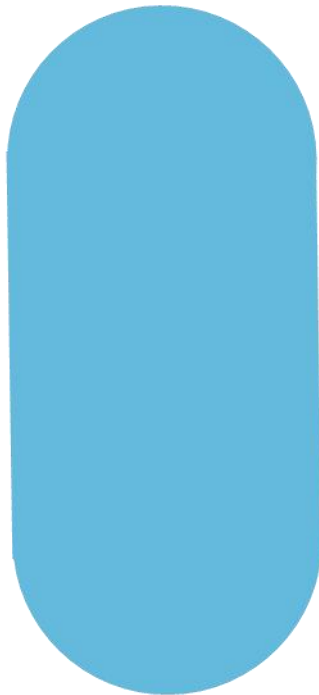
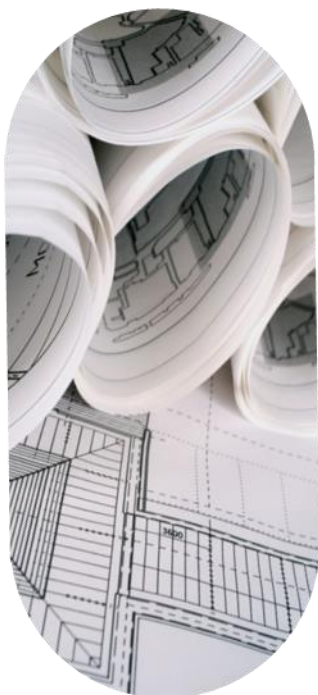


## Representations

South Warwickshire Local Plan Part 1 –  
Issues and Options Consultation

**RICHBOROUGH ESTATES (WARWICK)**

**March 2023**





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Richborough Estates, in respect of their land interest north of Hampton Road, Warwick (the site). The site forms part of Broad Location 32, and has been identified as Site 214 on the Interactive Map,
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and appended is a South Warwickshire Housing Need Evidence Base Review Technical Report - this has been prepared to consider the evidence base relating to housing need in South Warwickshire, namely the HEDNA, and provides commentary and guidance on how this issue should be considered as the SWLP evolves.

### Chapter 3 - Vision and Strategic Objectives

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

3. Richborough Estates consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and Richborough Estates consider it would be more appropriate to reference meeting unmet need from the wider Housing Market Areas.
4. Whilst Birmingham and the Black Country authorities are not neighbouring authorities of South Warwickshire, they do form part of the same Housing Market Area and therefore should not be excluded.

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

#### Q-I1: Sustainability Appraisal

5. The following comments are made in respect of the SA for Warwick. The site promoted by Richborough Estates forms part of Warwick West (Broad Location 32). In assessing the three Broad Locations (BL) identified against the SA Objectives, the SA concludes that parcels to the east and west of Warwick perform better overall. It



should be noted that Warwick Northeast falls within the Green Belt and so should only be considered where all other reasonable options (such as Site 214, the part of Warwick West that falls outside of the Green Belt) have been fully examined.

6. It also should be noted that the boundary of Warwick West can be extended to include land available to the north that falls between the racecourse and the A46 (as illustrated as site 214). This land to the north has a role in mitigating any adverse impacts arising from the SA, for example in relation to ecology, and so should be included within the next iteration of the SA.
7. The following specific comments are made in relation to the SA and Warwick West.
8. SA Objective 2: Flood Risk acknowledges that only very small proportions of the area coincide with Flood Zone 3, and therefore there is negligible impact. All BLs perform arguably equally, and should be assessed as such.
9. It is noted for SA Objective 4: Landscape that additional surveys are required to understand latest sensitivity qualities at each BL. However, the conclusion that Warwick West performs best is agreed, particularly in respect of the part of the Broad Location that falls to the east of the A46 and thereby contained within the urban area.
10. Reference is made to increased risk of coalescence with Hampton on the Hill to the west, although this would be avoided if development is limited to the eastern side of the A46.
11. SA Objective 5: Cultural Heritage notes the potential negative impact of Warwick West on the setting of the Warwick Conservation Area. This is identified in the Heritage and Settlement Sensitivity Assessment, where it considers there is 'little scope for development within the bypass without causing harm to the asset' and accordingly the site is assessed as 'red'.
12. It is recommended to the Councils that this Broad Location is not dismissed on the basis of this evidence alone for the following reasons. Firstly, the Assessment itself acknowledges this is a 'high level' assessment undertaken without the benefit of a site visit. Richborough Estates have undertaken a more detailed assessment, including site visits, to arrive at an illustrative masterplan for the area within the bypass. This



masterplan retains views across the area from St Mary's Church and the town centre to the countryside beyond the A46, sets any development back from the Racecourse Conservation Area to ensure a sense of openness around the asset, and retains field patterns to the north of the site filtering any views of development from the Canal Conservation Area. These three components of any masterplan avoid harm to the setting of the assets. These components are illustrated within the Vision Document submitted with the call for sites form by Richborough Estates.

13. Secondly, the Assessment appears to have incorrectly identified the area as 'red' and as it does not identify any potential major impacts within the report. Any major impacts could be avoided and so the area should not be classified as 'red'.
14. Richborough Estates fully acknowledge that this is a sensitive area in heritage terms, and that careful masterplanning is necessary to avoid or limit harm to the setting of the Conservation Area. This requires a more detailed assessment than the high level assessment undertaken, and Richborough Estates would be happy to work with the Councils in undertaking their more detailed assessment as part of the next iteration of the Plan.
15. SA Objective 11: Accessibility concludes that Warwick Northwest is the best performing BL due to its connectivity score. Warwick West performs equally as well in the connectivity assessment within the Settlement Design Analysis, save for the Analysis has concluded that the land north of the existing racecourse straight within the bypass has the poorest connectivity (E). It is not clear from the text why this part of the area has been assessed differently to land to the south of the straight. Access to the land to the north can be provided around the racecourse straight as illustrated within the Vision Document submitted with the call for sites submission by Richborough Estates. This parcel of land therefore has the same connection to the town as the remainder of the broad location assessed as (D).
16. Warwick West is therefore the equal best performing option, and the SA should be amended accordingly in the next iteration. Further comments are made on the Settlement Design Analysis under Q-S4.2.



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17. SA Objective 12: Education concludes Warwick Northeast is the best performing option, however this does not reflect the analysis in Appendix B which places them as equal with Warwick West. Moreover, Warwick West is within 1.5km of Aylesford School, Warwick and therefore within the target distance. Warwick West has therefore been incorrectly scored, and is therefore the best performing option and this should be amended in the next iteration of the SA.
18. Warwick West performs better than has been recorded in this SA, and this should be recognised in the next iteration of the SA. Further, what is evident from the SA is that where adverse impacts are identified they can be mitigated or avoided.
19. The key constraint to growth at Warwick is the A46 which is a strong barrier to the west. The most logical location to therefore extend Warwick is on land between the town and the A46, and to do this in a way that avoids and minimises any harm to the heritage assets. Richborough Estates have put forward proposals to the Council as to how Warwick West (within the bypass) could come forward in a comprehensive and sensitive manner, and we would request the Councils allocate site 214 for strategic development.

#### Option S2-C: Intensification

20. Intensification is a way to optimise brownfield land and realise its effectiveness. However, Richborough Estates consider that this matter should be dealt with by the SWLP Part 2 Local Plan or Neighbourhood Plans if relevant, so that the implications of applying an intensification policy to a particular area can be assessed in terms of character and deliverability, which are key factors to consider.
21. Intensification is challenging and requires evidence around viability and deliverability before it can be considered to form part of the supply, and as such any intensification potential in the windfall allowance should be avoided.

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

22. The production of an Urban Capacity Study (UCS, October 2022) to support identification of brownfield land to help deliver the growth needs of South



Warwickshire is in accordance with the NPPF<sup>1</sup>. The following points are made in relation to how the UCS considers housing supply in the urban areas. However, it should be noted that the UCS also discusses the SWLP housing requirement and representations are made on those points under Q-H1-1 & 2.

23. In relation to housing allocations from the adopted Local Plans, Richborough Estates consider that a comprehensive review of all outstanding allocations without planning permission is required to ensure that such sites still meet the definition of developable as set out in the NPPF<sup>2</sup>. In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will increase beyond what is included within the adopted Local Plan. That review and evidence must be published prior to the next iteration of the Plan to demonstrate the capacity from the allocations can be relied upon to meet the housing need.
24. The UCS also includes within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas, and are considered to be potentially suitable. As no formal assessment of these submissions has taken place, their inclusion will need to be reviewed once the Housing and Economic Land Availability Assessment (HELAA) is published. Any allowance for such sites must be deducted from the windfall allowance.
25. The UCS identifies an additional five sites on vacant land in the urban areas which have not yet been submitted to the Call for Sites process, but are considered potentially suitable for 328 dwellings. There is no certainty around the availability and deliverability of these sites to include them at this stage. Further, on assessment of these sites there are some serious concerns around their suitability in any case. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39 dwellings). As above, these sites have not yet been submitted to the Call for Sites process and so there is no certainty around delivery.
26. Finally, the UCS includes an assessment of the potential windfall supply with reference to the level of windfall delivery across South Warwickshire in the period

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

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



2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the sources of windfall supply, nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence as required by the NPPF<sup>3</sup>.

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

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

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

28. The following comments are made in respect of Richborough Estates site (reference 214), which is Areas 2 and 3 within the Warwick South area.

29. In respect of Connectivity, the site has been assessed as (D) and (E). The land immediately adjacent to Hampton Road (Area 3) is assessed as (D), which is defined as having barriers which may be overcome but not easily. It is not clear from the supporting text what barrier exists to connectivity on Hampton Road, and access can be provided as illustrated in the Vision Document submitted with the call for sites form by Richborough Estates. Hampton Road is a multi-modal route within the urban area that provides for all forms of transport, and can be improved where necessary.

30. Reference is made in the text to noise from the A46, areas of flood risk, and a slight incline. None of these factors impact on connectivity, and can be mitigated or avoided through careful masterplanning. This is demonstrated within the Vision Document submitted with the call for sites by Richborough Estates. It is requested Area 3 is reassessed in the next iteration of this analysis, particularly as areas separated from the town by the River Avon (Area 1 in Warwick North) are considered to have better connectivity.

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



31. Area 2 has been assessed as having the least potential for connectivity, and defined as having significant barriers which would be difficult to overcome. Again, it is not clear from the text what the barriers are to connectivity, or why this part of the area has been assessed differently to land to the south (Area 3). Access to Area 2 can be provided around the racecourse straight as illustrated within the Vision Document submitted with the call for sites submission by Richborough Estates. This parcel of land therefore has the same connection to the town as Area 3, and should be re-assessed in the same way. As above, reference to noise and flood risk are constraints that can be overcome through careful masterplanning.
32. In relation to Connectivity, it is also worth remembering that one of the key benefits from the strategic allocation of this site is the ability to provide an active travel connection from the west of Warwick area, through the site and over the A46, and into Warwick Parkway Rail Station. This could provide a safe, direct, and convenient route for pedestrians, cyclists or e-bike users who are new residents or existing residents who live in Chase Meadow or the Shakespeare Estate. This would be a significant benefit, and assist the Council in seeking to achieve carbon reductions during the lifetime of the Plan.
33. In respect of Landforms, it is noted there is reference to a slight incline on Area 3, but this is marginal and not a constraint on development.
34. In respect of local facilities within 800m, it is noted that the report highlights the absence of retail/jobs/economy, healthcare, and education for Area 2. However, the area is within 800m of the Racecourse which is an employer in the area, and this should be recognised in the next iteration of the Analysis. The area is also only marginally just over 800m to the Chase Meadow Local Centre and Newburgh Primary School. It is noted that Area 3 has all facilities within 800m which shows how suitable this area for development given its proximity to facilities.
35. When taking account of the evidence above, Areas 2 and 3 are a suitable location to accommodate a strategic allocation, as there are no barriers to connectivity to the town, and facilities are available within 800m.





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

36. Richborough Estates consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.
37. Firstly, the results of the high level testing of the five growth options in the supporting Sustainability Appraisal demonstrates that the options perform differently in different areas, with no one option standing out as the best performing option across all areas.
38. Secondly, it is important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.
39. Finally, given the significant level of growth the SWLP will need to accommodate (see response to Issues H1 and H4 below) this is unlikely to be able to be met sustainably through a single growth strategy.
40. Richborough Estates support the inclusion of Warwick in each of the Options.

### **Chapter 5 - Delivering South Warwickshire's Economic Needs**

#### Q-E7.1: Core Opportunity Areas

41. Richborough Estates support option E7.1a and directing employment growth to the Core Opportunity Area.

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

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

42. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, Richborough Estates reserve its position in respect of whether this approach is reasonable for other authorities in Coventry and Warwickshire.
43. The NPPF sets out that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted



using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”<sup>4</sup>. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.

44. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.
45. As set out in the appended South Warwickshire Housing Need Evidence Base Review Technical Report commissioned by Richborough Estates, whilst Richborough Estates support the housing need figures for South Warwickshire set out in the HEDNA, Richborough Estates have some concerns with the approach taken in the HEDNA to economic growth and affordable housing need.
46. On economic growth, whilst Richborough Estates agree with the demographic modelling assumptions used to calculate economic-led housing need in the HEDNA, the job growth assumptions require updating for the following reasons:
- The 2022 HEDNA’s Cambridge Econometrics (CE) job forecast is outdated (March 2021) and was generated during strict Covid-19 measures in the UK;
  - CE are a robust source of job forecasts but a more recent forecast should be used;
  - Assumed GDP informing the HEDNA’s job growth forecasts has now been shown to be an underestimate of growth by the Office for National Statistics;
  - The higher GDP for 2021 and 2022 indicates job growth forecasts would be higher than those used by the HEDNA;
  - Furthermore, job growth experienced in Warwick District and Stratford-on-Avon District during 2011 to 2019 significantly exceeded the CE forecast used to calculate economic-led housing need for the 2022-2043 period;

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



- It is unclear from the HEDNA whether economic growth on a number of sites within South Warwickshire are taken account of by the CE baseline projections. If not, these developments should be taken account of;
- The Council should consider job growth forecasts from Oxford Economics and Experian Economics alongside those from the CE.

47. Richborough Estates also consider that the significant level of unmet affordable housing needs across South Warwickshire should be taken into account in determining the housing requirement. The submitted analysis finds that the minimum housing need would be 1,609 dwellings per annum in Stratford-on-Avon District and 2,872 dwellings per annum to meet affordable housing needs based on past net delivery. Whilst it is recognised that this is significantly greater than the level of housing need set out in the HEDNA and is possibly unsustainable to deliver, this should influence the housing requirement through an appropriate uplift.

48. The enclosed analysis should be given consideration as the SWLP emerges, to ensure a sufficient level of housing is planned for across South Warwickshire.

49. The UCS suggests that the SWLP housing need equates to 30,750 dwellings, however this figure does not reflect the latest evidence within the HEDNA and needs updating. In addition, the UCS assumes a Plan period which commences in 2025, however this does not align with the base date of the HEDNA and as such a Plan period from 2022 is considered more appropriate to align with the evidence base.

50. On the basis of the above, we consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period.

51. In line with the NPPF<sup>5</sup>, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to set a higher housing requirement in line with national guidance<sup>6</sup>; for example in order to address a significant affordable housing shortfall, support economic development, or address strategic infrastructure requirements which are likely to increase the number of homes needed.

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

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



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

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



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

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

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

54. It is imperative that that SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire, to ensure compliance with the Duty to Cooperate and so the SWLP can demonstrate adherence with the



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

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

*Birmingham and Black Country*

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

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



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

*Coventry and Warwickshire*

62. Although the question does not address Coventry's unmet needs, this cannot be ignored. Coventry has by far the greatest level of housing need across Coventry and Warwickshire as set out in the HEDNA, with a housing need calculation derived from the Standard Method of some 3,188 dwellings per annum, adjusted in the HEDNA trend-based approach to 1,964 dwellings per annum. Applying the housing need calculated in the HEDNA to the proposed SWLP Plan period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.
63. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development. This was reflected in the adopted Coventry Local Plan (December 2017), where the local housing need in Coventry in the period 2011 to 2031 was calculated at 42,400. The Coventry Local Plan set a housing requirement of just 24,600 (some 60% of its local housing need), leaving a shortfall of some 17,800 dwellings to be met elsewhere.



64. It is therefore highly unlikely that Coventry will be able to meet its local housing need identified in the HEDNA of 54,992 dwellings to 2050. Even assuming that Coventry can accommodate a proportion of its local housing need consistent with that set out in the adopted Coventry Local Plan (i.e. 60%), which is itself a challenge, Coventry could only accommodate 33,000 dwellings to 2050 leaving a shortfall of some 22,000 dwellings to be met elsewhere.
65. Given South Warwickshire's functional relationship with Coventry, and as South Warwickshire makes up around half of the population of Warwickshire according to the 2021 Census data early releases<sup>9</sup>, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This equates to approximately 11,000 dwellings and should be taken into consideration at this stage of the process as a working assumption for the level of unmet need to be accommodated.

Q-H4.3: Accommodating Housing Needs Arising from outside of South Warwickshire

66. With regard to how and where best housing shortfalls should be accommodated in South Warwickshire, Richborough Estates consider that settlements with the strongest sustainable transport connections to the conurbations where unmet housing needs are arising should be prioritised. In the case of Coventry and Birmingham's unmet needs, this should include Warwick given its rail links.

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