

South Warwickshire Local Plan

Issues and Options Consultation March 2023

Land at Copham's Hill, Stratford-upon-Avon

Prepared on behalf of Barratt David Wilson Trading Limited

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Ref. SWLP/CH01

Confidential

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Introduction

Knight Frank is instructed by Barratt David Wilson Trading Limited (the Landowners) (BDW) to submit these representations in response to the Issues and Options (Regulation 18) consultation to the South Warwickshire Local Plan. Through these representations reference is made to land at Copham's Hill, west of the A46, Stratford upon Avon, Warwickshire (site reference ID 385) as evidence about which policy approaches are deliverable.

The 2021 Call for Sites identified that the site proposed a mixed-use scheme, the reference number 385. The Housing and Economic Land Availability Assessment – Methodology (February 2022), which forms part of the council's evidence base for the Regulation 18 consultation, sets out the methodology for the assessment of the sites submitted as part of the Call for Sites search.

This representation and submission of the site supersedes any previous submission made via the Call for Sites process. In particular, the proposed uses of the site have changed, and the submission further reflects and aligns with landownership.

This representation seeks to assist with positive discussions and encourages engagement between Knight Frank and South Warwickshire, particularly in relation to mutually beneficial opportunities the above-named site offers by way of accommodating a mixed-use development, ranging from residential including affordable housing, to local centre, hotel and associated infrastructure.

A location plan and masterplan have been appended to this representation.

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The Site

The site, measures approximately 37.36 hectares, is located to the north-west of Stratford-upon-Avon at Copham's Hill, west of the A46 (see Appendix A). It currently comprises agricultural land, with two minor watercourses running north west to south east.

The site benefits from direct access off the A46, with potential for direct public transport links to central Stratford-upon-Avon and pedestrian/cycle links (see Appendix C). Further, the site has direct access from The Ridgeway, a minor access road connecting to Alcester Road and into the town centre.

The site is currently within the green belt. The Environment Agency's flood risk map shows that the site is predominantly located within an area with a low risk of flooding (Flood Zone 1), with some areas along and around existing watercourses with a higher risk of flooding (Flood Zones 2 and 3).

Proposed development description

The proposed development of the site at Copham's Hill offers potential for a mixed-use scheme with up to approximately 800 dwellings. A Vision Document will be submitted to the Council following the

submission of these representations and will provide a comprehensive overview of the site's potential for a mixed-use development in a highly sustainable location.

The site is proposed to include the following (see Masterplan, Appendix B):

- Residential development of up to approximately 800 dwellings (35-40 dpha)
- Primary school
- Hotel
- Local centre
- Alternative fuels / petrol station (including EV-charging)
- Natural and semi natural green space
- Formal play areas
- Landscaping
- Attenuation basin / SuDS
- Pedestrian / cycle links
- Bus services access

Local Plan Representations

Chapter 3

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

Partially.

The focus in the Vision to be on the delivery of homes and jobs is appropriate as is the inclusion, where appropriate, to meet the unmet need from neighbouring authorities. The 5 elements of the Vision are considered to be relevant and valid. The site BDW is promoting at Copham's Hill is an example of a site that will fully address each of the main areas set out in the Vision.

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

The vision is set out up to the year 2050. The current National Planning Policy Framework (NPPF) para. 22 states that strategic policies should look ahead over a minimum 15-year period from adoption, with policies to be set within a vision that looks further ahead to at least 30 years where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy. These growth scenarios are currently being considered within South Warwickshire and if preferred, given adoption is likely in 2025, the plan period should be extended to at least 2055.

Chapter 4

Q.I1 Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

Whilst it is noted that the SA generally states that large scale residential development will likely result in increased GHG emissions, it does not appear to recognise that mixed-use schemes will have lower GHG emissions. The proposed allocation site at Copham's Hill (site ref. ID 385) provides an opportunity for a mixed-use scheme that would be in accordance with the TCPA 20-Minute Neighbourhoods report, including:

- Diverse mix of homes, including affordable
- Network of pedestrian and cycle routes

- Local shops
- Local employment
- Green infrastructure, including accessible open space
- Community centre

Therefore, the SA should give more consideration to the potential for the development of mixed-use sites, particularly with reference to larger sites such as that at Copham's Hill (see Appendix D) as per Appendix B B.27 Stratford-upon-Avon Northwest in the SA.

A detailed, robust SA should clearly set out the site selection process methodology with principles and key sustainability issues clearly defined. Strategic design principles should form an element of this assessment methodology. The site selection process and sustainability appraisal should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects on location for growth.

Q.I2 Please select the option which is most appropriate for South Warwickshire

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

Q.I3 Please select the option which is most appropriate for South Warwickshire

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

Q.I4.1 Should we include a policy to safeguard specific infrastructure schemes within the SWLP

Yes.

Q.I4.2 Please add any comments you wish to make about these specific safeguarding provisions.

It is important to safeguard infrastructure projects necessary for the delivery of future developments. However, a level of flexibility should be included to ensure that future progress on these infrastructure projects is not overly constrained or onerously limited, especially where delays may adversely impact the delivery of residential, commercial or industrial development proposals. Care must be taken in allocating land for residential, commercial or industrial development that is dependent on the delivery of strategic infrastructure. Where such sites are allocated, they should be placed towards the back of any delivery trajectory.

Q.I5 Please add any comments you wish to make about infrastructure, viability and deliverability

It should be noted that, whilst safeguarding specific infrastructure is important to provide assurances as strategic infrastructure projects are heavily reliant on funding. The South-Western Relief Road (SWRR), which is necessary for the delivery of the Long Marston Airfield development, failed to secure the required funding via the Housing Infrastructure Fund, which led to substantial constraints for the Long Marston Airfield development. Until sufficient infrastructure is in place to support growth to the south and east of the settlement, any substantial growth around Stratford-upon-Avon should be focussed north and west of the A46, which has the infrastructure in place.

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

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

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

Option S2b: Have a policy with 'in principle' support for intensification development, applicable across South Warwickshire; and develop design codes

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

The study focusses on density as a quantified figure based on existing capacities, which is a helpful tool to ascertain the expected density for new developments in proximity of existing development. The study notes that proximity of constraints, including listed buildings or wildlife sites, are not fundamental to prevent development. This is the right approach.

However, the limitations of the Urban Capacity Study are identified in the report, itself. The study is a theoretical exercise that is not intended to conclusively establish the urban housing capacity of South Warwickshire over the plan period. Instead, it indicates a current potential urban housing capacity. More detailed work is required to confirm actual capacities, especially when it is noted that the study has not been informed by the outcome of a HELAA.

Directly linked to the Urban Capacity Study, further work should also be undertaken to ascertain the potential of incorporating a similar concept to the PTAL¹ rate (density driven by proximity to public transport) in relation to urban areas. This would further encourage and guide development to sustainable locations and provide benefits for proposals with better PTAL rates (i.e. support for higher densities, reduced car parking requirements), or additional requirements for proposals with worse PTAL rates (i.e. additional car parking spaces, financial contributions) on a case-by-case basis.

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

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

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

Yes. Growth of existing settlements is one of a number of important approaches, where it utilises existing and available infrastructure to support sustainable growth.

Q.S4.2 Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on

Appendix 1 Stratford-upon-Avon Segment 5 and 6: There is potential for the development of land at Copham's Hill, Stratford-upon-Avon (ref. ID 385) for a mixed-use scheme (see Appendix A to D). The analysis of the proposed site should also consider its potential for improved connectivity (see Appendix C).

The analysis notes that part of the site sites within a flood zone. However, the proposed Copham's Hill site excludes development in areas of higher flood risk (see Appendix A and B).

In light of the site's potential for a significantly improved connectivity to the adjacent town centre and its exclusion of the areas of higher flood risk, it is considered that the site should result in a connectivity grade of A or, at minimum, B.

Q.S5.2 Do you think new settlements should be part of the overall strategy?

Possibly. This should only be in accordance with the NPPF, and robust evidence should be provided in respect to the sustainability of any new settlement and their deliverability within the plan period. Consideration should be given to landownership, delivery models and infrastructure requirements in the first instance, prior to setting out a strategic approach and action plan for each new settlement. It is very likely that they will have significant obstacles to overcome until effective delivery.

¹ Public Transport Accessibility Level, as defined by Transport for London (TfL)

Q.S5.3 In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?

Yes, South Warwickshire has some unique opportunities to deliver meaningful levels of sustainable development in the vicinity of some of its existing train stations. The better stations have other infrastructure in place, such as bus services, that will provide sustainable additionality to the development. The council should support those locations that offer additionality such as access to other means of sustainable transport (i.e. bus services, pedestrian footpaths, cycle routes).

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

Option 1: Rail Corridors

Appropriate strategy

The Rail Corridor Growth option must remain a key focus for future development within South Warwickshire. It will deliver the most sustainable forms of development through encouraging sustainable travel and the reduction of car dependency. Land, such as that at Copham's Hill, is available that will allow the delivery of housing at scale for a rail corridor approach.

Priority should be given to focusing growth in areas that are demonstrably sustainable and which will provide good sustainable modes of travel. Serious consideration needs to be given to the to the balance of delivering development on less sustainable non-Green Belt locations compared to locations in the Green Belt which offer stronger sustainable opportunities.

With respect to delivery, those locations neighbouring or within easy access of existing stations, such as in the of Copham's Hill, have a significantly better likelihood of being delivered than those that will rely on new stations being built.

Option 2: Sustainable Travel

Appropriate strategy

The merging of the train and bus corridor growth options into a Sustainable Travel growth option is eminently sensible. The additionality of this joined up approach in enhancing the use of public transport should not be ignored. This growth option should be flexible so as not to lose opportunities which may not be located on a "bus corridor" and which do have bus services. The location of development in such locations may have a bigger influence on strengthening bus services.

This growth Option could be expanded to encourage Active Transport and mixed-use developments, particularly as walking and cycling complement the use of public transport. In addition, this option would encourage the integrating of bus and rail services to provide a synergetic hierarchy of sustainable modes of transport, including not only first tier rail transport over further distances but also second and third tier bus services that connect local neighbourhoods and key local destinations. Sites, such as Copham's Hill, are available to deliver this growth Option.

Option 3: Economy

Neutral

As mentioned in the previous Knight Frank representation (ref. 2102), economic growth is a priority for Central Government, local authorities and is a core objective of national planning policy. There should be a focus on economic growth within the Local Plan. Whilst it is welcomed that this option effectively supports a mix of uses, including residential and commercial, which would theoretically contribute to a reduced need to travel and provide support for additional employment generating uses, the option would most likely focus on supporting housing and business growth along strategic road networks sustainable travel is unlikely to be encouraged due to ease of access by car. While there are some forms of

economic growth that will, within the period of the new plan, rely on the strategic road network, the opportunity must be taken to consider other forms of economic growth towards more sustainable forms of transport. Therefore, a purely economic approach would not fulfil the sustainability aspirations of the Councils and might conflict with the climate emergencies that both councils have declared.

Option 4: Sustainable Travel and Economy

Appropriate strategy

The combination of sustainable transport with economic growth is particularly sensible and priority should be given to focusing economic growth in areas that are demonstrably sustainable and are likely able to provide good modes of sustainable travel, i.e. good accessibility to bus and rail. In particular, the value attributable to the reduction in travel and, by virtue of congestion, is a significant benefit that needs to be taken into account when balancing the climate emergency imperative against less sustainable locations even though this may require the release of some areas of Green Belt.

Sustainable mixed-use developments (including the site at Copham's Hill (ID 385) can provide employment and sufficient services and facilities in addition to the sustainable transport opportunities they offer.

Option 5: Dispersed

Appropriate

While the focus of future development in South Warwickshire should be on Option 4, this should not ignore those settlements, especially the smaller ones which should not be allowed to stagnate. They will require some development to make a contribution and continue to thrive. Hence some degree of dispersed development has to be allowed. In these locations opportunities to develop better public transport, pedestrian links and cycle routes should be encouraged.

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

No. This should be assessed on a case-by-case basis, as the quality, acceptability and sustainability of developments is not inherently based on the quantity of dwellings proposed, but the appropriate location and the detailed design and layout. Further, a threshold level may be appropriate for some settlements given their scale but may not be appropriate for other settlements. Therefore, flexibility to allow this to be taken into account should be kept.

Q.S8.2 For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?

A threshold approach should not be adopted.

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

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

Q.S10 Please add any comments you wish to make about the development distribution strategy for South Warwickshire.

The growth strategies described in Q.S7.2 include development in green belt locations. A Green Belt review should be undertaken as part of the core evidence base for the next stage of the local plan process.

Growth Options 1, 2 and 4 should form the basis of future development within South Warwickshire, with Growth Option 3 being applied to a limited degree and Growth Option 5 to ensure the survival of smaller,

more rural settlements. The local plan should adopt a flexible approach in terms of employment uses, so that it can account for future needs or opportunities that will best reflect market signals and requirements.

Chapter 5

Q-E4.2: Please select the option which is most appropriate for South Warwickshire

Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas

Q.E7.2 Please select the option which is most appropriate for South Warwickshire

Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.

Q.E10 Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?

No. As mentioned in the previous Knight Frank response (ref. 2102), tourism plays an important role for South Warwickshire and is integral for the vitality of town centres and is therefore a strategically important policy. Policies should be included to support tourism linked development that will enhance the provision and vitality of other services on offer. This should include additional support for the provision of additional guest accommodation in appropriate locations, as this will contribute to strengthening the economy.

Furthermore, the NPPF paras 84 and 85 support the role of sustainable rural tourism and leisure development that benefits businesses in rural areas, communities and visitors, and which respect the character of the countryside. Therefore, supporting policies for facilities linked to tourism, including guest accommodation, should be included in Part 1.

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

Delivering economic growth is a priority for the government and local authorities and is a core objective of the NPPF. Policies should develop a clear economic vision and understand the requirements for employment space. The local plan should adopt a flexible approach in terms of employment uses to be able to consider current market trends and requirements.

Chapter 6

Q.H1.1 The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

Yes.

The HEDNA is considered to accord with NPPF para 61, whereby it provides evidence that exceptional circumstances justify the use of an alternative approach (trend-based) to determine the minimum number of homes needed, rather than utilising the 2014-based household projections due to its evident inconsistencies with the resulting housing need figure for Coventry.

Given that the South Warwickshire councils share a Housing Market Area (HMA) with Coventry and the neighbouring councils North Warwickshire, Nuneaton and Bedworth and Rugby, the South Warwickshire Local Plan provides an opportunity to consider the local housing needs in consideration of the up-to-date household figures within the HMA. It is noted that the trend-based figures identified in the HEDNA result in a higher local housing need than the standard method based on the 2014 household projections. The council should ensure that a sufficient supply of housing sites, including affordable, is provided, in line with the Government's aim of significantly boosting the housing land supply in accordance with NPPF para 60.

However, consideration should be given to the unmet needs from Birmingham, given the overlap of the HMA with the Birmingham HMA. Further evidence should be provided to understand the population movements and projections within the wider housing market.

The Greater Birmingham HMA Strategic Growth Study (GL Hearn, February 2018), which built on the Birmingham Strategic Growth Study 2 Report (PBA 2014) and Strategic Housing Needs Study (PBA, 2015), notes that Birmingham's functional HMA extends to include the Black Country, parts of Worcestershire, Staffordshire and Warwickshire, which is also confirmed within the 2022 Birmingham HEDNA.

The Birmingham HMA includes part of Stratford-on-Avon district and given the overlap between Birmingham and Coventry/Warwickshire HMA. NPPF (2021) para 61 states that *"any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"*.

It is therefore considered essential that the joint evidence provided from neighbouring authorities within overlapping HMAs should be taken into account when making provision to meet the wider HMA housing needs. The HEDNA should therefore be expanded to consider the wider HMA. In particular, the assumed split of in-migration from the overlapping Birmingham HMA, based on past trends, should be considered.

The Birmingham HEDNA demonstrates that on average, there were between approximately 7,000 to 10,500 net moves per annum from Birmingham to the wider HMA between 2015 to 2020. Therefore, additional evidence should be provided to take account of internal migration flows from Birmingham.

The Birmingham HMA Strategic Growth Study states that the evidence points to a baseline / minimum level of housing need for 205,000 to 264,600 homes from 2011 to 2031 and between 256,000 and 310,000 to 2036 (2011 baseline) in the Birmingham HMA, which extends into Warwickshire. The report notes that Stratford-on-Avon is contributing 2,020 dwellings to 2031, extending to 3,600 until 2036 if measured on a pro-rata basis.

With consideration of the land supply to 2031 (179,829) and 2036 (197,618), the minimum shortfall in the HMA to 2031 and 2036 is 28,150 and 60,855 respectively. The report notes that Stratford's Core Strategy is making provision for 5,440 dwellings to meet unmet needs of other areas, of which 50% contributes to meeting unmet needs in the Coventry and Warwickshire HMA and Birmingham HMA respectively.

The evidence provided, particularly the trend-based approach based on 2021 projections, as opposed to the 2014 projections, appears to provide a reasonable basis in light of the evident issues with Coventry based figures. However, a further analysis of the wider housing market area (HMA), including the Birmingham HMA, and the likely movements from the wider HMA into Stratford-on-Avon and Warwick is necessary to address the local housing need. Additionally, given that evidence of Coventry's level of unmet need may not be available within the timescales of the South Warwickshire local plan process, there may be a need for the provision of additional housing land supply to ensure the unmet needs from Coventry can be met.

It is understood that the South Warwickshire Councils are currently engaging with Birmingham City Council to seek agreement on a Memorandum of Understanding to ensure that unmet needs can be met. We would welcome the agreement to form part of the evidence base for the next stage in the local plan to provide certainty of the local housing needs. We expect that South Warwickshire will need to take on some of the unmet needs of the Birmingham HMA, given their significant shortfall.

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

As mentioned in the previous Knight Frank response (ref. 2102), principal contributions to affordable stock arise predominantly through the delivery of greenfield sites. In particular, large-scale mixed-use developments, such as the proposed site at Copham's Hill, Stratford-upon-Avon (ref. ID 385), are best placed to provide an important amount of affordable housing. Therefore, positively worded supporting policies would likely lead to an increase in affordable housing.

Local planning authorities can also improve the delivery of affordable housing through the creative use of their own resources, including land within its ownership and working effectively with other providers of affordable stock. Consideration should be given to alternative approaches such as the conversion of existing stock or vacant housing, further accelerating the delivery of social and intermediate housing.

The provision of affordable housing should not exceed the technical housing standards, particularly the set national standards (Nationally Described Space Standards).

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

Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts

Q.H.3 Please select all options which are appropriate for South Warwickshire

Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.

It should be noted that NPPF footnote 49 states that policies may also make use of the nationally described space standard (NDSS), where the need for an internal space standard can be justified. In relation to the NDSS the PPG (Paragraph: 020 Reference ID: 56-020-20150327) identifies that LPAs need to take account of need, viability and timing. In relation to the M4(2) and M4(3) standards the PPG (Paragraph: 007 Reference ID: 56-007-20150327) there is a need for LPAs to give regard to: the likely future need for housing for older and disabled people (including wheelchair user dwellings); size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability.

The evidence base needs to be made available to clearly justify inclusion of these additional technical standards.

Q.H4.1 Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?

Yes. See Q.H1.1.

Q.H4.2 Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan

The local plan needs to seek to accommodate some unmet need from the Birmingham and Black Country HMA. However, as noted in Q.H1.1, further evidence should be provided relating to migration within or between HMAs, particularly movements from Birmingham to more rural areas within South Warwickshire. The unmet needs arising from within Birmingham should be agreed via a Memorandum of Understanding and allocations made to meet the unmet needs within Part 1 of the Local Plan dealing with strategic policies.

If homes are being provided to meet needs arising in Coventry and Birmingham then those homes should be located as close as possible to the source of those needs in order to minimise travel, or close to good transport connections to these areas. Particular emphasis should be placed on locations for development to service the needs of Birmingham and Coventry that have sustainable connections to these cities.

If South Warwickshire are to accept a substantial shortfall arising from within Birmingham and the Black Country, then there should be an expectation that those local authorities have accommodated growth within the Green Belt falling within their own administrative areas.

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

Additional housing to meet the shortfalls from neighbouring authorities should be located on public transport corridors, i.e. Growth Options 1 (rail corridors) and 2 (sustainable travel) in order that residents of the new housing can utilise existing sustainable transport options to commute to work.

The Greater Birmingham HMA (GL Hearn, 2018) includes three sites within Stratford-on-Avon within its area of search for potential sites, one of which is directly related to Stratford-upon-Avon. In consideration of the rail infrastructure between Stratford-upon-Avon and Birmingham City, the site at Copham's Hill, Stratford-upon-Avon, is one such site that can deliver sustainable housing that would contribute to the shortfalls.

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

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

Chapter 7

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

Yes.

Building Regulations Part L, published in December 2021, sets out an ambitious target of reducing carbon emissions for dwellings. These changes are interim measures and will lead up to the Future Home and Buildings Standard, which is set to be introduced in 2025. These will require further cuts to carbon emissions, whereby all new dwellings will need to reduce emissions by at least 75% and the use of fossil fuel-based heating will be banned. It is anticipated that building regulations will evolve further to achieve carbon net zero for new builds in the future.

To ensure that developments can still be delivered when they are unable, for justifiable reasons, to achieve carbon net zero, the council should seek to identify land for carbon offsetting. Any policy requirements relating to achieving carbon net zero should be set out with a sufficient level of flexibility to allow for carbon offsetting, if it can be robustly justified that achieving carbon net zero is not viable or achievable.

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

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

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

Option C6.1c: None of these

Q.C6.3 Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire

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

Q-C7: Please select the option which is most appropriate for South Warwickshire

Option C7c: None of these

The preferred option should be determined with reference to a robust evidence base, including in relation to the viability. More evidence is required.

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

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

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

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

Option C9.1b is appropriate as new legislation will deal with this matter.

Q.C9.2 Please add any comments you wish to make about climate responsive development design in South Warwickshire

As reflected in the previous Knight Frank response (ref. 2102), there is a clear emphasis on climate change adaptation and mitigation set out in the Planning Act 2008 and further commitments set out in the Net Zero Strategy: Build Back Greener (October 2021), which should be reflected in the council's planning policies without duplicating existing requirements or introducing additional or onerous measures that adversely affect the viability of development proposals. The councils should also consider Part L Buildings Regulations when developing policies, to ensure that developments are not overburdened with additional measures that go beyond the requirements of national policy, regulations and guidance.

Any policies relating to climate responsive design should be based upon a proportionate evidence base to be found 'sound', including an assessment of their impacts upon viability for individual sites and on a whole-plan basis to ensure other policies are not adversely affected.

Q.C10.1 Please select all options which are appropriate for South Warwickshire

Option C10.1c: None of these

The SWLP should not be imposing additional requirements over and above national guidance.

Q.C12 Please add any comments you wish to make about water management or flood risk in South Warwickshire

As stated in the previous Knight Frank response (ref. 2102), Climate Change and the integration of SuDS within developments should be considered in line with national policy and guidance. PPG para 055 ref. ID 7-055-20220825 states that SuDS provide benefits for water quantity and quality, biodiversity and amenity, with multifunctional SuDS delivering a wider range of additional biodiversity and environmental net gains.

Chapter 8

Q.D1.1 Do you agree that this is an appropriate range of topics for a strategic design policy?

Yes

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

Option D2d: None of these

Design codes should not be unduly restrictive. Detailed design of a site should take into account the relevant technical considerations that will not be fully investigated at the plan making stage

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

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

Q.D4.1 Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?

Yes

Q.D5 Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?

Don't Know

While heritage assets are important to the character of South Warwickshire and require consideration in plan-making, they should not dominate the growth strategy unduly.

Chapter 9

Q.W2 Please select the option which is most appropriate for South Warwickshire

Option W2b: Do not include a policy on Health Impact Assessments.

Q.W3 Please select the option which is most appropriate for South Warwickshire

Option W3a: Include an overall policy on health.

Chapter 10

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

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

National policy does not currently require all developments in all locations to achieve Building for a Healthy Life accreditation or endorse the principles of a 20-minute neighbourhood. The connectivity and context of developments can be determined on a site-by-site basis.

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

Option T2b: Do not include a policy which takes a hierarchical approach.

Chapter 11

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

Option B1b: Remove Areas of Restraint designations

Q.B6 Should the South Warwickshire Local Plan introduce Wildbelts designations?

No

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

No

This policy does not need to be included in the SWLP given that the approach to development on agricultural land is already dealt with in the NPPF.

Chapter 12

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

No

Q.P1.2 If no, please indicate why

Strategic site allocations should form part of Part 1 to support the effective delivery of residential, commercial, and other necessary uses. Allocations forming the Part 1 Local Plan should not only meet the needs identified within South Warwickshire but identify sites to meet unmet needs arising within Coventry, Birmingham, and the Black Country.

There are advantages and disadvantages to having a single document and to having a two-part document. In the former case, there will be certainty right from the start. The council should have a healthy housing land supply from adoption, prevailing into at least the medium term of the plan period. However, adopting such a plan generally takes a long time.

The part 1 document of a two-part plan may take less time to adopt but would leave the council vulnerable to having an insufficient housing land supply. Therefore, it is essential that Part 1 of such a plan can demonstrate an adequate land supply allocated for housing along with the respective housing land supply numbers, to ensure the council maintains a healthy land supply into the medium term.

Further to the previous Knight Frank response (ref. 2102), the strategic site at Copham's Hill, Stratford-upon-Avon would provide a mixed-use scheme, including approximately 800 residential dwellings, shops, a primary school, open space and associated infrastructure that could be delivered in the early years of the Local Plan.

Q.P1.3 Do you agree with the selection of policies to be addressed in the Part 1 plan?

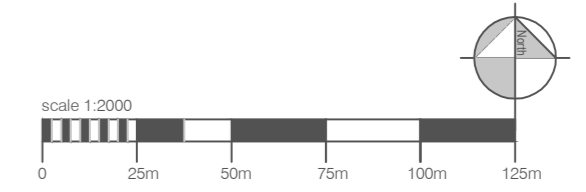
No

Q.P1.4 If not, please indicate why

As per option B1b, Policy CS.13 Areas of Restraint should be removed and considered by other means.

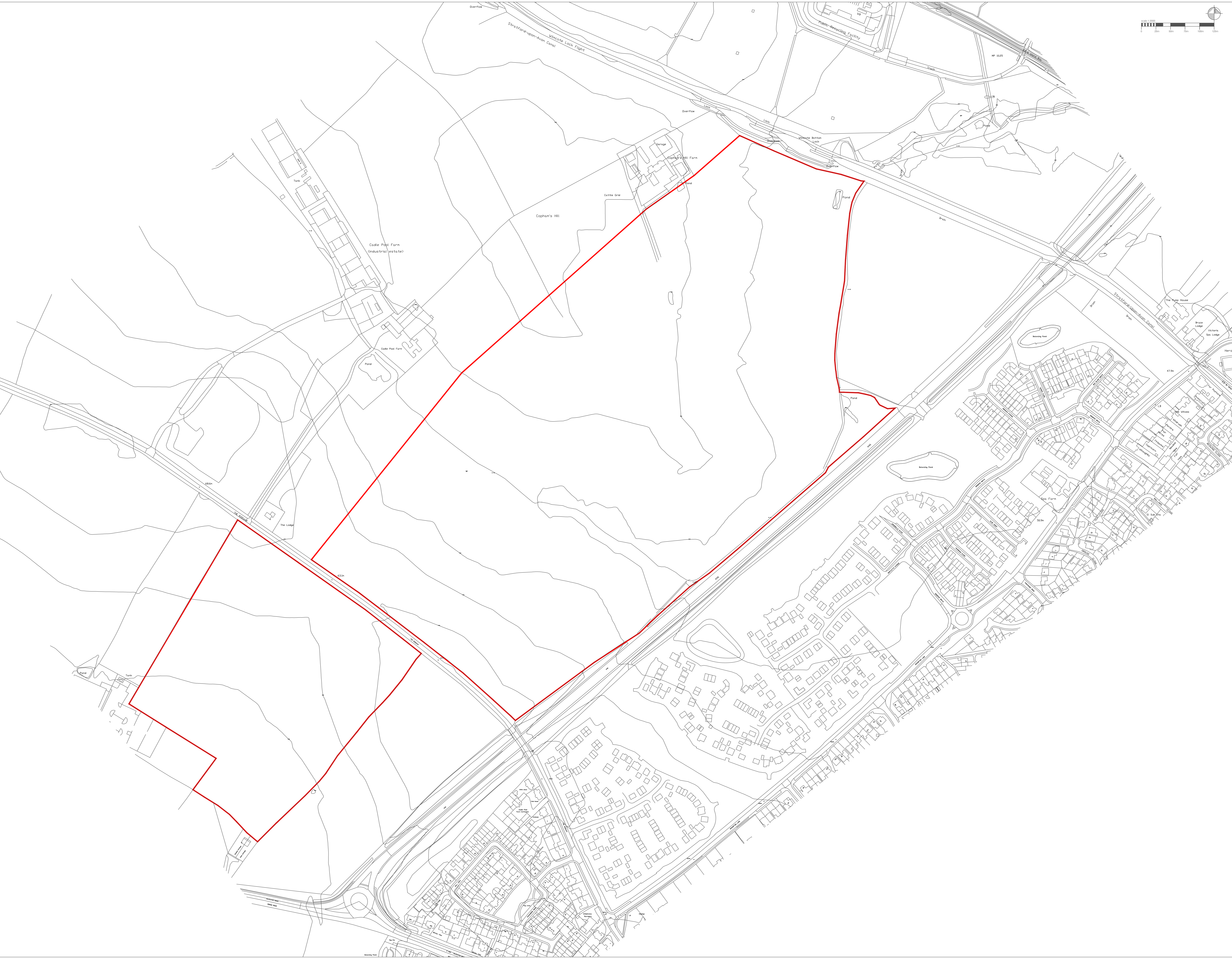
Policy FW2 Sustainable Drainage to be addressed in Part 1, as it should provide the necessary guidance and requirements for proposals within strategic sites at this stage.

Appendix A Site location plan



NOTES
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 Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
 Where applicable this drawing is to be read in conjunction with the Consultant's drawings.

Legend
 Site boundary



DATE | AUTHOR | DWG

SITE PROMOTION

RUA
 ARCHITECTURE
 URBAN DESIGN

Thistle Down Barn, Sywell, Northants, NN6 0BG
 Land line: 01604 720 774 Mobile: 07860629991 www.r-u-a.co.uk

PROJECT
 Ridgeway
 Stratford upon-Avon

DRAWING
 Site Location Plan

| | | |
|-------------|-------------|--------|
| SCALE | DATE | AUTHOR |
| 1:2000 @A0 | 22.02.23 | IR |
| JOB NO. | DRAWING NO. | REV |
| RSA | RSA-SLP-000 | |
| CLIENT REF. | BDW_MERCIA | |

Appendix B Masterplan



- NOTES**
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 Where applicable this drawing is to be read in conjunction with the Consultant's drawings.
- Legend**
- Site boundary
 - Potential site access
 - Existing footpath link (PROW)
 - Proposed footpath link
 - Potential footbridge connection
 - Proposed combined footpath & cycle link
 - Existing ridge line
 - Existing trees and hedgerows
 - Existing ditch / watercourse
 - Natural & semi natural green space = 40 acres / 16.18ha
 - Formal play areas (LEAP & LAP) = 0.76 acres / 0.30ha
 - Proposed attenuation basin
 - Proposed structural planting
 - Proposed residential development
22 acres / 21ha up to 800 dwellings at 35-40dph
 - Proposed Local Centre = 2.0 acres / 0.80ha
 - Proposed 2 form entry primary school, sports pitches and car park = 7.25 acres / 2.92ha
 - Proposed Hotel = 1.85 acres / 0.75ha
 - Proposed alternative fuel petrol station
EV charging = 1.1 acres / 0.45ha

| DATE | AUTHOR | CHKD |
|------|--------|------|
| | | |

SITE PROMOTION



RUA
ARCHITECTURE
URBAN DESIGN

Thistle Down Barn, Sywell, Northants, NN6 0BG
Land line: 01604 720 774 Mobile: 07860629991 www.r-u-a.co.uk

PROJECT
Ridgeway
Stratford upon-Avon

DRAWING
Master Plan Framework (01)

| SCALE | DATE | AUTHOR | CHKD |
|------------|----------|--------|------|
| 1:2000 @A0 | 22.02.23 | IR | |

| JOB NO. | DRAWING NO. | REV |
|---------|-------------|-----|
| RSA | RSA-MPF-001 | |

CLIENT REF.
BDW_MERCIA

Appendix C Connections plan



- NOTES**
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- Legend**
- Site boundary
 - Potential site access
 - Existing main road network
 - Existing footpath link (PROW)
 - Proposed footpath link
 - Opportunity for new footpath link
 - Existing footpath link to Railway station
 - Potential footbridge connection
 - Proposed combined footpath & cycle link
 - Railway Station
 - Stratford-upon-Avon Town Centre
 - Stratford-upon-Avon canal
 - Local shops & supermarkets
 - Secondary school
 - Rother house medical centre



DATE: 22.02.23 | AUTHOR: CHUKU

SITE PROMOTION

RUA
ARCHITECTURE
URBAN DESIGN

Thistle Down Barn, Sywell, Northants, NN6 0BG
Land line: 01604 720 774 Mobile: 07860629991 www.r-u-a.co.uk

PROJECT
Ridgeway
Stratford upon-Avon

DRAWING
Connections Plan

| | | |
|--------------|--------------|--------------|
| SCALE: | DATE: | AUTHOR/CHKD: |
| 1:2500 @A0 | 22.02.23 | IR |
| JOB NO.: | DRAWING NO.: | REV: |
| RSA | RSA-CP-002 | |
| CLIENT REF.: | BDW_MERCIA | |

Appendix D Assessment of the site based on SA criteria

This assessment is based on the assessment of the wider site to the northwest of Stratford-upon-Avon (see Appendix B of the SA, site B.27 Stratford-upon-Avon Northwest) and assesses the site at Copham's Hill (see Appendix A location plan).

The scoring system aligns with that of the SA, as follows:

| Likely Impact | Description | Impact Symbol |
|-----------------------|--|---------------|
| Major Positive Impact | The proposed option contributes to the achievement of the SA Objective to a significant extent. | ++ |
| Minor Positive Impact | The proposed option contributes to the achievement of the SA Objective to some extent. | + |
| Negligible Impact | The proposed option has no effect or an insignificant effect on the achievement of the SA Objective. | 0 |
| Uncertain Impact | The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made. | +/- |
| Minor Adverse Impact | The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention. | - |
| Major Adverse Impact | The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required. | -- |

| Receptors | SA score | KF score | Effect | KF Comments | Difference to SA |
|--|----------|----------|--|---|--------------------------------|
| Potential increase in carbon footprint | -- | +/- | Mixed-use development of up to ca. 800 dwellings | Site complies with 20-min. neighbourhood. Mixed-use development. Sustainable transport possible, including ped/cycle, potential for bus services. Detailed assessment required. | Likely significant improvement |
| Riparian flood zones | 0 | 0 | Less than 10% within flood zones 2 & 3 | Negligible impact. | Same |
| Surface water flood risk | 0 | 0 | Less than 10% within flood zones 2 & 3 | Negligible impact. | Same |
| Habitats sites | +/- | +/- | Uncertain impacts on habitat sites | Avoid impacts through HRA process. | Same |
| SSSIs | 0 | 0 | Within SSSI IRZ | No residential threat to SSSI | Same |
| NNRs | 0 | 0 | No NNRs in proximity | N/A | Same |
| Ancient woodland | 0 | 0 | No ancient woodland in close proximity | N/A | Same |

| Receptors | SA score | KF score | Effect | KF Comments | Difference to SA |
|-----------------------------|----------|----------|---|---|------------------------|
| LNRs | 0 | 0 | Unlikely to adversely affect LNRs | N/A | Same |
| LWSs | - | + | Wildmoor, Stratford on Avon Canal, River Avon Tributaries | Location and layout of proposed development will not only minimise impacts but enhance | Reduced impacts |
| LGS | 0 | 0 | Does not coincide with LGS | N/A | Same |
| Priority habitats | - | + | Small proportion coincides with priority habitats | Location and layout of proposed development will not only minimise impacts but enhance | Reduced impacts |
| National landscapes / AONBs | 0 | 0 | Ca 9km from Cotswolds NL. Unlikely significant impacts. | N/A | Same |
| Landscape character | - | 0 | Within Avon Character Area, Vale Orchard Belt. | Location and layout of proposed development, with robust landscape strategy, will minimise impacts | Reduced impacts |
| Landscape sensitivity | -- | +/- | High-medium landscape sensitivity | Layout and design of proposed development to be supported by a Landscape and Visual Assessment, which will determine the site's impacts | Uncertain |
| Special landscape areas | - | +/- | Partially within Arden SLA | Layout and design of proposed development to be supported by a Landscape and Visual Assessment, which will determine the site's impacts | Uncertain |
| Country parks | 0 | 0 | Not in close proximity to a country park | N/A | Same |
| Views of PRoW Users | - | + | Adjacent to PRoW footpath. | Potential for landscape-led design and integration of PRoW, with potential for improvements | Likely improvement |
| Coalescence | 0 | 0 | Unlikely to lead to coalescence | N/A | Same |
| Grade I listed building | 0 | 0 | Not in proximity | N/A | Same |
| Grade II* listed building | 0 | 0 | Not in proximity | N/A | Same |
| Grade II listed building | - | +/- | Near to Barn southwest of Burton, pump house and | Likely reduced impacts due to location of site. Proposed design and | Likely reduced impacts |

| Receptors | SA score | KF score | Effect | KF Comments | Difference to SA |
|---------------------------------------|----------|----------|---|---|-------------------------|
| | | | Victoria Spa Lodge and Bruce Lodge | layout with consideration of heritage assets. Impacts to be determined by a Heritage Assessment. | |
| Registered parks and gardens | 0 | 0 | Not in proximity | N/A | Same |
| Conservation area | 0 | 0 | Not in proximity | N/A | Same |
| Scheduled monument | 0 | 0 | Not in proximity | N/A | Same |
| AQMA (pollution) | - | 0 | Located adjacent to SuA AQMA | Increased transport levels. Layout, landscaping and mixed-use to minimise transport use. Inclusion of EV charging facilities. Improved pedestrian/cycling infrastructure. | Reduced impacts |
| Main Road | - | 0 | Located adjacent to A46. | Increased transport levels. Layout, landscaping and mixed-use to minimise transport use. | Reduced impacts |
| Railway Line | - | 0 | Railway line in proximity. | Unlikely impacts due to distance of development to railway line. | Unlikely impacts |
| Watercourses | - | + | South Stratford Canal. | Appropriate management of construction, incorporation of SuDS and GI. Potential to improve canal | Significant improvement |
| Groundwater SPZ | 0 | 0 | Not within groundwater SPZ | N/A | Same |
| ALC Grade | -- | - | Large proportion in ALC Grade 3 land, with some on Grade 4 land. | Loss of BMV land, albeit smaller area than B.27 area. Can partially be used for GI. | Reduced impacts |
| Mineral Safeguarding Areas | 0 | 0 | Not in MSA | N/A | Same |
| Potential increase in household waste | -- | - | Mixed-use development likely to result in an increase in household waste generation. Potential for 800 dwellings. | Proposal allows for a reduced number of units (800) and mixed-use elements. Reduced waste in comparison to SA. | Reduced impacts |
| Housing provision | ++ | ++ | Mixed-use development for up | Major positive impact on housing provision | Same |

| Receptors | SA score | KF score | Effect | KF Comments | Difference to SA |
|---------------------------|----------|----------|--|---|-----------------------|
| | | | to circa 800 dwellings. | | |
| NHS Hospital/A&E | - | 0 | Distance to NHS hospital with A&E | Incorporation of public transport and travel options | Reduced impact |
| GP Surgery access | - | 0 | Access to GP surgery | Potential for GP surgery in proposed development. Potential for improved public transport and travel options | Potential Improvement |
| Leisure facilities access | - | + | Outside of target distance to leisure facilities | Site falls well within target distance to leisure facilities given proximity to Bannatyne Health Club and Spa at Wildmoor | Reduced impact |
| AQMA (noise) | - | 0 | Located adjacent to SuA AQMA | Increased transport levels. Layout, landscaping and mixed-use to minimise transport use. Inclusion of EV charging facilities. Improved pedestrian/cycling infrastructure. | Reduced impacts |
| Main road | - | 0 | Adjacent to A46. Air and noise pollution. | Location of site avoids A3400 noise/pollution. Design and layout, green buffers, EV charging facilities. | Reduced impacts. |
| Access to greenspace | ++ | ++ | Majority within target distance to one or more greenspaces. | Layout to facilitate access. | Same |
| Access to PRoW/Cycle path | + | ++ | Located adjacent to PRoW and cycle networks. | Positive effects expected due to design/layout, with inclusion of attractive pedestrian and cycle links | Improvement |
| Bus stop | + | ++ | Partially within target distance to a bus stop. | Actively exploring potential inclusion of additional bus services within proposal area. Improved connectivity to existing bus stop. | Potential improvement |
| Railway station | ++ | ++ | Located within sustainable target distance to railway station. | Major positive impact. Improved connectivity to railway station. | Same |
| Connectivity | 0 | + | Currently within area identified as having moderate | Improved connectivity with inclusion of pedestrian and cycle | Improvement |

| Receptors | SA score | KF score | Effect | KF Comments | Difference to SA |
|------------------------------------|----------|----------|---|--|-------------------------|
| | | | connectivity to the existing settlement. | link and public transport. | |
| Food stores | - | + | Situated outside of sustainable target distance to food stores. | Mixed-use development to include food stores for daily uses. | Improvement |
| Access to primary school | + | ++ | Within sustainable target distance to Bishopston Primary School. | Additional primary school proposed as part of development. | Improvement |
| Access to secondary school | - | + | Location outside of sustainable target distance of any secondary schools. | Improved connectivity with inclusion of pedestrian and cycle link and public transport. | Improvement |
| Access to further education | + | ++ | Within target distance to post-16 education. | Improved connectivity with inclusion of pedestrian and cycle link and public transport. | Improvement |
| Employment floorspace provision | +/- | ++ | No loss of current employment. Provision of 800 homes and employment. | Mixed-use development to include local centre with shops and services, permanent employment uses, temporary employment during construction works. | Significant improvement |
| Access to employment opportunities | + | ++ | Location within target distance to employment opportunities. Mixed-use development. | Inclusion of permanent and temporary (construction) employment opportunities as part of the mixed-use scheme. Improved connectivity (pedestrian, cycle and public transport) to the town centre. | Significant improvement |

Appendix E Call for Sites

South Warwickshire Local Plan

Call for Sites March 2023

Land at Copham's Hill, Stratford-upon-Avon

Prepared on behalf of Barratt David Wilson Trading Limited

Date: 6 March 2023

Ref. SWLP/CH01

Confidential

Call for Sites

| Questions | KF answers |
|--|--|
| Have you submitted this site for the SWLP before? | Yes |
| If yes, are you seeking to amend the boundary or proposed use for this site? | Amend proposed use. |
| Please enter site ref number assigned previously | 385 |
| Proposed development | Mixed-use development with up to approximately 800 dwellings, including a primary school, hotel, local centre, alternative fuels/petrol station (including EV-charging), pedestrian/cycle links, bus services access, natural and semi-natural green space, formal play areas, landscaping and associated infrastructure |
| Proposed intended use, tick from below: <ul style="list-style-type: none"> • Housing/residential • Employment/industrial/commercial • Retail • Leisure/community • Gypsy and travellers • Open space/biodiversity/green infrastructure • Renewable energy • Other (please specify) | See chosen uses in green . Other: <ul style="list-style-type: none"> • Alternative fuels/petrol (including EV) |
| Site capacity / density (estimated number of homes/floor space) | Residential: up to 800 dwellings at 35-40dpha Local centre: 4,000 sqm Hotel: 10,200 sqm Primary school: 3,000 sqm Alternative fuel station (petrol/EV): 550 sqm |
| Potential for development: <ul style="list-style-type: none"> • Marketed for development • Negotiations for developer • In control of a developer | See chosen uses in green |
| Availability: <ul style="list-style-type: none"> • Short term (within 5 years) • Mid term (6-10 years) • Long term (+11 years) | See chosen uses in green |
| Estimated development timescale/phasing (including building rates) | 2028/29: 95 dwellings 2029 to 2035: 115 dwellings pa 2035/36: 15 dwellings |
| Please add any further information you wish us to know here: | |
| Attached files | Site location plan Masterplan |
| Files to follow (not part of this submission) | Vision document Market Report |