

South Warwickshire Local Plan (SWLP)

Issues and Options Consultation (Regulation 18)

In respect of:

Land south of Henley-in-Arden

By

McLoughlin Planning Ltd

On behalf of

Mactaggart and Mickel (Mac Mic Group)

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0605



McLOUGHLIN
PLANNING



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1.0 Introduction

- 1.1. These representations have been prepared by McLoughlin Planning on behalf of Mactaggart and Mickel (The Respondent) and relate to the South Warwickshire Local Plan (SWLP) Issues and Options Consultation (Regulation 18).
- 1.2. The SWLP Issues and Options Consultation Document (the Consultation Document) has been jointly prepared by Warwick District Council and Stratford-on-Avon District Council (the Councils) and is subject to public consultation until the 6th of March 2023.
- 1.3. This document makes a series of representations on the Consultation Document and promotes the Respondent's interests within the settlement of Henley-in-Arden for housing development.
- 1.4. It is against this context and within its capacity as a residential land promoter and house builder that the Respondent comments on the Consultation Document and those policies of relevance to the delivery of housing.
- 1.5. The structure of these representations is as follows:
 - Section 1: Introduction
 - Section 2: Representations
 - Section 3: Land south of Henley-in-Arden
 - Section 4: Conclusion
- 1.6. A Vision Document in respect of land south of Henley-in-Arden is appended to these representations as Appendix 1 and provides further information regarding the delivery of this site.
- 1.7. Should the Councils have any queries in respect of these representations, or the Vision Document appended, then they are invited to make contact via the contact details at the end of this Statement.

2.0 Representations

- 2.1. This section sets out the Respondent's representations on the Consultation Document and specifically, the questions posed by the Councils where they are pertinent to the delivery of major housing development. These representations make clear where the Respondent agrees with the Council's approach and where they object and suggests alternatives, where relevant.

General Observations

- 2.2. Section 1.3 of the Consultation Document confirms that the SWLP will become the Local Plan for both Stratford-on-Avon District Council and Warwick District Council up to 2050. Paragraph 22 of the National Planning Policy Framework (NPPF) requires that all strategic policies should have a minimum timeframe of 15 years from point of adoption. While the SWLP is compliant with Paragraph 22 there is concern that a plan period to 2050 may be too ambitious in so far as it may be difficult for the plan to adapt to change. A further concern is that in establishing a 25-year plan period, the SWLP will make decisions that are so long term that it could compromise meeting the development needs of the area. By way of example, the SWLP could allocate a site which would genuinely take 20 years to deliver as a key part of its development strategy and given the magnitude of such sites could lead to smaller sites, in deliverable locations, not coming forward to meet housing needs in the intervening period.
- 2.3. Section 1.4 of the Consultation Document confirms that it remains the Council's intention to prepare a two-part plan. The Respondent's main concern regarding a two-tier system is the inevitable delay in plan-making that will occur as a result and the impact that this will have on the ability to deliver the Councils' growth strategy in a timely manner, including the delivery of market and affordable housing. Owing to the interrelationship between a Part 1 strategic plan and subsequent lower tier plans, there will also be no flexibility in the second-tier documents to make changes to the development strategy to reflect updated evidence needs. This is a particular concern given the projected end date of the plan being some 25 years hence.
- 2.4. The suggested timetable for the SWLP's preparation is also considered to be highly ambitious. Given that most Local Plans take more than a year to be Examined by the Secretary of State it is considered very unlikely that Part 1 will be adopted before 2027

and potentially beyond if there is slippage between the public consultation stages indicated in Figure 2 (Page 16) of the Consultation Document.

Response to Questions Posed in Consultation Document

- 2.5. The following representations comprise the Respondent's response to the questions posed in the Consultation Document that are considered particularly relevant to the delivery of housing.

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

Q-V3.2: If no, please indicate why:

- 2.6. The Respondent is in general agreement with the vision and strategic objectives set out in the Consultation Document but considers that the delivery of market and affordable housing to meet housing needs, including unmet need arising from neighbouring authorities, should be given greater emphasis in the Council's Vision for the Local Plan (V1).

- 2.7. The respondent would suggest the following amendment:

*"The vision is to meet South Warwickshire's sustainable development needs to 2050, **including new market and affordable homes**, while responding to the climate emergency. Where appropriate and agreed, this **should** include unmet need from neighbouring authorities. The plan will provide homes and jobs, **to** boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:"*

- 2.8. With regards to V3: Strategic Objectives, the role that all current settlements can play in meeting housing needs should be recognised.
- 2.9. Furthermore, in recognition that it may not be possible to fully off-set carbon emissions in all cases (see comments made later in this Statement), the Council should consider updating the strategic objective of "Contributing towards Net Zero Carbon targets" to refer to "Minimising net carbon emissions arising from new development as far as practicable" (or similar).

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

Option I2a: Set out infrastructure requirements for all scales, types and location of development

- 2.10. The Respondent considers Option I2a as being most appropriate to ensure a consistent approach across the plan area and avoid disconnect between the SWLP and current extant Local Plan policies.
- 2.11. While the Respondent would not object to the utilisation of a combination of S106 Planning Obligations and Community Infrastructure Levy (CIL) as per the current system, any policy must reflect the provisions of the CIL Regulations 2010 (as amended) and particularly Regulation 122, which requires S106 obligations to be fairly and reasonable related in scale and kind to development.

Q-13: Please select the option which is most appropriate for South Warwickshire

Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan

- 2.12. The Respondent considers that a single CIL for the whole of South Warwickshire is most appropriate since it will provide greater certainty to developers. While the Consultation Document indicates that separate levies could better respond to different conditions in different areas of South Warwickshire (i.e., the Stratford-on-Avon and Warwick Districts), in the Respondent's view, this can equally be achieved through the implementation of different charging zones where these are justified.
- 2.13. The Consultation Document confirms that an Infrastructure Delivery Strategy (IDS) will be prepared which will set out the key pieces of new infrastructure needed to deliver the Councils' growth strategy and how such infrastructure will be delivered. The Respondent is supportive of this action and considers the preparation of an IDS to be an essential component of the evidence base.

Q-14.1: Should we include a policy to safeguard specific infrastructure schemes within the SWLP? Y/N/DK

- 2.14. Yes. The Respondent considers it sensible to include a policy that safeguards land that will facilitate the delivery of key infrastructure projects where this is justified. The Respondent recognises that safeguarding would be difficult to achieve post adoption

of the SWLP and is best considered at an early stage of the plan preparation process to ensure that the growth strategy is capable of being delivered.

Q-15: Please add any comments you wish to make about infrastructure, viability and deliverability

- 2.15. Completion of a robust and comprehensive Plan Viability Assessment will be essential to ensure that the SWLP is viable and deliverable in a timely manner. The Respondent considers that both an IDS and Viability Assessment should be prepared at an early stage and used to inform a preferred strategy. Any such documents should be made available for comment as part of the Preferred Options Public Consultation.

Q-S1: Please select the option which is most appropriate for South Warwickshire

Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy

- 2.16. While the Respondent does not object to the identification of Green and Blue Corridors in principle (in accordance with Paragraph 20 of the NPPF), they are not convinced that such designations can be robustly evidenced or justified in absence of the Councils' Local Nature Recovery Strategy (LNRS). The Respondent would therefore err towards not identifying such areas at this stage.

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

Option 2c. Have a policy with 'in principle' support for intensification development, applicable across South Warwickshire; and develop design codes.

- 2.17. Developers tend to err towards higher densities without the need for a planning policy requiring such. It is the inter-play of policy requirements and the input of stakeholders that tend to drive densities down rather than developer choice.
- 2.18. The Urban Capacity Study (October 2022), which forms part of the Issues and Options Evidence Base, identifies the biggest constraint to the maximisation of gross developable areas on sites as being the requirement to provide private and shared parking spaces (Urban Capacity Study, Section 3.3, Page 20). Should the Councils

therefore wish to optimise densities, careful thought will need to be given to the implication of other policies and requirements on the ability for developers to build at higher densities.

- 2.19. With regard to Design Codes, while these can sometimes be helpful in providing clarity on the design approaches and standards that are likely to be acceptable, they are generally overly prescriptive and lack flexibility, which can do more harm than good from an urban design and density perspective.
- 2.20. Since developers tend to err towards maximising the efficiency of sites anyway, the preparation of a design code simply to support intensification would seem a disproportionate response to the issue at hand. It would be better if the Councils focus on the consideration of the wider implications of policies and standards contained in the plan which are known to drive densities down.

Q-S3.1: Please add any comments you wish to make about the Urban Capacity Study.

- 2.21. The Urban Capacity Study identifies a potential baseline housing supply for the 2025-2050 plan period of 19,950 dwellings. Of this, 6,145 dwellings would be located within existing urban areas and the remainder located elsewhere (including new settlements).
- 2.22. The conclusion drawn at Section 4.6 of the Urban Capacity Study confirms that greenfield land must be released to meet South Warwickshire's housing needs and states 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.**"*
(Section 4.6, Page 37, own emphasis)

- 2.23. While the study indicates that the shortfall between urban and existing committed housing capacity could be reduced by undertaking development on public car parks around South Warwickshire, this would seem highly unlikely given the significant programme of intervention and management that would be required for such capacity to be realised. The Respondent would also anticipate the likely yield from such sites to be considerably less than 3,400 dwellings and more likely towards the lower end of the range indicated (800 dwellings).

- 2.24. In the Respondent's view, the inevitability of significant greenfield land being required adds considerably to the case for Green Belt release given that it is within the Green Belt that development can be most sustainably located.
- 2.25. It is agreed that to allow choice and competition in the market in accordance with National Planning Practice Guidance (NPPG) a buffer should be applied to the housing need as suggested in the Urban Capacity Study (Paragraph 4.6).

Q-S3.2: Please select the option which is most appropriate for South Warwickshire

Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.

- 2.26. While the Respondent recognises the importance of re-using Brownfield land, having considered the options presented in the Consultation Document, Option S3.2a is considered most appropriate in South Warwickshire, with Brownfield sites prioritised only where they are sustainably located and in line with the identified growth strategy. To do otherwise could result in unsustainable patterns of development that would conflict with the overarching vision and strategic objectives of the plan.

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

- 2.27. Yes. The Respondent agrees that growth of existing settlements should be part of the overall growth strategy for South Warwickshire. As opposed to new settlements, sustainable development at existing settlements has the benefit of being delivered without significant infrastructure investment and within a much shorter time frame.
- 2.28. Turning to Henley-in-Arden, the Respondent's site represents a sustainable and logical extension that is capable of being developed without technical impediment and would assist in supporting existing facilities and services at the town. Such matters are discussed in further detail in the site-specific representation at Section 3.0 of this Statement.

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.

- 2.29. Appendix 2 (Connectivity Analysis for Henley-in-Arden) of the Settlement Analysis indicates particularly poor connectivity to the west, north-east and east of the town which the Respondent would agree with.
- 2.30. In respect of land to the north of the town, it is the Respondent's view that this land should not be graded as high as it has, particularly considering the influence of the dismantled railway embankment that acts as a permanent, physical and visual barrier to rest of the town. If land to the north has been accurately Graded as 'C' then, in the Respondent's view, land to the south should, in turn, be accorded a higher grade (B) in recognition of the absence of any such physical barrier.
- 2.31. The respondent also draws attention to the error in the Henley-in-Arden Density Analysis which indicates an area of Green Infrastructure as an 'Urban Neighbourhood'. There are also notable inconsistencies between the density assumptions made in the settlement analysis versus those made in the Urban Capacity Study; a rationale for which should be provided for the avoidance of doubt.

Q-S5.2: Do you think new settlements should be part of the overall strategy? Y/N/DK

- 2.32. Broadly yes. The Respondent is generally supportive of the inclusion of new settlements in the overall growth strategy as they can be an effective way, at least in theory, of delivering new housing where there are barriers to the sustainable delivery of sufficient housing elsewhere. However, in reality, the physical implementation of new settlements is often complex and costly, which can significantly hamper their delivery. The Respondent would therefore caution against over reliance on new settlements in the preferred growth strategy.
- 2.33. Where new settlements are proposed the infrastructure requirements should be identified and robustly costed to ensure that delivery is viable. The Councils should also take a conservative approach regarding assumed capacity and likely build-out rates and avoid including housing completions from new settlements too early in the plan period. The Lichfield's Start to Finish (Second Edition) 2020 report may be a helpful starting point in this regard, although any assumptions that are made will need to be fully evidenced having regard to site specific constraints and circumstances.
- 2.34. To improve choice and competition and help to mitigate the risk and implications of such sites not coming forward within the timescales envisaged it is recommended that a buffer is applied to the housing need, with a greater number of small-medium sites

allocated at sustainable settlements to ensure adequate housing delivery in the short-medium term.

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? Y/N/DK

- 2.35. Yes. The Respondent considers it sensible to look to rail corridors as a preferred approach to the identification of potential locations. However, given the problems and delays that can often occur with the provision of new rail services and stations, it considered that the intensification of existing rail services should be considered before new ones. The Respondent's site to the south of Henley-in-Arden is an ideal candidate for future housing development in this context given its location within walking distance to Henley-in-Arden Station.

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

- 2.36. Henley-in-Arden is included as a potential location for growth under all five growth options, of which the Respondent is supportive. A site-specific representation in favour of the allocation of additional housing development at land south of Henley-in-Arden is set out under Section 3.0 of this Statement.
- 2.37. Given the emphasis on mitigating the impacts of climate change and reducing the need to travel in order to reduce carbon emissions, it is the Respondent's view that settlements such as Henley-in-Arden, which have a good range of services and are located in close proximity to existing rail services, should be retained as locations for growth under all options.
- 2.38. Considering the evidence base prepared to date, the Respondent would agree that Option 2 (Rail and Bus Corridors) would appear to align best with the overall objective of mitigating the impacts of climate change and, on balance, considers this to be the most appropriate option for South Warwickshire. However, in the interests of maintaining the vitality of existing settlements there is also considered to be merit in Option 5 as a hybrid approach.
- 2.39. As recognised in the Consultation Document, existing settlements within the Green Belt (such as Henley-in-Arden) are some of the most connected of all the settlements within South Warwickshire. Considering the magnitude of the housing need and the need to

deliver a significant proportion of this on greenfield sites (as confirmed in the Urban Capacity Study) then it is considered inevitable that there will be a need for Green Belt release. The alternative being to limit growth to locations outside existing Green Belt designations, which would unlikely deliver the most sustainable or climate friendly option since it would push development away from areas with the best infrastructure and opportunities for access. To this end, the Respondent agrees that a review of the Green Belt across South Warwickshire will be an essential piece of evidence.

- 2.40. However, it is likely that even with Green Belt release the Councils will need to look beyond the initial list of settlements identified under Option 2 to meet South Warwickshire's needs in full. On which basis it is recommended that the Councils also look to the next tier of settlements and locations, such as the Category 1 Service Villages identified in the Stratford-on-Avon Core Strategy, such as Bishop's Itchington. The benefit of such an approach being a more even distribution of housing across the plan period that strikes a better balance between prioritising development at the most sustainable settlements (such as Henley-in-Arden) but also ensures the vitality of rural communities in accordance with Paragraph 79 of the NPPF.

Q-S8.1: For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward? Y/N/DK

- 2.41. No. The sustainability of settlements falling outside of the chosen growth strategy will vary to a significant degree and should not therefore be treated as equal.
- 2.42. Settlements such as Bishop's Itchington, which is defined as a Local Service Village under Policy CS15 of the current Stratford-on-Avon Core Strategy, have the potential to accommodate significantly more growth than is being suggested in the current Consultation Document and in the interests of maintaining the vitality and viability of such settlements should not be ignored in the development of a preferred strategy; particularly where they have a good range of facilities and access to public transport services. In such cases it would seem irrational to restrict development via an unnecessarily arbitrary approach.
- 2.43. In the Respondent's view, a comprehensive settlement audit should be undertaken for those settlements that fall outside the identified growth strategy to better understand their functionality and relative sustainability. The results of which can then be used to inform an appropriate distribution strategy across these settlements in a less arbitrary

and more transparent way. To do otherwise would put at risk the vitality of such settlements in conflict with Paragraph 79 of the NPPF.

Q-S9: Please select the option which is most appropriate for South Warwickshire

Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.

- 2.44. Of the options presented the Respondent considers that a consistent approach across Stratford-on-Avon and Warwick District is most appropriate and would therefore lean towards Option S9b as being the most appropriate option for South Warwickshire.
- 2.45. The Consultation Document notes that one disadvantage of this option is that some non-strategic land allocations will likely not be made until Part 2 comes forward and that it would be difficult to make appropriate revisions to boundaries in advance of these non-strategic allocations being made. The Respondent does not disagree and considers this to be one of a number of disadvantages in proceeding with a two-tier plan rather than a single one as discussed further in the response to Q-P1.2.

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? Y/N/DK

- 2.46. Yes. Overall, the Respondent considers that the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, it should be noted that the level of future housing need stated in the HEDNA is a floor figure and does not include any unmet housing needs that may arise from other local authorities, which still needs to be established under the duty to cooperate.
- 2.47. In setting a housing requirement for the plan area it is suggested that the Councils look to allocate significantly more sites than may be required to meet the minimum housing need identified in the HEDNA to increase the supply of affordable housing and attempt to address the issue of affordability in both districts (discussed further under Question Q-H2-1 below). This could be reasonably achieved through the application of a reasonable buffer on top of the minimum housing need identified, which the Urban Capacity Study would also appear to recommend.

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

- 2.48. Fundamentally, the best way to increase the supply of affordable housing across South Warwickshire is to allocate more land for market housing (a proportion of which would be delivered as affordable).
- 2.49. The principal barrier to a housing development's ability to deliver affordable housing is viability, which is particularly less assured on brownfield sites and in new settlement allocations hence why affordable housing provision is inevitably reduced on such sites. The Councils therefore need to carefully consider the impact of their preferred strategy, along with the financial implications that other policy requirements may have on the provision of affordable housing, for affordable housing provision to remain viable throughout the plan period and to boost supply.
- 2.50. While it is appreciated that building more houses does not necessarily bring the value of homes down, ensuring that more than enough land has been allocated to meet housing needs will greatly assist in the timely delivery of market housing which, assuming that other policy requirements are pitched correctly, will translate to the timely delivery of an increased quantum and range of affordable housing product.

Q-H2-2: Please select the option which is most appropriate for South Warwickshire:

Option H2-2a: A single South Warwickshire wide affordable housing requirement

- 2.51. The Respondent considers that a consistent approach with regards to affordable housing should be applied across both Districts. Accordingly, of the options presented, Option H2-2a is probably the most appropriate in that it would appear to give the greatest certainty to developers and avoid making some areas more attractive than others. However, whatever the option that is settled upon it is imperative that the approach is thoroughly tested in terms of its viability and is appropriately justified.

Q-H3: Please select all options which are appropriate for South Warwickshire

Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.

- 2.52. The Respondent agrees that should the Councils wish to impose minimum space standards that they should be adopted as development plan policy.

- 2.53. The Councils' aspiration to raise the standard of design of new homes in South Warwickshire is understood. However, given the notable unaffordability issues within the Warwick and Stratford Districts, where house prices are around 25% higher than the rest of the HMA, the Respondent has significant reservations regarding the imposition of space standards. Specifically, the respondent is concerned about the implication that such standards could have on the viability of sites, as well as the affordability of new homes, given that properties are generally valued and sold on a £ for square ft basis.
- 2.54. Should the Council wish to introduce the application of Nationally Described Space Standards (NDSS) or optional Building Regulations M4(2)/M4(3) then Footnote 49 of the NPPF makes clear that the need for such standards needs to be justified. Further work will therefore need to be undertaken to demonstrate an appropriate justification.
- 2.55. For the avoidance of doubt the Respondent would strongly object to the imposition of space standards beyond NDSS.

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? Y/N/DK

- 2.56. Yes broadly. The Respondent agrees that there is a strong argument that the homes needed to contribute to the Birmingham and Black Country HMA shortfall to 2031 should be located close to the source of those needs. However, the Respondent considers that locations that are proximate in terms of sustainable transport connections, and particularly rail services, which benefit from a reasonable commute to sources of need should also not be ruled out.

Q-H4-2: Do you have any comments about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan? Y/N/DK

- 2.57. Birmingham City Council has identified a shortfall in housing of 78,415 homes in its Local Plan Review 2042 Issues and Options Consultation Document, which equates to approximately 55% of the City's total housing need (based on the latest HELAA). Under the current adopted Birmingham Local Plan the shortfall is 38,000 homes to 2031, which the Greater Birmingham and Black Country Strategic Housing Needs Study indicated would largely need to be met on greenfield sites, including green belt land outside Birmingham's administrative area. Options, including urban extensions and

growth around railway stations, were also identified as possible ways of addressing the shortfall.” (Black Country Plan Issues and Options, Paragraph 3.11).

- 2.58. The SWLP Consultation Document suggests that additional shortfalls could also arise from the other Black Country authorities. The magnitude of the shortfall that the SWLP might need to accommodate up to 2050 therefore has the potential to be quite significant. On which basis it is imperative that the relevant Councils engage fully as a matter of urgency in the duty to co-operate process to establish what percentage of the identified shortfall the SWLP plan area will be responsible for.

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?

- 2.59. The Respondent considers that if shortfalls from outside of South Warwickshire need to be met then these would be best accommodated close to the source of those needs and/or locations that are proximate in terms of sustainable transport connections, and particularly rail services, which benefit from a reasonable commute. Such locations are likely to reside in the Green Belt.
- 2.60. For the reasons explained under Q-S5.2, the Respondent would caution the Council against the development of a growth strategy that is overly reliant on the delivery of new settlements and should also look to maximise opportunities adjacent to existing settlements with sustainable transport connections and particularly rail.

Q-H5: Please select all options which are appropriate for South Warwickshire

Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.

- 2.61. The Respondent has experience of providing self-build plots on developments in other parts of the Country and would caution that there is often a disparity between the number of people that register an interest in such plots and those that will make a firm commitment and complete a purchase.
- 2.62. As the Consultation Document points out, there are people who may express an interest for a self-build property but do not want to live within or on the edge of a new housing estate. In a largely rural authority, it is considered likely that the demand for

self/custom build is for single plots on the edge of small villages/hamlets or on plots within the open countryside. A case-by-case approach as per that suggested under Option H5c would therefore seem most appropriate in South Warwickshire or for specific sites on the edge of existing settlements to be allocated specifically for this purpose where there is identified demand (Option H5a).

- 2.63. If Option 5b is to be taken forward, then there must be the flexibility to revert self-build plots back to normal build plots once they have been marketed for an appropriate amount of time. The period of marketing required to demonstrate a lack of demand should not prevent the main developer from completing the self-build plots before the construction programme finishes, since it would not be desirable for developers to be left with vacant plots or for new residents to be subjected to construction activities for a prolonged period.

Q-C3.1: Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site? Y/N/DK

- 2.64. Don't know. As recognised in the Consultation Document, some developments may not be able to completely neutralise their carbon emissions on site and in these cases a carbon off-setting approach would seem reasonable. However, it will be imperative that the SWLP provides an appropriate mechanism for carbon offsetting. The Consultation Document suggests that in addition to natural solutions such as tree planting that a fund could be created through the pooling of financial contributions from developers which will enable the existing housing stock to be retrofitted with measures to help reduce carbon emissions. However, it is not clear how such a scheme would operate in practice (i.e., how will financial contributions be calculated and who would be responsible for administering, delivering and monitoring such a scheme?) or if it would meet the tests of Regulation 122 of the CIL Regulations 2010 (as amended). Without more information it is therefore very difficult to comment. Accordingly, the Respondent reserves their right to comment once more information is made available in this regard.

Q-C3.3: Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire

- 2.65. The integration of renewable energy and carbon sequestration within new developments could both be feasible options in helping to achieve net zero carbon

development but, as stated elsewhere in this Statement, anything above standard requirements will need to be carefully considered in the context of other policy requirements to ensure that any approach adopted by the Councils is justified, viable and deliverable.

- 2.66. In the Respondent's view, significantly more information needs to be provided before developers can provide any sort of meaningful comments on the suggested approach to renewable energy generation or carbon sequestration in South Warwickshire. The Respondent therefore reserves their right to make further comments once more information is made available in this regard.

Q-C4.1: Please select all options which are appropriate for South Warwickshire

Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.

- 2.67. The Respondent considers it superfluous to include a policy requiring new development to comply with national building regulation requirements given that developers will need to comply with Building Regulations in any event.
- 2.68. While the Councils' aspirations to raise the standard of design and achieve net zero carbon is understood, and to some extent supported, achieving this will come at a significant cost to development which, given the time frames involved, is unlikely to be easily absorbed and therefore has the potential to put at risk the delivery of sites and, in turn, the timely delivery of market and affordable homes.
- 2.69. Considering these concerns, Option 4.1a is considered to be most appropriate. If, however, the Councils are minded to set a higher local standard, then it is advised that realistic transitional arrangements are allowed for to enable the development industry time to respond. In the Respondent's view, the timeframe indicated in Option C4.1c is the minimum that should be adopted. In imposing standards caution also needs to be shown to ensure that redundant technology is not prescribed and that developers can make an appropriate choice of systems at the time houses are being delivered. In addition, the Plan will have to be supported by evidence demonstrating that the viability both technical and financial has been taken into account.

Q-C6.1: Please select the option which is most appropriate for South Warwickshire

Option C6.1c: None of these

- 2.70. While the Councils' aspiration to raise standards and seek greater reductions in embodied emissions is appreciated, the Respondent has significant concerns regarding the additional cost to the development industry, which cannot be easily absorbed.

Q-C6.2: If a phased approach is used, what dates and thresholds should be used? For example, achieve 80% reduction by 2030 and 100% reduction by 2040.

- 2.71. If the decision is made to proceed with a policy that seeks reductions in embodied emissions, then a phased approach should be adopted. However, it is difficult to advise where this threshold should be set without more information being provided regarding the potential implications of such a policy. The Councils should therefore look to test the various options and present this work as part of a preferred strategy which can be commented on in due course.

Q-C8: Please select the option which is most appropriate for South Warwickshire

Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events

- 2.72. The Respondent is generally supportive of the management and use of water within new developments and already seeks to incorporate SUDS in its schemes where it is feasible to do so. Furthermore, the Respondent has no in principle objection to the implementation of measures to reduce water consumption, however, they would not currently support a policy which goes beyond existing Building Regulations.

Q-C9.1: Please select the option which is most appropriate for South Warwickshire

Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

- 2.73. The Respondent is generally supportive of incorporating measures to increase biodiversity within new developments and notes that the need to provide 10%

Biodiversity Net Gain (BNG) is soon to become mandatory under the Environment Act 2021. In light of which the need for an additional policy is unclear.

- 2.74. The introduction of any policy that has the potential to affect the viability and delivery of sites needs to be cautiously considered, with overly prescriptive requirements (such as limitations on the amount of hard landscaping that can be used within sites etc.) avoided. In the Respondent's view, suggestions regarding how a development might go about achieving biodiversity increases on site should be set out in supporting text and not directly in policy wording to reflect best practice rather than a strict policy requirement.
- 2.75. While the delivery of on-site BNG may be preferred, the ability to deliver off-site BNG should not be ruled out, since there will be sites where BNG on site is not achievable. In this regard it is imperative that the SWLP provides an appropriate mechanism for offsetting when it is simply impractical to provide the level of net gain by any calculator being adopted by Natural England.
- 2.76. For the avoidance of doubt, the Respondent would have significant objections if the level of BNG required in South Warwickshire were to extend beyond the 10% required in line with the provisions of the Environment Act 2021.

Q-D2: Please select all options which are appropriate for South Warwickshire

Option D2d: None of these

- 2.77. While Design Guides can sometimes be helpful in providing clarity on the design approaches and standards that are likely to be acceptable in a local authority area, they are generally overly prescriptive and lack flexibility, which can do more harm than good from an urban design perspective since they can give rise to homogeneity.
- 2.78. The Respondent would also caution against the preparation of design guides for numerous different areas, which would seem an overly complex approach.
- 2.79. If the Councils decide to proceed with the preparation of design guides or codes for specific places, then it is considered imperative that these are publicly consulted on.
- 2.80. If intended to be used as policy rather than flexible guides, then Design Guides must be brought forward as Development Plan Documents (DPD) and independently examined given the implications that they could have on the viability and delivery of development.

Q-D3: Please select all options which are appropriate for South Warwickshire

Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.

- 2.81. The Respondent is not convinced that a policy that prescribes densities is entirely necessary and considers Options D3c and D3d to be unduly complex. However, it is acknowledged that density does need to be optimised in accordance with Paragraph 141 of the NPPF if Green Belt release is to be justified. Considering the options therefore, the Respondent would suggest the inclusion of a policy that is in line with Option D3a but which is perhaps supplemented with explanatory supporting text with regards to the sort of density ranges that developments should be aiming for depending on their location, accessibility and context.

Q-T1: Please select all options which are appropriate for South Warwickshire

Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g., Building for a Healthy Life) within a broader overarching policy.

- 2.82. The Respondent is supportive of the maximisation of opportunities for people to meet their day-to-day needs near to where they live and are therefore supportive, in principle, of the 20-minute neighbourhood concept. Turning to Henley-in-Arden, the Respondent's site to the south of the town is compliant with the 20-minute neighbourhood principle and is considered an ideal candidate for allocation. Further information regarding the site is set out under Section 3.0 of this Statement and the accompanying Vision Document.
- 2.83. The main issue with the application of the 20-minute neighbourhood concept is the predominant rural nature of South Warwickshire, where 20-minute neighbourhood principles will be difficult to translate. As noted elsewhere in this Statement, the Councils have an obligation to consider the vitality of rural settlements in accordance with Paragraph 79 of the NPPF. To adopt a strategy that plans solely on the basis of the 20-minute neighbourhood concept therefore is to potentially ignore large swathes of the plan area to the disadvantage of the vitality and viability of those settlements located within the rural hinterlands. The Council will therefore need to allow for

flexibility in the way that 20-minute neighbourhood principles are applied should they proceed with such an approach. The same goes for alternatives such as Building for Healthy Life, which in the Respondent's view should be presented as best practice as opposed to a specific policy requirement.

Q-T2: Please select the option which is most appropriate for South Warwickshire

Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.

- 2.84. The Respondent is supportive of the inclusion of a policy that seeks to maximise opportunities for sustainable transport by taking a hierarchical approach. However, it should be recognised that opportunities to maximise sustainable transport solutions will vary between urban and rural areas as per Paragraph 105 of the NPPF.
- 2.85. The introduction of lower parking standards in areas that have good active/public transport links may be appropriate but only where there is robust evidence to suggest that such action is likely to achieve a change in travel habits. This will help to avoid issues related to insufficient parking provision once developments are occupied.

Q-B1: Please select the option which is most appropriate for South Warwickshire

Option B1b: Remove Areas of Restraint designations

- 2.86. A disjointed approach between the two local authority areas should be avoided wherever possible. Of the options presented therefore, the Respondent would favour removal of existing areas of restraint, with open areas of land that serve to preserve the structure and character of settlements protected through more generic heritage and/or landscape policies.

Q-B3: Please select the option which is most appropriate for South Warwickshire

Option B3c: Discard Special Landscape Areas and bolster general landscape policy

- 2.87. A disjointed approach between the two local authority areas should be avoided wherever possible. Given that Special Landscape Areas are now a somewhat outdated concept the Respondent considers, in the interests of consistency across the plan area,

that Special Landscape Areas should be discarded (rather than seek to establish such areas across the whole of South Warwickshire).

Q-B4: Please select the option which is most appropriate for South Warwickshire

Option B4a: Maintain the current policy approach, without the use of a buffer

- 2.88. Creating a buffer around the Cotswold AONB is superfluous to national planning policy that requires development within the setting of AONBs to be sensitively located and designed to avoid or minimise impacts. The Respondent therefore considers Option B4a, which seeks to maintain the current policy approach without use of a buffer to be sufficient in this case.

Q-B5: Please select the option which is most appropriate for South Warwickshire

Option B5c: None of these

- 2.89. Environmental Net Gain is an entirely new concept with no tried and tested approach to its delivery. It is therefore currently unknown how Environmental Net Gain would work in practice. The Respondent therefore reserves their right to make comment once more detailed information is available.

Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations? Y/N/ DK

- 2.90. No. Wildbelt is a highly aspirational concept with no statutory or national planning policy basis. Unlike other designations there is no tried and tested method for the identification or delivery of Wildbelt. It is therefore unclear upon what basis the Council would seek to justify such designations particularly in light of the absence of the Local Nature Recovery Strategy (LNRS), which is understood from the Consultation Document to be many years away. The Respondent therefore reserves their right to make comment once more detailed information is made available.

Q-B8.1: Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development? Y/N/DK

2.91. No. Agricultural Land quality is only one of a number of factors that is taken into account when considering whether a site should be developed or not. While Paragraph 174b of the NPPF recognises the benefits of best and most versatile agricultural land this is expanded on in Footnote 58 on Page 50 of the NPPF which requires consideration of the issue only where 'significant development' of agricultural land is demonstrated to be necessary. In such instances, the Footnote considers that poorer quality land should be 'preferred' to that of a higher quality. However, this does not mean that it is mandatory to avoid the development of best and most versatile agricultural land. It is therefore highly inadvisable to promote a policy that looks to avoid the development of or seeks the retention of best agricultural land as suggested.

***Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan?
Y/N/DK***

2.92. No.

Q-P1.2: If no, please indicate why

2.93. No. The Respondent has significant concerns regarding the preparation of a two-part plan. The Respondent's main concern with regards to a two-tier system is the inevitable delay in plan-making that will occur as result and the impact that this will have on the ability to deliver the Councils' growth strategy in a timely manner, including the delivery of market and affordable housing.

2.94. The current two-tier approach in Stratford-on-Avon District Council is a prime example of where significant delays in the preparation of second tier policy documents have occurred. In proposing a two-tier SWLP, the authorities are in danger of repeating the same mistakes of the Stratford on Avon Local Plan and putting in place a Plan that will genuinely not be reviewed every five years as required by national guidance.

2.95. Owing to the interrelationship between a Part 1 strategic plan and subsequent lower tier plans there will also be no flexibility in the second-tier documents to make changes to the development strategy to reflect any updated evidence needs. This is a particular concern given the projected end date of the plan.

2.96. While it is noted that the intention is to "*allow for a flexible, robust and long-lasting framework*" this can be difficult to achieve in practice and will need to be given very careful consideration when policies are drafted.

- 2.97. The South Worcestershire Development Plan has demonstrated that it is entirely possible for authorities to work together to produce a complex development plan covering all aspects of managing growth across three or four LPAs without recourse to a divisive and time-consuming two-tier approach.
- 2.98. On this basis, it is considered that a comprehensive local plan should be prepared that includes a full complement of allocations and development management policies; with Area Action Plans, Neighbourhood Plans, Design Codes and Design Briefs/Masterplans prepared in a timely, albeit subsequent, timeframe.

3.0 Land south of Henley-in-Arden

- 3.1. This Section of the Statement seeks to promote land to the south-east of Henley-in-Arden which the Respondent can confirm is under the unified control of Mactaggart and Mickel (Mac Mic Group) and is available for residential development.

The Site

- 3.2. The Respondent's site is located at the southern end of the Market Town of Henley-in-Arden and falls within the administrative area of Stratford-on-Avon District Council (SDC).
- 3.3. Henley-in-Arden is well connected by both road and rail to surrounding towns and cities including Birmingham, Kidderminster and Stratford-on-Avon. Its High Street offers a range of facilities and amenities, all of which are located within a short distance of the site. Henley-in-Arden Secondary School borders the site to the north-west and two primary schools are located less than 800m north via Arden Road.
- 3.4. The site itself comprises 23.86 hectares (ha) of arable land and is bisected by the River Alne. The site is bounded to the west by the A4300 Stratford Road and by Warwick Road to the north. At the center of the site, outside of the red line boundary, lies Blackford Mill Farm, a Grade II listed farmhouse and associated buildings, accessed via the existing agricultural tracks.
- 3.5. In accessibility terms, the site is located within an approximate 7-minute cycle ride of Henley-in-Arden Rail Station and an approximate 17-minute walk from Stratford Road. Bus stops are available within walking distance (including the River House School stop) and Public Right of Way 192/SD188/1, which crosses the site, provides a direct connection between the site and Henley-in-Arden School. From Warwick Road the top of the High Street is an approximate 18-minute walk.

Constraints & Opportunities

- 3.6. The current Development Plan for Stratford-on-Avon comprises principally the Stratford-on-Avon District Core Strategy 2011-2031 (adopted 11th July 2016). In this plan Henley-in-Arden is identified as a Main Rural Centre and thus sits within the second tier of settlements behind the main town of Stratford-on-Avon.

- 3.7. A comprehensive summary of the site's constraints and opportunities is set out in the accompanying Vision Document. This demonstrates that the site is free from significant environmental constraint. Visually the site is generally well contained, due to a combination of the surrounding mature vegetation and undulating topography. The main barrier to the delivery of the site is therefore its location within the Green Belt, the presence of which has severely prohibited the growth of the town.

Why release land at Henley-in-Arden from the Green Belt?

- 3.8. Green Belt is designed to prevent urban sprawl through the unplanned expansion of urban areas. While it is a successful spatial planning tool in this regard, it can have significant implications on the ability to deliver otherwise sustainable patterns of development. In recognition of this, there are mechanisms within National Planning Policy to enable Green Belt Review.
- 3.9. The Issues and Options Consultation Document (January 2023) sets out five options for growth (1-5) as follows:
- Option 1: Rail Corridors
 - Option 2: Sustainable Travel
 - Option 3: Economy
 - Option 4: Sustainable Travel and Economy
 - Option 5: Dispersed
- 3.10. It noted that all five growth options include Henley-in-Arden as a potential location for growth. However, it is understood that the option currently considered to best align with mitigating climate change, following completion of a Sustainability Appraisal, is Option 2. This option is a hybrid of the Rail Corridor and Bus Corridor Options presented at the Scoping Consultation stage. It is therefore expected that improving connectivity and locating development in highly sustainable locations, with access to public transport, and particularly rail, is likely to remain the focus of the joint authorities' overarching strategy.
- 3.11. Given that there are so few settlements within South Warwickshire with rail stations outside of the Green Belt it is considered somewhat inevitable that in order to release sufficient land for development within the most sustainable locations with regards to sustainable travel options that there must be Green Belt release.

- 3.12. Paragraph 142 of the NPPF provides that where it has been concluded that it is necessary to release Green Belt land for development that plans should give first consideration to land which has been previously developed and/or well-served by public transport.
- 3.13. Henley-in-Arden is one of only a small number of settlements that benefit from an existing rail station with frequent services to Stratford-on-Avon and Birmingham. It has an excellent range of facilities and for these reasons has rightly been identified as a potential location for growth under all five growth options set out in the Issues and Options Consultation Document and should be retained as such despite its location within the Green Belt.

Why Release land to the South of Henley-in-Arden?

- 3.14. The site constitutes a logical and sustainable location that is consistent with the historic evolution of the settlement and benefits from close proximity to the wide range of facilities located within the town. The site is within a 17-minute walking distance of Henley-in-Arden Rail Station and provides an excellent opportunity to realise the Council's ambition to apply the principles of the 20-minute neighbourhood. Such benefits also mean making better use of existing infrastructure without significant investment being required.
- 3.15. In terms of the other available options with regards to the expansion of the town it is noted that the town is well-contained to the west and north by the alignments of the current and former rail lines. In both instances, connectivity beyond these features is limited. The disused rail line that runs along the northern edge of the town forms a substantial green edge which severs the town and the immediate landscape setting. To the east, rising topography and open accessible landscapes such as Beaudesert Mount further limit opportunities for development that would be appropriate to the character of the settlement. The attached Vision Document discusses these barriers to the town's expansion in more detail.
- 3.16. The Respondent's site, on the other hand, is ideally situated to the south of the town and near to the town's amenities, particularly Henley-in-Arden School. The site is the 'right side' of the existing railway and former railway embankments and there is no visual relationship between the site and the SAM at Beaudesert Mount.

- 3.17. By contrast, the Respondent's site to the south of the town therefore presents a more logical extension that respects the character and historic pattern of growth of the settlement than the alternatives.

Assessment against the Purposes of the Green Belt

- 3.18. The representations set out in this Statement make clear that irrespective of the options taken forward in the SWLP and despite the town's location in the Green Belt that Henley-in-Arden should continue to be considered an appropriate location for growth going forward. Whilst development could be provided outside of the Green Belt, there is concern that a blanket exclusion on development would be counterproductive to the economic and social wellbeing of those areas within the Green Belt and would give rise to an unsustainable pattern of development by pushing development to areas that are inherently less sustainable.
- 3.19. Paragraphs 137 to 143 of the NPPF provides the necessary guidance for the review of Green Belt. The joint authorities will need to be satisfied that there are exceptional circumstances to justify Green Belt release and should look to release land that does not compromise the five purposes of including land within the Green Belt. A Green Belt Review will therefore be an essential component of the evidence base.
- 3.20. Set out below is a brief overview of the performance of the site against these five purposes.

1. To check the unrestricted sprawl of large built-up areas.

Henley-in-Arden is not a large built-up urban area and development on the south-eastern side of the town would not lead to urban sprawl. The existing field structure, boundary roads and hedgerows provide an ideal framework against which defensible boundaries can be designed, preserving the function of the Green Belt in accordance with this purpose.

2. Prevent neighbouring towns merging into one another.

The south-eastern expansion of Henley-in-Arden will not lead to the coalescence of one town with another. Defined and defensible boundaries can and will be provided which will further prevent the risk of unrestricted sprawl.

3. To assist in safeguarding the countryside from encroachment.

Development of the site would lead to expansion of development into the countryside as a result of the extension of Henley-in-Arden to the south-east of the town. However, the site is already seen in the context of existing development at Henley-in-Arden. Enhancements to existing green infrastructure will assist in creating a defined and defensible boundary, limiting the extent of any perceived encroachment without compromising this purpose. Development of the site to the south would also provide opportunity for a new and significantly improved defined edge to the town, which in other directions is already well defined and contained. The broad thrust and function of the purpose of the Green Belt in safeguarding the countryside from encroachment in this location would therefore remain essentially unaffected.

4. To preserve the setting and special character of historic towns.

The site is in close proximity to the Henley-in-Arden Conservation Area and is located adjacent to Blackford Mill Farm which is Grade II Listed. However, both heritage assets have been responded to in the masterplan, which demonstrates that the site can be developed without compromising the setting and special character of the town, as demonstrated in the attached Vision Document.

5. To assist urban regeneration by encouraging recycling of derelict and other urban land.

While the site itself is greenfield its release does not in any way disincentivise the urban regeneration of sites elsewhere in the plan area. Given the lack of supply of brownfield land in either Warwick District or Stratford-on-Avon District it is simply unrealistic to expect new housing to be accommodated on brownfield sites alone. This is evident by the need in previous Local Plans to allocate greenfield and Green Belt sites to meet development needs. On which basis it can be assumed, given the magnitude of the housing need for South Warwickshire, that greenfield and Green Belt land will need to be released again, under the SWLP.

Conclusion

- 3.21. Given the scale of housing need and the significant consequences for sustainable development within the plan area if Green Belt is not released, the exceptional circumstances threshold set out under Paragraph 140 of the NPPF is considered to be met. It is also considered that the release of land to the south of Henley-in-Arden would

not compromise the five purposes of Green Belts set out under Paragraph 138 of the NPPF and is therefore supportable in principle, unlike other options.

The Vision for the Site

- 3.22. The Vision for the site has been informed by the site's location and the unique local character and context of the town, as well as the site-specific considerations and core design principles that will help to inform the formulation of a detailed and high-quality scheme in due course.
- 3.23. The proposals set out in the attached Vision Document illustrates that the site has the capacity to deliver up to 300 new homes and a range of community benefits - including provision for young people - all set within a well-contained woodland context and new riverside landscape. The design and layout builds upon historic growth patterns and utilises features and details characteristic of the town and landscape to create a 21st century iteration of the established local vernacular.
- 3.24. While the Vision Document illustrates only one way in which the site could be developed, it demonstrates that land to the south of Henley-in-Arden would constitute a logical and suitable location for sustainable development and outperforms other available options. Through comprehensive analysis of the contextual, planning and technical parameters it also provides evidence that the site is an appropriate location within the town, that it is available now and is capable of delivering new homes within the next plan period without any technical impediments.

Conclusion

- 3.25. It is clear from the accompanying Vision Document that, aside from Green Belt, the Respondent's site at Henley-in-Arden is not subject to any major constraints.
- 3.26. The site's unified control by a trusted and experienced land promotion company (Mactaggart and Mickel) and its non-dependence upon any major new strategic infrastructure means that development of the site would be deliverable early in the SWLP plan period.
- 3.27. For the reasons explained elsewhere in this Statement, it is the Respondent's belief that the site is the superior option for the development of new homes at Henley-in-Arden and accordingly should be allocated for housing development to assist in meeting the housing requirements of the SWLP in a positive and effective way in accordance

with both Paragraph 79 of the NPPF and the tests of soundness set out under Paragraph 35 of the NPPF.

4.0 Conclusion

- 4.1. While there is clearly still much to consider it is welcomed that the Councils have taken a pragmatic approach to progress with the preparation of a South Warwickshire wide Local Plan, and we look forward to engaging with the Councils in the upcoming stages of the SWLP preparation process.
- 4.2. Please note that we would be happy to discuss the matters raised in this response with the Councils in greater detail, including the option of bringing forward the Respondent's land to the south of Henley-in-Arden. Nevertheless, we trust that the Councils will duly consider the representations made and hope that they are found useful in the continued preparation of the SWLP.
- 4.3. We would be grateful if you could please acknowledge receipt of these representations and keep us informed of progress using the contact details provided below:

Mactaggart and Mickel (Mac Mic Group)

c/o McLoughlin Planning, 119 Promenade, Cheltenham, Glos, GL50 1NW

Email: nathan.mcloughlin@mplanning.co.uk

Appendix 1

Land south of Henley-in-Arden

Vision Document

(bound separately)



McLOUGHLIN
PLANNING