

SOUTH WARWICKSHIRE LOCAL PLAN (PART 1) ISSUES AND OPTIONS REPRESENTATIONS

Land at Coventry Gateway West

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REPORT

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Approval for issue

Paul Hill

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1 March 2023

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Appendix A - Vision Document

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1 INTRODUCTION

- 1.1 These representations have been prepared by RPS Consulting Ltd ('RPS') on behalf of Lenco Investments (Lenco) in relation to the South Warwickshire Local Plan ('SWLP') Issues and Options ('I&O') Consultation including the Sustainability Appraisal and accompany evidence base.
- 1.2 Both Districts ('the Councils') of Warwick and Stratford on Avon recognise there is a need to deliver a greater amount of housing within their respective administrative boundaries than the level previously proposed within the Stratford-on-Avon District Council Core Strategy and the Warwick District Council's Local Plan which were adopted in 2016 and 2017, respectively. The Councils' proposed housing need in the SWLP I&O is in response to the Coventry and Warwickshire 'Housing and Economic Development Needs Assessment' ('HEDNA') prepared by Icen Projects on behalf of the Coventry & Warwickshire Local Authorities in November 2022, to accompany the evidence base to the SWLP.
- 1.3 The SWLP I&O identifies, as an option, that a review of the existing Green Belt boundaries is necessary to inform the preferred strategy up to 2050. The Councils are therefore consulting upon a number of options for housing growth including Green Belt release around Coventry and Birmingham.
- 1.4 Lenco's land interests predominantly relate to their freehold land, referred for the purposes of this promotion as Land at Coventry Gateway West ('the Site'), to the South of Coventry and on the edge of the city. The land control across the site is comprehensive, notwithstanding a small parcel of Stoneleigh Road in third-party control (NGR: SP 34327 73724). Please refer to Figure 1 Land Control for a detailed breakdown of the extent of land control in the area which is being promoted through these representations.
- 1.5 To support these representations, a Vision Document (Appendix A) has been prepared which demonstrates the Site is an appropriate site for allocation in the SWLP and can respond positively to the wider work which the Councils are currently undertaking in assessing strategic land opportunities in a Study Area on the southern side of Coventry around the existing Coventry Gateway site. In addition, a slightly amended Call for Sites submission form has been completed for the site and is appended (Appendix B), reflecting the ownership extent.

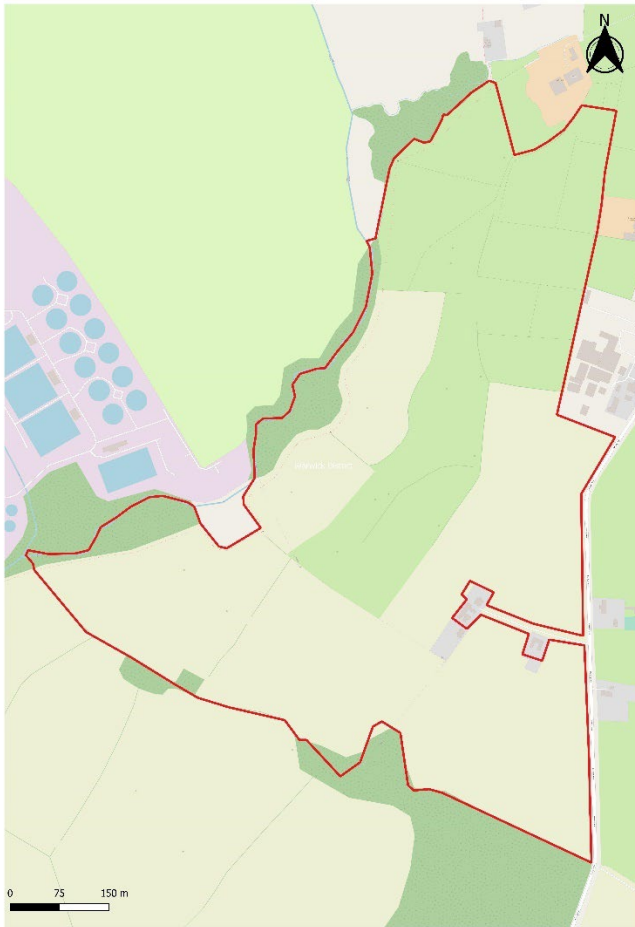


Figure 1-1 Land Control

1.6 The site has most recently been promoted through the Scoping and Call for Sites consultation in 2021. The vision document prepared for the site and is presented to be read in conjunction with this submission. It sets out how development could progress and provides greater detail about the site and its suitability for strategic residential or employment development, alongside supporting technical evidence base and in particular how it could relate to strategic growth considerations in the wider area.

Structure of this document

1.7 The following chapters provides comments in relation to:

- Overview of the sites
- Specific comments to the I&O consultation
- Comments to the evidence base
- Comments to the sustainability appraisal

2 OVERVIEW OF THE SITE

Site context and description

- 2.1 Coventry's Southern Gateway is a strategic growth area and has a common boundary with the City of Coventry in the West Midlands. Whilst Coventry Gateway is located within Warwick District, its built form physically adjoins the Coventry urban area and being approximately 6.5km from Coventry City Centre the area looks to the city for both its social and economic needs.
- 2.2 The nearest train station is Coventry Station (approximately 2.5 miles to the north). Coventry Gateway is also served by local bus services from Coventry. Coventry Airport lies to the east of the Stoneleigh Road with the main runway lying within approximately 500m of the eastern boundary of the site. However, the airport is only open to private light aircraft traffic. The Airport is facing possible closure, given in February 2021, a joint venture partnership between Coventry City Council and The Rigby Group proposed to build a Gigafactory producing batteries for electric cars on the Coventry Airport site, if the project attracts investment and government funding. It is therefore clear that with the site being adjacent to an area of substantial change it is well placed to form part of that change and in particular benefit from substantial road infrastructure that has recently been implemented.
- 2.3 The site could gain access to the A45 strategic road network to the north via the newly constructed Silver Eagle Way with residential development in this location balancing the very substantial employment base on the southern side of Coventry (UK BIC, Gateway South & Middlemarch Industrial Estate), all of which are a very short distance from the site.
- 2.4 The site extends to approximately 50 hectares of greenfield land which comprises mainly fields enclosed by hedgerows albeit with a few properties along its eastern boundary. The site in its entirety and its immediate context is indicated in the vision document.

Approximate capacity

- 2.5 As indicated in the accompanying Vision Document, the site is suitable for a variety of land uses. Two potential options have been put forward.
- 2.6 Firstly, based upon the density assumptions of the consultation and acknowledging the likely densities that could be achieved at this site, the estimated capacity of this site promotion, when taking account for the effect of constraints on net developable area for the site at this stage which has been explored through the vision document's technical work

that an estimated capacity equates to over 1000 dwellings (at 40dph with 50% of site for residential and remaining 50% for supporting facilities, green and blue infrastructure).

2.7 Secondly, an option for a new business park has been presented. The key ambition of an employment/commercial-led proposal is to set any development within a new landscape structure to ensure the delivery of high-quality development that relates well to the wider employment offer at the Coventry Gateway sites. Whilst taking account of the site constraints, ensuring a balance of green open spaces and access to the existing green network for potential users, at this stage the estimated capacity for possible commercial uses equates to approximately 23 hectares.

Site constraints

2.8 The basis of analysed site constraints is incorporated into the accompanying vision document for the site (Section 3 of Vision Document) and forms the initial technical evidence base work for the site. For the avoidance of repetition, only matters that are not discussed through Vision Document are outlined, as follows:

Agricultural Land Classification

2.9 The provisional Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development. Natural England's Open Data Publication grades the agricultural land across the site as Grade 3¹.

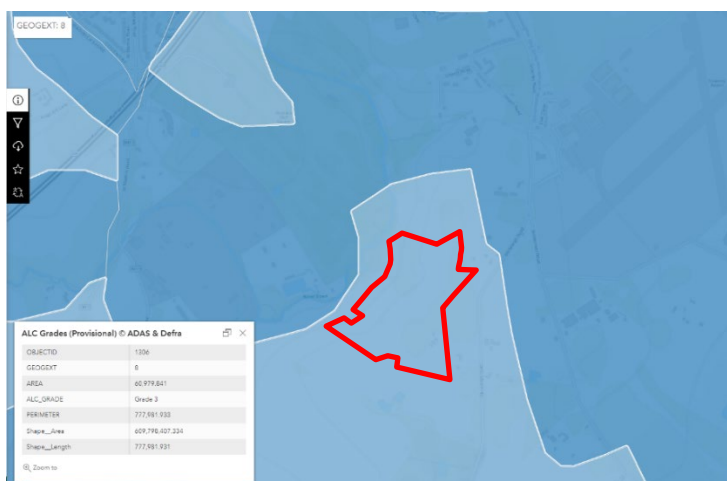


Figure 2-1 ALC Grades (ADAS & DEFRA)

¹ [Provisional Agricultural Land Classification \(ALC\) \(England\) | Provisional Agricultural Land Classification \(ALC\) \(England\) | Natural England Open Data Geoportal \(arcgis.com\)](#)

Tree Preservation Orders

- 2.10 There are no tree preservation orders within the site extents.

Public Rights of Way

- 2.11 There is a public right of way from Baginton to Stoneleigh along the river corridor, that links with a wider network of public rights of way within the locality.

Heritage Assets

- 2.12 The development site does not contain any listed buildings.
- 2.13 In the vicinity of the site, in Church Road there are a series of listed buildings including, Lucy Price House, Oak Farm, No. 2 Church Road and the Old Rectory, together with the Church of St John the Baptist. The Church is Grade I listed and is of 13th Century origin. It is set in an attractive church yard with numerous yew trees and an 18th Century brick wall at defines the northern boundary. These are a considerable distance from the Site, with very little or no intervisibility between the two, therefore either proposal will have a neutral effect on the heritage assets, and even if the Council concluded there were some harm to that asset, it would be less than substantial, and objectively outweighed by many public benefits.
- 2.14 In regard to, Scheduled Ancient Monuments, Baginton Castle and Fishponds are scheduled and located at some distance from the northern boundary of the site and does not present any overall constraint on the development of the site.

Watercourses and Flood Risk

- 2.15 The Environment Agency's Flood Maps for planning shows that part of the site lies immediately east of the River Sowe. The topography of the steeply sloping river valley sides ensures that although there are areas likely to be flooded to the west of the site land, it is restricted to the immediate vicinity of the river. It is not proposed that this area be developed as indicated in the vision document, the entirety of the developable site area is within Flood Zone 1.

Ecology

- 2.16 No Sites of Importance for Nature Conservation ('SINCs') or Sites of Local Importance for Nature Conservation ('SLINCs') are identified within the site boundary.

2.17 The ecological data search undertaken on the site concluded there were no known nationally important sites (e.g., SSSI) which fall within the immediate area of the site. There are no designated sites of nature conservation importance within the site boundary. This information has informed the preparation of the Illustrative Concept Masterplan. The proposal will deliver in excess of 10% biodiversity net gain.

Warwick District Council's Local Plan Review (2012)

2.18 The adopted Key Diagram proposals map below highlights the urban areas and the extent of the Green Belt within the District boundary, there exists a concentrated extent of Green Belt land towards to the north of the district adjacent existing built-up areas. The principal component of which is south of Coventry. As indicated below, various sites were removed from the Green Belt and allocated for housing / employment in the adopted plan (see Figure 2-2). This includes the adjoining site (Ref. H19) which was previously removed from the Green Belt and is currently subject to a part planning approval.

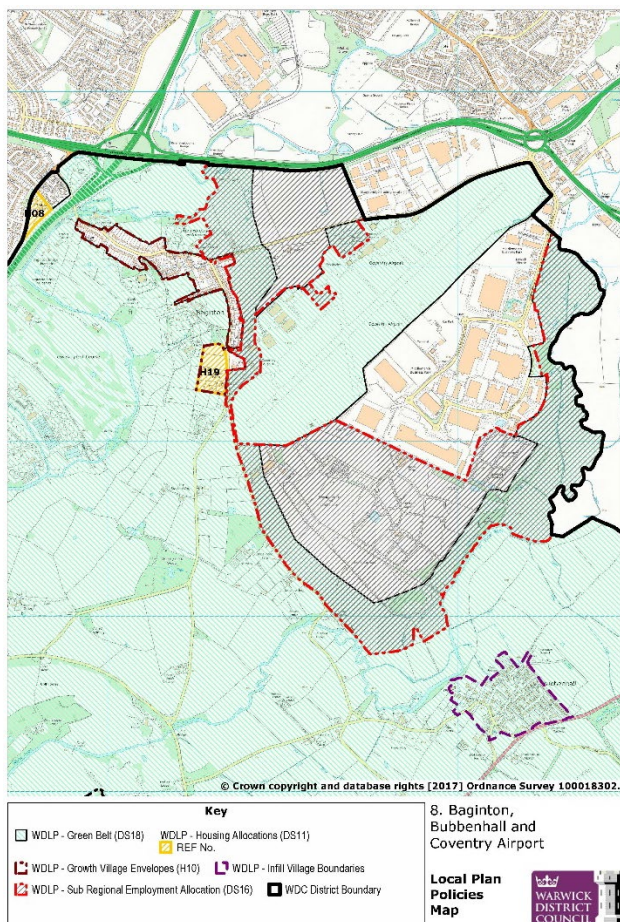


Figure 2-2 Adopted Local Plan Policies Map (Inset Map 8)

2.19 The allocations shown in the map (Figure 2-3) shows the WDLP Allocations that were previously released from the Green Belt and is allocated as part of policy DS11 [Allocated Housing Sites] and policy DS16 [Regional Employment Sites] as development opportunities on greenfield sites on the edge of Coventry. The inclusion of the Site in the SWLP would represent a logical extension to the existing allocations identified on the edge of Coventry.

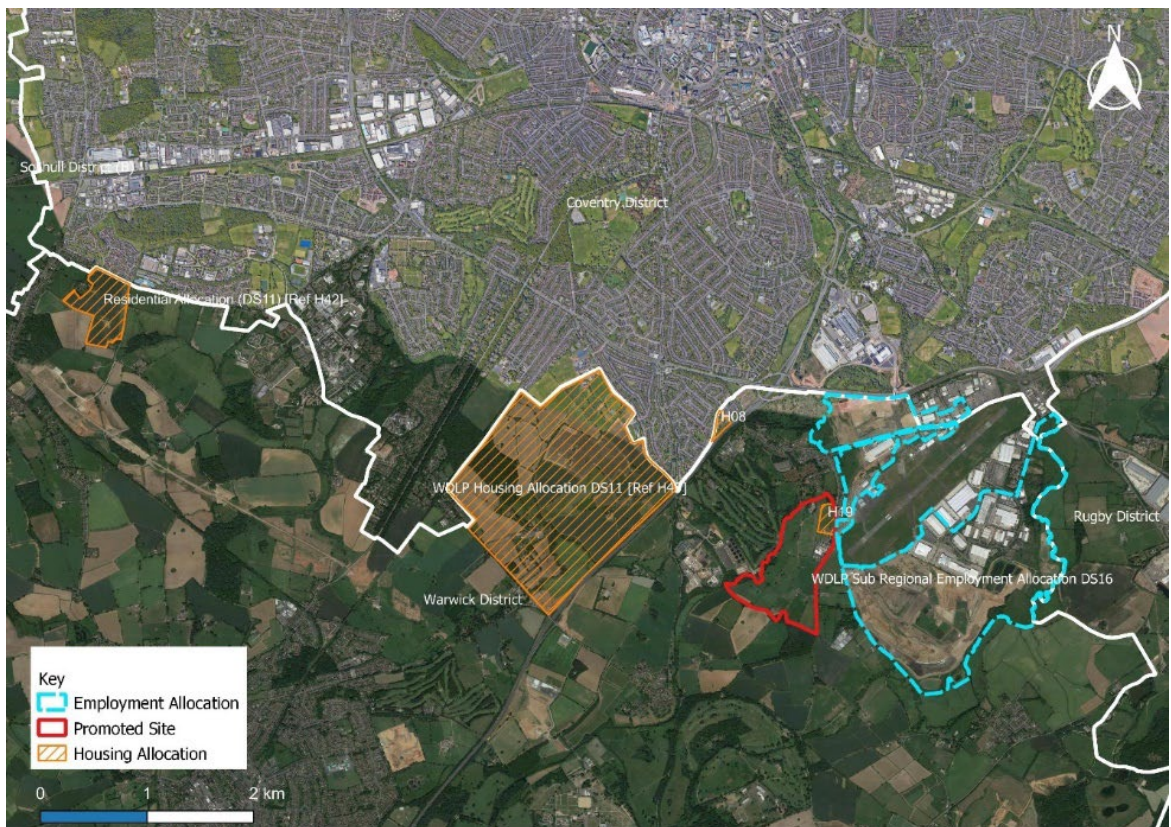


Figure 2-3 Previous Green Belt Release Allocations in the South of Coventry area

Kenilworth/south of Coventry area

2.20 An important context for the site, is the work being undertaken by Warwick District Council, alongside partners Warwickshire County Council, Coventry City Council and the University of Warwick, looking at a master planning framework for land to the north of Kenilworth/south of Coventry area. The site its firmly in the centre of this study area and is well placed to o utilise the supporting infrastructure already in place. Considering Coventry Gateway West in the future context, the Site would benefit from access to the infrastructure that will now be delivered at the Southern Gateway (application reference W/21/1370) and possibly at the Airport and be able to provide further employment opportunities for new residents or an expansion of the commercial activities on the site through a new commercial business park.

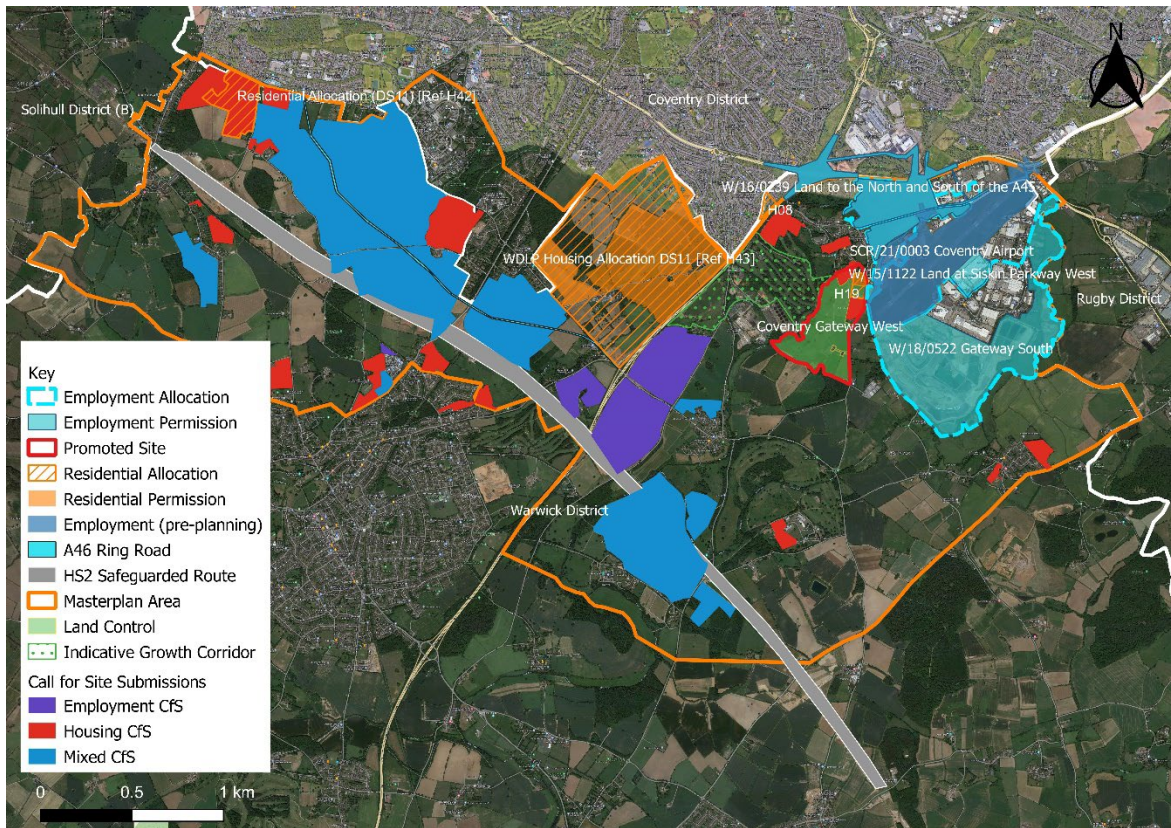


Figure 2-4 Map showing previous allocations, permissions, with first round Call for Sites submissions and HS2 safeguarded route

- 2.21 When presenting the current adopted plan allocations (housing and employment) on a map with the new Call for Sites submissions (from May 2021) and the defensible boundary that will be formed by HS2, it becomes visually clear that a growth pattern (i.e., a southern arc) can be formed around Coventry. The Site at Coventry Gateway West (outlined in red above) is strategically placed between existing and new employment opportunities and existing housing allocations, creating a clear opportunity for sustainable growth including travel options for potential new residents or new places of work for existing residents.
- 2.22 In summary, inclusion of the Site in the SWLP would represent a logical extension to the existing allocations identified on the edge of Coventry, when viewed in the existing and future context of largescale neighbouring development.

3 ISSUES AND OPTIONS CONSULTATION RESPONSES

- 3.1 The responses to the I&O consultation document, included below, where relevant, have been set out in the same format and order as the list of consultation questions.

Chapter 3 – Vision and Strategic Objectives

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

- 3.2 Agreed. The Councils rightly recognise that to meet Sustainable Development Needs an allowance for growth in new homes that meets the diverse needs of all residents, including affordable, specialist and self and custom build housing must be addressed in the SWLP. Recognising that the population of the Coventry and Warwickshire area is growing and changing, the projected change in population 2022-2032 is expected to be +6.4%, equating to around 60,632 more people living in Coventry and Warwickshire by 2032 (HEDNA, Table 5.30). This means there will be more homes required of different types and sizes. The Councils recognise the challenge to accommodate all of this housing within the districts in the most sustainable locations. RPS recognise that the HEDNA's identified housing need across the Housing Market Area ('HMA') for 4,906 dwellings per annum: lower than the standard method as published, and lower mainly due to the stated issues in published population projections for Coventry. Notwithstanding that, it is considered necessary for a number of policies (including Green Belt) to be changed through the plan-making process in order to overcome constraints and meet housing need.
- 3.3 The Council recognises the need to accommodate the growth in employment opportunities that builds upon the diverse economy in South Warwickshire and neighbouring authorities, through the strategic objective 'delivering opportunities for jobs'. The HEDNA envisages:
- 3.4 *"a continuing focus of strategic B8 growth ... with a greater potential role for South Warwickshire than seen historically. Given the need for Green Belt development if the needs identified are to be met, it would be advisable to coordinate assessment of suitable sites at a sub-regional level to integrate relevant consideration including landscape harm, and limit harm to Green Belt purposes". Concluding, "It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority. Planning for strategic [employment] development is inevitable in an area where it will be important that the local authorities in the sub-region continue to collaborate".*
- 3.5 We consider that there is an opportunity to focus growth and development on the edge of urban areas. In the north of Warwick district, the Green Belt adjoins the urban edge of

Coventry's administrative boundary. The urban area provides the main source of jobs, services and public transport and has the potential, with improved infrastructure where necessary, to accommodate significant levels of sustainable growth. This aligns with the objectives regarding 'supporting vibrant and distinct centres', 'providing infrastructure in the right place at the right time', 'contributing towards Net Zero Carbon targets' and 'connecting people to places'.

- 3.6 For these reasons, RPS agrees with the strategic objectives and the challenge regarding *'delivery homes that meet the needs of all our communities'*.

Chapter 4 – Meeting South Warwickshire's Sustainable Development Needs

Infrastructure

Q-12. Please select the option which is most appropriate for South Warwickshire.

- 3.7 RPS considers Option I2b with a *'focus on the strategic infrastructure relating specifically to the growth strategy'* is most appropriate. Noting that in the interim, existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two districts. Given the site promotion at Coventry Gateway West relies on the strategic infrastructure currently underway on the new access road to the A45/A46, other development schemes in close proximity to the site are most applicable to the delivery of our site.
- 3.8 RPS acknowledges that infrastructure provision is a factor in assessing the potential suitability of development in terms of location. Nonetheless, national policy (NPPF 2021, paragraph 20b and 20c and 20d) makes clear that strategic policies should *'...make sufficient provision for...infrastructure'* and *'should...anticipate and respond to long-term requirements and opportunities such as those arising from major improvement in infrastructure...'* (paragraph 22).
- 3.9 Therefore, national policy does not consider existing levels of infrastructure provision as being an absolute constraint on development, but rather encourages local planning authorities to find solutions to blockages in infrastructure provision that can unlock the potential to support additional growth where this supports the wider strategic objectives and policies of the development plan.
- 3.10 Furthermore, the provision of significant new infrastructure investment can also be a catalyst for increased demand for housing and other uses that was not previously in use when previous plans were being prepared, most notably the significant investment planned

as part of the HS2 project, as well as other significant infrastructure investments that has recently come into operation, i.e. Toll Bar End roundabout, and infrastructure provision associated with development around Coventry Airport, all in close proximity to the site.

Q13. Please select the option which is most appropriate for South Warwickshire.

- 3.11 Option I3a - A single Levy would provide clarity and greater certainty regarding likely development costs.
- 3.12 National policy makes clear that contributions, either as part of a development or through in-kind benefits, should be defined in development plans (NPPF 2021, para 34). It also states that such policies should not undermine the deliverability of the plan. Furthermore, contributions or in-kind benefits secured through planning obligations must only be sought where they meet all of the three tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (NPPF 2021, para 57).
- 3.13 Therefore, the SWLP needs to ensure that any enhancements that are sought are consistent with national policy, fully justified on the evidence, and also do not go beyond the legal tests highlighted above.

Intensification options

Q-S2. Please select the [Intensification] option most appropriate for South Warwickshire

- 3.14 The housing requirement identified across the Coventry and Warwickshire HMA shows a need for 4,906dpa. The SWLP will therefore need to set out a potential total supply for the plan period. Not achieving this would mean that the approach towards supply and delivery of housing land is not justified, effective or consistent with national policy. The Council’s general approach to estimating dwelling capacity to date has been to assume a density of 35dph for greenfield sites and 50dph for urban brownfield sites. The net developable area for edge of village sites and most brownfield sites is assumed as 66% of the gross site area and for strategic greenfield sites this previously has fallen to 50% to reflect the additional infrastructure and strategic landscaping which is likely needed. RPS consider that the Council should take a cautious approach to estimating site capacity through intensification, to ensure they are realistic and justified.
- 3.15 We therefore consider Option S2c ‘*Not having a policy which encourages intensification*’, to be the most appropriate option for South Warwickshire given the rural nature of the district and recognising that the estimates are not the upper limits on the number of dwellings that could come forward on sites.

Urban Capacity Study

Q-S3.1. Comments about the Urban Capacity Study

- 3.16 We welcome and support the recognition at section 4.6 of the Urban Capacity Study that an identified capacity of around 19,950 compares to a housing need for South Warwickshire over the new plan period of 30,750. Concluding 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”*. This report clearly demonstrates that the district authorities cannot meet their own housing need on previously development land while building at appropriate densities or utilising public car park sites. Given the scale of need that is expected to be unable to be met on previously developed land, this suggests exceptional circumstances exist to review the Green Belt.

Q-S3.2. Option [brownfield development] which is most appropriate for South Warwickshire

- 3.17 RPS consider that broadly the proposed housing growth option most appropriate for South Warwickshire is Option S3.2c. We do not agree with the way that this option sets out greenfield sites (particularly in respect of the Green Belt) as a measure of last resort only to be considered if all alternative options are exhausted. Neither the NPPF nor planning guidance defines Green Belt as an absolute constraint on development that should automatically preclude Green Belt sites from the assessment of suitability for development and does not specifically identify Green Belt as a constraint (ID: 3-018). Notably, the PPG states that:
- 3.18 *“Identified sites, **which have particular constraints (such as Green Belt), need to be included in the assessment** for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints.”* (ID: 3-010)
- 3.19 The guidance is clear that Green Belt development sites should be considered alongside other options rather than separately or as a later phase of the process. Notwithstanding the other concerns regarding a brownfield approach, such as concerns relating to loss of businesses and our concerns that brownfield sites may struggle to provide green infrastructure due to site constraints, and blanket approaches can often impede development.

- 3.20 Equally, in the context of changes to national planning policy, the Department for Levelling Up, Housing and Communities ('DLUHC') is consulting on proposed changes to Green Belt reviews, whereby "Green Belt boundaries are not required to be reviewed and altered". However new paragraph 142 of the draft Framework text goes onto state, "strategic policies should establish the need for any changes to Green Belt boundaries...". RPS therefore contend it is important for SWLP authorities to maintain a Green Belt review on the southern side of Coventry (even in the event the draft changes put forward by Government are agreed), as this is an area of strategic important for the sub-regional economy and cross-boundary housing needs.

Growth of existing settlements and the growth strategy

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

- 3.21 Yes, we agree that a distribution strategy for new development within South Warwickshire is important to consider the potential for growth around the edges of the existing settlements.
- 3.22 We accept that existing towns and villages provide varying levels of facilities and services to meet the needs of the people who live or work in and around them. Some of the larger settlements act as a hub for surrounding small villages. It is important to recognise the benefits of 20-minute neighbourhood principles whereby people are able to meet their regular day-to-day needs within reasonable walking distances. This concept follows the objective of sustainable development and aligns with the overarching principles of this Local Plan review.
- 3.23 RPS take issue with the exclusion of settlements on the edge of the district boundaries where the benefits of adjacency to a larger urban area is of benefit to the locality (i.e., edge of Coventry). The I&O consultation document states that to help inform consideration as to whether there is potential for new development - to help deliver the advantages of a 20-minute neighbourhood - a settlement analysis evidence base has been developed to help identify the opportunities and constraints to growth in and around the edges of the following settlements and locations across South Warwickshire. Yet, we contend some settlements should be subject to connectivity, accessibility and density analysis, should include settlements surrounded by Green Belt – such as south of Coventry and in particular Coventry Gateway West site. This will help determine their favourability and sustainability credentials and whether they would fall within a growth option.

Growth options

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

- 3.24 Option 1 [Rail Corridors] – RPS acknowledge that some benefits could be achieved from this option. However, it would concentrate growth around existing major urban areas within the district (i.e. not locating development where the need arises). Consequently, Option A is unlikely to address all the development needs of the SW area and so, this should only form one part of the mix of options.
- 3.25 Option 2 [Sustainable Travel] – RPS consider this option should form part of the overall strategy. It is considered that a sustainable development proposal can be designed in this location, that not only can deliver a range of dwelling types and tenures to meet housing and community needs, but which also respond positively to the local character of the surrounding area. This approach would strength existing transport corridors by placing potential new users on well-served corridors. An alternative approach would be to use development to ‘plug the gaps’ where significant numbers of new residents and employees could encourage new or improved bus services to areas that are currently poorly served. In essence, a large residential base coupled with a large employment area creates a demand to extend existing bus corridors to facilitate sustainable travel options (i.e. West of Coventry’s Southern Gateway).
- 3.26 Option 3 [Economy] – RPS consider this option should form part of the overall strategy. This option 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. This growth options means that jobs and homes are co-located meaning people are given the choice of living closer to their place of work. Shorter journeys mean that active travel options are more appealing and therefore more likely to be chosen as a feasible way of getting to work. Proximity to employment locations is one aspect of sustainability, and this option presents opportunities for growth in some smaller settlements that would otherwise not be considered sustainable locations. The Site we are promoting on behalf of our client is an indicative settlement / location that would align with this growth option.
- 3.27 Option 4 [Sustainable Travel and Economy] – Option 4 is hybrid of options 2 and 3. Given support is had for these options, option 4 is also considered an appropriate growth strategy. It recognises the balance of growth at existing main settlements and more modest growth in smaller settlements, which can contribute to the enhanced viability of centres. This growth option recognises the need to consider significant release of Green Belt land.

- 3.28 Option 5 [Dispersed] – Option 5 recognises that a wider range of locations can mean that the amount of growth in individual settlements is reduced, but with a higher number of settlements taking some growth. Whilst the SWLP puts forward the argument that dispersing growth would not help encourage sustainable travel, we contend that Coventry Gateway West represents a sustainable location rather than a dispersed pattern of development.

Development distribution strategy

Q-S10. Development distribution strategy for South Warwickshire

- 3.29 RPS advocate for a mix of approaches which is consistent with the desire for a 'flexible and responsive' spatial development strategy as highlighted in the SWLP, which would better enable the full growth needs of SW area to be achieved as intended.
- 3.30 In addition, in relation to the housing distribution strategy, RPS would recommend that key consideration in identifying suitable locations to address these neighbouring shortfalls should be to prioritise locations that are accessible and in close proximity to where the unmet need arises, thus reducing travel distances as well as offering the potential for linked service provision to meet the wider needs of the new communities. In strategic terms, this means that the re-distribution of any unmet housing need should be related to settlements on a duty to cooperate basis (whether this is from the West Midland conurbation, Coventry and / or Redditch), and which would clearly lead to an increase in the overall level of growth to be accommodated within the SWLP and the need for additional land to accommodate that growth.
- 3.31 RPS further recommends that key consideration is given to identifying suitable locations for employment opportunities also, to address the strategic employment issues that are crucial to accommodating suitable level of growth for the sub-regional economy. This is reflective of the 'flexible and responsive' strategy RPS considers is necessary.

Chapter 5 – Delivering South Warwickshire's Economic Needs

Q-E1.1. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?

- 3.32 Similar to previous submissions, RPS welcomes the recognition of the link between jobs and housing, and that a boost in local employment needs to be balanced by an appropriate level of housing growth to be delivered as part of the emerging strategy. This could form part of the solution to reducing levels of commuting, in particular in-commuting, and also helping to tackle wider unaffordability of housing more generally across the SW area.

- 3.33 In addressing the issue of commuting, the provision of more housing to encourage people to move into the SW area closer to their place of work would help to reduce commuting levels, thus having wider benefits in terms of offering people wider choice of travel mode and reductions in fuel consumption.
- 3.34 RPS would also wish to reiterate the importance for the SWLP to promote innovation in employment in order to assist in a longer-term sustainable recovery across the wider region by creating a more attractive location for investment. By doing so, this would help ensure the long-term sustainability of employment and investment within the SW area. This is evident in the recent decision to locate a Gigafactory on land at Coventry Airport, which is located within the SW area and in close proximity to the Coventry Gateway West site.

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

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?

- 3.35 The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method and following the relevant Planning Practice Guidance (PPG) the method shows a need for 5,554 dwellings per annum across the Housing Market Area (HMA).
- 3.36 The PPG does however allow for authorities to diverge from the Standard Method where this can be justified by exceptional circumstances; any alternative approach should reflect current and future demographic trends (which includes migration) and market signals. The HEDNA proposes an alternative ‘trend-based’ projection, which is set out at Table 9 of the I&O consultation document. RPS broadly agrees that this is justified on the evidence. For example, in South Warwickshire there is a case for higher housing provision to be made over and above the standard method starting point in order to manage cross-boundary commuting which currently shows a net-in flow into the area to access local employment. This is outlined in Issue E3 (page 81 of the consultation document), *“It is important to ensure that South Warwickshire is attracting a mix of employment to the area which will help to prevent out-commuting and retain residents within South Warwickshire”*.
- 3.37 In this regard, RPS welcomes the use of a ‘trend-based’ projection as set out in the consultation.

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

- 3.38 RPS consider Option H2-2a ‘a single South Warwickshire wide affordable housing requirement’ the most appropriate.
- 3.39 The demand for affordable housing is a significant factor that should be considered in establishing the housing requirement. Para 15.21 of the HEDNA document advises that there is a requirement for 3,833 social or affordable rented homes per annum across the HMA from households who cannot afford to meet their needs within the open market. In addition, the core analysis within the report indicates that there is a need for around 609 affordable home ownership homes per annum.
- 3.40 The greatest need is shown to be within South Warwickshire, with the evidence pointing to a lack of or very modest need for affordable home ownership products. It is expected that the principal way of delivering this affordable housing would be via Section 106 agreements.
- 3.41 In addition to ensuring a sufficient supply of affordable housing, RPS contends that housing for key workers should be considered as an option, in the context of Coventry Gateway West there is an ability for the site to provide dedicated worker accommodation for the principal employment growth around the wider Coventry Gateway site
- 3.42 The demand for affordable housing is a significant factor that should be considered in establishing the housing requirement for South Warwickshire.

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

- 3.43 RPS welcomes the reference in the SWLP Issues and Options document (Table 10) to the need for a ‘net need’ of 1,386 affordable dwellings to be provided for each year up to 2050. RPS recognises that the unaffordability of housing is a function of under-supply and that improvements in affordability can be tackled through increasing the supply of market housing.
- 3.44 Figure 11, based on affordability data recently published by ONS², illustrates the affordability problem in South Warwickshire currently. As can be seen, Stratford has the

² ONS Table 5c, Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England, and Wales, 1997 to 2020

second highest affordability ratio in the West Midlands, only behind Malvern Hills, with Warwick sixth overall.

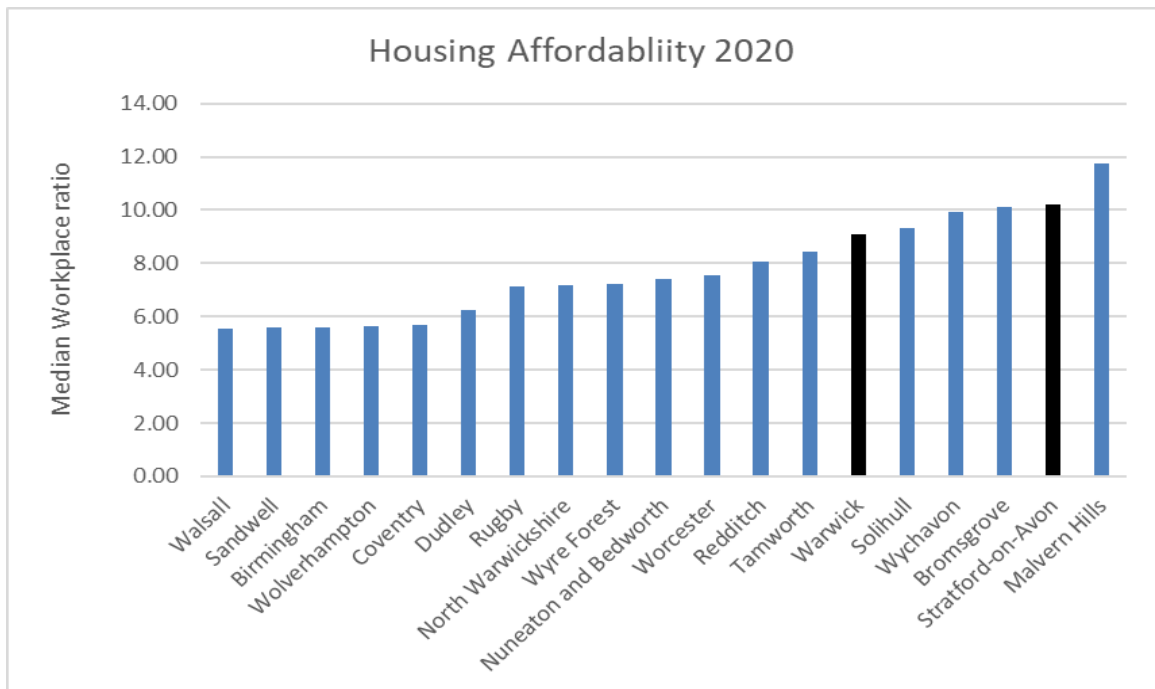


Figure 3-1 Affordability of Housing across the West Midlands

3.45 The new housing requirement for the SWLP is calculated in part to address affordability issues through the 'affordability uplift' when calculating the local housing need figure for the area (under Step 2 of the method). The resultant increase in the demographic starting point (based on household change) would then, ultimately, feed through to the identification of additional land to help address the problem of affordability in the SW area. Nonetheless, RPS considers the affordability problem facing the SW area to be significant relative to neighbouring areas and so, on that basis, the SWLP should assess the adequacy of the affordability uplift in addressing the chronic and long-standing unaffordability of housing seen across the SW area and whether it is appropriate to consider a further adjustment to address the problem of unaffordability. This can be addressed through an appropriate adjustment to the housing figures to assist in increase the delivery of affordable housing, in line with advice in the PPG³.

3.46 RPS would also recommend that, separate to the above, that the SWAs consider at an early stage applying an adjustment to the total housing figure specifically to assist in addressing the need for affordable housing. Similarly, given that current affordable housing

³ Paragraph: 024 Reference ID: 2a-024-20190220 Revision date: 20 02 2019

target is already set at 35% in the Stratford Core Strategy (under Policy CS.18), there is very little scope to increase the provision sought within the existing supply under the current policy. The likely result of this would be the need for additional land to be identified to assist in addressing the affordable housing need uplift. Such an approach was adopted by the Gloucester, Cheltenham, and Tewkesbury in 2017, where affordability is currently better compared to the SW area. Through the identification of more land, RPS argue that it would become more viable to deliver more affordable homes given the need is spread more widely, thus reducing the burden on individual sites.

3.47 We contend Option H2-2a 'A single South Warwickshire wide affordable housing requirement' is the best option. For the purposes of consistency across both districts which currently are different in their affordable housing requirements in the new developments. The resultant effects of this, means certainty for developers, greater certainty in anticipating their costs and greater certainty in anticipating delivery of affordable homes.

3.48 For the HMA as a whole, when considering past delivery, an affordable housing requirement of 35% would be incapable of delivering a sufficient quantum of affordable housing to meet the identified need. Based on the above, RPS supports any measure to increase the overall supply of housing in order to address housing (un) affordability of housing generally and specifically to address the need for affordable housing in the SW area. Warwick District Council reached an agreement with Coventry City Council to accommodate 94 affordable dwellings per annum towards Coventry's affordable housing need. In total this means Warwick District needs to accommodate 374 dwellings per annum, which equates to 40% of the average annual housing requirement. Warwick District Council has only achieved this target twice in the past ten years.

Q-H4-2. Comments regarding the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the SWLP

3.49 RPS welcomes the reference made in the SWLP potential requirement to meet identified housing shortfall from neighbouring authorities. The SWLP recognises that the SW area sits in the wider West Midlands region, and in preparing the SWLP it will be necessary to take into account the plans and strategies of a number of neighbouring authorities. RPS contends that this represents a key strategic matter that will need to be addressed through the SWLP as it moves forward, as part of the Duty to Cooperate obligations relevant to the SWLP, which the LPAs recognise is required (page 101).

3.50 Whilst RPS acknowledges that the Government has proposed reforms to the NPPF (with consultation running up to 2nd March 2023), looks to propose removal of the Duty to

Cooperate until provisions come into effect and it be replaced with an “alignment policy” as part of a future revised NPPF. As yet, however, it is not clear what specific requirement will replace the duty. Nonetheless, there remains the requirement in national policy for strategic policies to address strategic priorities of the area, including any relevant cross-boundary issues and also the requirement to demonstrate effective and on-going joint working by documenting those relevant cross-boundary matters that are being addressed and the progress made in cooperating to address these.

- 3.51 Page 111 of the I&O consultation document refers to the four elements of unmet need that may have implications for South Warwickshire arising from the different Housing Market Areas. These HMAs are likely to face difficulties in meeting their own needs within their boundaries as time moves on, given that both Birmingham and Coventry are now amongst the ‘35% uplift’ authorities identified as part of the revised standard method. Birmingham City Council’s Local Plan review to 2042 has an identified housing shortfall of 78,415 homes.
- 3.52 Based on the information set out in Chapter 6 regarding shortfalls, the SWLP provides no clarity on how much potential housing shortfall from the surrounding HMAs that would be addressed in the SWLP, apart from highlighting two potential contributions of 5,000 and 10,000 additional homes in the Sustainability Appraisal. The SWLP should under a separate policy to make a commitment to accommodating a proportion of any identified housing shortfall from its neighbours and build this into the emerging spatial strategy for the SWLP.
- 3.53 There are, in addition, other local authority areas that are also likely to face their own challenges in meeting their housing need once their plans are brought forward for review. Based on current available information these are likely to include the Black Country Authorities, and potentially in neighbouring Redditch and Bromsgrove who may be requested to take some of this housing shortfall. These areas share the same housing market area with Stratford-upon-Avon.
- 3.54 In the Black Country, it is now apparent that there will be an identified housing shortfall post 2031 in the GBBCHMA, with the Black Country Urban Capacity Review estimated a shortfall of 29,288 dwellings⁴ by 2038 (paragraph 2.1.40), which it will be the primary issue for consideration through the respective emerging Local Plans (given the now defunct joint Black Country Plan). This represents a substantial level of unmet need, which does not

⁴ *Black Country Urban Capacity Review* December 2019

take into account the 35% uplift that will also need to be applied to Wolverhampton's component of the Black Country's need, which is likely to further increase the scale of the shortfall. More recent evidence⁵ indicates that the shortfall in the Black Country has increased further, from 29,288 to 36,819 dwellings, an increase of over 25% on previous estimates.

- 3.55 RPS would recommend that a key consideration in identifying suitable locations to address these shortfalls should be to prioritise locations that are accessible and in close proximity to where the unmet need arises, thus reducing travel distances as well as offering the potential for linked service provision to meet the wider needs of the new communities. In strategic terms, this means that the re-distribution of any unmet housing need should be related to settlements on a duty to cooperate basis (in this instance South of Coventry), and which would clearly lead to an increase in the overall level of growth to be accommodated within the SWLP and the need for additional land to accommodate that growth.

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

- 3.56 The Warwick District of the Coventry and Warwickshire HMA most strongly relates to Coventry given its shared boundary and interrelationships with the city. Under the trend projection put forward in the HEDNA, the redistribution of housing resulting from this, it is likely Coventry will not be able to accommodate all of its housing needs (1,964 homes per annum), and as such a relatively modest shortfall may exist to 2050. Recognising that these shortfalls arise because of the way Coventry is constrained by the West Midlands Green Belt. However, consideration must be given to the strength of the relationship between South Warwickshire and the source of these shortfalls. RPS considers that the significant scale of the shortfalls presents exceptional circumstances that justify the release of land from the Green Belt for residential development.
- 3.57 The Green Belt areas in sustainable areas, in proximity to where the strength of the relationship from where shortfalls arise is strongest, areas south of Coventry are considered to be the most appropriate locations for sustainable urban extensions to accommodate this need.
- 3.58 This view is reaffirmed by the Council, RPS are aware that Warwick District Council, alongside partners Warwickshire County Council, Coventry City Council and the University

⁵ The Black Country Urban Capacity Review Update (May 2021) Summary, page 2

of Warwick, are undertaking a masterplanning framework for land to the north of Kenilworth/south of Coventry area. Further information is available in the [Cabinet Report from April 2022](#). The Cabinet Report states:

- 3.59 *“There is considerable growth pressure in this area, and this can be seen in sites that are already being promoted in the South Warwickshire Local Plan (SWLP) being prepared jointly by Warwick and Stratford District Councils”.*

Chapter 12 – Plan content

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

- 3.60 Whilst we agree with the proposed broad content of the Part 1 plan, it is worth highlighting to the Council’s the implications of the transitional arrangements to new Joint Spatial Development Strategies and new style Local Plans as proposed in the LURB in the context of the SWLP progressing as separate parts. In particular, the broad content proposed at this stage does not include site specific allocations or policies, therefore it is worth flagging the potential issues of delayed plan-making. Notwithstanding this, the South of Coventry study area as set out in the [Cabinet Report from April 2022](#) from Warwick District Council, should be considered as a strategic policy through the Part 1 plan via appropriate status without the need for it to be defined through Part 2 and this would be more fragmented and site specific. It must be clear, in terms of transparent decision making, how the SWLP authorities identify the South of Coventry study area as a potential area for future growth or not (referring to para 1.7 of the April 2022 Cabinet Report).
- 3.61 Whilst the approach the SWLP authorities are taking should remain unchanged, we wish to use this opportunity to remind the Councils that timescales in relation to the transitional arrangements set out by the draft NPPF changes are of consideration.
- 3.62 Given the SWLP is in the earlier stages of plan making (i.e., pre-Reg 18), we note the current up to date timeline indicates that the SWLP will reach submission stage by June 2025. Assuming this deadline is met, then work on a new plan will need to start by the latest January 2032. If the deadline is missed, new style plan preparation will need to begin immediately from that date (July 2025).
- 3.63 If the deadline is met, this has benefits in that late commencement of a new-style plan, gives the SWLP authorities more guidance, best practice, and case law to consider.

- 3.64 We urge the SWLP authorities to continue with preparing the local plan at the current timetable for the June 2025 submission target date, as this will ensure the timely preparation of the SWLP.

4 SUSTAINABILITY APPRAISAL COMMENTS

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

- 4.1 It is a requirement of European and UK Legislation that a Sustainability Appraisal ('SA') is undertaken incorporating the requirements of the Environmental Assessment of the Plans and Programmes Regulations 2004 which was derived from the Strategic Environmental Assessment (SEA) Directive.
- 4.2 The purpose of the SA (incorporating the requirements of the SEA Directive) is to ensure that the plan or programme (in this instance the emerging Our Future Birmingham City Plan) promotes the principles of sustainable development by assessing the potential environmental, social and economic impacts or benefits of the plan and incorporating suitable mitigation measures to decrease or increase these respectively.
- 4.3 The Strategic Environmental Assessment Regulations requirements checklist requires the *"preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2))"*.
- 4.4 Paragraph 32 of the NPPF states that "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered".
- 4.5 We note that the SA at this stage is identifying reasonable alternatives, these being 'reasonable alternative broad locations' and 'reasonable alternative small settlement locations', based on a set of criteria (see Figure 8).

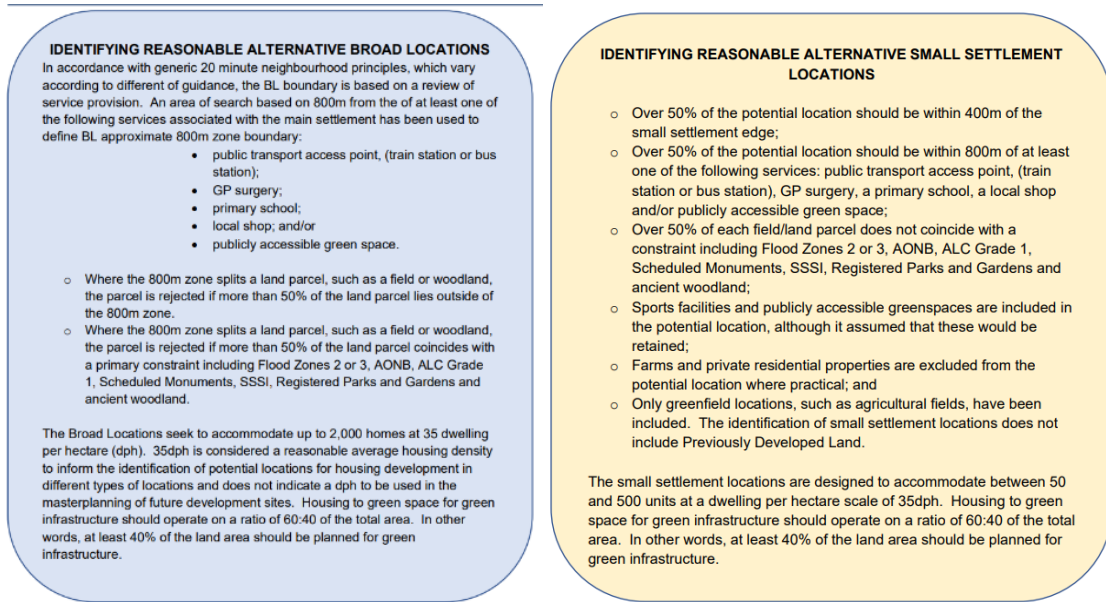


Figure 4-1 Procedure for identifying reasonable alternative Broad Locations and Small Settlement Locations

- 4.6 Regarding the list of alternative development locations, we note that ‘South of Coventry’ and ‘South Coventry’ has been identified to provide an alternative scale of development. Whilst we accept that the Councils identified list of 32 broad locations and 22 small settlement locations is not an exhaustive list, and which fits a number of criteria relating to accessibility and position in the settlement hierarchy, it has been arbitrarily defined.
- 4.7 We object to the SA on the grounds that the land further east of ‘South Coventry’ (as shown in C.17, page 117 of SA Appendices) hasn’t been considered in the SA as a reasonable location option for analysis.
- 4.8 We take fundamental issue with the reasonable alternative development options that could be located near existing services in the main settlements, the Main Settlements listed in paragraph 3.5.2 of the SA Report (page 46) have been divided into Broad Locations. Essentially, this has been done on the basis that the main settlements were all sufficiently large that they could each have three or more Broad Locations associated with them. We question why - given the scale of Coventry as a city - ‘South of Coventry’ has not been identified in **bold font** as a main settlement with reasonable alternative broad locations to the south of the city. In effect, RPS considers the whole study area set out in Warwick District Council’s April 2022 Cabinet Report should be identified as a broad location, so as to ensure it has been assessed appropriately.
- 4.9 Whilst the ambition is to deliver approximately 2,000 homes as part of a strategic allocation, the plan must provide options for all scales. The 1,000 homes mark is preferable given it

supports primary education provision, reducing pressure on existing services in the local area, providing a degree of self-containment, mitigating its impacts when assessed against the SA. Furthermore, RPS considers that the ‘identified’ (based on the criteria set by the Councils) sites on the edge of Coventry should be considered differently in SA terms given their ability to utilise and be accessible from many higher order services that are resultant of the proximity with Coventry.

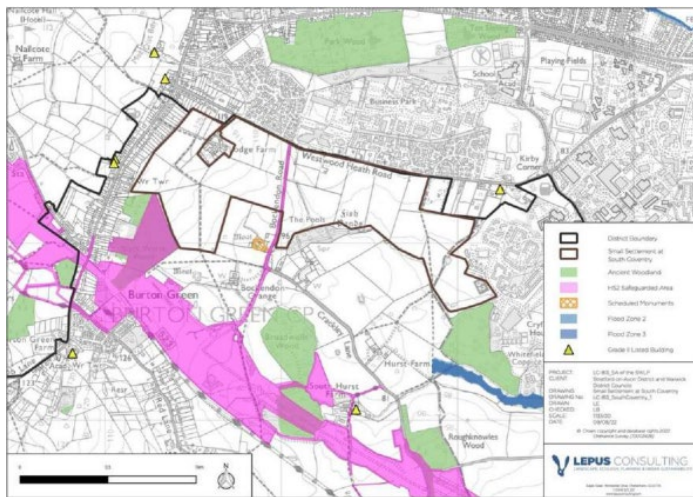


Figure 4-2 Current extent of C.17 'South Coventry', excerpt of SA Report, page 117

4.10 We contend that the Site, Coventry Gateway West presents an opportunity to provide an alternative scale of development that meets the criteria relating to key aspects of accessibility and position in the settlement hierarchy. Therefore, the extent of C.17 [South Coventry] should be drawn to a greater extent to envelope a true extension to Coventry, or present two parcels to C.17, acknowledging the planning commitments at King’s Hill coming forward and thus form a clear ‘arc’ south of Coventry as an alternative development location. A map below (Figure 3-3) highlights the possible extent of an alternative development location we contend should be assessed against the SA objectives. This extent aligns with the master planning work being undertaken by Warwick District Council, alongside partners Warwickshire County Council, Coventry City Council and the University of Warwick, for land to the north of Kenilworth/south of Coventry area. Given the scale of masterplan area, it would not be appropriate, or expected to assess all areas within it.

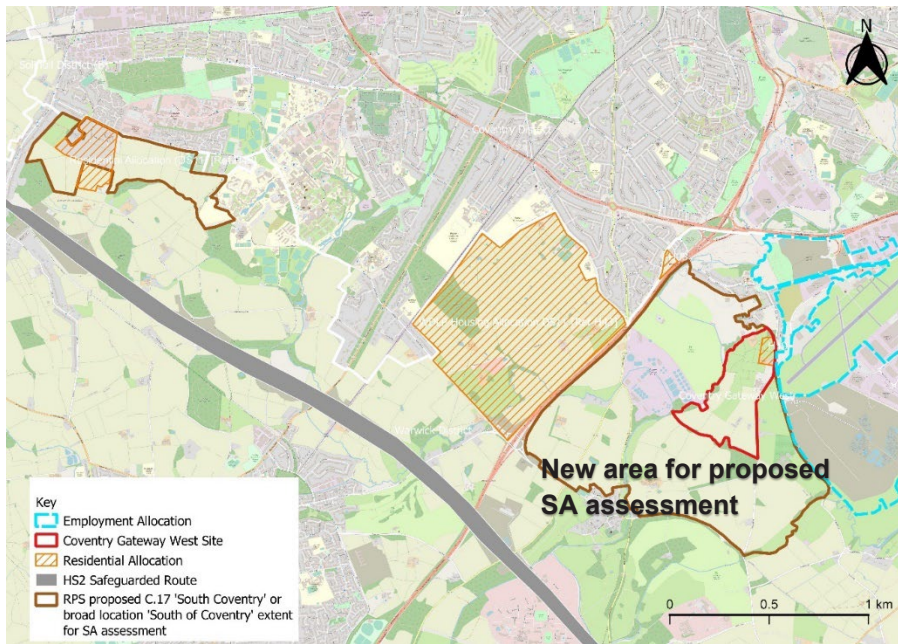


Figure 4-3 RPS proposed extent of C.17 small settlement at South Coventry or broad location ‘South of Coventry’

- 4.11 RPS’s proposed extent of SA reasonable alternative locations (above) is presented at this stage as a broad parcel area, given an in-depth assessment has not been undertaken of our (presented) additional segment enveloping the land at Coventry Gateway West. It is envisaged the area when considered as a whole or as smaller parcels (to discount constrained areas) would score as equally positive, if not more so against SA objectives, in particular access to employment opportunities (shown as employment allocation).

- 4.12 Chapter 7 of the SA ‘Evaluation of the Spatial Growth Options’ sets out the various spatial growth options and how they perform against each SA objective. Table 7.1 of the SA summarises the findings of these options, as replicated in Table 1.

Table 1 Excerpt of SA - Summary of findings for the spatial growth options

Spatial Option	SA Objective												
	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Rail Corridors	-	0	+/-	-	+/-	+	+	-	++	+/-	++	+/-	+
Sustainable Travel	-	0	-	+	+/-	+	+	-	++	+/-	+	+/-	+
Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	-	+/-	++
Sustainable Travel & Economy	-	0	-	-	+/-	+/-	-	-	++	+/-	+	+/-	++
Dispersed	--	0	--	+	+	+/-	0	-	++	--	--	-	-

4.13 We wish to make clear that the distinction between Options should not be too broad and wide-ranging and not to disregard mid-high growth options. In this regard the PPG states: *“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”*

4.14 Given some of the spatial options, in the Council’s own words consist of some level of overlap, RPS consider that the finding indicates considerable overlap in the likely effects across the different options. We contend some changes are required to the scoring to assess the sites more accurately in sustainability terms. These are set out in Table 2.

	SA Objectives												
Spatial Option	SA1: Climate Change	SA2: Flood Risk	SA3: Biodiversity	SA4: Landscape	SA5: Cultural Heritage	SA6: Environmental Pollution	SA7: Natural Resources	SA8: Waste	SA9: Housing	SA10: Health	SA11: Accessibility	SA12: Education	SA13: Economy
Rail Corridors	-	0	+/-	-	+/-	+	+	-	++	+/-	++	+/-	+
Sustainable Travel	-	0	-	+	+/-	+	+	-	++	+/-	+	+/-	+
Economy	-	0	-	+	+/-	+/-	+	-	++	+/-	-	+/-	++
Sustainable travel & economy	-	0	-	+	+/-	+/-	+	-	++	+/-	+	+/-	++
Dispersed	--	0	--	+	+	+/-	0	-	++	--	--	-	-

Table 2 RPS amendments to spatial growth option scoring

4.15 In respect of SA Objective 4 ‘Landscape’ against spatial options 3 & 4, we consider that all spatial options are likely to be located, in large part, on previously undeveloped land into the surrounding countryside. Recognising that landscape receptors at each location will determine the extent to which a landscape can accommodate change without permanent adverse effects, it is perhaps too broad brush an approach to score that overall, a significant adverse effect on the local landscape cannot be ruled out, when discussing growth at the scale envisaged by the plan. Coupled with possible emergent policy options that may require a ‘landscape-led’ development framework concept. It is possible for development of sites in the countryside to enhance the landscape character by restoration of landscape features; mitigation of potential adjacent housing and provide integration between built and rural landscapes with improved access for future residents. We therefore contend, the effects likely to landscape are positive within these spatial options and thus be scored ‘+’ or ‘0’ at a minimum.

4.16 In respect of SA Objective 7 'Natural Resources' against spatial options 3 & 4, we consider that all spatial options are to be directed towards open countryside. Given that development, regardless of the type of proposal would be directed to previously undeveloped locations and would be expected to result in a permanent and irreversible net loss of ecologically and agriculturally valuable soils caused by excavation, compaction, erosion, contamination, and removal of vegetation cover. We therefore contend that the spatial options 3 & 4 should be scored as '0'. With respect to options 1 & 2, given they may potentially promote higher density development, this is an assumption and is dependent of forthcoming proposals, therefore a score of '+/-' would be more reflective of the possible alternatives.