



Warwickshire

Property & Development

SOUTH WARWICKSHIRE

ISSUES AND OPTIONS CONSULTATION

REGULATION 18 SUBMISSION

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1.0 INTRODUCTION

1.1 This Representation is prepared by Warwickshire Property & Development Group (WPDG). This is in response to the South Warwickshire Local Plan Issues and Options Consultation (Regulation 18). This is intended to be tailored towards proposed allocation of land in Bidford on Avon.

1.2 This representation provides a response to the following specific questions:

- Q-S4.1: Do you think that growth of some of our existing settlements should be part of the overall strategy?
- 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.
- Q-S5.3: In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?
- Q-S5.4: If not, what approach would you take?
- Q-S7.1: Please provide any comments you have on the emissions estimation modelling for the five growth options
- Q-S7.2: For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire: Option 1: Rail Corridors, Option 2: Sustainable Travel, Option 3: Economy, Option 4: Sustainable Travel and Economy and Option 5: Dispersed.
- Q-S10: Please add any comments you wish to make about the development distribution strategy for South Warwickshire
- Q-E11: Please add any comments you wish to make about delivering South Warwickshire's economic needs
- Q-H1-1: 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?
- Q-H2-1: What is the best way to significantly increase the supply of affordable housing across South Warwickshire?
- Q-H2-3: How should South Warwickshire best address the specialist needs for older people?
- 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?
- 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
- 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?

- 1.3 This representation is made in the context of the following planning policies.
- 1.4 Paragraph 8 of the National Planning Policy Framework (2021) (NPPF) and its three sustainability objectives. These being:
- 'a) an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) an environmental objective – to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.*
- 1.5 In accordance with paragraph 35 of the NPPF (2021), Local Plans must be assessed as to whether they accord with legal and procedural requirements and meet the test of soundness as set out below;
- 'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'*
- 1.6 Paragraph 24 of the NPPF (2021) states that local planning authorities are under a duty to cooperate with each other and with other prescribed bodies on strategic matters that cross administrative boundaries which includes addressing unmet housing need. Furthermore, paragraph 27 details the requirement to demonstrate effective and on-going joint working through the preparation of Statements of Common Ground.

2.0 REPRESENTATION

Issue S4: Growth of existing settlements

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

- 2.1 YES. The overall development strategy should include delivery of sustainable development across South Warwickshire's existing settlements as part of its overall strategy and plan. This being particularly pertinent where any proposed development would meet the needs of the local community. Paragraph 79 of the NPPF (2021) is clear that planning policies should *'identify opportunities for villages to grow and thrive'*.
- 2.2 Continued use of a settlement hierarchy should be supported to ensure development is directed towards the most sustainable towns and villages and where this supports a level of growth aligned with the settlement's relative sustainability. The adopted strategy inclusive of expansion to existing settlements ought to be based on a robust series of evidential hierarchy considering both housing and employment needs to meet the requisite tests of soundness within the NPPF (2021) paragraph 35.

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

- 2.3 Bidford-on-Avon is identified as a highly sustainable location, offering its residents a wide range of services and employment as well as access to public transport and other modes of sustainable travel across the settlement and onward to other nearby towns and villages.
- 2.4 Bidford-on-Avon is also identified as a small settlement location which provides access by foot and riding to key services which help support strong alignment with the principles of the 20-minute neighbourhood, the settlement being compact and connected with a range of services to meet most people's needs.
- 2.5 It is understood that the 20-minute neighbourhood is a key pillar in the South Warwickshire Settlement Analysis (2023), and it is our understanding that subject to further consultation and evidence base preparation, the Councils are intending to incorporate them within the South Warwickshire Local Plan.
- 2.6 More specifically Bidford-on-Avon is identified at section 3.5 of the Sustainability Appraisal of the emerging South Warwickshire Local Plan as a smaller location which may be able to deliver 50-500 new homes.
- 2.7 Given the settlements high degree of sustainability the indicated 500 dwellings should not be treated as a maximum provided it can be demonstrated that additional development aligns with the three overarching sustainability pillars in the NPPF (2021) referenced previously. Similarly the ongoing and well documented housing crisis and drive to significantly boost housing delivery and supply supports this position. Lastly there is no overt or obvious rational

or calculation for the proposed upper limit and this should therefore be treated as a guide only.

- 2.8 WPDG is promoting land known as Broom Farm forming part of site ref: 562. This site can deliver up to 220 homes. The site adjoins existing residential dwellings comprising established and recently delivered housing development. The site makes a logical infill opportunity benefitting from substantial road frontage and being located with high levels of accessibility to local amenities. A high-quality scheme can be delivered which positively contributes to sustainability objectives to be met through the adoption of the South Warwickshire Local Plan. The allocation of the site can incorporate measures to prevent coalescence of Bidford-on-Avon with nearby Broom.
- 2.9 We agree with the connectivity analysis which identifies the site as Connectivity Grade B, the second highest grading and the joint highest available within the settlement.
- 2.10 The density analysis for Bidford provides a useful evidence base to inform the preparation of site layouts. The evidence base principles can be incorporated where it would be appropriate to bring forward an 'Outer Suburb' form of residential development which is sensitive to the site relative proximity to the settlement boundary.
- 2.11 To ensure the South Warwickshire Local Plan meets the test of soundness detailed in paragraph 35 of the NPPF (2021), it is paramount that the Councils use the evidence base prepared to develop a plan which is justified.

Issue S7: Refined Spatial Growth Options

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

- 2.12 We agree that the emissions modelling is a useful element of the evidence base to inform the Local Plan. However, it is important to note that reducing emissions is only a small element of achieving sustainability and this needs to be balanced against building a strong, responsive, and competitive economy, supporting strong, vibrant, and healthy communities, and significantly boosting the supply of homes. Warwick District Council and Stratford on Avon District Council, as plan-makers, need to take into account the emissions model along with the full evidence base to ensure the plan meets the test of soundness including being positively prepared, justified, effective and consistent with national policy.

Q-S7.2: For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire: Option 1: Rail Corridors, Option 2: Sustainable Travel, Option 3: Economy, Option 4: Sustainable Travel and Economy and Option 5: Dispersed.

- 2.13 We believe with the majority view identified at the scoping stage that a hybrid approach would be the most appropriate. This enables the Council to deliver a mix of the options which most align with the sustainability objectives. Given that option 5 performs the least favourably in the Councils Sustainability Appraisal, this should be given the least reliance in the overall strategy. Such an approach will ensure development is appropriately located and

able to meet the area's objectively assessed need and pressures relating to unmet need from neighbouring Authorities.

Issue E11: Any other economic issues

Q-E11: Please add any comments you wish to make about delivering South Warwickshire's economic needs

- 2.14 This proposal is focused on housing delivery. Housing development is critical to ensure local job creation opportunities are met and provide support to local services minimising the movement of people for access to work and services across settlements and wider boundaries. Housing development goes hand in glove in respect of supporting wider economic growth and resilience.

Q-H1-1: 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?

- 2.15 In accordance with Table 9 (Overall Housing Need in Coventry and Warwickshire (dwellings per annum) of the South Warwickshire Local Plan Part 1 (Stage 2: Issues and Options Consultation, January 2023), the 2014-based projection results in a housing need of 1,239 per annum for Stratford-on-Avon and Warwick. The trend-based approach results in an increased housing need of 1,679 per annum. It is important to note that for all other Local Authorities in Coventry and Warwickshire, the trend-based projection results in a lower housing need, with the exception of Rugby.
- 2.16 Paragraph 61 of the NPPF (2021) is clear that to determine the local housing need, the standard method must be used unless *'exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'*. This is reiterated in paragraph 003 of Planning Practice Guidance relating to Housing and Economic Development Needs Assessments which reads as follows; *'there is an expectation that the standard method will be used, and that any other method will be used only in exceptional circumstances.'* The first step to calculating housing need in the Planning Practice Guidance is setting the baseline using the national 2014-based household projection rather than a trend-based approach.
- 2.17 The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (November 2022) states that *'population growth for Coventry appears to be systematically over-estimated, which leads to trend-based projections that are demonstrably too high. Additionally, there is evidence that more recent trends in population growth (confirmed by Census data) in many parts of Warwickshire have been stronger than in the period to 2014 – mainly due to changes in migration levels – and so the 2014-based figures can be thought of as unreliable. It is also the case that other key aspects of population projections (fertility and mortality rates) have diverged significantly from those projected in the 2014-based projections.'*

- 2.18 Paragraph 015 of Planning Practice Guidance relating to Housing and Economic Development Needs Assessments states that *‘where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.’* Thus, whilst we have not scrutinised the data and evidence underpinning the proposed trend-based approach, in our view proceeding with the alternative approach presents a risk of significant scrutiny during examination testing.
- 2.19 In any event, the objectively assessed housing need is a minimum starting point. As detailed in paragraph 10 of Planning Practice Guidance relating to housing and economic needs assessment, the objectively assessed housing need is *‘a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.’*
- 2.20 It is also strongly recommended that South Warwickshire include a further economic uplift to facilitate growth and support the community in the economic recovery. The economic benefits of delivering housing and its contribution to building a strong and competitive economy in line with paragraph 8 of the NPPF (2021) is well established. The Economic Footprint of UK Housing Building in England and Wales (July 2018) prepared by the Home Builders Federation and Lichfield’s states that £39bn is generated as an economic output as a result of house building each year. This financial output can also result in a positive impact in support of the environmental and social objectives outlined in national planning policies.
- 2.21 As detailed in our response to Q-H2-1, South Warwickshire have a significant need for affordable housing. Chapter 6 of the South Warwickshire Local Plan Part 1 (Stage 2: Issues and Options Consultation, January 2023) is clear that affordable homes are primarily delivered as a percentage of market housing schemes. Thus, in order to significantly boost the supply of affordable homes to meet the needs of the local community, a further uplift to the objectively assessed housing need is required.
- 2.22 As detailed in our response to Q-H4-1, Q-H4-2 and Q-H4-3, an uplift is also required to meet the needs of neighbouring Authorities in accordance with the duty to cooperate and the test of soundness.

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

- 2.23 As detailed in Chapter 6 of South Warwickshire Local Plan Part 1 (Stage 2: Issues and Options Consultation, January 2023), the primary source of affordable housing is through delivery as part of market housing schemes.
- 2.24 We strongly recommend the best way to significantly increase the supply of affordable housing across South Warwickshire is to allocate sites for residential development significantly above the minimum objectively assessed need. This aligns with the planning

practice guidance which makes clear the identified need is a minimum starting point and uplifts can be applied where it is justified.

- 2.25 This approach would in our view meet the test of soundness by being positively prepared to meet local need, justified by being based on appropriate evidence base and consistent with national policies aim of significantly boosting the supply of homes. To ensure the Plan is effective, we recommend that South Warwickshire agree Statements of Common Grounds with all landowners and developers that have draft allocations within the plan, this will assist in demonstrating deliverability at independent examination.

Q-H2-3: How should South Warwickshire best address the specialist needs for older people?

- 2.26 In order to address the specialist needs for older people, we recommend that a specific planning policy is included in the South Warwickshire Local Plan. Similar to that contained within the Warwick District Local Plan (September 2017) and Stratford-on-Avon District Core Strategy (2011-2031), a criteria-based approach would be considered an appropriate mechanism to controlling the delivery of older people accommodation. However, these Plan's do not allocate sites which are suitable for meeting the identified need and instead rely on applicants demonstrating proposals meet the needs of older people.
- 2.27 In order to ensure older people accommodation is delivered in South Warwickshire, we recommend the plan incorporates appropriate allocations. This could either be as part of a wider mix-used schemes or sites solely for the delivery of older people accommodation.
- 2.28 This strategy will accord with the test of soundness detailed in paragraph 35 of the NPPF (2021) by meeting the objectively assessed need through allocated sites which have derived from a proportionate evidence base. It will also align with national planning policies which state that plans should reflect the need for different groups in the community, including older people.
- 2.29 It is essential that older people accommodation is situated in highly sustainable locations which are accessible to facilities and services to meet the day to day needs of the residents. This will not only support the environmental objective by reducing the need to travel but it will result in significant social benefits by creating a strong, vibrant, and healthy community.

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?

- 2.30 Chapter 6 of the South Warwickshire Local Plan Part 1 (Stage 2: Issues and Options Consultation, January 2023), states that *'South Warwickshire sits most fully within the Coventry and Warwickshire HMA, with Warwick District most strongly related to Coventry given its shared boundary and interrelationships with the city. However, South Warwickshire is also within the Birmingham and Black Country HMA owing to Stratford-on-Avon District's shared boundaries and inter-relationships with Solihull and Redditch boroughs and Bromsgrove district'*.

- 2.31 The identified sites in Stratford-on-Avon amount to a total of 530 dwellings, including STR.D – East of Banbury Road, Stratford-upon-Avon which appears to have infrastructure constraints. In accordance, with the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum (December 2021), the total shortfall of housing is 66,139, comprising of 37,900 arising from Birmingham and 28,239 from the Black Country. In 2021, the identified contribution from Authorities within the housing market area totalled 13,935. Thus, there remains a significant shortfall across the HMA which has not been accounted for.
- 2.32 Given the scale of the unmet need, we strongly disagree with the Council’s proposed approach to meeting the Birmingham and Black Country shortfall. It is not clear what evidence the Council is using to underpin this approach. Thus, if South Warwickshire were to continue without further evidence, the test of soundness would not be satisfied.
- 2.33 Moreover, South Warwickshire should be fostering a positive and proactive approach to delivering sustainable housing to assist in addressing the current housing crisis. The NPPF (2021), is clear that for a Plan to be found sound. it must be positively prepared which includes as a minimum ensuring that *‘unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’*. We are not aware of any evidence which demonstrates that allocating additional sites to contribute to meeting the Birmingham and Black Country HMA shortfall to 2031 is unpractical or fails to achieve sustainable development.
- 2.34 Thus, we strongly recommend that South Warwickshire include an uplift on their housing need to address this identified unmet need. We do however agree that given the location of the unmet need, the allocation of additional sites would be most appropriate within Stratford-on-Avon given its proximity to the source of the unmet need.

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

- 2.35 As detailed above in our response to Q-H4-1, South Warwickshire should be allocating additional sites to assist in meeting the Birmingham and Black Country HMA shortfall to 2031.
- 2.36 The South Warwickshire Local Plan subject of this consultation does however have a plan period of up to 2050. Thus, in order for the plan to meet the test of soundness, it must take into account the shortfall arising over that period. Birmingham City Council has commenced its Local Plan Review to 2042. The Council has identified a shortfall in housing of 78,415 homes. The Black Country Local Plan is no longer proceeding and the Local Plans for the four Black Country Councils will now be prepared separately. Thus, it may be that an additional shortfall for the HMA will be identified through the plan-making process.
- 2.37 Therefore, South Warwickshire should accommodate a proportion of the shortfall identified by Birmingham up to 2050. It is also highly likely additional unmet need will arise from the Black Country and we recommend that South Warwickshire keep this under constant review to ensure a flexible Plan is prepared which can assist in meeting any unmet need identified.

2.38 It is essential that this is incorporated within the plan to ensure that it meets the test of soundness by being positively prepared, justified, effective and consistent with national planning policies.

•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?

2.39 It is our view that the ideal position would be to allocate sites for unmet need as close to the area which has an identified unmet need. However, given the scale of the unmet need to be accommodated with South Warwickshire, this approach could lead to disproportionate growth in certain areas which could have a determinantal impact on achieving sustainability. Thus, we recommend that approach is undertaken in conjunction with utilising the Council's settlement hierarchy to direct development towards the most sustainable settlements in South Warwickshire.

3.0 CONCLUSION

- 3.1 In conclusion there are several potential growth settlements and villages appropriately categorised within the emerging local plan evidence base which can accommodate the local and wider HMA requirements, notably Stratford-on-Avon's ability to part meet consistent under delivery within the Birmingham and Black Country HMA. A key example is Bidford-on-Avon where the settlement can support growth through its good sustainable connectivity and its local amenities and services.
- 3.2 The South Warwickshire plan should uplift their housing targets to address this unmet demand, particularly where there is evident capability to deliver on sustainably located sites in established settlements.
- 3.3 There remains the opportunity therefore to allocate land which would substantially increase delivery capacity, providing a range of house types and tenures, helping to bridge the affordability divide whilst simultaneously supporting job creation, leisure and retail provision.