



# RIDGE

**EMERGING SOUTH  
WARWICKSHIRE LOCAL PLAN 2<sup>ND</sup>  
ISSUES AND OPTIONS  
CONSULTATION (REGULATION  
18)**

**HG HODGES LIMITED**  
March 2023

# EMERGING SOUTH WARWICKSHIRE LOCAL PLAN 2<sup>ND</sup> ISSUES AND OPTIONS CONSULTATION (REGULATION 18) FOR HG HODGES LIMITED

March 2023

Prepared for

HG Hodges Ltd.

## Prepared by

Ridge and Partners LLP  
3<sup>rd</sup> Floor, Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX  
Tel: 01242 230066

## Contact

Guy Wakefield  
Partner  
[gwakefield@ridge.co.uk](mailto:gwakefield@ridge.co.uk)

Claudia Jones  
Senior Planner  
[cjones@ridge.co.uk](mailto:cjones@ridge.co.uk)

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**APPENDIX 1: REPRESENTATION TO STRATFORD UPON AVON'S EMERGING SAP CONSULTATION (JULY 2022)**

**APPENDIX 2: REPRESENTATION TO EMERGING SOUTH WARWICKSHIRE LOCAL PLAN SCOPING AND CALL FOR SITES CONSULTATION (JUNE 2021)**

# 1. INTRODUCTION

- 1.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the emerging South Warwickshire Local Plan 2<sup>nd</sup> Issues and Options Consultation (Regulation 18). The consultation runs between 9<sup>th</sup> January and 6<sup>th</sup> March 2023. The emerging LP will cover Stratford-on-Avon and Warwick District Councils, setting out a development strategy for both local authority areas as well as identifying sites for meeting their future development needs up until 2050.
- 1.2 The emerging LP continues to recognise Long Marston Airfield (LMA) as a new settlement, carried through from the Stratford-on-Avon Core Strategy. This representation supports the continued promotion of this site as a growth point for development which is set to deliver approximately 3,500 homes (2,100 homes up until 2031 - the plan period for the Stratford-on-Avon Core Strategy) alongside 13 ha of employment land, community and leisure facilities.
- 1.3 A previous representation was submitted in response to the Scoping and Call for Sites consultation in June 2021, which supported Growth Options that directed development toward new settlements (specifically supporting Growth Options A, B, D and E), and also supported densification. With regard to the latter, that representation promoted the opportunity for LMA to deliver an additional 500 dwellings above its current allocation, seeking to deliver approximately 4,000 new dwellings overall in line with what is proposed in Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP). Additional representations have been submitted to consultations for the emerging SAP that have demonstrated a total of 1,050 additional dwellings can be accommodated at LMA above the 3,500 homes already allocated.
- 1.4 This representation continues to support Growth Options that cater towards the delivery of new settlements, having particular regard to development directed around Rail Corridors, Sustainable Travel, Economy, and Sustainable Travel and Economy. This representation also continues to support intensification as a strategy to deliver sustainable development. It remains the case that the site has the potential to deliver 1,050 additional dwellings above the 3,500 dwellings already allocated, seeking to deliver 4,550 new dwellings overall.
- 1.5 A number of questions are contained within the consultation document that relate to the following issues:
- Issue I1: Sustainability Appraisal
  - Issue I2: Intensification
  - Issue S3: Using Brownfield Land for Development
  - Issue S4: Growth of Existing Settlements

- Issue S5: The Potential for New Settlement(s)
- Issue S7: Refined Spatial Growth Options
- Issue S10: Any Other Development Strategy Issues

### ***Long Marston Airfield Garden Village Background***

- 1.6 LMA is allocated within the adopted Core Strategy as a new settlement seeking to deliver 3,500 new dwellings. In January 2017, LMA was selected as one of 14 Garden Villages in the country. Paragraphs 6.11.10 to 6.11.14 of the adopted Stratford-on-Avon Core Strategy set out the vision for the development, aiming to achieve *“a mixed-use development which will provide a range of accessible services, facilities and employment opportunities that are convenient and accessible to the community itself and the local area.”*
- 1.7 At paragraph 6.11.5, Stratford-on-Avon Council make clear that the Garden Village will help meet the overall housing requirement for the District during the plan period of the Core Strategy and beyond as well as delivering a significant amount of employment land. Clearly, Stratford-on-Avon Council consider the delivery of this site a significant driver in helping to meet their overall housing target and delivering the Plan’s strategic aims for sustainable development across the Plan period and beyond. This is further supported within the SAP Preferred Options Consultation where the Council propose an additional 500 dwellings can come forward at this allocation sooner to help support necessary infrastructure. Consequently, its allocation is carried through to the emerging LP.

### **Statement Structure**

- 1.8 Following this introduction, **Section 2** provides an overview of the site context whilst **Section 3** sets out our support for LMA as a growth point in the emerging LP and promotes Growth Options Rail Corridors, Sustainable Travel, Economy, and Sustainable Travel and Economy as well as the approaches to direct development towards new settlements and encourage densification. It also demonstrates there is opportunity for an additional 1,050 dwellings to be delivered at the LMA growth point, above its current allocation. As part of this, a number questions contained within the consultation document will be answered. **Section 4** sets out the deliverability of the site and **Section 5** provides a conclusion and recommendations.

## 2. SITE AND BACKGROUND CONTEXT

### Site Description and Location

- 2.1 LMA ('the site') sits just east of the village of Long Marston and is located approximately 3 miles south of Stratford-upon-Avon. It measures a size of approximately 205 hectares.
- 2.2 The majority of the site comprises a former airfield once used as a training station for the RAF between 1941 and 1954. It contains a number of runways with grassed areas and a small number of remaining aircraft hangers. Toward the western part of the airfield is an earth embankment once used as a noise bund. The western parcel of the site also includes undeveloped land which sits outside the curtilage of the airfield. That land comprises a mix of agricultural fields dissected by hedgerows/trees, a woodland and a pond. Along the site's western boundary is a brook.
- 2.3 Immediately to the south of the site are open agricultural fields. Further south lies the former Long Marston Depot which is currently considered as a 'Large Rural Brownfield Site' for mixed development under Policy AS.11. The emerging SAP proposed the allocation of this site, under Proposal RURAL.4, for the development of up to 300 homes.
- 2.4 Along the east of the site lies the B4632 Campden Road. Toward the west of the site lies the former Stratford-to-Honeybourne railway line which is used for walking, cycling and horse riding, otherwise known as the "The Greenway".

### Planning History

- 2.5 As above, the site is allocated as a Garden Village within the Stratford-on-Avon Core Strategy, seeking to deliver 3,500 dwellings alongside a mix of other employment and commercial uses.
- 2.6 On 28<sup>th</sup> February 2017, outline planning permission was granted for the first phase of its development which proposed for the erection of up to 400 dwellings, 4,000 m<sup>2</sup> of employment use (Class B1(a)-c) Uses) and a community hub (including Classes A1-A5/B1(a)/C3/D1/D2) alongside the provision of open space and access (**ref. 14/03579/OUT**).
- 2.7 Subsequent reserved matter applications have been submitted and approved for the delivery of 400 dwellings and the community and employment uses (**ref. 17/03258/REM** and **20/00606/REM**).
- 2.8 Several non-material amendments and discharge of condition applications have since been submitted and approved (**ref. 20/03179/AMD; 20/03178/AMD; 20/00385/AMD; 20/00295/AMD; 20/00294/AMD; 21/03365/AMD; 21/02867/AMD; 21/03527/AMD; 22/01709/AMD; DISCN/00848/20; DISCE/00007/21; DISCN/00022/21; DISCN/00023/21; DISCN/00024/21; DISCN/00025/21; DISCN/00026/21; DISCN/00027/21; DISCN/00028/21; DISCN/00029/21/DISCN/00030/21**).

- 2.9 More recently, a full planning application has been submitted that proposes to deliver 124 dwellings (43 affordable homes) with some amendments to the public open space and community orchard that was approved under REM application 17/03258/REM.

## Designations

- 2.10 The site does not contain any statutory landscape or historic related designations.
- 2.11 The site in its majority sits within Flood Zone 1 and therefore is at the lowest risk of flooding. However, where the brook sits along the western boundary of the site that land comprises Flood Zone 3 and is at the highest probability of flooding.

### 3. RESPONSE TO QUESTIONS

- 3.1 The emerging South Warwickshire LP continues to allocate Long Marston Airfield (LMA) as a proposed growth point. This has been carried through from the Stratford-on-Avon Core Strategy which allocates LMA for approximately 3,500 dwellings (2,100 of which are to be delivered by 2031) alongside 13 ha of employment land, community and leisure facilities.
- 3.2 In the first instance this report has been prepared in support of the site's continued allocation as a new settlement. In this context, it will indicate several proposed Growth Options in which it supports.
- 3.3 This report also continues to support the approach to allocating a significant number of housing toward new settlements as well as increasing the intensification of sites. In considering the latter, this representation also takes the opportunity to promote LMA to be able to deliver an additional 1,050 new dwellings above its current allocation, aiming to deliver 4,550 new homes overall. This argument is detailed in a representation to Stratford-upon-Avon's emerging SAP as part of their Revised Preferred Options consultation in July 2022, a copy of which can be found in **Appendix 1**.
- 3.4 In this context, the structure of the following section will address a number of issues and questions contained within the consultation document.

#### Issue I1: Sustainability Appraisal

- 3.5 A review of the Sustainability Appraisal (SA) that accompanies the consultation has been undertaken in order to answer the following question:

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

- 3.6 This section makes reference to Chapter 7 of the SA 'Evaluation of the Spatial Growth Options'. It is understood that the Growth Options included as part of this consultation are an amalgamation of the Growth Options considered in the previous consultation. This representation in principle supports growth relating to:

- Rail Corridors (previously Growth Option A);
- Sustainable Travel (previously Growth Options A and B);
- Economy (previously Growth Options D and E); and
- Sustainable Travel and Economy (previously Growth Options A, B, D and E).

- 3.7 Reasons why are set out in paragraphs 4.7 to 4.18 of the representation submitted as part of the previous emerging LP consultation (see **Appendix 2**).



3.8 Table 7.1 in the SA (copied below) demonstrates that these growth options are the most sustainable options for the delivery of development when compared to the remaining Growth Option 'Dispersed'. We agree with the conclusions of the SA and support the principle of delivering growth concentrated around these options, which in turn supports the delivery of Long Marston Airfield and indeed the densification of the allocation (addressed in detail further below).

*Table 7.1: Summary SA findings for the Spatial Growth Options*

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

3.9 The main consultation document discusses each of the Growth Options. Having reviewed this, this representation seeks to make no further comments over and above what is discussed at paragraphs 4.7 to 4.18 of the previous representation.

### Issue 14: Infrastructure Safeguarding

3.10 Question 14.1 asks “Should we include a policy to safeguard specific infrastructure schemes within the SWDLP?”

3.11 The Stratford-upon-Avon South Western Relief Road (SWRR) is a key strategic road to help inform the delivery of development south of Stratford-upon-Avon. In part this will support the delivery of LMA and therefore it is considered appropriate a specific policy is included in the emerging Local Plan that continues to safeguard this road. That being said the delivery of some phases of LMA can continue and therefore such a policy should not prejudice its delivery.

3.12 Similarly, the former railway line between Stratford-upon-Avon and LMA is safeguarded within Policy CS.26 of the existing Stratford-upon-Avon Core Strategy and should also be carried forward as part of the emerging Local Plan, tying into our support for development along Rail Corridors. Doing so will ensure that sustainable links are delivered to support the growth of LMA outside its current

allocation. That being said, the same applies above insofar that the delivery of the additional development at LMA is not reliant on the former railway line coming into use.

## Issue S2: Intensification

3.13 It is positive that the emerging LP continues to promote intensification as a strategy to deliver sustainable development as part of its growth strategy. This consultation builds upon the last consultation by providing options that could be appropriate for intensifying development in South Warwickshire (question Q-S2). These include:

- Option S2a: Identify areas considered particularly suited to intensification of development and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.
- Option S2b: Have a policy with 'in principle' support for intensification development, applicable across South Warwickshire; and develop design codes.
- Option S2c: Do not have a policy which encourages intensification.

3.14 This representation supports options S2a and S2b given the emphasis towards promoting intensification of development in the emerging LP. In the context of LMA, there is no specific preference whether either option to be carried through the LP process as the site itself would meet both options by:

1. Being a self-sufficient new settlement that will comprise a number of services and facilities, as well as taking advantage of nearby existing travel corridors (rail and bus), and nearby employment sites as well as delivering its own; and
2. Having regard to the local character of the area by way of design and scale.

3.15 As demonstrated in paragraphs 4.26 to 4.34 of the previous representation (see **Appendix 2**) and within a more recent representation submitted to the emerging SAP (see **Appendix 1**), there is an opportunity to deliver circa 1,050 dwellings above the 3,500 dwellings already allocated at LMA.

3.16 It is noted a Density Guide has been prepared as technical evidence to support this consultation. It specifically comments upon the density of LMA drawing on a part of the reserved matters approval to illustrate an average density of 23 dph will be present. However, it should be reminded that the Long Marston Garden Village Framework Masterplan SPD (February 2018) specifies a range of density from 25-55 dph. Indeed, delivering further residential development above what is currently allocated and proposed to be allocated will see the density of development at the higher end of this scale. Therefore, the Density Guide should not be taken as read.

- 3.17 Delivering a considerable number of additional dwellings on a site already deemed suitable and sustainable for development, and which is currently under construction, should be a preferred option for the Councils to help deliver their future housing requirements.
- 3.18 As well as helping to secure the Council's anticipated housing target for the plan period, intensifying the site also attaches benefits in terms of sustainability. By delivering more homes in close proximity to services this reduces the need to travel, thereby reducing the rate of carbon emissions and pressure toward infrastructure in the wider rural area. Moreover, the pressure to develop on greenfield sites is reduced, which consequently reduces any impacts upon landscape, drainage and ecology that could otherwise occur.
- 3.19 Given the above, this representation overall supports the strategy to intensify sites for development, and requests that the emerging LP considers LMA as a possible site to help deliver a further 1,050 dwellings above the 3,500 dwellings already allocated. Supporting such a strategy will comply with Paragraphs 119, 120 c), 124 and 125 of the NPPF.

### Issue S3: Using Brownfield Land for Development

- 3.20 It is positive to see the promotion of previously developed land as a potential strategy for the delivery of growth. As set out in Chapter 2 of this representation, the site in the majority is considered previously developed land. Its development is therefore considered sustainable in its own right and is supported by Paragraphs 119 and 120 c) of the NPPF.
- 3.21 Question Q-S3.2 asks to select an option relevant to the development of brownfield land:
- 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.
  - Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location.
  - Option S3.2c: None of these.
- 3.22 Given the development of LMA, this representation in principle supports options S3.2a and S3.2b and specifically would be supported by option S3.2a which is seen, in our view, the most sustainable option. This is because the delivery and growth of LMA would correspond with the identified growth strategy by redeveloping brownfield land in a sustainable location for development as outlined above. Indeed, this representation agrees with the following statement in the main consultation document which states *"Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development."* As explained above, there is an opportunity to intensify the number of dwellings to be delivered on site, helping to meet the future housing target for the Councils, thereafter according with this statement.

## Issue S4: Growth of Existing Settlements

- 3.23 In principle, this representation supports the growth of existing settlements as a strategy to deliver sustainable development. The main consultation document lists the main towns within the administrative areas but does not highlight the delivery of LMA which is currently being constructed. Given its clear delivery as a new settlement we consider that this Issue can also be applied to LMA, particularly as it will include several services and facilities within it, as well as employment opportunities, making it self-sufficient and sustainable in its own right.
- 3.24 The consultation recognises four factors to help inform the level of growth at existing settlements. These include Connectivity Analysis, Landform Analysis, Density Analysis and consideration of heritage and settlement sensitivity. This representation supports each of these factors as measures to inform growth of existing settlements. It also adds that the proposed increase of housing at LMA would be contained in the site's boundaries such that there would be no uptake of surrounding land and therefore the impact on landscape and ecology would be indiscernible. Further, as demonstrated by the site's compliance with four of the proposed growth strategies, the site is well connected via sustainable transport modes (being on the rail and bus corridors) and within proximity to existing employment opportunities as well proposed to deliver its own employment land.
- 3.25 In answer to question Q-S4.1, this representation agrees that the growth of existing settlements should form part of the overall development strategy and that regard should be had to LMA in this context that has the capacity to deliver additional housing above what is allocated.

## Issue S5: The Potential for New Settlement(s)

- 3.26 The consultation looks at the potential for new settlements and outlines principles for why they are considered a sustainable form of development (quoted below), which this representation agrees with:

*"Whilst it is acknowledged that large-scale development will transform the landscape of the specific area in which it is built, it provides many benefits including a range of new community, employment, and leisure services. At the same time, focusing significant development in new locations can relieve pressure on other areas thus helping to retain their special character and qualities. Many of these places are our existing larger villages and historic market towns. An added benefit is that because of their scale, necessary infrastructure and employment premises can be built in from the beginning helping to ensure that they create or contribute to sustainable communities as well as ensuring a holistic approach when it comes to infrastructure delivery."*

- 3.27 It is noted that this consultation looks at identifying locations for new settlements. It is assumed this is in the context that LMA is already being delivered and these settlements would be additional. As part of this it suggests new settlements should be focused on a site area of 250 hectares, with a density of 40 dwellings per hectare.

- 3.28 As above, there is an opportunity to deliver an additional 1,050 dwellings at LMA, a settlement currently being constructed. Based on Table 3 of the main consultation document, the delivery of circa 1,000 dwellings would be considered a new settlement. With the option of identifying new settlements as part of the emerging development strategy, it is considered the Councils are anticipating the need to deliver a considerable number of dwellings to help meet their future housing targets. To reduce or completely avoid the need to find additional sites that are substantial in size, we suggest that the Councils increase the density of LMA, an emerging settlement that is already considered to be suitable for development. This would equate to the delivery of 4,550 homes overall, 1,050 dwellings above the site's allocation, a scale that would be defined as a new settlement as set out above.
- 3.29 This would be the more sustainable option than finding additional sites for development that will likely create adverse impacts on the landscape and on biodiversity. Indeed, all the potential new settlement locations outlined in Table 4 of the consultation document have been scored negatively in several SA Objectives.
- 3.30 To answer question Q-S5.2, this representation agrees in principle that a new settlement is a sustainable and suitable option for the emerging LP to carry forward in helping to achieve its growth targets. However, for reasons set out above, the Councils should be looking at LMA as a suitable and more sustainable option to help meet the anticipated growth targets by intensifying the delivery of residential development on site.
- 3.31 To answer question Q-S5.3, this representation also supports the delivery of growth along rail corridors. We would also add that the delivery of growth along bus corridors and near employment hubs should be considered as part of this issue.

## Issue S7: Refined Spatial Growth Options

- 3.32 This Issue specifically looks at the five proposed Growth Options. It is positive to see as part of the previous consultation the most preferred Growth Option was based around rail corridors and in addition, a hybrid of Growth Options was also preferred (a mix of rail, bus and employment hubs). Such Growth Options support the delivery of LMA and its proposed intensification.
- 3.33 Comments on each of the proposed Growth Options have already been provided above when addressing Issue I1, details of which can be found within the previous representation (**Appendix 1**). Question Q-S7.2 asks to comment on each Growth Option. For completeness:
- Option 1: Rail Corridors – appropriate strategy.
  - Option 2: Sustainable Travel – appropriate strategy.
  - Option 3: Economy – appropriate strategy.
  - Option 4: Sustainable Travel and Economy – appropriate strategy.

- Option 5: Dispersed – neutral.

## Issue S10: Any Other Development Strategy Issues

- 3.34 Question Q-S10 asks for any further comments to be made about the development distribution strategy for South Warwickshire.
- 3.35 Following on from the comments made to Issues S4 and S5, consideration should be given to directing more development toward new settlements such as LMA. Intensifying the site would help deliver sustainable development in a location already deemed suitable. The proposals will ensure that the additional dwellings are kept within the confines of the site boundary and that the other uses to be delivered (community, employment and open space) will remain.

## 4. SUPPORTING LONG MARSTON AIRFIELD GROWTH POINT

4.1 The following section demonstrates how the delivery of LMA and its intensification will conform with the NPPF's presumption in favour of sustainable development.

### Sustainability

4.2 The presumption in favour of sustainable development sits at the heart of the Framework under Paragraph 10. To achieve this, three objectives are set out in Paragraph 8:

- Economic Objective;
- Social Objective; and
- Environmental Objective.

4.3 The following demonstrates how the increase of residential development at this site would meet those objectives.

### *Economic*

4.4 The development of housing growth and investment into the housing sector brings significant growth to the construction industry. With reference to the "Laying the Foundations: A Housing Strategy for England. HM Government" every £1 million received from new housing development supports 12 net jobs (seven direct and five indirect) for a year, as well as apprenticeship opportunities. A more responsive housing market can play a major role in delivering local economic growth, with housing construction, repairs and maintenance having a direct impact on economic output, accounting for an average 3% of GDP. This would bring prosperity and growth to the local economy.

4.5 A well-functioning housing market is therefore vital to the Country's competitiveness and attractiveness to business, which will drive the economic growth the country needs. The availability of housing in the right places and at the right time will therefore bring economic prosperity to areas, supporting the economic dimension to sustainable development.

4.6 Evidently, delivering additional units at one location that is already allocated in the Stratford-on-Avon Core Strategy and is available, achievable and suitable for development would deliver further financial benefits to Stratford-on-Avon District. This will allow future residents of the residential development to contribute towards the local economy by supporting proposed and existing services and facilities within the local area, boosting the District's GDP and helping maintain LMA as a site for growth.

4.7 In light of the above, the proposal contributes towards building a strong, responsive and competitive economy, delivering major economic benefits.

### *Social*

4.8 The delivery of this site has the potential to supply a significant amount of housing to meet needs of present and future generations, a key principle within the Framework. As such, the site would deliver a mix of housing that would contribute towards meeting the District's identified housing need.

4.9 As part of delivering a policy compliant housing mix, the scheme provides the opportunity to cater for those who are in need of affordable housing, consequently reducing the rate of those that are on housing registers, which is highlighted as a key issue to resolve within the emerging LP.

4.10 The future residents of the site will contribute towards the local communities, and services and facilities that exist within the local area, and will sustain and enhance the proposed services and infrastructure within the LMA.

4.11 This site therefore has the potential to deliver significant social benefits.

### *Environmental*

4.12 By intensifying the development of a site that is in part brownfield land and has had its principle of development already established will reduce the pressure of developing on greenfield land, and will overall provide environmental benefits including a reduction in carbon emissions, and the retainment and enhancement of the local landscape, biodiversity and causing no adverse impact toward flood risk.

4.13 Through its allocation and the numerous planning applications the site has been demonstrated to meet the environmental objective contained within the NPPF.

### *Conclusion*

4.14 The above has demonstrated that through supporting the growth of new settlements and delivering additional housing at LMA, its development will significantly contribute towards the three objectives within the Framework, which in turn achieves sustainable development.



## 5. DELIVERABILITY

- 5.1 Paragraph 60 of the Framework states, *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”* and *“that the needs of groups with specific housing requirements are addressed.”*
- 5.2 Paragraph 68 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) *“specific, deliverable sites for years one to five of the plan period; and*
  - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 5.3 Annex 2 within the Framework defines ‘deliverable’ as the following:
- “To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*
- 5.4 Through its allocation and the progress which has been made to deliver the site, the site should be considered available, suitable and achievable in line with the NPPF.

## 6. CONCLUSION

- 6.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the emerging South Warwickshire Local Plan 2<sup>nd</sup> Issues and Options Consultation (Regulation 18).
- 6.2 Overall, this representation has been made to support the continued promotion of LMA as a new settlement with its expected delivery of 3,500 new homes alongside 13 ha of employment land, community and leisure facilities.
- 6.3 Relevant to the delivery of LMA, this representation supports Rail Corridors, Sustainable Travel, Economy, and Sustainable Travel and Economy as proposed within the emerging LP, demonstrating that delivering development in line with these strategies will help deliver sustainable growth across both local authority areas. It will concentrate development in locations that will retain and enhance public transportation as well as support socio-economic growth and cater toward the local affordable housing and job needs.
- 6.4 The above has demonstrated that LMA can be delivered in line with these Growth Options, which are preferable in terms of sustainability and ability to tackle climate change. Moreover, this representation supports the Council's suggestion to deliver growth in the form of new settlements which will ultimately allow both Council's to deliver a significant amount of growth sustainably, reflecting the positive climate change impacts associated with the preferred Growth Options.
- 6.5 A number of questions have been answered in response to the Council's issues and options. All of which have been answered in the context of supporting the principle of new settlements and also intensifying their growth to help the Councils deliver their future housing need. This strategy will help deliver sustainable development, according with the relevant paragraphs of the NPPF.

### **Recommendation**

- 6.6 It is recommended that the site be allocated to deliver an additional 1,050 new homes above the 3,500 dwellings allocated at LMA, supporting the Council's aim to encourage densification as advocated within Paragraph 122 of the NPPF. This representation explains how this can be achieved at LMA, which in summary will include the promotion of brownfield land and accommodating residential use amongst the mixed use development proposed; both of which are concepts that will help drive the housing figures upwards.
- 6.7 This representation also assesses how the additional development will help meet the economic, social and environmental objectives of the NPPF, comprising a form of sustainable development.
- 6.8 Finally, it has been demonstrated that the site is available, suitable and achievable for an additional 1,050 new homes above its current allocation, which is evident through the 400 homes and 4,000 m<sup>2</sup> of employment use that is already being constructed on site.

6.9 In light of the above we respectfully request the Council look upon this representation favourably.

RIDGE



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# APPENDIX 1: REPRESENTATION TO STRAFORD UPON AVON' S EMERGING SAP CONSULTATION (JULY 2022)



# RIDGE

**REVISED PREFERRED OPTIONS  
CONSULTATION (REGULATION  
18) IN RESPECT OF THE SITE  
ALLOCATIONS PLAN (SAP) FOR  
STRATFORD-ON-AVON DISTRICT  
COUNCIL**

**HG HODGES LIMITED**  
July 2022

# REVISED PREFERRED OPTIONS CONSULTATION (REGULATION 18) IN RESPECT OF THE SITE ALLOCATIONS PLAN (SAP) FOR STRATFORD-ON- AVON DISTRICT COUNCIL

July 2022

Prepared for

HG Hodges Ltd.

## Prepared by

Ridge and Partners LLP  
3<sup>rd</sup> Floor, Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX  
Tel: 01242 230066

## Contact

Guy Wakefield  
Partner  
[gwakefield@ridge.co.uk](mailto:gwakefield@ridge.co.uk)

Claudia Jones  
Senior Planner  
[cjones@ridge.co.uk](mailto:cjones@ridge.co.uk)

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# 1. INTRODUCTION

- 1.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the Site Allocations Plan (SAP) Revised Preferred Options consultation (Regulation 18) for Stratford-on-Avon District Council. The consultation runs between 16<sup>th</sup> June and 29<sup>th</sup> July 2022. This consultation follows the Preferred Options consultation that ran between October and December 2020 to which representations were submitted on behalf of our client (see **Appendix 1**).
- 1.2 Overall, this statement reiterates the points made within the previous representation, continuing to support the additional units that are proposed to be allocated south of Stratford-on-Avon (circa 750 dwellings) and in particular the 500 dwellings proposed to be allocated within Proposal RURAL.5 which relates to the Long Marston Airfield (LMA) allocation (as identified in the Core Strategy).
- 1.3 Modifications have been made to the Revised Preferred Options consultation document following the first Regulation 18 consultation. Those relevant to this representation include:
- *“Revisions to the policies on Reserve Housing Sites;*
  - *Amended basis for identifying Reserve Housing Sites;*
  - *Adjustment to the mechanisms for releasing Reserve Housing Sites; and*
  - *Changes to a number of the Specific Site Proposals, particularly in relation to Meon Vale.”*
- 1.4 Whilst the modified consultation document continues to allocate 500 additional dwellings at LMA it has not been amended to deliver all 750 dwellings proposed towards south of Stratford-on-Avon to that allocation as per our previous representation submitted. This statement reiterates why the residual 250 dwellings should be allocated to the LMA allocation having regard to its allocation in the current Core Strategy and therefore its accordence with the adopted spatial strategy. In doing so, this document comments upon the Council’s proposed strategy for releasing reserve housing sites having particular regard to reserve housing site STR.B ‘East of Shipston Road, Stratford-upon-Avon’.
- 1.5 In addition, it is noted that the Meon Vale allocation (Proposal RURAL.4) previously proposed to deliver up to 300 dwellings has been amended to be allocated as Local Green Space. This document will also comment upon this amendment and the reallocation of those 300 dwellings, contending they should also be delivered toward LMA.

## ***Long Marston Airfield Garden Village Background***

- 1.6 LMA is allocated within the adopted Core Strategy as a new settlement seeking to deliver 3,500 new dwellings. In January 2017, LMA was selected as one of 14 Garden Villages in the country. Paragraphs 6.11.10 to 6.11.14 of the Core Strategy set out the vision for the development, aiming to achieve *“a mixed-use development which will provide a range of accessible services, facilities*

*and employment opportunities that are convenient and accessible to the community itself and the local area.”*

- 1.7 At paragraph 6.11.5, the Council make clear that the Garden Village will help meet the overall housing requirement for the District during the current plan period and beyond as well as delivering a significant amount of employment land. Clearly, the Council consider the delivery of this site a significant driver in helping to meet their overall housing target, which is reflected in the Revised Preferred Options consultation document where an additional 500 dwellings are proposed to come forward to help support necessary infrastructure.

## Statement Structure

- 1.8 Following this introduction, **Section 2** refers to site context and relevant planning history whilst **Section 3** provides an overview of the planning policy context and identifies the development plan policies and material considerations that are pertinent to the consideration of the site for the delivery of increased housing numbers. **Section 4** sets out our support for the additional dwellings to be allocated south of Stratford-on-Avon and considers the suitability of the site for accommodating the additional 250 dwellings on top of the proposed 500 at LMA. It also comments upon the replacement of 300 additional dwellings at Meon Vale to Local Green Space, promoting the reallocation of those dwellings to LMA. Finally, **Section 5** sets out the deliverability of the site and **Section 6** provides a summary and conclusion.

## 2. SITE AND BACKGROUND CONTEXT

- 2.1 A detailed description of the site's context and relevant planning history can be found within Section 2 of the previous representation contained within **Appendix 1**.
- 2.2 Since the submission of that representation there have been no material updates to the planning history attached to the site.

### 3. PLANNING POLICY CONTEXT

- 3.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2 The Development Plan includes the Stratford-on-Avon Core Strategy 2011 to 2031 (adopted 11<sup>th</sup> July 2016). A copy of development plan policies relevant to the site can be found in Section 3 of the previous representation attached at **Appendix 1**.
- 3.3 Material considerations include national guidance set out within the National Planning Policy Framework (NPPF), revised in July 2021, and the revised Preferred Options consultation document in respect of the emerging Sites Allocations Plan (SAP). Those relevant to the proposed allocation at LMA are set out below.

#### The National Planning Policy Framework (NPPF)

- 3.4 **Paragraph 7** is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** sets out that the planning system has three overarching interrelated sustainable objectives, which are economic, social and environmental.
- 3.5 As set out in **Paragraph 10**, so that sustainable development is pursued in a positive way, at the heart of NPPF is a presumption in favour of sustainable development. **Paragraph 11** states plans should apply a presumption in favour of sustainable development. For plan-making, it is required all plans should promote sustainable patterns of development that seeks to meet the development needs of the area, align growth and infrastructure, improve the environment, mitigate climate change and adapt to its effects.
- 3.6 **Paragraph 60** sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where needed.
- 3.7 **Paragraph 73** states that:

*"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

- a) *consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."*

3.8 **Paragraph 79** states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

3.9 **Paragraph 105** states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

3.10 **Paragraph 110** states in assessing sites that may be allocated for development in places, it should be ensured that:

- a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*

*d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

3.11 **Paragraph 119** sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

3.12 **Paragraph 122** states that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

3.13 **Paragraph 124** states that planning policies and decisions should support development that makes efficient use of land, taking into account:

*a) “the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed, attractive and healthy places.”*

## Site Allocations Plan Revised Preferred Options Consultation document (June 2022)

3.14 The following sets out relevant emerging policies from the Site Allocations Plan Revised Preferred Options Consultation document (June 2022).

3.15 As part of its emerging vision, the SAP states LMA *“will have been developed to provide about 2,100 homes by 2031, along with a range of new facilities and services including education, health and leisure. It will benefit from extensive areas of open space and sustainable transport links to Stratford-upon-Avon.”*

3.16 **Policy SAP.1** refers to the identified reserved housing sites. The revised version of the consultation document removes reference to the approximate number of dwellings identified within the reserve housing sites, and states:

*“Reserve sites will be released if the Council’s monitoring shows that there is, or is likely to be, an undersupply of housing or if the Council accepts that additional housing is required to be accommodated within the District by 2031.”*

3.17 It then goes onto reiterate the policy wording of Policy CS.16.

3.18 The accompanying text highlights that due to the emerging South Warwickshire Local Plan (SWLP), the releasing of reserved housing sites will focus on a short-term period until the SWLP is adopted. The accompanying text has also been updated to highlight that the capacity of each reserve housing site should deliver up to 20% of the total housing requirement for that individual settlement, and that the site should be capable of being delivered within the next five years or so.

3.19 **Policy SAP.3** provides guidance on the release of Reserved Housing sites. That policy has been amended to reflect the updated approach on the release of reserve housing sites. In summary, the emerging SAP will be responsible to release reserve housing sites to rectify an identified shortfall in housing delivery:

*“Reserve sites will be released for this purpose when the Council calculates that either its 5 year supply falls below 5.5 years (applying the appropriate buffer), or its Housing Delivery Test trajectory shows that the delivery is expected to fall below 100% in the following three years.*

*If a shortfall is identified due to either of the above circumstances, the Council will consider releasing certain reserve housing sites from the first tranche in Annex 1. The release of appropriate sites to meet this purpose will be dependent on the scale of any shortfall in supply.”*

3.20 The Council does not now anticipate that reserve housing sites contained in the first tranche will need to be released for the following reasons, and considers that will be the role of the SWLP once adopted:

- *“To respond to the growth in jobs by Jaguar Land Rover on land at Gaydon/Lighthorne Heath.*
- *To contribute to meeting a shortfall in housing arising from within the Coventry & Warwickshire Housing Market Area.*
- *To contribute to meeting a shortfall in housing arising from outside the Coventry & Warwickshire Housing Market Area.”*

3.21 Paragraph 2.3.3 of the emerging SAP makes clear that the *“focus in the short-term is now on maintaining a 5 year housing land supply in the District and to provide for an appropriate level of contribution to the housing needs of the Greater Birmingham & Black Country HMA.”*

3.22 **Policy SAP.4** outlines the reserve housing sites in order to meet the needs of the Greater Birmingham and Black County HMA, which includes STR.B 'East of Shipston Road, Stratford-upon-Avon' set to deliver 210 dwellings.

3.23 **Proposal SUA.5** sets out details of the East of Shipston Road allocation, which is seeking to deliver approximately 3 hectares of employment land. Details of this allocation can be found below.

| <b>Proposal SUA.5: East of Shipston Road, Stratford-upon-Avon</b> |  |
|---|--|
| Where it is to be delivered                                       | East of Shipston Road<br>Approx. 3 hectares  |
| What is to be delivered   | The relocation of specific businesses from Wharf Road within the Canal Quarter Regeneration Zone.  |
| When it is to be delivered  | Phase 2 – 3 (2016/17 – 2025/26)  |
| How it is to be delivered   | Private sector   |
| Specific requirements   | <ul style="list-style-type: none"> <li>• provide a satisfactory access off Shipston Road to be identified in a Transport Assessment mitigate impact on the local and strategic road network where identified in a detailed transport assessment which should accompany a planning application</li> <li>• provide pedestrian and cycle access to the adjacent Rosebird Centre <u>and the wider network of existing routes</u></li> <li>• provide extensive structural landscaping around the boundaries of the site</li> <li>• incorporate small (less than 3,000sqft) business units aimed at business start-ups</li> <li>• locate buildings and activities on the site to avoid unacceptable impact on neighbouring existing and proposed residential uses</li> <li>• a Legal Agreement to ensure that the occupation of the site is restricted to specific named companies relocating from the Canal Quarter Regeneration Zone</li> <li>• a marketing exercise to be undertaken for an agreed period of time following the commencement of development</li> <li>• an application for planning consent on this site should be sought in tandem with any application for redevelopment of the Wharf Road site to ensure that the Council can ensure, as far as is practicable, that the relocated employment uses are delivered.</li> <li>• if necessary, the commissioning of independent consultants to confirm the viability of any proposal</li> </ul> |
|   | <ul style="list-style-type: none"> <li>• if necessary, the commissioning of independent consultants to confirm the viability of any proposal</li> </ul>  |

3.24 **Proposal RURAL.4** relates to Meon Vale which is now proposed to be allocated as Local Green Space rather than up to 300 homes due to the site owners not wishing the pursue the site for housing. The details of Proposal RURAL.4 are below:



| <b><u>Proposal RURAL.4: Meon Vale Local Green Space</u></b> |   |
|---|---|
| <u>Where it is to be delivered</u>                          | <u>Meon Vale, Long Marston Parish</u><br><u>Approx. 48 hectares</u>   |
| <u>What is to be delivered</u>                              | <u>Local Green Space</u>  |
| <u>When it is to be delivered</u>                           | <u>Ongoing</u>  |
| <u>How it is to be delivered</u>                            | <u>Responsible agencies, local community</u>  |
| <u>Specific requirements</u>                                | <ul style="list-style-type: none"> <li>• <u>prevent development on the Local Green Space that would harm its special character or its significance and value to the local community, unless there are very special circumstances which outweigh the harm to it</u></li> <li>• <u>protect and enhance the biodiversity value and interest of the area</u></li> <li>• <u>protect significant trees and secure additional tree planting</u></li> <li>• <u>safeguard and improve the accessibility of the woodland</u></li> <li>• <u>use the woodland, wetland and open areas as an educational resource</u></li> </ul> |

3.25 **Proposal RURAL.5** sets out details of the proposed allocation for LMA Phase 1b which can be found below.

### Proposal RURAL.5: Long Marston Airfield Phase 1b

|                             |   |
|-----------------------------|---|
| Where it is to be delivered | Long Marston Airfield Garden Village<br>Approx. 37 hectares   |
| What is to be delivered     | Up to 500 homes, of which 35% are to be provided as affordable housing in accordance with Core Strategy Policy CS.18.<br><br>Approx. 6 hectares of employment land.   |
| When it is to be delivered  | Phase 3 – 4 (2020/21 – 2030/31)   |
| How it is to be delivered   | Private sector  |
| Specific requirements       | <ul style="list-style-type: none"><li>• ensure development is in accordance with the Supplementary Planning Document Framework Masterplan</li><li>• ensure full integration of the different phases of development, including structural landscaping and provision of vehicular, pedestrian and cycle connections between phases</li><li>• provide land for a primary school at the southern end of the site</li><li>• incorporate an open space network throughout the development</li><li>• provide an additional vehicular access from Campden Road</li><li>• undertake a comprehensive Transport Assessment to identify impact on the highway network and improvements required</li></ul> |

## 4. SUPPORTING AND ACCOMMODATING ADDITIONAL HOUSING SOUTH OF STRATFORD-ON-AVON

- 4.1 We continue to support the delivery of 750 additional homes in the 'south of Stratford-on-Avon' area and in particular the 500 additional homes that are proposed to be allocated in LMA. However, as per the previous representation submitted (**Appendix 1**) it was contended that all 750 dwellings could be allocated at LMA. To demonstrate this, it was concluded that the delivery of those 250 dwellings above the 500 dwellings would not have a significant adverse impact on the highway network utilising technical evidence prepared by Vectos Microsim which supports the emerging SAP. Indeed not only would those 250 dwellings be best served supporting one of the District's largest strategic allocations, but it is also unclear where those residual 250 dwellings have been allocated to, particularly mindful of the de-allocation of the draft allocation at Meon Vale.
- 4.2 It is therefore unfortunate that the policy wording for Proposal RURAL.5 has not been revised as part of this consultation to increase the number of homes to be delivered at LMA from 500 to 750. It remains the case that the delivery of all 750 dwellings will not create severe overcapacity issues on the existing highway network. It is noted Vectos Microsim has provided an updated note (June 2021) which took account of revisions to the SAP and removed the South Western Relief Road (SWRR) in its equation. That note confirms *"that the inclusion of the SAP sites within the Core Strategy model are unlikely to elicit any notable impact or worsening of the network performance relative to the updated Core Strategy conditions."* This is reflected in the emerging SAP's continuation to deliver additional housing within south of Stratford-upon-Avon.
- 4.3 Amendments have been made to the accompanying text which is supported:

*"7.12.7 However, the most recent transport assessment ~~undertaken to support the 2019 Proposed Submission consultation and further work~~ undertaken to inform the preparation of this version of the Site Allocations Plan confirms that there is some additional capacity within the highway network to enable further development for about 750 dwellings to the south of Stratford-upon-Avon in advance of the SWRR being constructed. This assessment is published as part of the technical evidence supporting this Plan.*

*7.12.8 The Council considers that the bulk of this spare capacity should be ascribed to Long Marston Airfield as opposed to alternative reserve sites. This is because Proposal LMA is an existing Core Strategy allocation which the Council should deliver in the first instance. Indeed, it would be perverse to identify reserve sites, that are only to be released if needed, in preference to additional land at LMA unless there was an overriding reason for doing so. This is the case with land East of Shipston Road at Stratford-upon-Avon because it will assist in the delivery of the Canal Quarter Regeneration Zone which is identified in the Core Strategy, but which by their very identification could cause them to be brought forward, because they undermined the Core Strategy itself.*

- 4.4 Taken the above into account, it is encouraging that the Council continue to acknowledge that the status of LMA against the reserve housing sites is greater and that the 'preference' is for 'the bulk' of spare capacity to be accommodated at LMA. We also agree in principle with the modification above that reserve housing sites should only be released if there is an overriding reason for doing so, having regard to the Council's responsibility to help meet any identified shortfall in housing delivery in the short term to 1) help maintain a five year housing land supply; and 2) meet the housing need in the Greater Birmingham & Black Country HMA (Policy SAP.3). However, it is not considered there is an 'overriding reason' for the delivery of the reserve housing site 'Land East of Shipston Road' (ref. STR.B) as explained below.
- 4.5 It is understood that 'Land East of Shipston Road' is to act as enabling development to the 'East of Shipston Road' allocation which is proposed to accommodate the relocation of businesses from Wharf Road within the Canal Quarter Regeneration Zone. Paragraph 7.3.2 of the emerging SAP is clear that the 'East of Shipston Road' allocation is in addition to proposed allocation 'Land at Alcester Road' (Proposal SUA.2) and 'Atherstone Airfield' (Proposal SUA.4) to accommodate the relocation of businesses along Wharf Road. However, the reason for this additional allocation is that *"one of the main companies affected by the Canal Quarter redevelopment would not consider, for operational reasons, moving to either of these sites."* It is also clear at paragraph 7.3.3 of the emerging SAP that *"The allocation of the site at this time is justified solely to assist in delivering the objectives of the Canal Quarter Regeneration Zone and no other purpose"* [own emphasis]. Thus, the only reason 'Land East of Shipston Road' is proposed to be released is to enable proposed allocation 'East of Shipston Road' to come forward which will assist the delivery of the Canal Quarter Regeneration Zone.
- 4.6 We do not disagree that the Canal Quarter Regeneration Zone should be delivered given its compliance with the current spatial strategy. However, as set out at paragraph 4.14 of our previous representation, there is sufficient capacity to accommodate the 'approximately 3 hectares' of employment land proposed at 'East of Shipston Road' at LMA, noting its proposal to deliver approximately 6 hectares of employment land under Proposal RURAL.5. Relocating these businesses to LMA accords with the current spatial strategy, rather than having to introduce a new allocation which is reliant on the delivery of a reserve housing site for its development to accommodate the relocated businesses. Consequently, this approach would help deliver both LMA and the Canal Quarter Regeneration Zone in the Core Strategy. As there is no comment on the possibility of relocating these businesses at LMA in the emerging SAP, it is respectfully requested that this is considered by the Council in the next consultation for reasons above.

## Reallocation of housing at Meon Vale

- 4.7 Proposal RURAL.4 'Meon Vale' is now proposed to be delivered as Local Green Space rather than 300 additional dwellings as proposed in the previous consultation, the reason being that the site promoters no longer want to pursue it for housing.

- 4.8 It is not clear whether the additional 300 dwellings are being distributed elsewhere. No increase has been made to other proposed allocations. It remains the case that the Council should look to existing allocations such as LMA to deliver additional housing rather than reserve housing sites.
- 4.9 Given the above, it is requested that the additional 300 dwellings is allocated to LMA which would support the Council's current spatial strategy. This would result in a total of 1,050 additional dwellings being allocated toward LMA, taking in account the additional 750 dwellings also requested to be allocated to LMA.

## Compliance with the adopted Spatial Strategy

- 4.10 Turning to the Core Strategy and the existing LMA allocation (Proposal LMA), it is clear that the LMA will seek to deliver approximately 3,500 dwellings, with 2,100 of those dwellings to be delivered by 2031, a significant delivery of housing for the District. Once in place, this new settlement will provide a number of social and economic benefits to the local area and wider district. Therefore, ensuring the delivery of this site is a significant factor for the Council to consider in helping meet their anticipated housing need, having regard to Paragraph 73 of the NPPF.
- 4.11 Further, there is the opportunity for the delivery of LMA to assist with the delivery of the Canal Quarter Regeneration Zone through the relocation of businesses from Wharf Road to LMA. This further supports the Council's adopted spatial strategy.
- 4.12 As per paragraph 4.15 of our previous representation, there are significant benefits in allowing for additional housing to be delivered at LMA. Also allowing for the phases of LMA to be delivered at a faster rate will allow the required infrastructure improvements to be delivered at a faster rate, creating further social and economic benefits.
- 4.13 Taking the above into account, the following reiterates the sustainability of LMA having regard to the three objectives contained in the NPPF in order to achieve sustainable development.

## Sustainability

- 4.1 The presumption in favour of sustainable development sits at the heart of the Framework under Paragraph 10. To achieve this, three objectives are set out in Paragraph 8:
- Economic Objective;
  - Social Objective; and
  - Environmental Objective.
- 4.2 The following demonstrates how residential development at this site would meet those objectives.

### **Economic**

- 4.3 The development of housing growth and investment into the housing sector brings significant growth to the construction industry. With reference to the “Laying the Foundations: A Housing Strategy for England. HM Government” every £1 million received from new housing development supports 12 net jobs (seven direct and five indirect) for a year, as well as apprenticeship opportunities. A more responsive housing market can play a major role in delivering local economic growth, with housing construction, repairs and maintenance having a direct impact on economic output, accounting for an average 3% of GDP. This would bring prosperity and growth to the local economy.
- 4.4 A well-functioning housing market is therefore vital to the Country’s competitiveness and attractiveness to business, which will drive the economic growth the country needs. The availability of housing in the right places and at the right time will therefore bring economic prosperity to areas, supporting the economic dimension to sustainable development.
- 4.5 Evidently, delivering additional units at one location and accommodating employment development that is already allocated in the Core Strategy and available, achievable and suitable for development could deliver major financial benefits to Stratford-on-Avon District sooner than if the housing was to be distributed. This will allow future residents of the residential development to contribute towards the local economy by supporting proposed and existing services and facilities within the local area, boosting the District’s GDP and helping maintain LMA as a site for growth.
- 4.6 In light of the above, the proposal contributes towards building a strong, responsive and competitive economy, delivering major economic benefits.

## **Social**

- 4.7 The delivery of this site has the potential to supply a significant amount of housing to meet needs of present and future generations, a key principle within the Framework, and at a quicker rate. As such, the site would deliver a mix of housing that would contribute towards meeting the District’s identified housing need.
- 4.8 As part of delivering a policy compliant housing mix, the scheme provides the opportunity to cater for those who are in need of affordable housing, consequently reducing the rate of those that are on housing registers, again at a faster rate.
- 4.9 The future residents of the site will contribute towards the local communities, and services and facilities that exist within the local area, and will sustain and enhance the proposed services and infrastructure within the LMA. As above, enabling the LMA to be delivered at a faster rate will ensure the infrastructure is in place faster to accommodate the allocation and support the wider area.
- 4.10 This site therefore has the potential to deliver significant social benefits.

## **Environmental**

- 4.11 Through its allocation and the numerous planning applications the site has been demonstrated to meet the environmental objective contained within the NPPF.
- 4.12 The above has demonstrated that through delivering additional housing at the site at a faster rate will significantly contribute towards the three objectives within the Framework, which in turn achieves sustainable development.

## 5. DELIVERABILITY

- 5.1 Paragraph 60 of the Framework states, *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”* and *“that the needs of groups with specific housing requirements are addressed.”*
- 5.2 Paragraph 68 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) *“specific, deliverable sites for years one to five of the plan period; and*
  - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 5.3 Annex 2 within the Framework defines ‘deliverable’ as the following:
- “To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*
- 5.4 Through its allocation and the progress which has been made to deliver the site, the site can be considered available, suitable and achievable in line with the NPPF.



## 6. CONCLUSION AND RECOMMENDATIONS

- 6.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the Site Allocations Plan (SAP) Revised Preferred Options consultation (Regulation 18) for Stratford-on-Avon District Council.
- 6.2 Overall, this representation supports the additional units that are proposed to be allocated south of Stratford-upon-Avon and also supports the 500 dwellings proposed to be allocated at LMA within Proposal RURAL.5.
- 6.3 As previously contended, this representation also demonstrates why the residual 250 dwellings should be allocated at LMA rather than toward reserving house sites south of Stratford-upon-Avon along with the additional 500 dwellings. Updated highways evidence highlights that there would still not be any notable impact or worsening of the network relative to the revised consultation document, which is reflected in the SAP's continuation to allocate an additional 750 dwellings to south of Stratford-upon-Avon.
- 6.4 The accompanying text to Proposal RURAL.5 has been amended which emphasises the preference toward allocating all 750 homes to LMA rather than reserve housing sites, which is supported. It then goes on to explain that there is an overriding reason to release reserve housing site 'Land East of Shipston Road, Stratford-upon-Avon' due to its assistance to deliver the 'East of Shipston Road' employment allocation and thereafter the Canal Quarter Regeneration Zone allocation in the Core Strategy. This representation explains that LMA can accommodate the employment proposed to be allocated at East of Shipston Road, removing it as a proposed allocation in the emerging SAP, and thereafter removing the need for reserve housing site 'Land East of Shipston Road'. Thus, all 750 dwellings can be allocated to LMA, the Council's preferred strategy.
- 6.5 In addition, this representation comments upon the loss of 300 dwellings previously proposed to be allocated at Meon Vale, concluding that LMA can accommodate these additional dwellings in addition to the 750 requested to be delivered. In total, LMA could accommodate the delivery of an additional 1,050 dwellings.
- 6.6 The above requests comply with the adopted spatial strategy given the current allocation of LMA in the Core Strategy and its expectation to deliver 3,500 dwellings overall, with 2,100 of those dwellings to be delivered by 2031. Further, reallocating the businesses from Wharf Road to LMA would help deliver both LMA and the Canal Quarter Regeneration Zone, negating the need to release reserve housing sites.
- 6.7 Finally, for completeness, this representation has demonstrated the sustainability of delivering additional housing and employment at LMA, according with the three objectives with Paragraph 8 of the NPPF, and highlighted its deliverability in line with the definition within the NPPF.

6.8 The following provides recommendations to assist the Council in delivering the objectives of this representation.

## Recommendations

- 6.9 As above, we support the Council's proposal to deliver an additional 750 dwellings south of Stratford-upon-Avon, however, we advocate that the entire 750 units should be allocated at LMA. To assist in this, we propose that existing businesses from the Canal Quarter are relocated to LMA rather than at the allocation 'East of Shipston Road' to negate the need to deliver additional housing at this reserved housing site.
- 6.10 We propose that the 300 dwellings originally proposed to be allocated at Meon Vale but now lost to Local Green Space should also be delivered to LMA.
- 6.11 A total of 1,050 additional dwellings can therefore be delivered at LMA. This will enable a quicker delivery of housing numbers but also employment land and supporting infrastructure.
- 6.12 In light of the above we respectfully request the Council look upon this representation favourably.

RIDGE



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# APPENDIX 1

Previous representation in response to  
Regulation 18 Site Allocations Plan  
(SAP) Preferred Options Consultation



# RIDGE

**REGULATION 18 SITE  
ALLOCATIONS PLAN (SAP)  
PREFERRED OPTIONS  
CONSULTATION FOR  
STRATFORD-ON-AVON DISTRICT  
COUNCIL**

**HG HODGES LIMITED**  
December 2020

# REGULATION 18 SITE ALLOCATIONS PLAN (SAP) PREFERRED OPTIONS CONSULTATION FOR STRATFORD-ON-AVON DISTRICT COUNCIL FOR HG HODGES LIMITED

December 2020

Prepared for

HG Hodges Ltd.

Prepared by

Ridge and Partners LLP  
3<sup>rd</sup> Floor, Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX  
Tel: 01242 230066

Contact

Guy Wakefield  
Partner  
gwakefield@ridge.co.uk

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# 1. INTRODUCTION

- 1.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the Site Allocations Plan (SAP) Preferred Options Consultation Regulation 18 held by Stratford-on-Avon District Council. The consultation runs between 29<sup>th</sup> October to 18<sup>th</sup> December 2020.
- 1.2 Overall, this statement has been made to support the additional units that are proposed to be allocated south of Stratford-on-Avon (circa 750 dwellings). This statement supports the 500 dwellings that are proposed to be allocated within Proposal RURAL.5 which relates to the Long Marston Airfield (LMA) allocation (as identified in the Core Strategy).
- 1.3 Notwithstanding the above, this statement demonstrates why the residual 250 dwellings should be allocated to the LMA allocation. As things currently stand the SAP is proposing that those 250 dwellings be allocated to new 'reserve' housing sites rather than an existing strategic allocated site and, which will only come forward if the Council's housing numbers deem it necessary. In this context the question to be asked is whether the full 750 dwellings would be better placed in coming forward now (or when the Plan is adopted) to support an existing strategic allocated site rather than on new sites (not assessed as part of the existing DP) and only as and when the Council's housing numbers deem it to be necessary. We say the answer should be to apportion all 750 to LMA. Indeed, it is worth noting that the only reason the numbers have been constrained at LMA is because of the highway constraint. Now that that constraint has changed, surely the capacity which exists is best distributed to support the strategic allocation and in doing so help its overall deliverability.
- 1.4 In addition to the above, this representation also refers to the allocation at Meon Vale.

## ***Long Marston Airfield Garden Village Background***

- 1.5 LMA is allocated within the adopted Core Strategy as a new settlement seeking to deliver 3,500 new dwellings. In January 2017, LMA was selected as one of 14 Garden Villages in the country. Paragraphs 6.11.10 to 6.11.14 of the Core Strategy set out the vision for the development, aiming to achieve *"a mixed-use development which will provide a range of accessible services, facilities and employment opportunities that are convenient and accessible to the community itself and the local area."*
- 1.6 At paragraph 6.11.5, the Council make clear that the Garden Village will help meet the overall housing requirement for the District during the current plan period and beyond as well as delivering a significant amount of employment land. Clearly, the Council consider the delivery of this site a significant driver in helping to meet their overall housing target. This is further supported within the Preferred Options Consultation summary leaflet where the Council consider an additional 500 dwellings can come forward at this proposed allocation to help support necessary infrastructure.



## Statement Structure

- 1.7 Following this introduction, **Section 2** provides an overview of the site context whilst **Section 3** provides an overview of the planning policy context and identifies the development plan policies and material considerations that are pertinent to the consideration of the site for the delivery of increased housing numbers within the extant outline planning permission area. **Section 4** sets out our support for the additional dwellings to be allocated south of Stratford-on-Avon and considers the suitability of the site for accommodating the additional 250 dwellings on top of the proposed 500 at LMA. **Section 5** considers the proposed allocation of Meon Vale. **Section 6** sets out the deliverability of the site and **Section 7** provides a summary and conclusion.

## 2. SITE AND BACKGROUND CONTEXT

### Site Description and Location

- 2.1 The site sits just east of the village of Long Marston and is located approximately 3 miles south of Stratford-upon-Avon. It measures a size of approximately 205 hectares.
- 2.2 The majority of the site comprises a former airfield once used as a training station for the RAF between 1941 and 1954. It contains a number of runways with grassed areas and a small number of remaining aircraft hangers. Toward the western part of the airfield is an earth embankment once used as a noise bund. The western parcel of the site also includes undeveloped land which sits outside the curtilage of the airfield. That land comprises a mix of agricultural fields dissected by hedgerows/trees, a woodland and a pond. Along the site's western boundary is a brook.
- 2.3 Immediately to the south of the site are open agricultural fields. Further south lies the former Long Marston Depot which is currently considered as a 'Large Rural Brownfield Site' for mixed development under Policy AS.11. The emerging SAP proposed the allocation of this site, under Proposal RURAL.4, for the development of up to 300 homes.
- 2.4 Along the east of the site lies the B4632 Campden Road. Toward the west of the site lies the former Stratford-to-Honeybourne railway line which is used for walking, cycling and horse riding, otherwise known as the "The Greenway".

### Planning History

- 2.5 As above, the site is allocated as a Garden Village, seeking to deliver 3,500 dwellings alongside a mix of other employment and commercial uses.
- 2.6 On 28<sup>th</sup> February 2017, outline planning permission was granted for the first phase of its development which proposed for the erection of up to 400 dwellings, 4,000 m<sup>2</sup> of employment use (Class B1(a)-(c) Uses) and a community hub (including Classes A1-A5/B1(a)/C3/D1/D2) alongside the provision of open space and access **(Ref. 14/03579/OUT)**.
- 2.7 A subsequent reserved matters application was submitted and then approved on 14<sup>th</sup> March 2019 in respect of details relating to access, appearance, landscaping, layout and scale **(Ref. 17/03258/REM)**.
- 2.8 Several non-material amendments have since been submitted and approved **(Ref. 20/03179/AMD; 20/03178/AMD; 20/00385/AMD; 20/00295/AMD; 20/00294/AMD)**.

### Designations

- 2.9 The site does not contain any statutory landscape or historic designations.

2.10 The site in its majority sits within Flood Zone 1 and therefore is at the lowest risk of flooding. However, where the brook sits along the western boundary of the site that land comprises Flood Zone 3 and is at the highest probability of flooding.

### 3. PLANNING POLICY CONTEXT

- 3.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2 The Development Plan includes the Stratford-on-Avon Core Strategy 2011 to 2031 (adopted 11<sup>th</sup> July 2016).
- 3.3 Material considerations in this instance include national guidance set out within the National Planning Policy Framework (NPPF), published February 2019, and the emerging Sites Allocations Plan (SAP).

#### Stratford-on-Avon Core Strategy

- 3.4 The Core Strategy sets out the spatial strategy for development within the District.
- 3.5 **Policy CS.1** echoes the presumption in favour of sustainable development as set in the National Planning Policy Framework.
- 3.6 **Policy CS.15** states the distribution of development in Stratford-on-Avon District during the plan period 2011 to 2031 will be based on a pattern of balanced dispersal, in accordance with the distinctive character and function of the wide range of sustainable locations across District. Part C of that policy focuses on new settlements and includes LMA. It defines LMA as a sustainable growth point for the creation of new communities, providing for a range of uses and making a significant contribution to meeting the housing needs of the District. Part E of that policy also considers 'Large Rural Brownfield Sites' which aim to encourage the effective use of previously developed land.
- 3.7 **Policy CS.16** sets out the District's housing requirement stating a provision will be made for at least 14,600 additional homes. Approximately 2,100 homes are to be distributed at LMA and approximately 1,245 homes are to be distributed at 'Large Rural Brownfield Sites'. Part D of that policy discusses the Site Allocations Plan and its role in identifying Reserve Housing Sites. That policy defines these as sites that will provide *"flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031."* That policy then provides circumstances in which Reserved Housing Sites will be released:
- *"To rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in Stratford-on-Avon District;*

- To contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath;
- To contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities; and
- To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District.”

3.8 **Proposal SUA.1: Canal Quarter Regeneration** contains an allocation for a mix of uses. That policy includes a description of what can be achieved on site. A copy of this can be found below.

| <b>Proposal SUA.1: Canal Quarter Regeneration Zone</b> |  |
|--|--|
| Where it is to be delivered                            | Land at Western Road, Wharf Road, Timothy’s Bridge Road and Masons Road<br>Approx. 27 hectares (gross)   |
| What is to be delivered                                | <ul style="list-style-type: none"> <li>• Housing – approx. 650 dwellings by 2031 of which up to 25% will be provided as a mix of affordable homes</li> <li>• 9,000sqm of Class B1 distributed throughout the Canal Quarter</li> <li>• Linear park alongside canal</li> <li>• Multi-purpose community facility (if required)</li> </ul>   |
| When it is to be delivered                             | Phase 2 (2016/17 - 2020/21) approx. 80 homes<br>Phase 3 (2021/22 - 2025/26) approx. 270 homes<br>Phase 4 (2026/27 - 2030/31) approx. 300 homes<br>Post 2031 approx. 350 homes  |
| How it is to be delivered                              | Private sector, public sector, Canal & River Trust   |
| Specific requirements                                  | Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community in the Canal Quarter. The SPD will set out broad principles to show how the policy requirements, together with other policy requirements in this Core Strategy, should be delivered on the site. The SPD will also incorporate a Delivery Strategy in conjunction with Proposal SUA.2 and Proposal SUA.4. |

| <b>Proposal SUA.1: Canal Quarter Regeneration Zone</b> |  |
|--|--|
| Where it is to be delivered                            | Land at Western Road, Wharf Road, Timothy's Bridge Road and Masons Road<br>Approx. 27 hectares (gross)   |
| What is to be delivered                                | <ul style="list-style-type: none"> <li>• Housing – approx. 650 dwellings by 2031 of which up to 25% will be provided as a mix of affordable homes</li> <li>• 9,000sqm of Class B1 distributed throughout the Canal Quarter</li> <li>• Linear park alongside canal</li> <li>• Multi-purpose community facility (if required)</li> </ul>   |
| When it is to be delivered                             | Phase 2 (2016/17 - 2020/21) approx. 80 homes<br>Phase 3 (2021/22 - 2025/26) approx. 270 homes<br>Phase 4 (2026/27 - 2030/31) approx. 300 homes<br>Post 2031 approx. 350 homes  |
| How it is to be delivered                              | Private sector, public sector, Canal & River Trust   |
| Specific requirements                                  | Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community in the Canal Quarter. The SPD will set out broad principles to show how the policy requirements, together with other policy requirements in this Core Strategy, should be delivered on the site. The SPD will also incorporate a Delivery Strategy in conjunction with Proposal SUA.2 and Proposal SUA.4. |

3.9 **Proposal LMA: Long Marston Airfield** at Section 6.11 of the Core Strategy contains a description of the allocation including what is to be delivered. A copy of this can be found below.

| <b>Proposal LMA: Long Marston Airfield</b> |  |
|--|--|
| Where it is to be Delivered                | Land west of B4632 Campden Road<br>Approx. 210 hectares (gross)  |
| What is to be Delivered                    | <p>Housing – approximately 3,500 dwellings (2,100 dwellings by 2031)</p> <p>A main village centre comprising a range of shops and services to include community and leisure facilities. A community hub, including a shop, police office and community facility, to be delivered within the defined first phase of development</p> <ul style="list-style-type: none"> <li>• Two primary schools, and</li> <li>• A secondary school,</li> </ul> <p>all as identified within the Infrastructure Delivery Plan</p> <p>A comprehensive Green Infrastructure strategy incorporating:</p> <ul style="list-style-type: none"> <li>• structural landscaping and open space;</li> <li>• a network of open spaces to include provision for children’s play, formal sports, allotments and community woodland.</li> </ul> <p>Employment – approximately 13 hectares in total (with no more than 8 hectares by 2031), of which no less than 10% should be in the form of small business workshops.</p> <p>The phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan, to include:</p> <ul style="list-style-type: none"> <li>• a connection to the strategic highway network (A46) at Wildmoor through the construction of a south-western relief road between A3400 Shipston Road and B439 Evesham Road, together with a road between B439 and A46 Alcester Road to be provided by others;</li> </ul> |

|                            |  |
|----------------------------|--|
|                            | <ul style="list-style-type: none"> <li>any specific schemes that may be identified as necessary to mitigate local traffic impacts, including in Stratford-upon-Avon and rural communities.</li> </ul> <p>Walking and cycling network within the site, together with links to the surrounding countryside and to Long Marston village.</p> <p>Frequent public transport services to Stratford-upon-Avon, including the station, and Honeybourne Station, potentially using the route of the former railway line between Stratford and Honeybourne.</p> <p>Land safeguarded for the possible provision of a railway station adjacent to the former Stratford to Honeybourne line.</p> <p>The phased delivery of utilities infrastructure to include:</p> <ul style="list-style-type: none"> <li>New primary substation</li> <li>Upgrade work to the foul sewer infrastructure</li> <li>Superfast fibre optic broadband</li> </ul>  |
| When it is to be Delivered | Phases 2-4 (2016/17 to 2030/31) and post 2031  |
| How it is to be Delivered  | Private sector, public sector, infrastructure and service agencies   |
| Specific Requirements      | <p>Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community at Long Marston Airfield. The SPD will set out broad principles to show how the above policy requirements, together with other policy requirements in this Core Strategy should be delivered on the site. It will need to accord with the following specific requirements:</p> <ul style="list-style-type: none"> <li>All elements of the proposal will be considered comprehensively in order to promote an integrated approach to the overall development as far as this is practicable.</li> <li>Land uses within the site and beyond should integrate both physically through the provision of public routes and visually through urban design principles.</li> <li>Completion of a south-western relief road before more than 400 dwellings can be occupied, unless a transport assessment demonstrates a higher threshold is appropriate.</li> </ul> |

3.10 **Policy AS.11** refers to 'Large Rural Brownfield Sites' and includes the Former Engineer Resources Depot at Long Marston as a site of previously developed land that can be re-used and redeveloped in the countryside, outside the Green Belt. It considers the following uses are appropriate in principle for that site:



- *“Leisure-related activities and accommodation;*
- *Employment uses within Classes B1, B2 and B8;*
- *Other forms of employment that make use of the rail connection to the site; and*
- *Residential development that is consistent with the approach set out in Policies CS.15 and CS.16.”*

3.11 That policy then goes on to state other uses will be compatible with those specified above and that satisfy the provisions of this policy.

3.12 **Policy CS.26** refers to transport and communications. At part B of that policy it states development will only be permitted if the necessary mitigation is provided against any unacceptable transport impacts which arise directly from that development.

## Material Considerations

### ***The National Planning Policy Framework (NPPF)***

3.13 The NPPF was revised and updated in February 2019. It sets out the Government Planning Policies for England and how they are expected to be applied.

3.14 **Paragraph 7** is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** sets out that the planning system has 3 overarching interrelated sustainable objectives, which are economic, social and environmental.

3.15 As set out in **Paragraph 10**, so that sustainable development is pursued in a positive way, at the heart of NPPF is a presumption in favour of sustainable development. **Paragraph 11** states plans should apply a presumption in favour of sustainable development. For plan-making this means plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

3.16 **Paragraph 59** sets out that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where needed.

3.17 **Paragraph 72** states that:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable*

locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) *consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."*

3.18 **Paragraph 78** states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

3.19 **Paragraph 103** follows from the above by stating that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

3.20 **Paragraph 117** sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

3.21 **Paragraph 120** states that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

3.22 **Paragraph 122** states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) *local market conditions and viability;*
- c) *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) *the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) *the importance of securing well-designed, attractive and healthy places.”*

**Site Allocations Plan Preferred Options Consultation Version (October 2020)**

- 3.23 The following sets out relevant emerging policies from the Site Allocations Plan (SAP) Preferred Options Consultation Plan, published October 2020.
- 3.24 As part of its emerging vision, the SAP states LMA *“will have been developed to provide about 2,100 homes by 2031, along with a range of new facilities and services including education, health and leisure. It will benefit from extensive areas of open space and sustainable transport links to Stratford-upon-Avon.”*
- 3.25 **Policy SAP.1** refers to the identified reserved housing sites. That policy states approximate 3,130 homes have been identified on the reserve housing sites listed in Annex 1 of the SAP. It then reiterates the policy wording of Policy CS.16.
- 3.26 **Policy SAP.3** provides guidance on the release of Reserved Housing sites. To ensure that a reasonable number of homes on reserve sites are available to meet any one of the four purposes set out in Policy SAP.1, the release of homes for purposes (b), (c) and (d) within will be capped, in the first instance, at a maximum of 1,000 homes. In circumstances where a purpose has been satisfied utilising fewer than 1,000 homes, any ‘residual’ will then be made available for the remaining purposes. That policy also states those reserve sites will be released in tranches in settlements in the following order:
1. Main Town of Stratford-upon-Avon;
  2. Main Rural Centres;
  3. Category 1 Local Service Villages and Large Rural Sites
  4. Category 2 Local Service Villages
  5. Category 3 Local Service Villages

6. Category 4 Local Service Villages

7. Other Local Service Villages

3.27 **Proposal SUA.5** sets out details of the East of Shipston Road allocation, which is seeking to deliver approximately 3 hectares of employment land. Details of this allocation can be found below.

| <b>Proposal SUA.5: East of Shipston Road, Stratford-upon-Avon</b> |  |
|---|--|
| Where it is to be delivered                                       | East of Shipston Road<br>Approx. 3 hectares  |
| What is to be delivered   | The relocation of specific businesses from Wharf Road within the Canal Quarter Regeneration Zone.  |
| When it is to be delivered  | Phase 2 – 3 (2016/17 – 2025/26)  |
| How it is to be delivered   | Private sector   |
| Specific requirements   | <ul style="list-style-type: none"><li>• provide a satisfactory access off Shipston Road to be identified in a Transport Assessment mitigate impact on the local and strategic road network where identified in a detailed transport assessment which should accompany a planning application</li><li>• provide pedestrian and cycle access to the adjacent Rosebird Centre</li><li>• provide extensive structural landscaping around the boundaries of the site</li><li>• incorporate small (less than 3,000sqft) business units aimed at business start-ups</li><li>• locate buildings and activities on the site to avoid unacceptable impact on neighbouring existing and proposed residential uses</li><li>• a Legal Agreement to ensure that the occupation of the site is restricted to specific named companies relocating from the Canal Quarter Regeneration Zone</li><li>• a marketing exercise to be undertaken for an agreed period of time following the commencement of development</li><li>• an application for planning consent on this site should be sought in tandem with any application for redevelopment of the Wharf Road site to ensure that the Council can ensure, as far as is practicable, that the relocated employment uses are delivered.</li><li>• if necessary, the commissioning of independent consultants to confirm the viability of any proposal</li></ul> |

3.28 **Proposal RURAL.4** sets out details of the Meon Vale proposed allocation, which is seeking to deliver up to 300 homes as a maximum subject to satisfying certain requirements. These are detailed below.

| <b>Proposal RURAL.4: Meon Vale (Former Engineer Resources Depot), Long Marston</b> |  |
|--|--|
| Where it is to be delivered  | Meon Vale, Former Engineer Resources Depot, Long Marston<br>Approx. 32 hectares (gross)  |
| What is to be delivered  | Up to a maximum of 300 homes (subject to satisfying the specific requirements below), of which 35% are to be provided as affordable housing in accordance with Core Strategy Policy CS.18.   |
| When it is to be delivered   | Phase 3 – 4 (2020/21 – 2030/31)  |
| How it is to be delivered  | Private sector   |
| Specific requirements  | <ul style="list-style-type: none"> <li>• expect the landowner to work with the District Council and Long Marston and Quinton parish councils in the preparation of the proposal</li> <li>• retain mature trees and non-plantation woodland</li> <li>• provide additional tree planting of native species to help achieve a net-gain in biodiversity on the site</li> <li>• retain, enhance and strengthen the woodland walk corridor and ensure that the design of the Proposal incorporates the maximum amount possible of the woodland areas</li> <li>• provide new publically accessible green spaces throughout the site</li> <li>• provide a structural landscaping buffer between the site proposal and the adjacent Quinton Rail Technology Centre (see Proposal RURAL.3) and adjacent employment uses</li> <li>• ensure that the residential development does not undermine the operational viability of the adjacent Quinton Rail Technology Centre (Proposal RURAL.3), in particular its rail loop which is integral to future investment in the site;</li> <li>• incorporate a high level of acoustic design in homes to enable residents to achieve an acceptable internal noise environment</li> <li>• undertake hydraulic modelling of the proposed development</li> </ul> |

3.29 **Proposal RURAL.5** sets out details of the proposed allocation for LMA Phase 1b which can be found below.

| <b>Proposal RURAL.5: Long Marston Airfield Phase 1b</b> |  |
|---|--|
| Where it is to be delivered                             | Long Marston Airfield Garden Village<br>Approx. 37 hectares  |
| What is to be delivered                                 | Up to 500 homes, of which 35% are to be provided as affordable housing in accordance with Core Strategy Policy CS.18.<br><br>Approx. 6 hectares of employment land.  |
| When it is to be delivered                              | Phase 3 – 4 (2020/21 – 2030/31)  |
| How it is to be delivered                               | Private sector   |
| Specific requirements                                   | <ul style="list-style-type: none"> <li>• ensure development is in accordance with the Supplementary Planning Document Framework Masterplan</li> <li>• ensure full integration of the different phases of development, including structural landscaping and provision of vehicular, pedestrian and cycle connections between phases</li> <li>• provide land for a primary school at the southern end of the site</li> <li>• incorporate an open space network throughout the development</li> <li>• provide an additional vehicular access from Campden Road</li> <li>• undertake a comprehensive Transport Assessment to identify impact on the highway network and improvements required</li> </ul> |

## 4. SUPPORTING AND ACCOMMODATING ADDITIONAL HOUSING SOUTH OF STRATFORD-ON-AVON

- 4.1 Following additional highways work carried out on behalf of the Council the emerging SAP identifies an additional 750 dwellings can be accommodated south of Stratford-on-Avon. It is proposed 500 of those dwellings will be accommodated at LMA (above the 400 dwellings that have already been granted planning permission under 14/03579/OUT and which are currently under construction). The remaining 250 dwellings are currently proposed to be accommodated at a number of reserved housing sites.
- 4.2 The following section firstly sets out our support of the additional development that is proposed within this area, and specifically at the LMA, and secondly considers the suitability of the LMA strategically allocated site to accommodate all 750 dwellings.

### Support for additional housing

- 4.3 As above, whilst supporting the 500 dwellings that are proposed to be allocated at LMA under Proposed RURAL.5 within the emerging SAP, we consider that the residual 250 dwellings be allocated alongside those 500 dwellings to LMA.
- 4.4 From reviewing the guidance attached to Proposed RURAL.5, specifically paragraph 7.14.7, it is noted that the increase in the number of dwellings south of Stratford-on-Avon is a result of recent transport assessments and further highways related work which ultimately concludes that a significant number of dwellings can be delivered prior to the construction of the South-Western Relief Road (SWRR) in this location without having a significant impact on the existing highways network. This is summarised within the Preferred Options Consultation summary leaflet and is welcomed news.
- 4.5 Further we support the Council's statement at paragraph 7.14.8 where they consider *"the bulk of this spare capacity should be ascribed to Long Marston Airfield as opposed to alternative reserve sites"*. Clearly, given its current allocation and its contribution towards delivering the strategy of the Core Strategy and the progression of developing this site out (with the 400 dwellings already under construction) there is ample opportunity to deliver a significant amount of housing alongside employment development (and other infrastructure) to help meet the Council's housing and employment needs in the not too distant future. This is reflected in the Council's proposal to allocate 500 of the 750 dwellings to LMA, which again we welcome and support.
- 4.6 Notwithstanding the above, the following considers why the LMA is a suitable site to accommodate all 750 dwellings south of Stratford-on-Avon.

## Suitability of the site for additional housing

- 4.7 As above, the second part of this statement demonstrates why the LMA should be allocated as a site that can accommodate all 750 dwellings south of Stratford-on-Avon before construction of the SWRR. At this point, it is worth highlighting that an exercise has not been carried out that has assessed the suitability of the reserved housing sites as it is not the intention here to try to criticise those sites and their suitability for development.
- 4.8 Following a review of the technical note prepared by Vectos Microsim on the South of Stratford Capacity Assessment which has been used to inform the emerging SAP, we understand that an initial assessment was undertaken which confirmed that an additional 750 dwellings could be accommodated south of Stratford-on-Avon. The technical note was then prepared on request by the Council to consider possible scenarios on how this additional development could be delivered and the difference in impact these could have on the existing highway network. The two scenarios that were considered are:
- *“2029 Reference + 750 LMA*
  - *2029 Reference + 300 LMA + 250 South of Stratford + 200 Quinton Area.”*
- 4.9 The former assesses the impact of development on the existing highway network if all 750 dwellings were accommodated at the LMA, and the latter assesses the same scenario but instead distributes the additional housing by allocating 300 dwellings at the LMA, 250 dwellings at two reserved housing sites South of Stratford and 200 dwellings at four reserved housing sites within the Quinton Area. To conclude, the latter scenario was the preferred option in highways terms, resulting in a marginally lower impact on the highway network albeit not that this impact was ‘severe’ and was therefore considered to result in an unacceptable impact on the network.
- 4.10 Indeed, the modelling confirmed that allocating all 750 dwellings at the LMA will not create overcapacity issues on the existing highway network and that the rate of trips could be accommodated without the need to deliver highway improvements prior to the delivery of more development. This is evident at paragraph 7 of the technical note where it is clear that either option will result in similar highway impacts, and equally the Council have considered this by allocating above the 350 dwelling limit at LMA as suggested by Vectos, proposing up to 500 dwellings. Overall, we consider there to be no technical highways reason why all 750 dwellings cannot be accommodated at LMA.
- 4.11 With that in mind, it is relevant to draw attention now to the status of the LMA allocation within the current Core Strategy. At section 6.11, the Core Strategy is clear that the LMA will seek to deliver approximately 3,500 dwellings, with 2,100 of those dwellings to be delivered by 2031, a significant delivery of housing for the District. Its delivery is set out in phases, with phase 1 already underway. Phases 2-4 are to be delivered between 2016/17 to 2030/31 and post 2031. This has been amended slightly within the emerging SAP where Phase 3-4 are to be delivered between 2020/21 and



2030/31. With this and the sites allocation in mind, it is demonstrated the site is achievable, suitable and available for development.

- 4.12 The Council's spatial strategy is set out at Policy CS.15 where at part C, new settlements such as LMA are considered *"sustainable growth points for the creation of new communities, providing for a range of uses and making significant contribution to meeting the housing needs of Stratford-on-Avon District."* Once in place, these settlements will provide a significant range of services and facilities which will support the development of the extensive housing and employment development to be delivered at these sites and beyond. Therefore, ensuring the delivery of these sites is a significant factor for the Council to consider in helping meet their anticipated housing need.
- 4.13 Given the above, it is considered that if sites such as LMA can accommodate additional development without having a significant adverse impact on the highway network then this should be supported through the emerging SAP to allow the Council to fully accord with their spatial strategy, rather than allocating these additional dwellings to reserved housing sites which at this time are only considered to come forward if the Council are to deliver a shortfall in their housing need.
- 4.14 On that note, it is worth highlighting that one of the reserved housing sites 'East of Shipston Road' is to only come forward to assist in the relocation of businesses from the Canal Quarter to 'East of Shipston Road', which in the emerging SAP is allocated for approximately 3 hectares of employment land under Proposal SUA.5. However, as set out in Proposal RURAL.5 approximately 6 hectares of employment land is proposed to be delivered at LMA, a site already justified as being suitable and available for development. We request the Council consider relocating the existing businesses at the Canal Quarter to the LMA allocation. In doing so would support the Canal Quarter Regeneration Zone allocation and the LMA allocation in the Core Strategy, supporting the Council's overall spatial strategy, and would remove the need to deliver additional housing at 'East of Shipston Road'. To reiterate, that housing can be delivered at LMA.
- 4.15 Additionally, allowing for a further 750 dwellings to be delivered on one site that has already demonstrated its availability, achievability and suitability for such development could help reduce the time in which it takes to build out the LMA allocation, possibly allowing the Council to reach its anticipated housing target earlier and then leaving further housing to be accommodated at other sites in the future that may become more sustainable and suitable for development. Additionally, allowing for the phases of the LMA to be delivered at a faster rate will allow the infrastructure that is to be delivered within the new settlement to also come forward at a faster rate, which in turn will create significant benefits to the local area both socially and economically.
- 4.16 Finally, supporting the above strategy would not undermine the technical work or conclusions drawn by Vectos nor the Council's suggestions so far because as demonstrated above either scenario assessed can be achieved without having a significant impact on the existing highway network.

4.17 Therefore, we respectfully request the Council review and support our suggestion to deliver all 750 dwellings at LMA.

## Sustainability

4.1 The presumption in favour of sustainable development sits at the heart of the Framework under Paragraph 10. To achieve this, three objectives are set out in Paragraph 8:

- Economic Objective;
- Social Objective; and
- Environmental Objective.

4.2 The following demonstrates how residential development at this site would meet those objectives.

### *Economic*

4.3 The development of housing growth and investment into the housing sector brings significant growth to the construction industry. With reference to the "Laying the Foundations: A Housing Strategy for England. HM Government" every £1 million received from new housing development supports 12 net jobs (seven direct and five indirect) for a year, as well as apprenticeship opportunities. A more responsive housing market can play a major role in delivering local economic growth, with housing construction, repairs and maintenance having a direct impact on economic output, accounting for an average 3% of GDP. This would bring prosperity and growth to the local economy.

4.4 A well-functioning housing market is therefore vital to the Country's competitiveness and attractiveness to business, which will drive the economic growth the country needs. The availability of housing in the right places and at the right time will therefore bring economic prosperity to areas, supporting the economic dimension to sustainable development.

4.5 Evidently, delivering additional units at one location that is already allocated in the Core Strategy and available, achievable and suitable for development could deliver major financial benefits to Stratford-on-Avon District sooner than if the housing was to be distributed. This will allow future residents of the residential development to contribute towards the local economy by supporting proposed and existing services and facilities within the local area, boosting the District's GDP and helping maintain LMA as a site for growth.

4.6 In light of the above, the proposal contributes towards building a strong, responsive and competitive economy, delivering major economic benefits.

### *Social*

- 4.7 The delivery of this site has the potential to supply a significant amount of housing to meet needs of present and future generations, a key principle within the Framework, and at a quicker rate. As such, the site would deliver a mix of housing that would contribute towards meeting the District's identified housing need.
- 4.8 As part of delivering a policy compliant housing mix, the scheme provides the opportunity to cater for those who are in need of affordable housing, consequently reducing the rate of those that are on housing registers, again at a faster rate.
- 4.9 The future residents of the site will contribute towards the local communities, and services and facilities that exist within the local area, and will sustain and enhance the proposed services and infrastructure within the LMA. As above, enabling the LMA to be delivered at a faster rate will ensure the infrastructure is in place faster to accommodate the allocation and support the wider area.
- 4.10 This site therefore has the potential to deliver significant social benefits.

### *Environmental*

- 4.11 Through its allocation and the numerous planning applications the site has been demonstrated to meet the environmental objective contained within the NPPF.

### *Conclusion*

- 4.12 The above has demonstrated that through delivering additional housing at the site at a faster rate will significantly contribute towards the three objectives within the Framework, which in turn achieves sustainable development.

## 5. MEON VALE

5.1 The emerging SAP also identifies a maximum of up to 300 dwellings (plus a possible 90 units) can be delivered at the proposed allocation known as Meon Vale. The site is included within the Core Strategy, referred to as the Former Engineer Resources Depot, and is one of the four Large Rural Brownfield Sites (defined as a site of previously developed land that can be re-used and redeveloped in the countryside, outside the Green Belt).

5.2 The proposed allocation sits just south of the LMA allocation.

5.3 Proposal RURAL.4 provides detail of the Meon Vale allocation within the emerging SAP, which can be found within Section 3 of this report. Its allocation will only be delivered if specific requirements listed in that policy are met. At paragraph 7.13.7 of the emerging SAP, it is established that the principle of development is acceptable in this location, however significant constraints attached to the site include:

- *“Retention of any areas of mature woodland and trees;*
- *Establishment of new publicly accessible green spaces throughout the site;*
- *Capacity of the highway network to accommodate additional vehicular traffic (in lieu of accepted levels from previously consented schemes); and*
- *Confirmation that there would be not detrimental impact (e.g. noise) on residential occupiers from the 24 hour operation of the Quinton Rail Technology Centre and adjacent industrial units and that appropriate mitigation measures can be provided.”*

5.4 As part of these significant constraints, it is understood that there is growing local concern over the suitability of this allocation which principally relates to ecological impacts. If following representations made from local people and from other consultees such as Natural England it is concluded that the biodiversity impacts don't justify the allocation of this land, and that the 300+ units will then have to be allocated elsewhere, we strongly recommend that those units be allocated at LMA allocation as well. The reasons for that are set out in Section 4 above and in summary will enable the continued delivery of the Garden Village allocated, overall supporting the spatial strategy of the Core Strategy and contributing towards the NPPF's key aim in achieving sustainable development.

## 6. DELIVERABILITY

- 6.1 Paragraph 59 of the Framework states, *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”* and *“that the needs of groups with specific housing requirements are addressed.”*
- 6.2 Paragraph 67 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) *“specific, deliverable sites for years one to five of the plan period; and*
  - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 6.3 Annex 2 within the Framework defines ‘deliverable’ as the following:
- “To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*
- 6.4 Through its allocation and the progress which has been made to deliver the site, the site can be considered available, suitable and achievable in line with the NPPF.

## 7. CONCLUSION

- 7.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the Site Allocations Plan (SAP) Preferred Options Consultation Regulation 18 held by Stratford-on-Avon District Council.
- 7.2 Overall, this representation has been made to support the additional units that are proposed to be allocated south of Stratford-upon-Avon, and to support the 500 dwellings that are proposed to be allocated at the LMA allocation within Proposal RURAL.5.
- 7.3 Notwithstanding the above, this statement has also demonstrated why the additional 250 dwellings to be allocated at reserved housing sites south of Stratford-upon-Avon should be accommodated instead at LMA alongside the 500 dwellings proposed already. In summary, due to a recent highways assessment prepared by Vectos Microsim which has informed the emerging SAP, it is concluded that accommodating an additional 750 dwellings south of Stratford-upon-Avon will not create overcapacity issues on the highway network, a previous significant constraint on the delivery of further housing in this part of the District
- 7.4 The conclusions of that assessment confirm that whilst an additional 250 dwellings can be accommodated at reserved housing sites, and which is the more favourable option, the matter of fact is that delivering the additional 250 dwellings at LMA would not create a significant adverse impact on the highway network.
- 7.5 As the LMA is an allocation within the current development plan, and the reserved housing sites sit below that allocation in terms of their delivery and are only in place in case the Council are struggling to meet their housing need, then support should be given by the Council to allocate all 750 dwellings to the LMA allocation so as not to undermine their current development strategy. Allowing for all 750 dwellings to be delivered at LMA supports the importance of bringing this new settlement into fruition, alongside the ability to relocate businesses at the Canal Quarter to LMA. Further, allowing for the delivery of all units at LMA enables a faster delivery rate of development, allowing the Council to reach their housing need target sooner and enabling the construction of infrastructure that will support and enhance the District at a faster rate. This will create significant benefits to the local community both socially and economically.
- 7.6 In addition to the above, we understand that there is significant local objection to the proposed Meon Vale allocation with regard to ecological impacts that may be caused by its development. If through consultation with Natural England and other relevant consultees it is advised that Meon Vale cannot be delivered, then we propose that those additional 390 units can also be delivered at LMA for reasons set out above.
- 7.7 Taking all the above into consideration, this statement has also demonstrated that delivering more units within a shorter timescales at LMA will provide significant economic, social and environmental benefits that contribute toward delivering a sustainable development in line with the NPPF.

7.8 The following provides recommendations to assist the Council in delivering the objectives of this representation.

## Recommendations

7.9 As above, we support the Council's proposal to deliver an additional 750 dwellings south of Stratford-upon-Avon, however, we advocate that the entire 750 units should be allocated at LMA. To assist in this, we propose that existing businesses from the Canal Quarter are relocated to LMA rather than at the allocation 'East of Shipston Road' to negate the need to deliver additional housing at this reserved housing site.

7.10 We propose that the 390 units proposed at Meon Vale should be delivered to LMA if the Council considers the growing local concerns over the suitability of the site and any statutory consultee comments deem its allocation as unsuitable.

7.11 A total of 1,140 dwellings will enable quicker delivery of housing numbers but also employment land and supporting infrastructure.

7.12 My client has control of the site and is fully committed to the submission of a planning application to deliver those units at the earliest opportunity.

7.13 In light of the above we respectfully request the Council look upon this representation favourably.

RIDGE



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**APPENDIX 2: REPRESENTATION TO  
EMERGING SOUTH WARWICKSHIRE  
LOCAL PLAN SCOPING AND CALL FOR  
SITES CONSULTATION (JUNE 2021)**



# RIDGE

**EMERGING SOUTH  
WARWICKSHIRE LOCAL PLAN –  
SCOPING AND CALL FOR SITES  
CONSULTATION (REGULATION  
18)**

**HG HODGES LIMITED**  
June 2021

# **EMERGING SOUTH WARWICKSHIRE LOCAL PLAN – SCOPING AND CALL FOR SITES CONSULTATION (REGULATION 18) FOR HG HODGES LIMITED**

June 2021

Prepared for

HG Hodges Ltd.

## **Prepared by**

Ridge and Partners LLP  
3<sup>rd</sup> Floor, Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX  
Tel: 01242 230066

## **Contact**

Guy Wakefield  
Partner  
gwakefield@ridge.co.uk

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# 1. INTRODUCTION

- 1.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the emerging South Warwickshire Local Plan (emerging LP) Scoping and Call for Sites Consultation (Regulation 18). The consultation runs between 10<sup>th</sup> May and 21<sup>st</sup> June 2021. The emerging LP will cover Stratford-on-Avon and Warwick District Councils, setting out a development strategy for both local authority areas as well as identifying sites for meeting their future development needs up until 2050.
- 1.2 The emerging LP recognises Long Marston Airfield (LMA) as a new settlement, carried through from the Stratford-on-Avon Core Strategy. This representation supports the continued promotion of this site as a growth point for development, seeking to deliver approximately 3,500 homes (2,100 homes up until 2031 - the plan period for the Stratford-on-Avon Core Strategy) alongside 13 ha of employment land, community and leisure facilities. This representation also specifically supports Growth Options A, B, D and E proposed within the emerging LP along with the approach to direct development toward new settlements and densification. With regard to the latter, this representation promotes the opportunity for LMA to deliver an additional 500 dwellings above its current allocation, seeking to deliver approximately 4,000 new dwellings overall.

## ***Long Marston Airfield Garden Village Background***

- 1.3 LMA is allocated within the adopted Core Strategy as a new settlement seeking to deliver 3,500 new dwellings. In January 2017, LMA was selected as one of 14 Garden Villages in the country. Paragraphs 6.11.10 to 6.11.14 of the adopted Stratford-on-Avon Core Strategy set out the vision for the development, aiming to achieve *"a mixed-use development which will provide a range of accessible services, facilities and employment opportunities that are convenient and accessible to the community itself and the local area."*
- 1.4 At paragraph 6.11.5, the Stratford-on-Avon Council make clear that the Garden Village will help meet the overall housing requirement for the District during the plan period of the Core Strategy and beyond as well as delivering a significant amount of employment land. Clearly, Stratford-on-Avon Council consider the delivery of this site a significant driver in helping to meet their overall housing target and delivering the Plan's strategic aims for sustainable development across the Plan period and beyond. This is further supported within the Site Allocations Plan Preferred Options Consultation where the Council propose an additional 500 dwellings can come forward at this allocation sooner to help support necessary infrastructure. Consequently, its allocation is carried through to the emerging LP.

## Statement Structure

- 1.5 Following this introduction, **Section 2** provides an overview of the site context whilst **Section 3** provides an overview of the planning policy context and identifies the development plan policies and

material considerations that are relevant to the site's continued allocation as a growth point and which support its proposed densification. **Section 4** sets out our support for LMA as a growth point in the emerging LP and promotes Growth Options A, B, D and E, as well as the approaches to direct development towards new settlements and encourage densification as considered in the emerging LP. It also demonstrates there is opportunity for the 500 additional dwellings to be delivered at the LMA growth point, above its current allocation. **Section 5** sets out the deliverability of the site and **Section 6** provides a summary and conclusion.

## 2. SITE AND BACKGROUND CONTEXT

### Site Description and Location

- 2.1 LMA ('the site') sits just east of the village of Long Marston and is located approximately 3 miles south of Stratford-upon-Avon. It measures a size of approximately 205 hectares.
- 2.2 The majority of the site comprises a former airfield once used as a training station for the RAF between 1941 and 1954. It contains a number of runways with grassed areas and a small number of remaining aircraft hangers. Toward the western part of the airfield is an earth embankment once used as a noise bund. The western parcel of the site also includes undeveloped land which sits outside the curtilage of the airfield. That land comprises a mix of agricultural fields dissected by hedgerows/trees, a woodland and a pond. Along the site's western boundary is a brook.
- 2.3 Immediately to the south of the site are open agricultural fields. Further south lies the former Long Marston Depot which is currently considered as a 'Large Rural Brownfield Site' for mixed development under Policy AS.11. The emerging SAP proposed the allocation of this site, under Proposal RURAL.4, for the development of up to 300 homes.
- 2.4 Along the east of the site lies the B4632 Campden Road. Toward the west of the site lies the former Stratford-to-Honeybourne railway line which is used for walking, cycling and horse riding, otherwise known as the "The Greenway".

### Planning History

- 2.5 As above, the site is allocated as a Garden Village within the Stratford-on-Avon Core Strategy, seeking to deliver 3,500 dwellings alongside a mix of other employment and commercial uses.
- 2.6 On 28<sup>th</sup> February 2017, outline planning permission was granted for the first phase of its development which proposed for the erection of up to 400 dwellings, 4,000 m<sup>2</sup> of employment use (Class B1(a)-c) Uses) and a community hub (including Classes A1-A5/B1(a)/C3/D1/D2) alongside the provision of open space and access **(Ref. 14/03579/OUT)**.
- 2.7 A subsequent reserved matters application was submitted and then approved on 14<sup>th</sup> March 2019 in respect of details relating to access, appearance, landscaping, layout and scale **(Ref. 17/03258/REM)**.
- 2.8 Several non-material amendments and discharge of condition applications have since been submitted and approved (Ref. 20/03179/AMD; 20/03178/AMD; 20/00385/AMD; 20/00295/AMD; 20/00294/AMD; DISCN/00848/20; DISCE/00007/21; DISCN/00022/21; DISCN/00023/21; DISCN/00024/21; DISCN/00025/21; DISCN/00026/21; DISCN/00027/21; DISCN/00028/21; DISCN/00029/21/DISCN/00030/21).

## Designations

- 2.9 The site does not contain any statutory landscape or historic related designations.
- 2.10 The site in its majority sits within Flood Zone 1 and therefore is at the lowest risk of flooding. However, where the brook sits along the western boundary of the site that land comprises Flood Zone 3 and is at the highest probability of flooding.



### 3. PLANNING POLICY CONTEXT

- 3.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2 The Development Plan in respect of the site includes the Stratford-on-Avon Core Strategy 2011 to 2031 (adopted 11<sup>th</sup> July 2016).
- 3.3 Material considerations in this instance include the emerging South Warwickshire Local Plan, national guidance set out within the National Planning Policy Framework (NPPF), published February 2019, and the emerging Stratford-on-Avon Sites Allocations Plan (SAP).

#### Stratford-on-Avon Core Strategy

- 3.4 The Core Strategy sets out the spatial strategy for development for the Stratford-on-Avon District.
- 3.5 **Policy CS.1** echoes the presumption in favour of sustainable development as set in the National Planning Policy Framework.
- 3.6 **Policy CS.15** states the distribution of development in Stratford-on-Avon District during the plan period 2011 to 2031 will be based on a pattern of balanced dispersal, in accordance with the distinctive character and function of the wide range of sustainable locations across District. Part C of that policy focuses on new settlements and includes LMA. It defines LMA as a sustainable growth point for the creation of new communities, providing for a range of uses and making a significant contribution to meeting the housing needs of the District. Part E of that policy also considers 'Large Rural Brownfield Sites' which aim to encourage the effective use of previously developed land.
- 3.7 **Policy CS.16** sets out the District's housing requirement stating a provision will be made for at least 14,600 additional homes. Approximately 2,100 homes are to be distributed at LMA and approximately 1,245 homes are to be distributed at 'Large Rural Brownfield Sites'. Part D of that policy discusses the Site Allocations Plan and its role in identifying Reserve Housing Sites.
- 3.8 **Proposal LMA: Long Marston Airfield** at Section 6.11 of the Core Strategy contains a description of the allocation including what is to be delivered. A copy of this can be found below.

## Proposal LMA: Long Marston Airfield

|                             |  |
|-----------------------------|--|
| Where it is to be Delivered | Land west of B4632 Campden Road<br>Approx. 210 hectares (gross)  |
| What is to be Delivered     | <p>Housing – approximately 3,500 dwellings (2,100 dwellings by 2031)</p> <p>A main village centre comprising a range of shops and services to include community and leisure facilities. A community hub, including a shop, police office and community facility, to be delivered within the defined first phase of development</p> <ul style="list-style-type: none"> <li>• Two primary schools, and</li> <li>• A secondary school,</li> </ul> <p>all as identified within the Infrastructure Delivery Plan</p> <p>A comprehensive Green Infrastructure strategy incorporating:</p> <ul style="list-style-type: none"> <li>• structural landscaping and open space;</li> <li>• a network of open spaces to include provision for children’s play, formal sports, allotments and community woodland.</li> </ul> <p>Employment – approximately 13 hectares in total (with no more than 8 hectares by 2031), of which no less than 10% should be in the form of small business workshops.</p> <p>The phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan, to include:</p> <ul style="list-style-type: none"> <li>• a connection to the strategic highway network (A46) at Wildmoor through the construction of a south-western relief road between A3400 Shipston Road and B439 Evesham Road, together with a road between B439 and A46 Alcester Road to be provided by others;</li> </ul> |

|                            |  |
|----------------------------|--|
|                            | <ul style="list-style-type: none"> <li>any specific schemes that may be identified as necessary to mitigate local traffic impacts, including in Stratford-upon-Avon and rural communities.</li> </ul> <p>Walking and cycling network within the site, together with links to the surrounding countryside and to Long Marston village.</p> <p>Frequent public transport services to Stratford-upon-Avon, including the station, and Honeybourne Station, potentially using the route of the former railway line between Stratford and Honeybourne.</p> <p>Land safeguarded for the possible provision of a railway station adjacent to the former Stratford to Honeybourne line.</p> <p>The phased delivery of utilities infrastructure to include:</p> <ul style="list-style-type: none"> <li>New primary substation</li> <li>Upgrade work to the foul sewer infrastructure</li> <li>Superfast fibre optic broadband</li> </ul>  |
| When it is to be Delivered | Phases 2-4 (2016/17 to 2030/31) and post 2031  |
| How it is to be Delivered  | Private sector, public sector, infrastructure and service agencies   |
| Specific Requirements      | <p>Production of a Framework Masterplan Supplementary Planning Document (SPD) to guide developers and the local planning authority in respect of environmental, social, design and economic objectives as they seek to create a new community at Long Marston Airfield. The SPD will set out broad principles to show how the above policy requirements, together with other policy requirements in this Core Strategy should be delivered on the site. It will need to accord with the following specific requirements:</p> <ul style="list-style-type: none"> <li>All elements of the proposal will be considered comprehensively in order to promote an integrated approach to the overall development as far as this is practicable.</li> <li>Land uses within the site and beyond should integrate both physically through the provision of public routes and visually through urban design principles.</li> <li>Completion of a south-western relief road before more than 400 dwellings can be occupied, unless a transport assessment demonstrates a higher threshold is appropriate.</li> </ul> |

3.9 **Policy AS.11** refers to ‘Large Rural Brownfield Sites’ supports proposals for the re-use and redevelopment of extensive previously developed sites in the countryside, outside the Green Belt, subject to a criteria.

## Material Considerations

### ***Emerging South Warwickshire Local Plan***

- 3.10 The Stratford-on-Avon and Warwick District Councils are working together to produce a joint development plan, named the South Warwickshire Local Plan, which will set out the development strategy for both districts, including development control planning policies, as well as identifying sites for development up until the plan period (2050). The emerging LP will replace certain key policies in the existing Stratford-on-Avon District Council Core Strategy and Warwick District Council Local Plan but other policies in these documents will continue to remain in force. It is not yet apparent what policies will remain.
- 3.11 The emerging LP is undertaking its Phase 1 'Scoping and Call for Sites' Regulation 18 consultation between 10<sup>th</sup> May to 21<sup>st</sup> June 2021. The Council has published a document as part of this which proposes key strategic issues, a vision and options for growth and lists a number of questions in which respondents can answer. The answers to this consultation will help inform the next stage of the local plan process. At this stage there is not a timetable as to when the next stage of the Local Plan process will commence, however the Planning Policy Team advise that the emerging LP is to be adopted in 2024.

### ***The National Planning Policy Framework (NPPF)***

- 3.12 The NPPF was revised and updated in February 2019. It sets out the Government Planning Policies for England and how they are expected to be applied.
- 3.13 **Paragraph 7** is clear that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 8** sets out that the planning system has 3 overarching interrelated sustainable objectives, which are economic, social and environmental.
- 3.14 As set out in **Paragraph 10**, so that sustainable development is pursued in a positive way, at the heart of NPPF is a presumption in favour of sustainable development. **Paragraph 11** states plans should apply a presumption in favour of sustainable development. For plan-making this means plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.
- 3.15 **Paragraph 59** sets out that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where needed.
- 3.16 **Paragraph 72** states that:

*"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing*

*villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."*

3.17 **Paragraph 78** states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

3.18 **Paragraph 103** follows from the above by stating that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

3.19 **Paragraph 117** sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

3.20 **Paragraph 120** states that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.

3.21 **Paragraph 122** states that planning policies and decisions should support development that makes efficient use of land, taking into account:

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed, attractive and healthy places.”*

***Site Allocations Plan Preferred Options Consultation Version (October 2020)***

3.22 The following sets out relevant emerging policies from the Site Allocations Plan (SAP) Preferred Options Consultation Plan, published October 2020.

3.23 As part of its emerging vision, the SAP states LMA “*will have been developed to provide about 2,100 homes by 2031, along with a range of new facilities and services including education, health and leisure. It will benefit from extensive areas of open space and sustainable transport links to Stratford-upon-Avon.*”

3.24 **Proposal RURAL.5** sets out details of the proposed allocation for LMA Phase 1b which can be found below.

## Proposal RURAL.5: Long Marston Airfield Phase 1b

|                             |   |
|-----------------------------|---|
| Where it is to be delivered | Long Marston Airfield Garden Village<br>Approx. 37 hectares   |
| What is to be delivered     | Up to 500 homes, of which 35% are to be provided as affordable housing in accordance with Core Strategy Policy CS.18.<br>Approx. 6 hectares of employment land.   |
| When it is to be delivered  | Phase 3 – 4 (2020/21 – 2030/31)   |
| How it is to be delivered   | Private sector  |
| Specific requirements       | <ul style="list-style-type: none"><li>• ensure development is in accordance with the Supplementary Planning Document Framework Masterplan</li><li>• ensure full integration of the different phases of development, including structural landscaping and provision of vehicular, pedestrian and cycle connections between phases</li><li>• provide land for a primary school at the southern end of the site</li><li>• incorporate an open space network throughout the development</li><li>• provide an additional vehicular access from Campden Road</li><li>• undertake a comprehensive Transport Assessment to identify impact on the highway network and improvements required</li></ul> |

## 4. SUPPORTING LONG MARSTON AIRFIELD GROWTH POINT

- 4.1 The emerging South Warwickshire LP allocates Long Marston Airfield (LMA) as a proposed growth point. This has been carried through from the Stratford-on-Avon Core Strategy which allocates LMA for approximately 3,500 dwellings (2,100 of which are to be delivered by 2031) alongside 13 ha of employment land, community and leisure facilities.
- 4.2 In the first instance this report has been prepared in support of the site's continued allocation as a new settlement. In this context, the following supports proposed Growth Options A, B, D and E and the approach to allocating a significant number of housing toward new settlements as well as increasing the intensification of sites. In considering the latter, this representation also takes the opportunity to promote LMA as being able to deliver an additional 500 dwellings above its current allocation, aiming to deliver 4,000 new homes overall.

### Proposed Growth Options

- 4.3 The emerging LP under Section 6.1 sets out that the minimum housing figure for both local authorities to meet within the plan period (up until 2050) equates to 35,000 new homes, with a minimum of 1,230 new homes to be delivered each year. As well as meeting the housing need for both local authorities, the emerging LP may have to assist in any shortfall in housing from Coventry and Birmingham if these areas cannot accommodate their own housing growth within their respective boundaries.
- 4.4 To help deliver this growth the emerging LP considers several Growth Options. These include:
- Option A: Rail Corridors;
  - Option B: Main Bus Corridors;
  - Option C: Main Road Corridors;
  - Option D: Enterprise Hubs;
  - Option E: Socio Economic;
  - Option F: Main Urban Areas; and
  - Option G: Dispersed.
- 4.5 To help inform the delivery of each growth option, a Sustainability of Growth Options report supports the emerging LP consultation document which lists advantages and disadvantages of each growth option.



4.6 Of those relevant to the delivery of LMA, Growth Options A, B, D and E are more preferable. The following seeks to deal with each of those in turn.

### **Growth Option A**

4.7 Growth Option A looks to direct growth toward settlements on the rail network, and as part of this identifies the two current freight-only branch lines that sit alongside Long Marston as possible locations to deliver development. These two lines sit adjacent to where LMA Garden Village is located, and as such supporting this Growth Option supports the delivery of LMA Garden Village.

4.8 This Option seeks to utilise the rail corridors, promoting sustainable transport and creating a modal shift away from private vehicular users, and provides opportunity to invest in rail infrastructure. This is reflected in the LMA allocation description contained within the Stratford-on-Avon Core Strategy which seeks to reinstate the former railway line between Stratford and Honeybourne and deliver a railway station adjacent to the former Stratford and Honeybourne line.

4.9 As such, this representation supports the delivery of development in line with Growth Option A and considers it to be a suitable option particularly given the benefits attached to it in terms of sustainability.

### **Growth Option B**

4.10 Growth Option B is similar to Growth Option A, which seeks to direct growth towards settlements located on the main bus route corridors and therefore promotes a modal shift toward non-car travel. In comparison to Option A, this option allows for growth in more villages across the District given the considerable number of bus routes that exist within both local authority areas.

4.11 LMA is located along a main bus route and therefore its development supports this growth option, and the overall principle to deliver development that would promote sustainable modes of transport.

4.12 Similar to Growth Option A, this representation supports the delivery of development in line with Growth Option B and considers it to be a suitable option given the benefits attached to it in terms of sustainability.

### **Growth Option D**

4.13 Growth Option D focuses new development in and around locations which are defined as major sources for employment, otherwise defined as Enterprise Hubs. Delivery of development in these locations would provide a better balance of homes and jobs and would result in a reduction in travel for employees within those employment areas if they had the opportunity to live close.

4.14 Quinton Rail Technology Centre is identified as a potential location for this type of development. LMA is located immediately north of this site and its development would support its employment use. Moreover, LMA itself will deliver approximately 13 hectares of employment land alongside

housing which will ultimately comprise its own Enterprise Hub. As such, the delivery of growth in line with Option D is supported.

## **Growth Option E**

- 4.15 Growth Option E seeks to deliver development that would provide socio-economic benefits, such as focusing new jobs and affordable housing in areas of deprivation. Included within this option are identified potential locations for such development to be directed toward.
- 4.16 LMA sits outside any areas identified as being in need of new jobs and affordable housing. However, the principle of Growth Point E will be delivered as part of LMA by achieving approximately 13 hectares of new employment land and an amount of affordable housing that will be significant to help meet the affordable housing need of the District given the scale of housing proposed.
- 4.17 As such, the principle of delivering this growth option is supported through the delivery of LMA and given the scale of the proposed new settlement, its delivery could offset the need for job growth and affordable housing within nearby Stratford-on-Avon and Bidford-on-Avon, two settlements identified as being in need within the emerging LP.
- 4.18 The following sets out our support for the alternative approaches to achieve the proposed growth options as considered above, and specifically seeks to promote the potential for LMA to deliver 500 dwellings above its current allocation in the Stratford-on-Avon Core Strategy, equating to a total of 4,000 new homes.

## **Support for New Settlements**

- 4.19 The emerging LP considers alternative approaches on how to deliver its proposed growth options, one of which being to deliver a considerable amount of development in the form of new settlements.
- 4.20 LMA is identified as a new settlement within the emerging LP which has been carried through from its allocation as a Garden Village within the Stratford-on-Avon Core Strategy. This representation supports the continued promotion of this site as a growth point and considers its development as a favourable option to help achieve the housing need figure within the plan period.
- 4.21 As set out in the emerging LP:
- “The benefit of the new settlement approach is that it better allows for the integration of new infrastructure to accompany new development. It also reduces the pressure on existing infrastructure in existing towns and villages which can often be difficult to, or more costly to, expand.”*
- 4.22 As well as housing and employment, LMA is set to deliver a range of community and leisure facilities as well as green infrastructure and highways infrastructure to accommodate not only its allocation but the wider area. This supports the principles of Growth Options A, B, D and E. In comparison,

Growth Option G, which looks to disperse new development across settlements within either local authority, is noted in the consultation document as a strategy that could increasingly urbanise rural areas and the level of traffic on country roads.

4.23 Rather, delivering a significant amount of development in one location that will also deliver the necessary infrastructure, such as LMA, is considered a more favourable and sustainable form of development. This is supported by the findings of the sustainability assessment which accompanies the emerging LP. That assessment identifies Growth Option G as having more disadvantages as a development strategy than advantages, compared to Growth Options A, B, D and E which support growth where it can sustain and enhance existing public transportation routes and help support existing employment uses, providing a better balance between the delivery of new homes and jobs.

4.24 These conclusions are similar to the climate change assessment also undertaken as part of the emerging LP which provides a rating based on the impact each growth option will have on the rate of carbon emission output and its ability to adapt to climate change. Whilst all growth options are considered to have no impact on adaptation to climate change, Growth Option G is rated as being likely to increase the rate of carbon emissions, whilst Growth Options A, B, D and E are considered to either reduce or have a neutral impact on carbon emissions.

4.25 Clearly, directing significant development in the form of new settlements is a preferable option in being able to deliver sustainable development that can help meet the housing needs proposed up to and beyond the plan period. It is noted there is a concern with regard to delivering larger strategic development such as new settlements within the emerging LP in terms of timescales. However, in this case LMA has already received planning permission for 400 dwellings along with 4,000 m<sup>2</sup> of employment land and a community hub, and is currently being constructed, demonstrating its deliverability. The only notable constraint to a greater rate of delivery is the requirement for offsite highway improvement works to be undertaken which includes a connection to the strategic highway network (A46) at Wildmoor through the construction of a south-western relief road between the A3400 Shipston Road and the B439 Evesham Road. In this case, we support the delivery of new settlements to be included as key growth options within the Council's emerging development strategy.

## Support for Additional New Homes

4.26 Densification of sites is another alternative approach in delivering growth within the emerging LP. The principle of increasing the density of sites is supported in the NPPF under Paragraph 122 which requires development to make efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;

- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

4.27 The emerging LP also considers, amongst other options, to focus growth on brownfield land, as supported by Paragraphs 117 and 118 c) of the NPPF, and to accommodate more homes above shops and commercial uses.

4.28 As above, LMA is allocated to deliver 3,500 dwellings in total, 2,100 of those of which are to be delivered by 2031. However, there is opportunity for this new settlement to deliver an additional 500 new dwellings above the 3,500 allocated, equating to a total of 4,000 new homes for the District.

4.29 The delivery of these further homes supports the Council’s aspiration to intensify sites given that a large extent of LMA is considered brownfield land and that it is the intention for the additional homes to be accommodated amongst the mixed-use that will be delivered.

4.30 Intensifying a site that is already acceptable in principle for development and which has commenced development should be supported as a preferred option to be carried through the emerging LP. This aligns with the Government’s ambition to deliver 300,000 new homes per year by the mid-2020s, and in doing so finding sustainable solutions to achieve this quickly. The report ‘Taking Stock – The geography of housing need, permissions and completions’ prepared by Lichfields in May 2021 refers to the Government’s target, stating:

*“In order for this ambition to be met there needs to be sufficient land with planning permission for housing which has a realistic prospect of being built within the relevant time period. At its most simple level, if the Government wants 300,000 net additional homes built each year, over a five year period there would need to be sufficient permissions that would enable 1.5m homes to be built, plus whatever is needed to replace the number of existing homes demolished (averaging just over 10,000 per year since 2010/11), taking into account the number of conversions and homes that secure approval via permitted development (PD).”*

4.31 The number of factors that need to be considered when assessing the actual number of homes to be delivered each year in order for the Government to achieve its target is considerable, and as a result there is a need for more housing to come forward to help meet the Government’s target. Otherwise, the ambition to achieve 300,000 new homes per year by the mid-2020s will not be met. To achieve this, the Lichfields paper advises that the number of planning permissions approved should be increased, and that *“it will be necessary to make adjustments to planning policy such that*

*planning applications for housing are encouraged in locations with a shortage of permissions, and in locations where there are realistic prospects of securing housing delivery.”*

- 4.32 Given LMA is already under construction, emphasis should be attributed toward the site’s suitability to achieve a higher density of development which will assist both Council’s to achieve their combined housing need target for the plan period, and which reflects the Government’s ambition to achieve 1.5 million dwellings by 2025.
- 4.33 As well as helping to secure the Council’s anticipated housing need target for the plan period, intensifying the site also attaches benefits in terms of sustainability. By delivering more homes in close proximity to services this reduces the need to travel, thereby reducing the rate of carbon emissions and pressure toward infrastructure in the wider rural area. Moreover, the pressure to develop on greenfield sites is reduced, which consequently reduces any impacts upon landscape, drainage and ecology that could otherwise occur.
- 4.34 Given the above, this representation overall supports the strategy to intensify sites for development, and requests that the emerging LP considers LMA as a possible site to help deliver a further 500 dwellings above the 3,500 dwellings already allocated.

## Sustainability

- 4.35 The presumption in favour of sustainable development sits at the heart of the Framework under Paragraph 10. To achieve this, three objectives are set out in Paragraph 8:
- Economic Objective;
  - Social Objective; and
  - Environmental Objective.
- 4.36 The following demonstrates how the increase of residential development at this site would meet those objectives.

## Economic

- 4.37 The development of housing growth and investment into the housing sector brings significant growth to the construction industry. With reference to the “Laying the Foundations: A Housing Strategy for England. HM Government” every £1 million received from new housing development supports 12 net jobs (seven direct and five indirect) for a year, as well as apprenticeship opportunities. A more responsive housing market can play a major role in delivering local economic growth, with housing construction, repairs and maintenance having a direct impact on economic output, accounting for an average 3% of GDP. This would bring prosperity and growth to the local economy.

- 4.38 A well-functioning housing market is therefore vital to the Country's competitiveness and attractiveness to business, which will drive the economic growth the country needs. The availability of housing in the right places and at the right time will therefore bring economic prosperity to areas, supporting the economic dimension to sustainable development.
- 4.39 Evidently, delivering additional units at one location that is already allocated in the Stratford-on-Avon Core Strategy and is available, achievable and suitable for development would deliver further financial benefits to Stratford-on-Avon District. This will allow future residents of the residential development to contribute towards the local economy by supporting proposed and existing services and facilities within the local area, boosting the District's GDP and helping maintain LMA as a site for growth.
- 4.40 In light of the above, the proposal contributes towards building a strong, responsive and competitive economy, delivering major economic benefits.

### *Social*

- 4.41 The delivery of this site has the potential to supply a significant amount of housing to meet needs of present and future generations, a key principle within the Framework. As such, the site would deliver a mix of housing that would contribute towards meeting the District's identified housing need.
- 4.42 As part of delivering a policy compliant housing mix, the scheme provides the opportunity to cater for those who are in need of affordable housing, consequently reducing the rate of those that are on housing registers, which is highlighted as a key issue to resolve within the emerging LP.
- 4.43 The future residents of the site will contribute towards the local communities, and services and facilities that exist within the local area, and will sustain and enhance the proposed services and infrastructure within the LMA.
- 4.44 This site therefore has the potential to deliver significant social benefits.

### *Environmental*

- 4.45 By intensifying the development of a site that is in part brownfield land and has had its principle of development already established will reduce the pressure of developing on greenfield land, and will overall provide environmental benefits including a reduction in carbon emissions, and the retainment and enhancement of the local landscape, biodiversity and causing no adverse impact toward flood risk.
- 4.46 Through its allocation and the numerous planning applications the site has been demonstrated to meet the environmental objective contained within the NPPF.

## *Conclusion*

4.47 The above has demonstrated that through supporting the growth of new settlements and delivering additional housing at LMA, its development will significantly contribute towards the three objectives within the Framework, which in turn achieves sustainable development.

## 5. DELIVERABILITY

- 5.1 Paragraph 59 of the Framework states, *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed”* and *“that the needs of groups with specific housing requirements are addressed.”*
- 5.2 Paragraph 67 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) *“specific, deliverable sites for years one to five of the plan period; and*
  - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 5.3 Annex 2 within the Framework defines ‘deliverable’ as the following:
- “To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*
- 5.4 Through its allocation and the progress which has been made to deliver the site, the site should be considered available, suitable and achievable in line with the NPPF.



## 6. CONCLUSION

- 6.1 This statement is to accompany representations that have been made by Ridge and Partners LLP on behalf of HG Hodges Limited in response to the emerging South Warwickshire Local Plan (emerging LP) Scoping and Call for Sites Consultation (Regulation 18).
- 6.2 Overall, this representation has been made to support the continued promotion of LMA as a new settlement with its expected delivery of 3,500 new homes alongside 13 ha of employment land, community and leisure facilities.
- 6.3 Relevant to the delivery of LMA, this representation supports Growth Options A, B, D and E as proposed within the emerging LP, demonstrating that delivering development in line with these strategies will help deliver growth sustainability across both local authority areas. It will concentrate development in locations that will retain and enhance public transportation as well as support socio-economic growth and cater toward the local affordable housing and job needs.
- 6.4 The above has demonstrated that LMA can be delivered in line with these Growth Options, which are preferable in terms of sustainability and ability to tackle climate change. Moreover, this representation supports the Council's suggestion to deliver growth in the form of new settlements which will ultimately allow both Council's to deliver a significant amount of growth sustainably, reflecting the positive climate change impacts associated with the preferred Growth Options.

### **Recommendation**

- 6.5 It is recommended that the site be allocated to deliver an additional 500 new homes above the 3,500 dwellings allocated at LMA, supporting the Council's aim to encourage densification as advocated within Paragraph 122 of the NPPF. This representation explains how this can be achieved at LMA, which in summary will include the promotion of brownfield land and accommodating residential use amongst the mixed use development proposed; both of which are concepts that will help drive the housing figures upwards, helping to achieve the Government's target of 1.5 million homes by 2025.
- 6.6 This representation also assesses how the additional development will help meet the economic, social and environmental objectives of the NPPF, comprising a form of sustainable development.
- 6.7 Finally, it has been demonstrated that the site is available, suitable and achievable for an additional 500 new homes above its current allocation, which is evident through the 400 homes and 4,000 m<sup>2</sup> of employment use that is already being constructed on site.
- 6.8 In light of the above we respectfully request the Council look upon this representation favourably

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