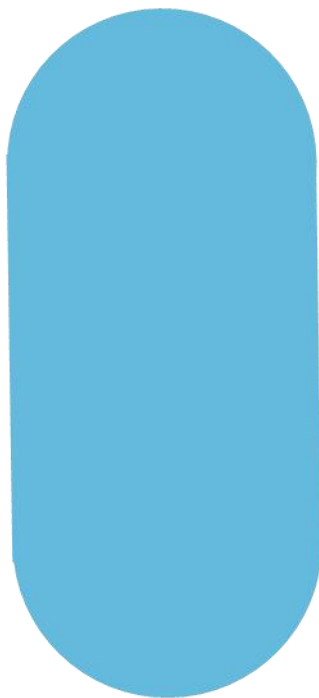
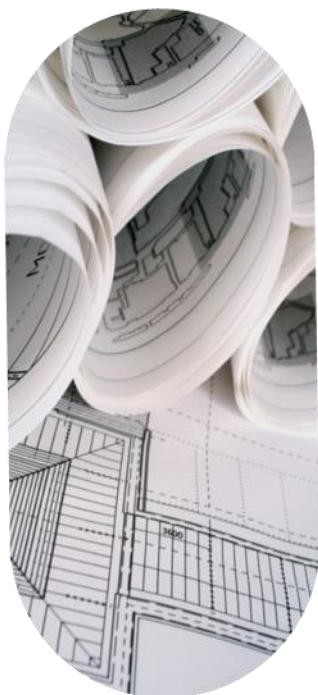


Representations on behalf of the Mactaggart & Mickel

South Warwickshire Local Plan Part 1 –
Issues and Options Consultation

Land at Station Lane, Kingswood

March 2023





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Mactaggart and Mickel (MacMic Group), in respect of their land interest at Station Lane, Kingswood.
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the supporting Site Location Plan, Opportunities and Constraints Plan, Concept Masterplan, Vision Document, Highways Technical Note, Flood Risk and Drainage Scoping Study and Plan, Tree Survey and Plan, Preliminary Ecological Appraisal, Grassland Survey Report, and Landscape and Visual Overview and Green Belt Assessment.

Chapter 3 - Vision and Strategic Objectives

Q-V3.1 Vision and Strategic Objectives

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

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

Q-S3.1 Urban Capacity Study

5. The production of an Urban Capacity Study (UCS, October 2022) to support identification of brownfield land to help deliver the growth needs of South Warwickshire is in accordance with the NPPF¹.

¹ Paragraph 119 of the National Planning Policy Framework (July 2021)



6. The UCS suggests that the SWLP housing need equates to 30,750 dwellings, however this figure does not reflect the latest evidence within the HEDNA and needs updating. In addition, the UCS assumes a Plan period which commences in 2025, however this does not align with the base date of the HEDNA and as such a Plan period from 2022 is considered more appropriate to align with the evidence base.
7. On the basis of the above, MacMic Group consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period, in accordance with the HEDNA and should therefore represent the minimum housing requirement for the SWLP.
8. In relation to capacity, the UCS considers housing supply, including sites with planning permission and outstanding allocations without planning permission across South Warwickshire, and other sources of potential supply within the urban areas. As the UCS assumes a Plan period from 2025, it is only sites with planning permission and outstanding allocations without planning permission which are scheduled to deliver in the period from 2025 onwards in the respective Housing Trajectories (at April 2021) which are included within the supply. Given MacMic Group consider a more appropriate Plan period commencement date is 2022, and given the respective April 2022 Housing Trajectories are now available, 20,695 dwellings is considered the accurate figure to be incorporated (on account of taking into consideration an additional three years of supply). The UCS incorporates a non-implementation deduction to be applied to site with planning permission at 5%, which is considered appropriate.
9. With regard to outstanding allocations without planning permission across South Warwickshire, a comprehensive review is required to ensure that such sites meet the definition of Developable as set out in the NPPF². One such outstanding allocation which requires review is Long Marston Airfield which is allocated in the adopted Stratford-on-Avon Core Strategy (July 2016) for circa 3,500 dwellings (2,100 in the Plan period to 2031) and associated development. There are known issues with the delivery of the south-western relief road required to support the delivery of the new settlement at Long Marston Airfield, which combined with other infrastructure

² Glossary of the National Planning Policy Framework (July 2021)



requirements is likely to be mean there is a significant lead-in time before development commences.

10. The UCS seeks to increase the level of supply on four outstanding allocations without planning permission in Warwick District at Kenilworth and Whitnash by 323 dwellings, however this is considered to be questionable. There is the potential for these outstanding allocations without planning permission to come forward delivering a higher number of dwellings than is set out in the adopted Warwick Local Plan (September 2017). However, until such a time as planning permission is granted, there is insufficient certainty to make assumptions around level of delivery. In addition, it is noted that the Warwick Housing Trajectory (at April 2022) already incorporates increases in projected delivery on some outstanding allocations without planning permission, and thus this could constitute double counting.
11. The UCS also seeks to include within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas and are considered to be potentially suitable. It is noted that, to date, no formal assessment of these Call for Sites submissions has taken place in the emerging Housing and Economic Land Availability Assessment (HELAA). As such, the inclusion of these sites as potential supply in the UCS is unjust and these sites should be subject to formal assessment before being considered potentially suitable for allocation in the SWLP.
12. Further, the UCS identifies an additional five sites on vacant land in the urban areas across South Warwickshire which have not yet been submitted to the Call for Sites process, but are considered potentially suitable in the UCS for 328 dwellings. Clearly there is insufficient certainty around the availability and deliverability of these sites which brings into question their potential for residential development. Further, on assessment of these sites there are some serious concerns around the suitability of these sites in any case. One example is Jephson's Farm which is located north of the railway and Griffin Road in Leamington Spa, and is identified in the UCS as potentially suitable with a capacity of 171 dwellings. This land forms one of the last remaining gaps between Leamington Spa and Warwick so development is unlikely to be desirable, and further the site is highly constrained by flood risk and access limitations.



As such, these five sites should be removed from the potential supply in the UCS as no evidence of their availability or deliverability has been provided.

13. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39 dwellings). As above, these sites have not yet been submitted to the Call for Sites process, but are considered potentially suitable in the UCS, again raising concerns around availability and deliverability. Talisman Square is subject to a current planning application for 44 dwellings on a larger site than identified in the UCS, but Westgate House has no planning history. As such, the inclusion of these two sites as potential supply in the UCS is unjust, and these sites should be subject to formal assessment before being considered potentially suitable for allocation in the SWLP
14. Finally, the UCS considers the level of windfall allowance to be included in the supply in the SWLP. An assessment is provided showing level of windfall allowance in the respective adopted Local Plans and level of windfall delivery across South Warwickshire in the period 2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the likely sources/types of windfall supply (based on past trends) nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is considered likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence that it will provide a reliable source of supply, as required by the NPPF³.

Q-S4.1 Growth of Existing Settlements

15. Yes, growth of existing settlements in South Warwickshire is considered to be imperative to deliver the overall growth targets, and achieve the Vision and overarching principles. Further, growth of existing settlements will support the sustainability and vitality of existing services, providing support to existing communities, which in turn has the potential to enhance placemaking and sustainability.

³ Paragraph 71 of the National Planning Policy Framework (July 2021)



16. Whilst the potential for new settlements in South Warwickshire is recognised, they will not ensure delivery of growth in the early part of the Plan period or sustain and enhance the vitality and sustainability of existing settlements. The need for housing, affordable and specialist housing, jobs, green infrastructure, improved facilities and infrastructure is within the towns and villages; those needs cannot be directly met sustainably in isolated settlements.

Q-S4.2 Settlement Analysis

17. The SWLP Issues and Options consultation evidence base includes a Settlement Analysis which reviews existing settlement structures across South Warwickshire with a view to guiding future development, assessing connectivity, landforms, accessibility to local facilities and density.

18. Kingswood is broken up into 12 Areas, with MacMic Group's interest at Land at Station Lane, Kingswood forming a large proportion of Area 7. The assessment of Area 7 in the Settlement Analysis with associated commentary is provided below.

19. Connectivity – Area 7 is graded B in recognition of its accessibility to key routes in the settlement, including Station Lane and the canal towpath. Area 7 is one of only four Areas in Kingswood graded B on connectivity, with the remainder achieving C, D or E.

20. Landforms – Area 7 is clear of any constraints aside from Flood Zones 2 and 3 on the eastern boundary of the site, which can be appropriately avoided and indeed enhanced in bringing forward residential development on Land at Station Lane, Kingswood.

21. Local Facilities – Area 7 scores 2 out of 5 with regard to accessibility to local facilities, being within 800m of categories: Places to Meet and Education. In terms of Retail, Jobs and Economy, it is recognised that Area 7 falls outside the 800m limit, however this is marginal with the convenience store, post office and other retail and employment generating uses falling around 850-900m of Area 7 and thus still considered generally accessible. With regard to Open Space, Leisure, Recreation – Wellbeing, the Concept Masterplan demonstrates how significant green infrastructure



provision and associated access to the canal towpath is to be incorporated into the development. On Healthcare, it is recognised that Area 7 falls outside the 800m limit, however again this is marginal with the surgery falling within 1km and thus still considered generally accessible. Connections with local facilities are supported in the emerging Concept Masterplan through maximising existing links and providing additional accessibility where appropriate.

22. Density – Kingswood is covered entirely by residential development classified as ‘Outer Suburb (approx. 20-40 dph)’. This has been taken account of in the emerging Concept Masterplan for Land at Station Lane, Kingswood, with residential development proposed at an average of 36 dph.

23. In conclusion, Area 7 performs well in the Settlement Analysis for Kingswood, particularly with regard to Connectivity and Landforms. With regard to access to Local Facilities, whilst some of these fall outside of the 800m threshold, this is marginal and generally the range of facilities on offer in Kingswood are considered to be accessible. This will be supported through significant green infrastructure provision on Land at Station Lane, Kingswood, along with improved connectivity from the Site. The density mapping has been considered and is reflected in the Concept Masterplan for Land at Station Lane, Kingswood with residential development proposed at an average of 36 dph. MacMic Group consider that more weight should be afforded to accessibility to rail in the Settlement Analysis and indeed wider consideration of the development strategy and site selection.

Q-5.2 The Potential for New Settlements

24. No, MacMic Group are of the view that new settlements should not form part of the strategy for dealing with South Warwickshire’s development growth needs, due to concerns regarding lead-in terms, infrastructure requirements, viability and market attractiveness. However, the expansion of existing settlements where there are opportunities to capitalise on existing benefits that new settlements are striving for should be considered. This would need to be supported by the allocation of sites which are deliverable in the short-term in sustainable locations, such as adjacent to Kingswood. This will help maintain and enhance the vitality and sustainability of existing settlements and deliver the need for housing, affordable and specialist



housing, jobs, green infrastructure, improved facilities and infrastructure within the towns and villages where such needs exist.

25. With regard to the potential new settlement C1 south of Kingswood, it is considered that this site is too close to Lapworth Railway Station to warrant growth of 6,000 dwellings to facilitate a new Railway Station. Whilst potential new settlement C1 could come forward and deliver significant infrastructure including a Primary School and Secondary School, MacMic Group consider that a standalone new settlement south of Kingswood would not maximise the significant benefit that the existing Lapworth Railway Station has to offer.

26. As such, MacMic Group consider that, should significant growth in this location be considered appropriate, the focus should be the existing settlement of Kingswood and a significant expansion of the village in order to maximise the offer of Lapworth Railway Station. This would allow the delivery of significant growth to meet the needs of South Warwickshire in a location well related to conurbation with unmet needs supported by the provision of significant new infrastructure, whilst maximising the potential and also sustaining the existing Lapworth Railway Station.

Issue S6 A Review of Green Belt Boundaries

27. MacMic Group strongly agree with the proposal to review Green Belt boundaries, in order to ensure that the most sustainable growth strategy in South Warwickshire can be achieved. To avoid Green Belt release in the SWLP would limit the potential for growth of a number of South Warwickshire's more sustainable settlements, including Kingswood.

28. The SWLP should be supported by an up-to-date Green Belt Study which assesses individual land parcels and, in association with a development strategy which supports growth in the most sustainable locations including on the edge of sustainable settlements such as Kingswood, recommends removal of land currently within the Green Belt which least serves the five purposes of the Green Belt, and can define a defensible boundary.



Q-S7.2 Refined Strategic Growth Options

29. The SWLP Issues and Options consultation presents five growth options which are proposed as potential solutions to deal with meeting South Warwickshire's requirements, with the suggestion that one of the options will be selected to be taken forward in the Preferred Options. However, MacMic Group consider a mixture of options will be required to best deliver the growth needs of South Warwickshire as set out below.
30. Firstly, Table 7 of the SWLP Issues and Options document details the results of the high level testing of the five growth options in the supporting Sustainability Appraisal (SA, November 2022). This demonstrates that the five options perform differently in different areas, with no one option standing out as the best performing option across all areas.
31. Secondly, it is noted and considered important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.
32. The findings of the SA are important to guide decision making, but other matters such as the requirements of the NPPF should also guide the selection of the most appropriate growth strategy. This includes the requirement to deliver sufficient sites for the first five years of the Plan⁴ as required in the NPPF.
33. Finally, given the significant level of growth the SWLP will need to accommodate (see response to Issues H1 and H4 below) this is unlikely to be able to be met sustainably through a single growth strategy.
34. Specific support is provided for Option 1: Rail Corridors and Option 5: Dispersed. These options support growth at Kingswood which is considered appropriate given it is identified as a Growth Village in the adopted Warwick Local Plan (2017), has a range of local facilities and benefits from Lapworth Railway Station with direct

⁴ Paragraph 68 a) of the National Planning Policy Framework (July 2021)



connections to Birmingham, Leamington, London, Solihull, Stratford & Warwick, along with bus provision. Kingswood also has good accessibility to the highway network and is located within easy reach of the M42 and M40. Kingswood also has a strong functional relationship with the Greater Birmingham Housing Market Area, and growth here would be well placed to contribute towards unmet needs. To frustrate any further growth of Kingswood in the SWLP would not be consistent with the provisions of the NPPF.

35. MacMic Group consider that the omission of Kingswood from Option 2: Sustainable Travel is an anomaly given the settlement's strong sustainable travel provision.

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

Q-H1-1 Providing the Right Number of New Homes

36. Yes, the HEDNA evidence does provide a reasonable basis for identifying future levels of housing need across South Warwickshire.
37. The provision of a sufficient level of housing growth in the SWLP is critical, in accordance with the NPPF⁵.
38. SWLP Issues and Options consultation evidence base includes the Coventry and Warwickshire Housing and Economic Development Needs Assessment ('the HEDNA', November 2022). The HEDNA seeks to explore the housing and employment needs across Coventry and Warwickshire, and applies a trend-based approach to modelling housing need in order to establish the starting point for the respective Local Authorities in plan-making.
39. The HEDNA applies the principles of the Standard Method calculation set out in national policy but utilises new demographic projections, supported by early data releases from the 2021 Census, to better reflect the needs of the respective and collective Local Authorities. The overall outcome for Coventry and Warwickshire is a decrease in annual housing need from 5,554 dwellings, derived from applying the Standard Method formula as set out in national policy, to 4,906 dwellings. Whilst there

⁵ Paragraph 11 a) and b) of the National Planning Policy Framework (July 2021)



are decreases in annual housing need for some of the Local Authorities, and in particular Coventry (a considerable reduction from 3,188 dwellings per annum to 1,964 dwellings per annum), for South Warwickshire there is an overall increase as set out in Table 1 below:

Table 1 – South Warwickshire Housing Need Comparison

Annual Housing Need	Stratford-on-Avon	Warwick	South Warwickshire Total
Standard Method	564	675	1,239
HEDNA Trend-Based	868	811	1,679

40. The NPPF sets out that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”⁶. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.

Emerging Requirement and Capacity

41. Commentary on the UCS supporting the SWLP Issues and Options consultation s provided in response to Q-S3.1 above.

42. To summarise, MacMic Group consider that the basis for housing need in South Warwickshire should be the HENDNA and that the Plan period should be assumed from 2022 onwards. As a result, MacMic Group consider the local housing need for the SWLP to be 47,012 dwellings over a 28 year plan period.

43. In line with the NPPF⁷, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to

⁶ Paragraph 61 of the National Planning Policy Framework (July 2021)

⁷ Paragraph 61 of the National Planning Policy Framework (July 2021)



set a higher housing requirement in line with national guidance⁸; in order to address a significant affordable housing shortfall, support economic development, or address strategic infrastructure requirements which are likely to increase the number of homes needed.

44. Further consideration will also need to be given to unmet needs within the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness⁹, which is explored in further detail in response to Q-H4-1 below.
45. With regard to capacity, MacMic Group consider that there are 14,360 dwellings with planning permission at 1st April 2022 which can be included as supply, applying a 5% lapse rate to the number of dwellings set out in the respective Housing Trajectories. There are also a further 5,579 dwellings on outstanding Local Plan allocations without planning permission which can be included in the supply, however it should be ensure that such sites can still be considered to be Developable in line with the NPPF¹⁰.
46. With regard to any windfall allowance, this should be calculated on the basis of compelling evidence that it will provide a reliable source of supply, as required by the NPPF¹¹.

Q-H4-1 Accommodating Housing Needs Arising from Outside of South Warwickshire

47. It is imperative that the SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire, to ensure compliance with the Duty to Cooperate and so the SWLP can demonstrate adherence with the positively prepared test of soundness set out in the NPPF¹². It is recognised that national planning policy and legislation has the potential to change during the course of the preparation of the SWLP, including in relation to the Duty to Cooperate and replacement with an 'alignment policy', however there is no suggestion the imperative for local authorities to address unmet needs arising from within their Housing Market Areas will be removed.

⁸ Paragraph 010 Reference ID 2a-010-20201216 of National Guidance

⁹ Paragraph 35 a) of the National Planning Policy Framework (July 2021)

¹⁰ Glossary of the National Planning Policy Framework (July 2021)

¹¹ Paragraph 71 of the National Planning Policy Framework (July 2021)

¹² Paragraph 35 a) of the National Planning Policy Framework (July 2021)



48. MacMic Group consider that there are two likely sources of unmet housing needs which require consideration in the development of the SWLP: Coventry and Warwickshire; and Greater Birmingham and Black Country.

Coventry and Warwickshire

49. Coventry has by far the greatest level of housing need across Coventry and Warwickshire as set out in the HEDNA, with a housing need calculation derived from the Standard Method of some 3,188 dwellings per annum, adjusted in the HEDNA trend-based approach to 1,964 dwellings per annum. Applying the housing need calculated in the HEDNA to the proposed SWLP period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.

50. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development outside the Green Belt. This was reflected in the adopted Coventry Local Plan (December 2017), where the local housing need in Coventry in the period 2011 to 2031 was calculated at 42,400. The Coventry Local Plan set a housing requirement of just 24,600 (some 60% of its local housing need), leaving a shortfall of some 17,800 dwellings to be met elsewhere.

51. It is therefore highly unlikely that Coventry will be able to meet its local housing need identified in the HEDNA of 54,992 dwellings to 2050. Even assuming that Coventry can accommodate a proportion of its local housing need consistent with that set out in the adopted Coventry Local Plan (i.e. 60%), which is itself a challenge, Coventry could only accommodate 33,000 dwellings leaving a shortfall of some 22,000 dwellings to be met elsewhere.

52. Given South Warwickshire's functional relationship with Coventry, and as South Warwickshire makes up around half of the population of Warwickshire according to the 2021 Census data early releases¹³, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This

¹³ [How the population changed where you live, Census 2021 - ONS](#)



equates to approximately 11,000 dwellings and should be taken into consideration at this stage of the process as a working assumption for the level of unmet need to be accommodated, as required by the still-extant Duty to Cooperate.

Greater Birmingham and Black Country

53. There are also significant unmet housing needs arising from the Greater Birmingham and Black Country Housing Market Area which require consideration.
54. Birmingham published a New Local Plan Issues and Options consultation document in October 2022. This identifies an overall housing need in Birmingham to 2042 derived from the Standard Method of some 149,286 dwellings, with total housing supply equating to just 70,871 – a shortfall of some 78,415 dwellings.
55. There are significant limitations to the potential for such substantial unmet needs to be met by Birmingham's neighbouring authorities due to lack of available land in the Black Country and significant Green Belt coverage in the Black Country and elsewhere (Bromsgrove, Solihull, North Warwickshire and Lichfield). This was evident in the work undertaken in the now abandoned Black Country Local Plan Review, which was subject to Regulation 18 consultation in August to October 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.
56. There are strong functional relationships between Birmingham and South Warwickshire, in terms of transport connections and commuting patterns, and development in South Warwickshire can contribute towards meeting unmet needs.
57. The Councils will need to engage with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to South Warwickshire, but given the scale of such unmet needs and limited scope for such unmet needs to be met elsewhere, the importance of the SWLP taking account of this should not be underestimated. It is noted that the SA has tested the effects of an additional 5,000 to 10,000 dwellings to accommodate Birmingham's unmet needs, however given the numbers discussed above MacMic Group consider this is likely to be at the lower end of what could be expected to be accommodated in South



Warwickshire. At this stage of the process, as a working assumption for the level of unmet need to be accommodated, the figure should be at least 10,000 dwellings.

Q-H4-3 Accommodating Housing Needs Arising from Outside of South Warwickshire

58. With regard to how and where best housing shortfalls should be accommodated in South Warwickshire, MacMic Group consider that settlements with strong sustainable transport connections and a strong functional relationship to the conurbations where unmet housing needs are arising should be prioritised.

59. This includes at Kingswood which has a strong functional relationship with the Greater Birmingham Housing Market Area, including benefiting from Lapworth Railway Station with direct connections to a number of urban conurbations including Birmingham, and a good highway network and is located within easy reach of the M42 and M40.

Conclusion on Housing Requirement

60. Bringing together all of the above, MacMic Group consider that the SWLP will need to plan for a level of housing growth as set out in the below Table 2 in the order of at least 43,000 dwellings.



Table 2 – SWLP Housing Need and Supply Calculation

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



Chapter 12 - Plan Content

Q-P1.1 and Q-P1.2 Part 1 and Part 2 Plans

61. No, MacMic Group do not agree with the proposed approach.
62. It is proposed that the SWLP will take the form of a Part 1 Local Plan to deal with the Vision and Strategic Objectives, Growth Strategy and Strategic Policies, followed up by a Part 2 Local Plan setting out detailed policies (in one or more Development Plan Documents) and Area Actions Plans. MacMic Group consider that this approach to plan-making in South Warwickshire is unnecessarily burdensome, and indeed likely to lead to greater uncertainty for stakeholders including local communities over a longer period of time.
63. Whilst the production of a Part 1 Local Plan would initially support a more streamlined process to adoption, overall the time implications of producing a Part 1 Local Plan followed up by a Part 2 Local Plan are likely to be far more significant than the production of a single all-encompassing Local Plan.
64. The implication of this is the potential for housing and employment growth in South Warwickshire to be inhibited, particularly as the SWLP is proposing to include the majority of strategic and non-strategic site allocations in the Part 2 Local Plan with only certain strategic site allocations and broad locations to be identified in the Part 1 Local Plan. This may result in the respective Councils not being able to demonstrate a positive Five Year Housing Land Supply position, and less sustainable sites than would otherwise be deemed appropriate for allocation may have to be looked upon favourably.
65. MacMic Group raise specific concerns with how the SWLP is proposing to deal with Green Belt release, with suggestion in Tables 16 and 17 of the Issues and Options document that Green Belt boundaries will be amended in the Part 1 plan but non-strategic allocations saved for Part 2. This could lead to land being released from the Green Belt in Part 1, but non-strategic sites not allocated and thus not supported for development in principle until the Part 2 plan is adopted. This would be impractical given the basis for Green Belt release would be to allow sites currently in the Green Belt to come forward for development. Dealing with Green Belt release and non-



strategic allocations in a single all-encompassing Local Plan would also support delivery of residential development in the early part of the SWLP period.

66. As such, MacMic Group suggest that the Local Plan process being adopted by the SWLP is reconsidered, and a single all-encompassing Local Plan be produced from the outset.

Land at Station Lane, Kingswood

67. Land at Station Lane, Kingswood, as identified in the attached Site Location Plan, is being promoted by MacMic Group to the SWLP. The site was submitted to the Call for Sites exercise in June 2021 and has subsequently been identified as Site 169 on the Interactive Map.

The Opportunity

68. Kingswood is identified as a Growth Village in the adopted Warwick Local Plan. Kingswood has a range of local facilities, including a Primary School, surgery, public house, convenience store, post office, garage, community and sporting facilities. Indeed Kingswood was joint third highest in the Village Settlement Hierarchy Report with a score of 53, and had the highest total score of 64 in the subsequent revised report (V18PM).
69. Kingswood also benefits from Lapworth Railway Station with direct connections to Birmingham, Leamington, London, Solihull, Stratford & Warwick, along with bus provision. Development in Kingswood will assist with sustaining the important facility, which had 84,716 passengers in 2019-20¹⁴. Kingswood is also accessible by a good highway network and is located within easy reach of the M42 and M40.
70. Kingswood lies 2 miles (3km) south of Dorridge, 6 miles (10km) south of Solihull and 10 miles (16km) to the north west of Warwick. It is centrally located to other larger settlements such as Birmingham, Coventry, Redditch and Leamington Spa, which offer opportunities for employment, travel and education.

¹⁴ [Station Details – Housing around Rural Stations \(russellcurtis.co.uk\)](http://russellcurtis.co.uk)



71. Kingswood had an indicative apportionment of 95 dwellings during the previous Local Plan process but only 48 dwellings are allocated in the Local Plan, reflecting the availability of land deemed suitable and available at the time. Therefore, there has been an under provision in the village in the adopted Local Plan, which is likely increasing unmet local needs for housing including affordable housing.
72. Kingswood has a strong functional relationship with the Greater Birmingham Housing Market Area, and growth here would be best placed to contribute towards unmet needs.
73. Whilst Land at Station Lane, Kingswood is currently within the Green Belt, it is in a sustainable location and there are no options for further growth within Kingswood without amendments to the Green Belt boundaries. The NPPF is clear that where Green Belt release is necessary, first consideration should be given to locations that are well-served by public transport¹⁵. The sustainable effects of attempting to allocate all development outside of the Green Belt, the lack of availability of non-Green Belt land, and the substantial housing need across the Plan area are the initial steps necessary to demonstrate exceptional circumstances in this case.
74. A new permanent Green Belt boundary could be established along the edge of the development. The Site sits within parcel KG2 of the Joint Green Belt Study and performed relatively low to elsewhere, scoring 10/20. In particular the study notes that KG2 has strong boundaries: “The Grand Union Canal represents the eastern border of the parcel. The canal sits close to the existing urban edge of the village and therefore represents a significant boundary preventing encroachment of the wider countryside to the east of the parcel.” Submitted with these representations is a Landscape and Green Belt Study specifically for the Site, which confirms that it makes a limited contribution to the purposes of the Green Belt, and its removal would not undermine the fundamental aims of Green Belt in the wider area.
75. A Concept Masterplan for the Site has been prepared; this details how Land at Station Lane, Kingswood responds to the opportunities and constraints and could deliver circa 125 dwellings, incorporating significant green infrastructure to retain the Site’s

¹⁵ Paragraph 142 of the National Planning Policy Framework (July 2021)



landscape character and historic environment setting. This is supported by a Vision Document which provides further detail on the context of the Site and how the emerging proposals respond to this, including the economic, social and environmental benefits to the local community.

76. A suite of technical evidence base work has been prepared in support of the emerging proposals at Station Lane, Kingswood. This includes a Highways Technical Note which concludes that access to the Site can be achieved from Station Lane and that there is scope for the provision of a new footway link to the existing footway network to the south, finding that development can be brought forward without resulting in a significant impact on highway safety or the operation of the surrounding highway network. A Flood Risk and Drainage Scoping Study identifies areas at risk of flooding and realistic on site drainage requirements. The Landscape and Green Belt report considers how development of the Site can be developed whilst respecting the wider Arden landscape character, and will be limited in Green Belt impacts. A Preliminary Ecological Appraisal has assessed the Site's habitat value and informed the Initial Concept masterplan, in order to ensure biodiversity is protected and enhanced. A Tree Survey has also been commissioned which demonstrates how the majority of trees can be retained in the creation of an access, with replacement trees able to be planted where there is a loss.

77. Overall, there are no technical impediments or environmental characteristics that could not be addressed through sensitive masterplanning, to deliver a high-quality proposal in this location.

SWLP Evidence Base

Sustainability Appraisal

78. Kingswood is identified in the SA as one of 22 Small Settlement Locations (SSLs), considered for intermediate scale, primarily residential development for between 50 and 500 dwellings. Land at Station Lane, Kingswood falls partly within one of the potential SSLs on the outskirts of the settlement.

79. A summary of the findings of the SA assessment of the SSLs is provided at Table 5.1 of the SA. It is clear that all SSL perform differently in different areas, with no one



option standing out as the best performing option across all areas. Having said that, it is recognised that Kingswood is one only five SSLs which performs strongly against SA Objective 11: Accessibility reflecting the settlement's public transport offer.

80. It is noted and considered important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.
81. The findings of the SA are important to guide decision making, but other matters such as the availability of land which meets the NPPF definition of Developable¹⁶ and the suitability of sites when considering the range of opportunities and constraints is most important.

Settlement Analysis

82. Detailed commentary on the Settlement Analysis in relation to Kingswood is provided in response to Q-S4.2 above.
83. To summarise, Area 7 performs well in the Settlement Analysis for Kingswood, particularly with regard to Connectivity and Landforms. With regard to access to Local Facilities, whilst some of these fall outside of the 800m threshold, this is marginal and generally the range of facilities on offer in Kingswood are considered to be accessible. This will be supported through significant green infrastructure provision on Land at Station Lane, Kingswood, along with improved connectivity from the Site. The density mapping has been considered and is reflected in the Concept Masterplan for Land at Station Lane, Kingswood with residential development proposed at an average of 36 dph.

Heritage and Settlement Sensitivity Assessment

84. The Heritage and Settlement Sensitivity Assessment details the range of historic environment assets in Kingswood and the ability for additional development to be brought forward in the settlement taking into account potential impacts.

¹⁶ Glossary of the National Planning Policy Framework (July 2021)



85. The Assessment finds that land to east of Kingswood has potential for development, with the historic environment limited to two Listed Buildings (both Grade II) and Conservation Area. The Concept Masterplan and Vision Document for Land at Station Lane, Kingswood detail how suitable consideration has been afforded to these historic assets.
86. It is clear that further growth to the south of Kingswood is unlikely to be able to be accommodated without significantly impacting the local historic environment, including the Conservation Area and a series of Listed Buildings. Concerns are also raised with development potential of the west of Kingswood recognising the Listed Buildings (including Grade I Listed Packwood House) and Registered Park and Garden.
87. Land to the north of Kingswood performs well in historic environment terms, however development to the north of Rising Lane would not be proximal to any of Kingswood's local services and facilities and would extend the built form of the settlement contrary to the existing pattern of the settlement. This is also likely to be challenging for a Green Belt release perspective, with no strong identifiable boundaries. As such, whilst development of land north of Kingswood may be most preferable from a historic environment perspective, other factors suggest this location is not suitable for further growth of the settlement.

Deliverability

88. Land at Station Lane, Kingswood is available in the short-term, supported by landowners who are committed to bringing forward the site as soon as possible and promoted by MacMic Group who have the necessary experience and expertise to successfully guide a development proposal through to implementation.
89. MacMic Group are acutely aware of the need for landowners, promoters and developers to support the SWLP, and to that end would prepare a planning application to be submitted at an appropriate time as the SWLP progress. Subject to good progress being made on the SWLP, with a view to the Examination taking place in Summer 2025, and subject to planning permission being granted on the Site in a timely manner, delivery could commence as early as 2027.



90. The supporting Concept Masterplan indicates that the Site could sensitively accommodate around 125 dwellings, including affordable dwellings to meet local needs, along with significant new green infrastructure including sustainable drainage systems. It is expected that the Site could be developed at 50 dwellings per annum, resulting in a development period of around 2.5 years.

Summary

91. Land at Station Lane, Kingswood, as identified in the attached Site Location Plan and on the Call for Sites Interactive Map (Site 169), is being promoted by MacMic Group to the SWLP.

92. Kingswood is considered to be an appropriate location for additional growth in the SWLP, noting its level of services and connectivity with nearby urban conurbations, including importantly by rail from Lapworth Railway Station.

93. A Concept Masterplan for the Land at Station Lane, Kingswood has been prepared; this details how the Site responds to the opportunities and constraints and could deliver around 125 dwellings, incorporating significant green infrastructure to retain the landscape character and historic environment setting. A suite of technical evidence base work has been prepared in support of the emerging proposals at Station Lane, Kingswood, including on highways and arboriculture. Overall, there are no technical impediments or environmental characteristics that could not be addressed through sensitive masterplanning, to deliver a high-quality proposal in this location.

94. To bring forward Land at Station Lane, Kingswood in the SWLP would also be consistent with the emerging evidence base, noting that this area of the settlement is well connected and accessible to local services and facilities, including notably Lapworth Railway Station, and is an area of relatively low historic environment sensitivity.

95. Land at Station Lane, Kingswood is available in the short-term and is controlled by a single developer, MacMic Group, who are willing to support the SWLP process including through the preparation of a planning application to be submitted at an



appropriate time as the SWLP progress, to provide comfort to the Examination Inspector that the site is deliverable. It is expected that the Site could sensitively deliver circa 125 dwellings, in a construction period of around 2.5 years, once planning permission is granted.

96. On the basis of the above, MacMic Group recommend that the SWLP allocates Land at Station Lane, Kingswood for development, in line with the provisions set out in the supporting Concept Masterplan.