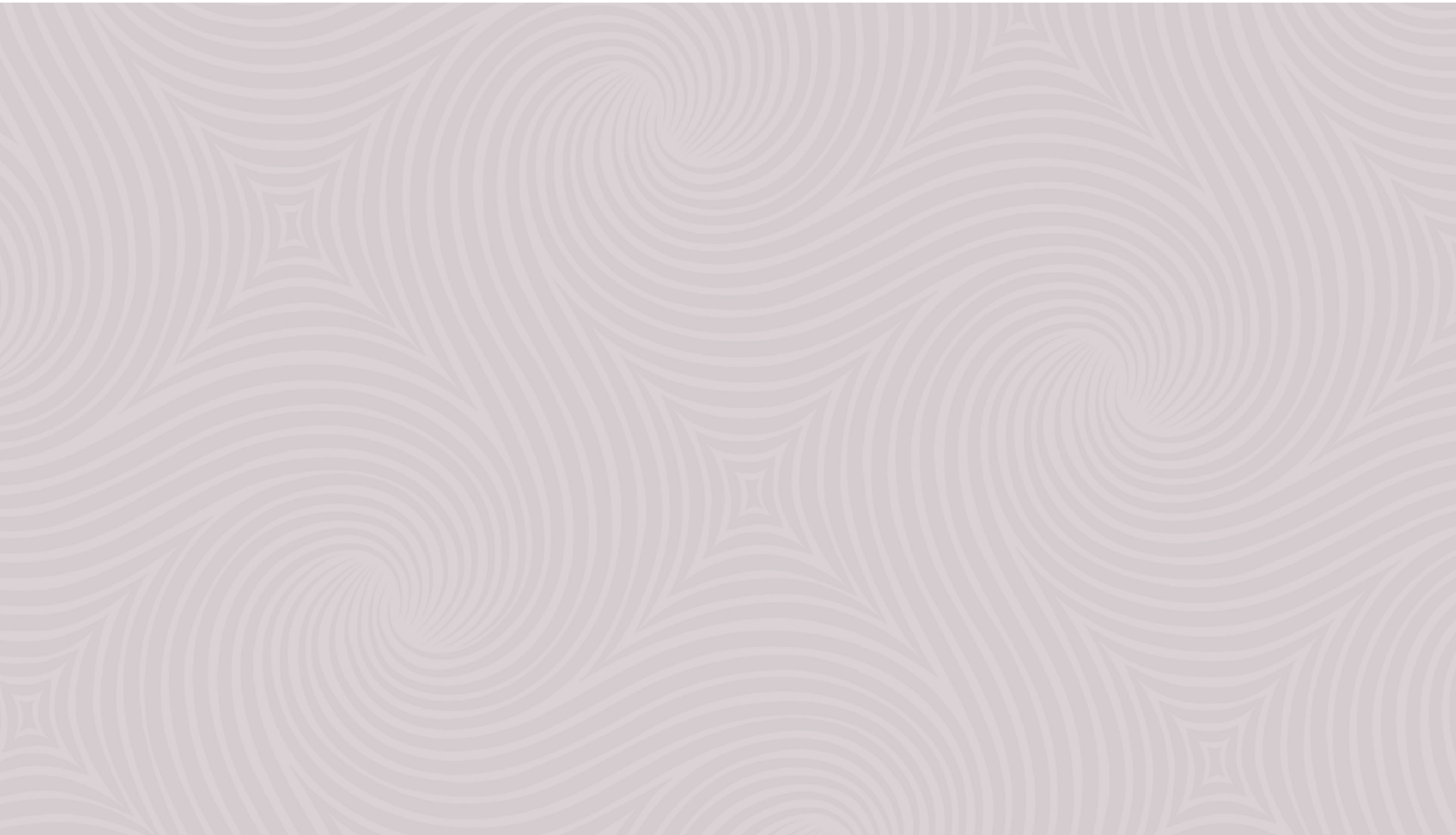
Haye Pasture Cottages at approximately 115m AOD. The landform slopes down to the south west with a low point near the eastern site boundary with Birmingham Road at 80-85m AOD.

Visually the site itself is reasonably well contained due to the undulating topography combined with mature vegetation both within and surrounding the site. The landform to the south east falls away from the site and vegetation along Haye Lane restricts views. Properties and existing tree cover to the west limits long range views to the south and west. Blocks of woodland between Birmingham Road & Claybrook Drive characterize the road corridor providing visual and physical separation to Matchborough. North of the site there are views from Henley Road looking across the northern field parcels, with views further south limited.



6.0

Access and Connectivity



6.0 Access and Connectivity

Access into the proposed development will primarily be from Henley Road with a secondary access on Birmingham Road. Access for non-motorised users along Henley Road would be accommodated by extending footways at the site access west to connect with those that already exist at Mappleborough Green Primary School.

Figure 18: Access Proposals

Along much of the northern frontage, Henley Road is subject to a 50mph speed limit. A speed limit reduction to 40mph could be promoted along the road for the extent of the site boundary. This could create a more favourable environment for roadside footways and cycling between Redditch and the proposed development.

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.

Within a 2km walk of the centre of the site there are primary schools, garden centres, a village hall, playgrounds, convenience stores, public houses, a park and a sports facility.

Residential areas to the east and south of Redditch are within a 5km cycle from the centre of the site. Local and National cycle routes are present in Redditch which can be easily accessed from the site.

Bus services are currently limited and would require improvements so as to provide an appropriate level of service for future residents.

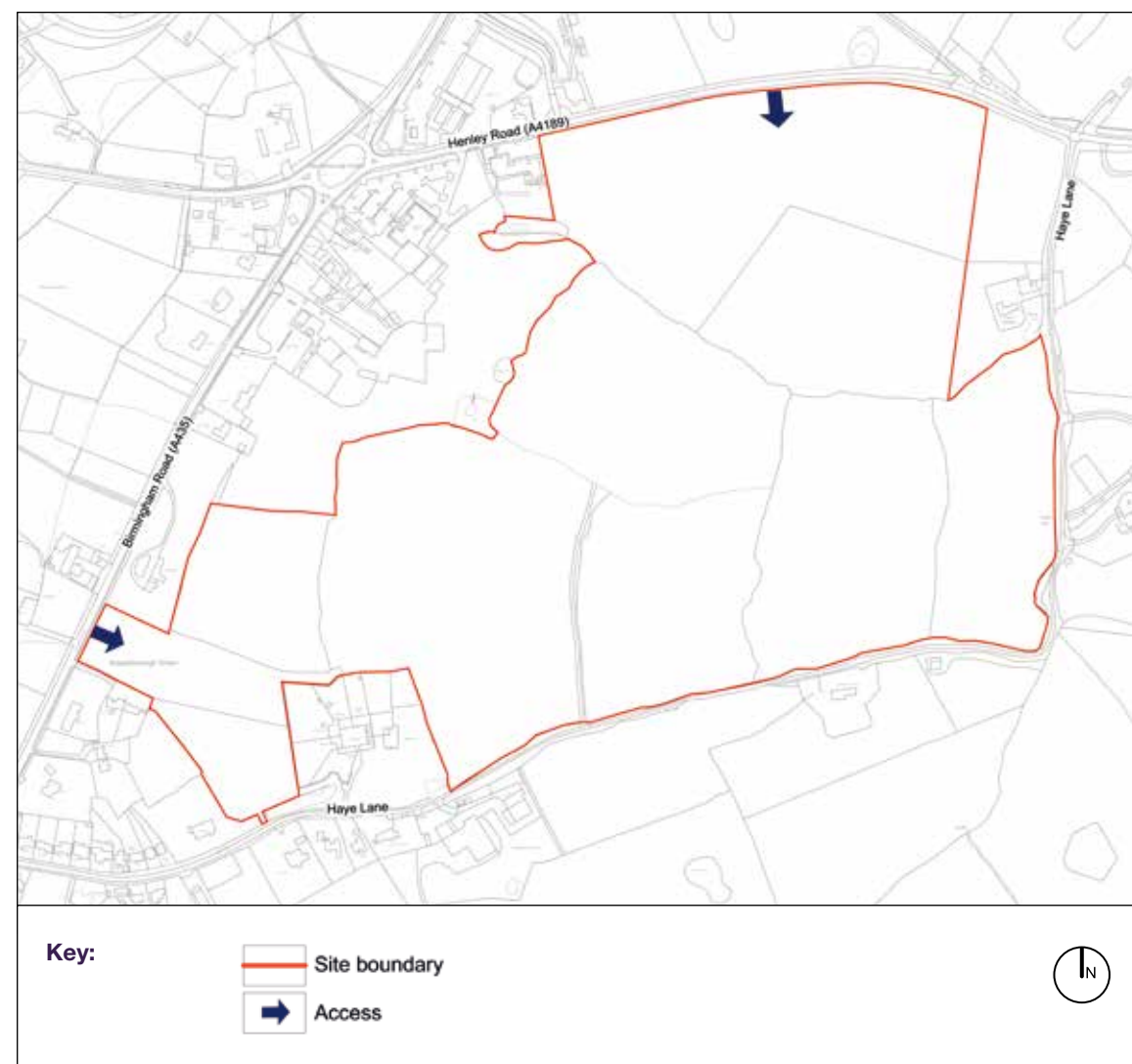
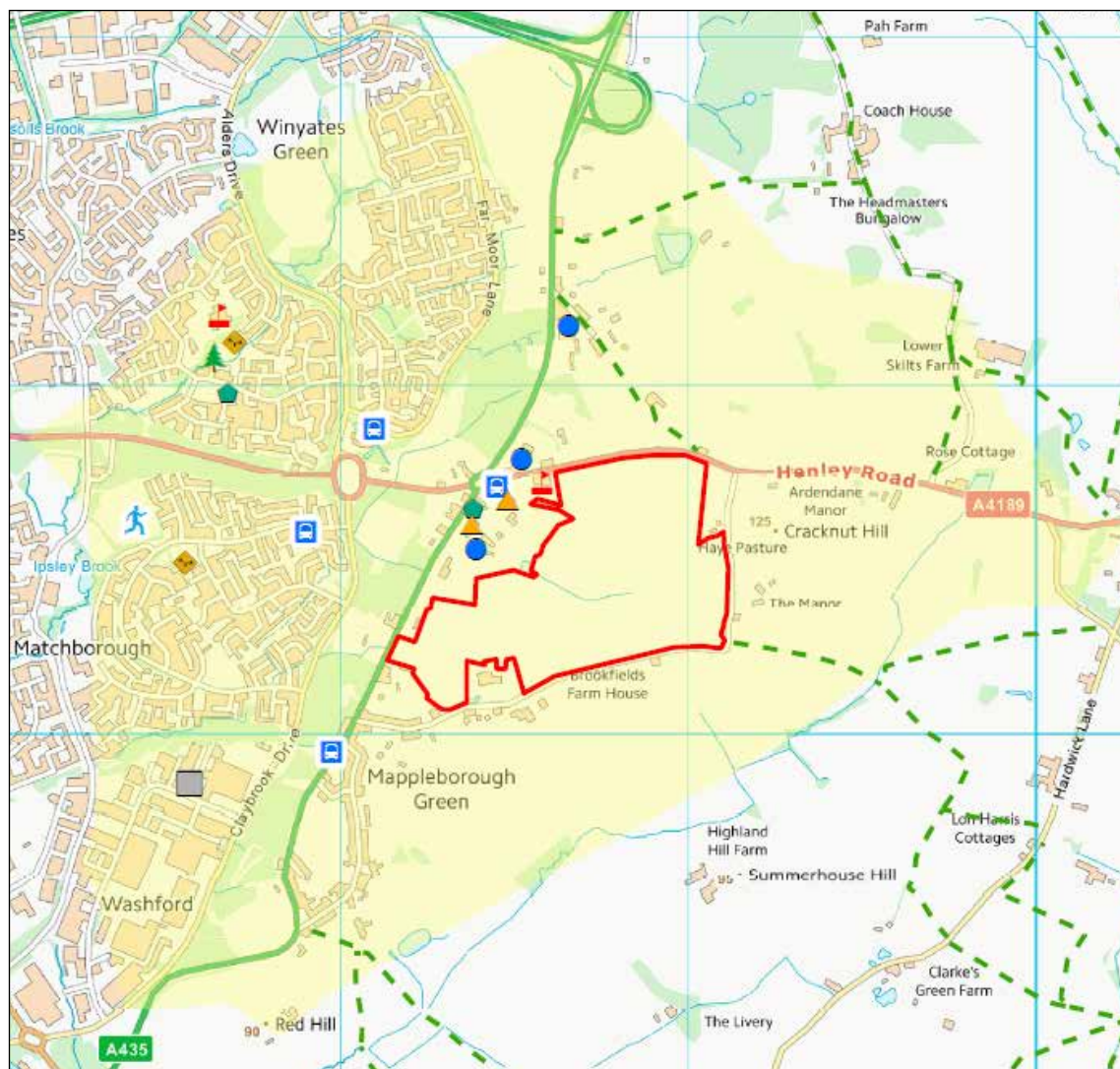




Figure 19: Amenities, Bus Stops and Public Rights of Way



Sustainable modes of transport would be promoted at the proposed development. The quantum of development could support and improve the existing public transport provision, which is currently limited, to the east of Redditch in a similar fashion. In particular we consider there to be the potential to either extend existing bus services or alternatively provide a new bus service through the site from Henley Road to Birmingham Road providing easy access to public transport. This would benefit both the proposed development and surrounding residential areas.

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.

It is understood that there have been some historic plans which could see a new bypass to the east of Redditch. This development is of a scale which could accommodate and deliver a section of any such bypass. Engagement will be undertaken with Warwickshire and Worcestershire County Council's in their capacity as Local Highways Authorities to explore the potential of this further.



7.0 Ecology



7.0 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 maximise ecological gain.

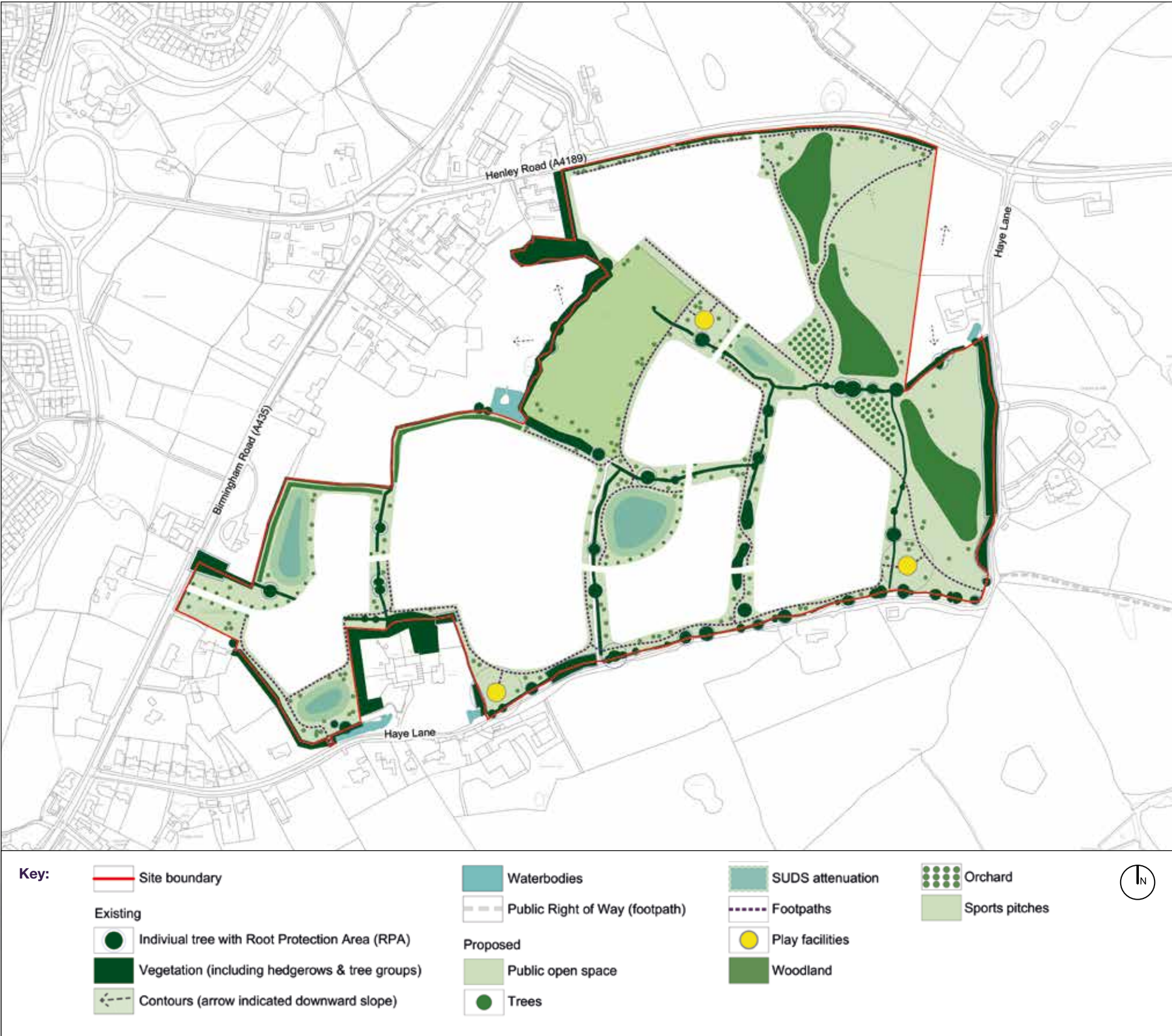
No internationally designated sites for nature conservation were recorded within 10km of the site. Ipsley Alders Marsh Site of Special Scientific Interest (SSSI) is located over 800 m away. The nearest locally designated site identified is Laye Lane potential Local Wildlife Site adjacent to the site which is considered potentially important for grassland habitats. No Ancient Woodland was recorded on or adjacent to the site.

The site is dominated by poor semi-improved grassland fields grazed by sheep and arable crops with hedgerows with scattered mature trees. Several ponds are within the local landscape. Whilst further detailed surveys would be needed to refine ecological mitigation and enhancement, particularly in relation to bats, amphibians, reptiles and birds, 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 including strengthening habitat corridors and enhancing the aquatic habitat through creation of new ponds. The Public Open Space has been designed to support habitat connectivity and the potential Local Wildlife Site. 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.

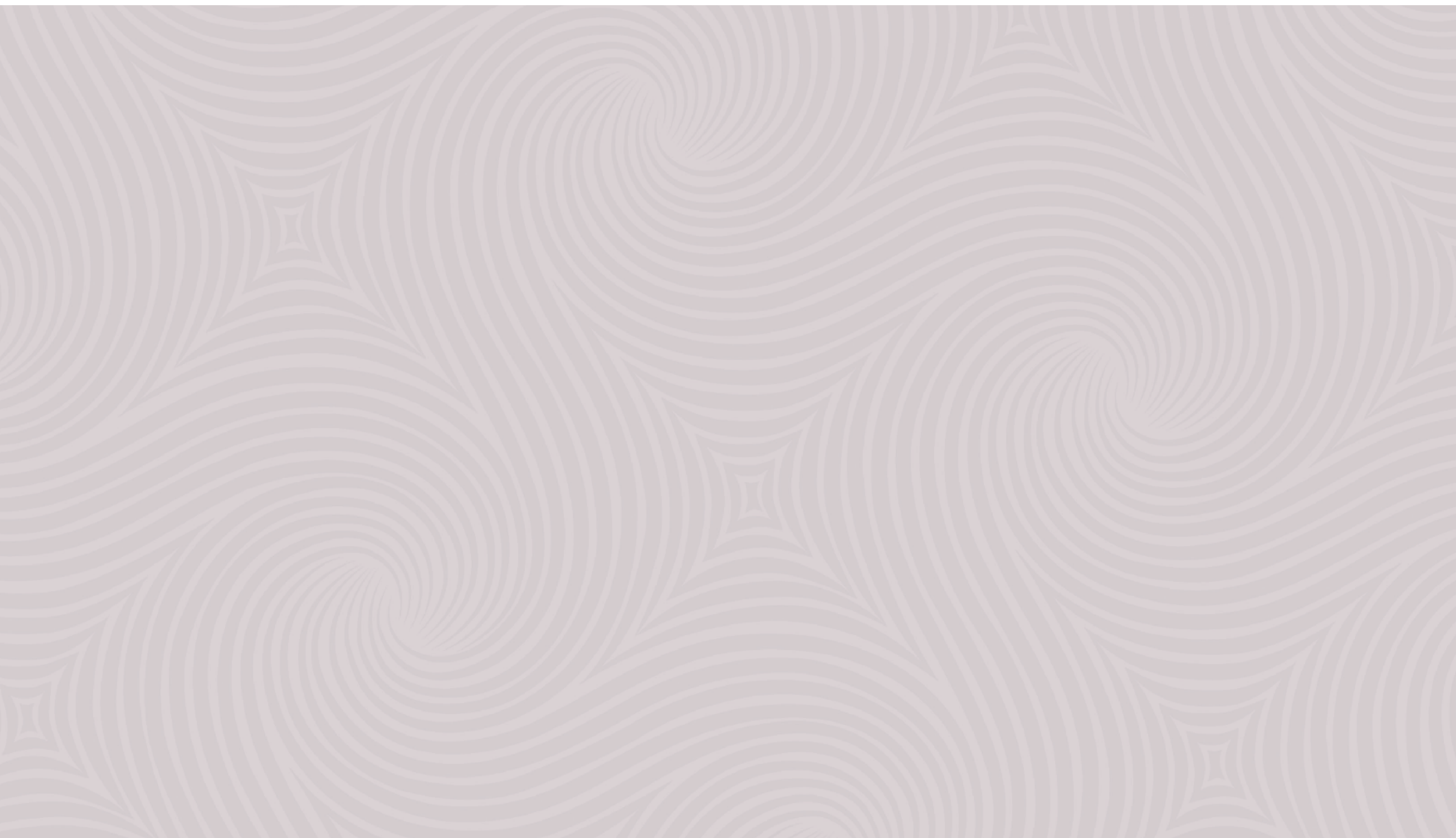


Figure 20: Green Infrastructure Proposals





8.0 Heritage



8.0 Heritage

CSA have undertaken an initial review of potential heritage constraints and opportunities in relation to archaeology, built heritage and historic landscape.

The nearest designated heritage assets to the site are the Grade II listed Common Farmhouse and associated Grade II listed stable and barn which are located approximately 130m north of the site. Development of the site would alter the wider agricultural setting of these listed buildings, although it would be offset beyond intervening agricultural land. The provision of open space in the north eastern part of the development will help to ensure that any harm is mitigated and so would be less than substantial. Under the NPPF, less than substantial harm to a designated heritage asset should be weighed against the public benefit in decision making. It is not anticipated that development would adversely impact any other designated heritage assets in the wider area.

There are wide-reaching views west from higher ground in the eastern area of the site, including views towards the historic core of Redditch and the spire of the Grade II listed Church of St Stephen, located within Church Green Conservation Area. However, given the distance, the presence of intervening built form, and the absence of any strong associative relationship, it is not anticipated that residential development of the site would adversely impact distant designated heritage assets.

Part of a possible medieval moat is extant in the southern area of the site, and there is potential for below-ground remains of a filled-in section. Formulation of design plans will consider retention of the moat, including the below-ground section. Based on current evidence this is a non-designated heritage asset. Possible medieval settlement is also recorded immediately south-east of the site but does not appear to have extended into the Site. Current evidence does not suggest below-ground remains are likely to be present which would preclude development across the wider site area.

Hay Farm is not recorded on the HER or the local heritage list but is recorded on 19th-century mapping and may be of some heritage interest, commensurate to a non-designated heritage asset. Development would alter its adjacent agricultural setting. It is not anticipated that this would necessarily preclude development but, under the NPPF, harm to a non-designated heritage asset should be 'taken into account' in decision making.

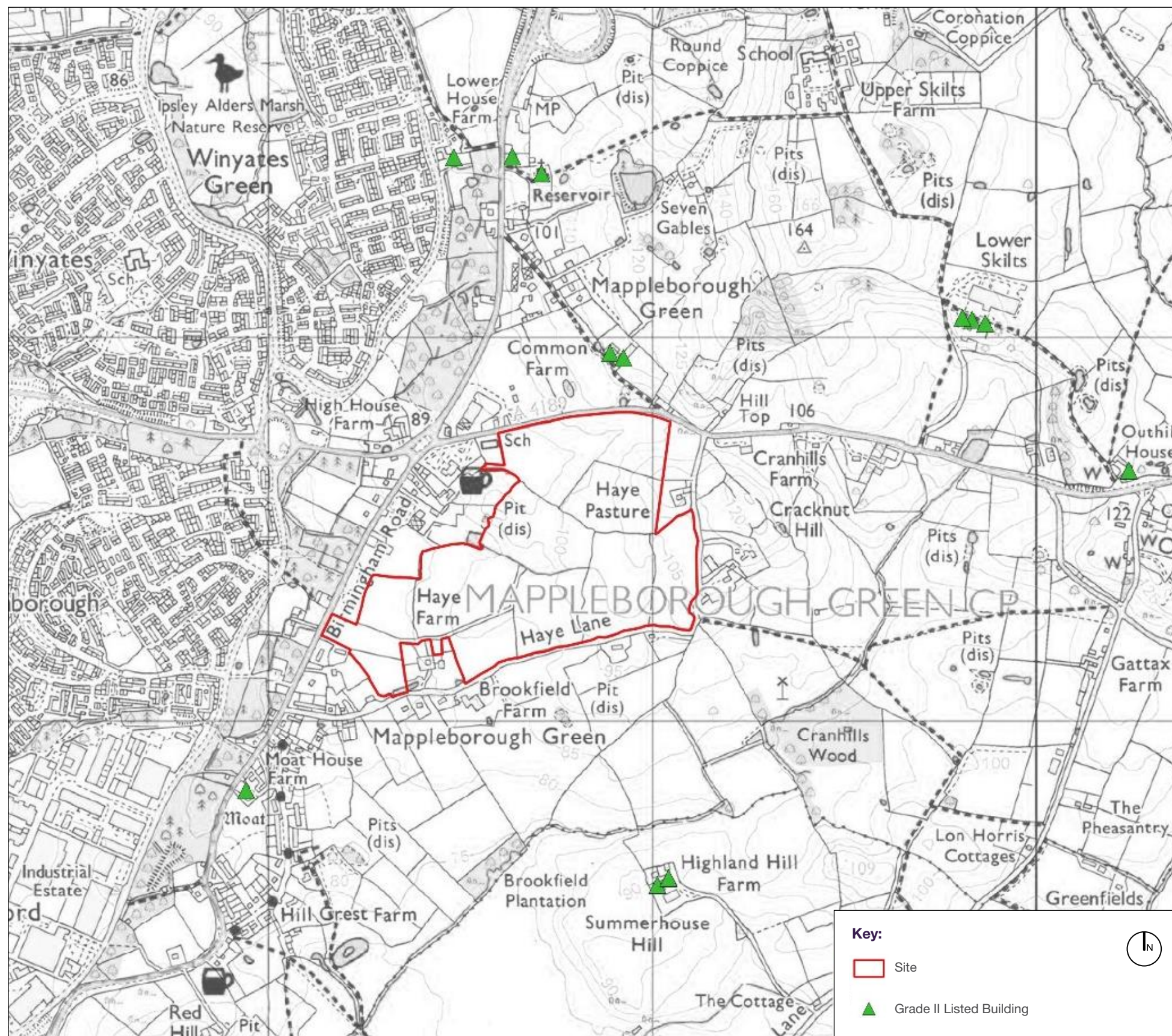


View looking across the Site to Common Farmhouse, view to north



View towards the Church of St Stephen from within the Site, view to north-west

Figure 21: Location of Designated Heritage Assets





9.0 Drainage



9.0 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 in Flood Zone 1. There are no recorded flooding events from all sources including groundwater, rivers and watercourses (fluvial), overland rainfall runoff (pluvial) or artificial sources such as overloaded or blocked public sewer networks.

As noted above there have been no recorded flooding events. Furthermore, the EA 'Risk of Flooding from Surface Water' map, Figure 23, 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 western 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 the table opposite.

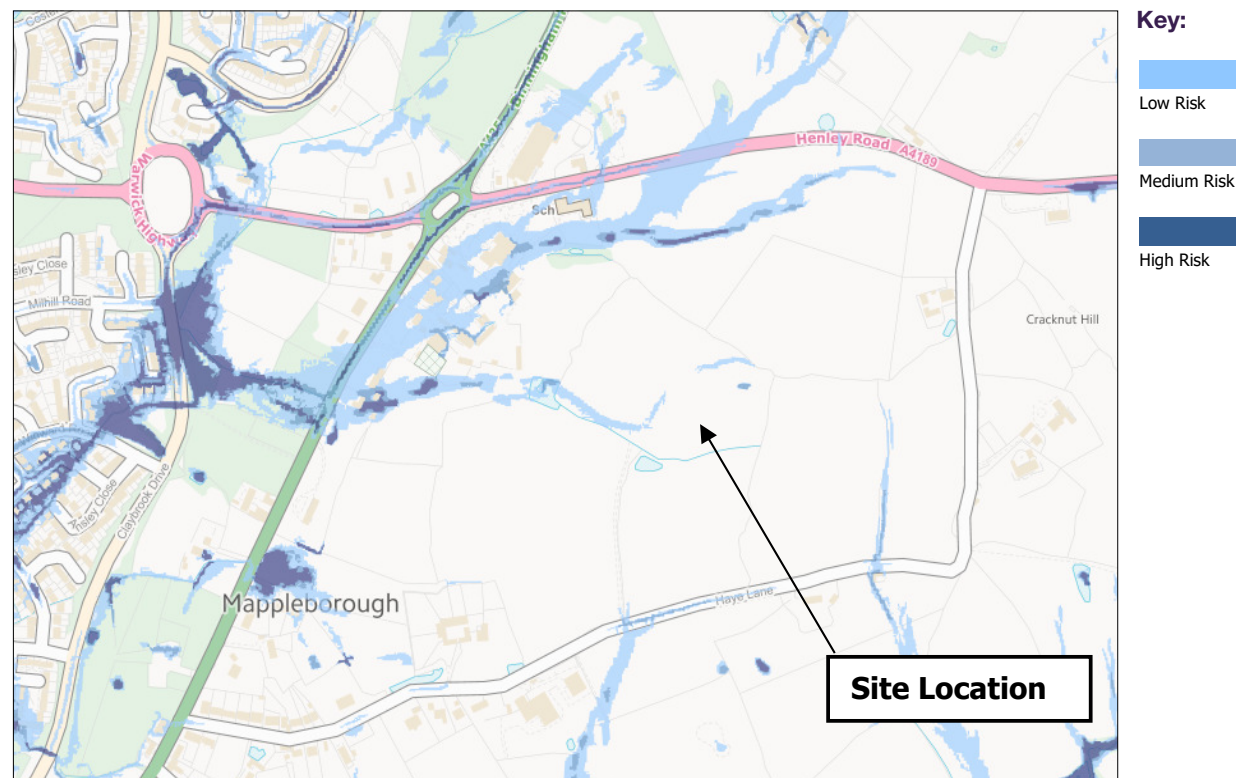
Figure 22: Flood Map for Planning (Environment Agency, March 2021)



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 23: Flood Risk from Surface Water
(Environment Agency, March 2021)**



- 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.
- Surface water runoff from the site will be discharged into the three ditches located within the site boundary.
- Discharge rates will be split for three potential outfall locations based on the estimated catchment areas.
- Surface water run-off will be managed by a combination of oversized below ground pipes, swales and retention ponds.
- Retention ponds will have permanent water and will provide water treatment as well as supporting aquatic and emergent vegetation. They are then discharged into the ditches located across the development site.
- New climate change policies will be adhered to.
- Attenuation will be provided in forms of permeable paving where applicable and subject to permeability test results.
- 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 meet the biodiversity and ecological requirements.
- The design flood level will include a freeboard above the flood level. Typically the Environment Agency requires 600mm for residential development.



**Figure 24: Preliminary Flood Risk
Assessment (Environment Agency,
December 2019)**



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10.0

Technical Considerations



10.0 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. Significant 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 Ipsley Primary Substation located on Watery Lane, approximately 3.5km from the site. We would expect a minimum 200mm water main would be required to supply the site. Severn Trent may allow a connection to the 700mm aqueduct crossing the site, the suitability of this is to be confirmed by Severn Trent. 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.

Severn Trent asset records show a 700mm clean water aqueduct crossing through the site from north west to south east, from Henley Road to Haye Lane. Severn Trent note that this is a strategic asset and such they will require risk assessments and method statements (RAMS) to be submitted for any works in or around the main.

It is anticipated that diversion of the main will not be possible due to cost and the strategic nature of the main to Severn Trent and therefore it will be maintained in its current location within a green corridor, with the masterplan designed around this. A minimum 12 metre easement will be maintained for the main, 6 metres either side of the pipe, within which no building will be permitted. The aqueduct and its easement should remain in open ground to allow access for maintenance and will not be included within a property boundary including gardens and driveways. Any reduction or increase in ground levels will also have to be agreed with Severn Trent Water.

Crossing points for the aqueduct will be agreed with Severn Trent and will require protection measures to be included to protect the aqueduct. Roads will cross the main at 90° and will not run along the line of the aqueduct.

Adequate protection in consideration of pipe size, depth, material, ground conditions, point loadings and frequency of vehicle movements, these will be addressed in the Risk Assessment Method Statement.

Western Power Distribution also have apparatus within the site boundary but we anticipate that these overheads will be diverted to accommodate the masterplan.



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 A4189 and the A435; however, the emissions from traffic using these roads is unlikely to provide any constraints to development, in terms of air quality, beyond a few metres from the roadsides.

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 AQMAs in Studley and Stratford-on-Avon to be revoked if concentrations continue to decline. The Studley AQMA is located over 2km to the south of the development site. There are no Air Quality Management Areas (AQMAs) in nearby Redditch.

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 within Redditch. It is possible that development-generated traffic travelling along the A435 may travel through the aforementioned Studley AQMA, and thus the air quality impacts in this area may need to be considered as part of the planning application.

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.

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;
- provision of secure cycle parking for all new homes;
- 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
- potential rerouting of the local bus service (service number 62) to provide improved transport links between the site and local amenities to reduce the number of private car trips.

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 are no constraints to residential development at the proposed site in terms of air quality beyond the setting back of sensitive development from the adjacent A-roads.

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, however several of the hedges have been subject to annual flail trimming. 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 Field Maple, situated within the field boundary hedges. The field boundaries are bounded by hedgerows of predominantly Hawthorn and Blackthorn. Of particular merit are the large Oak and Ash situated on the eastern and southern boundaries adjacent Hayes Road. Oak and Ash are also prominent features of the tree group adjacent to the boundary with the property outside of the site immediately north from where the site abuts Birmingham Road. Other trees of significance within the site are the larger Oaks within the field boundaries internally within the site. Several of the Ash and Field Maple 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 would 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.



11.0 Proposals



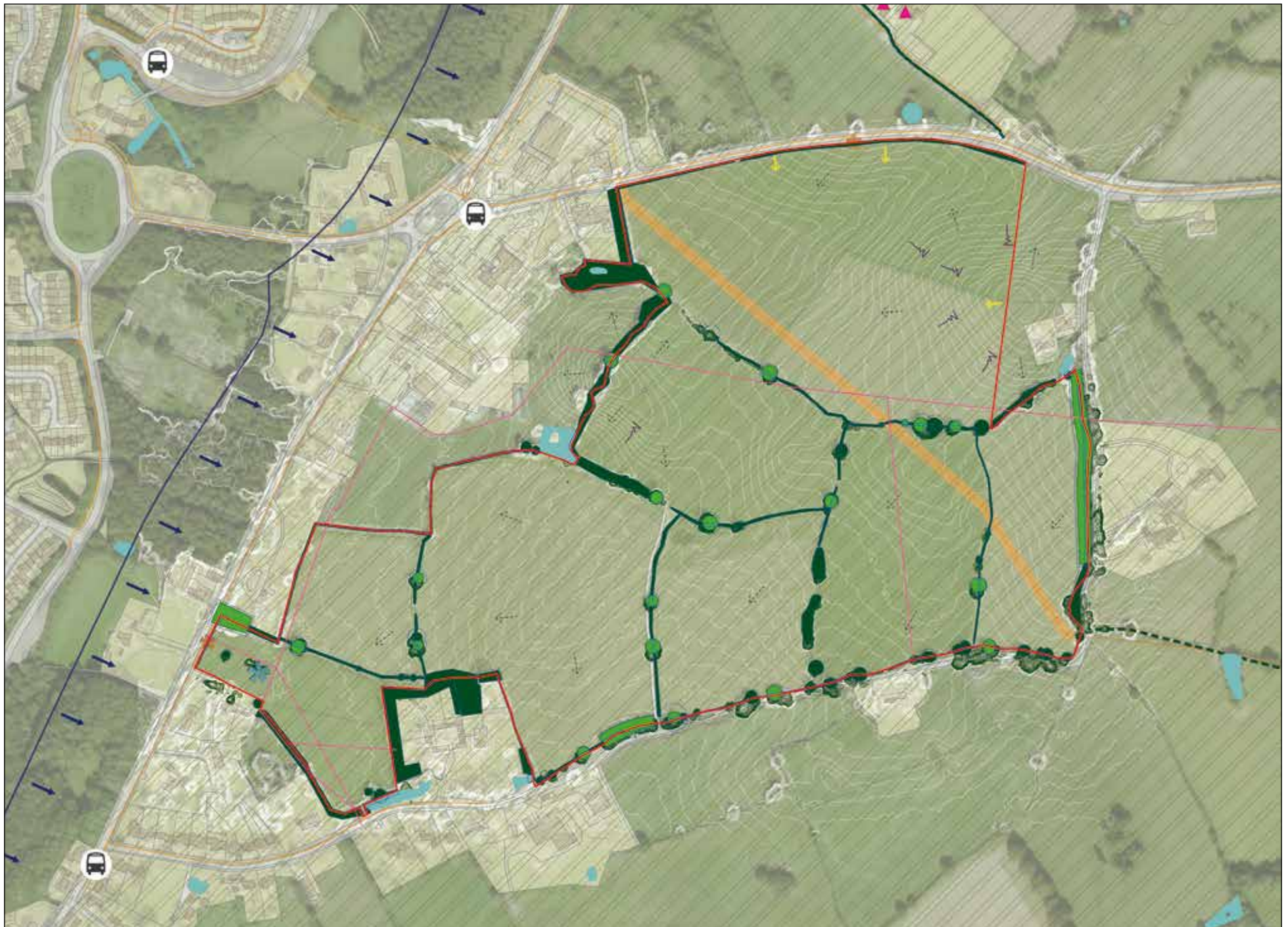
11.0 Proposals



The existing site has been considered through an analysis of the baseline assessments which have informed the emerging proposal. This approach has entailed collaboration between landscape, urban design, transport, ecological, arboriculture, heritage, drainage, air quality and other professionals. The landscape components of the scheme are an important integral part of the proposals.

- A landscape led 'ground up' approach has been undertaken for the concept masterplan, which retains and protects the site's best assets.
- High quality residential development would extend the existing settlement at Mappleborough, with strong containment along Birmingham Road, Henley Road and Haye Lane.
- Approximately 16ha of land is proposed for residential development providing up to 560 dwellings at 35dph.
- A community hub provides expansion land for the primary school along with other new facilities including a village shop, sports pitches and children's play area in a convenient central location adjacent to the existing settlement.
- Main vehicular access points are proposed off Henley Road and Birmingham Road providing a Primary Street 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 a distinctive route.

Figure 25: Constraints & Opportunities



Key:

 Site boundary	 Steep slopes	 Public Right of Way (footpath)	 Bus Stop	
 Individual tree with Root Protection Area (RPA)	 Potential site access	 Green Belt	 Special Landscape Area (Arden)	
 Category A tree	 Low point within site	 Views	 Overhead electric cables	
 Vegetation (including hedgerows & tree groups)	 Grade II Listed building	 Development		
 Contours (arrow indicated downward slope)	 Waterbodies	 Utilities Aqueduct with 6m offset for development		

Figure 26: Concept Masterplan



Key:	Site boundary	Waterbodies	Primary school expansion and community facilities	
Existing	Public Right of Way (footpath)	Development	Main access road	
	Individual tree with Root Protection Area (RPA)	Proposed	Public open space	Footpaths
	Vegetation (including hedgerows & tree groups)	Residential development	Trees	Play facilities
	Contours (arrow indicated downward slope)		SUDS attenuation	Orchard
			Woodland	Sports pitches



The masterplan will maximise opportunities to create walkable neighbourhoods. New footpaths and cycleways will ensure that safe routes are provided along attractive greenways, linking to key destinations such as the community hub and areas of focal open space. Connections to the existing footpath and highways network within the wider area will create circular routes around the site.

A substantial proportion of the site is proposed for Green Infrastructure, with a new community park along the eastern edge of the site. Existing landscape features across the site including the characteristic pattern of field hedgerows and mature oak trees would be retained, as part of an enhanced Green Infrastructure strategy providing a guiding framework for the development parcels. Retained vegetation will be supplemented with native broadleaf tree and woodland planting, attenuation basins, orchards and meadows providing a rich, high-quality landscape which integrates the new development within the Arden landscape.

The masterplan can accommodate residential development, associated infrastructure and community facilities, which are sensitive to the areas inherent character and landscape features. Opportunities to deliver a high quality development based upon best practice and sustainability will be sought throughout the masterplan providing environmental and social benefits as well as mitigation for the new development.





The location of the site gives an opportunity for further development to the south of Haye Lane, as part of a comprehensive sustainable urban expansion along the eastern edge of Redditch, incorporating the site and additional land to the south.

While the current proposal is focused on the site Taylor Wimpey also have the opportunity to deliver a larger scheme in this location, encompassing additional land to the south of the site, in the longer term as shown on Figure 27. Taylor Wimpey would be happy to explore this further with the Council should it be of interest.



Figure 27: Potential Further Development





12

12.0 Conclusion



12.0 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 (but outside) the boundary of Redditch; is currently located within the Green Belt; and is located within the Arden Special Landscape Area.
- 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.
- The exceptional circumstances required to remove land from the Green Belt for development exist within Stratford-on-Avon District and that doing so would not undermine the integrity and overall purposes of the Green Belt.
- While the site is located within a Special Landscape Area it is capable of being developed without having a harmful effect on the distinctive character and appearance of the landscape.
- 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.

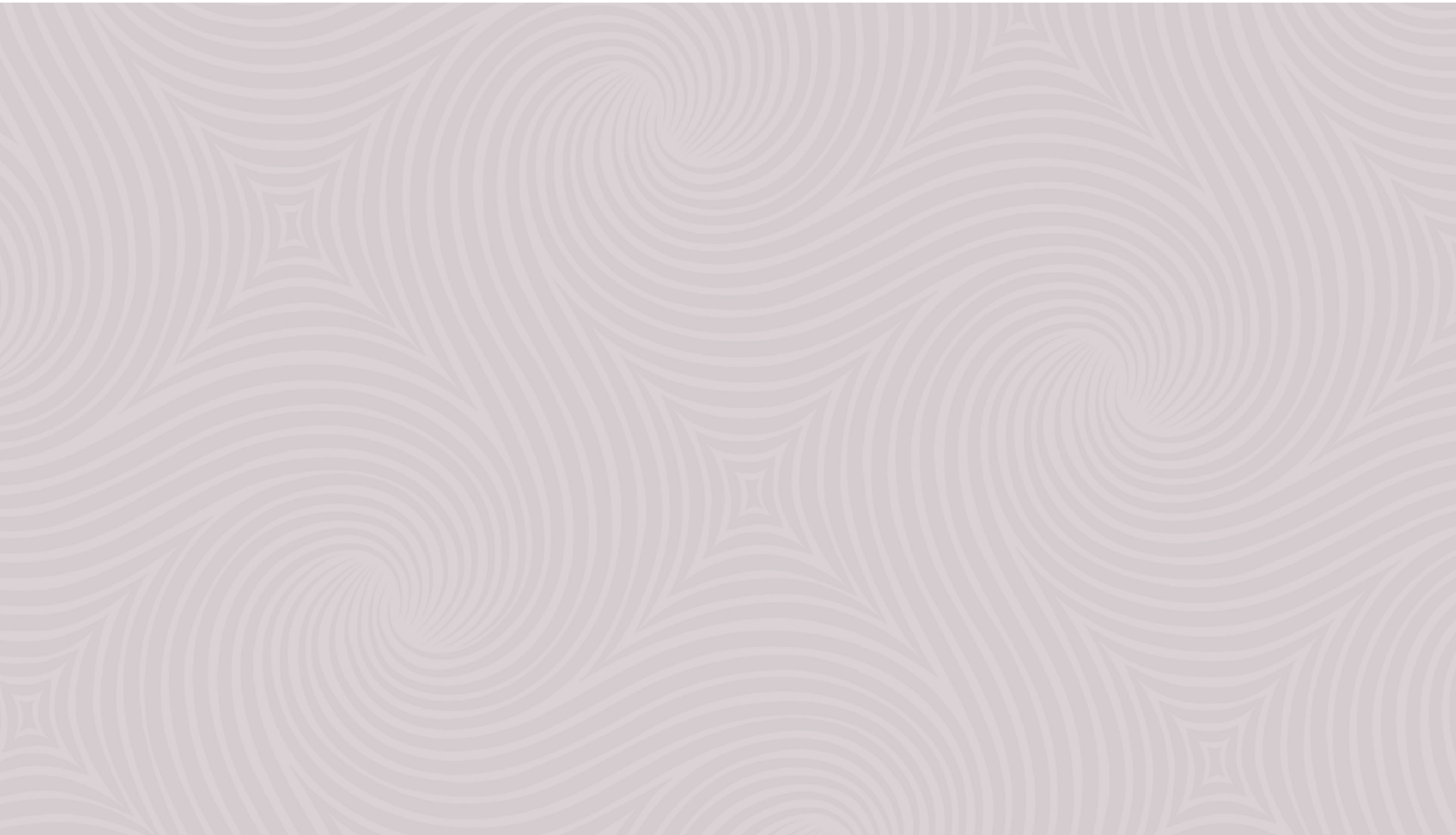




13

13.0

About Us



13.0 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

Haye Lane,
East of
Redditch

Vision Document

March 2023

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