

2 March 2023
Issues and Options Reps Final 02-03-2023 (Amended)



Andrew Cornfoot
Business Manager, Policy & Site Delivery
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

Michael Burrow
E: MBurrow@savills.com
DL: +44 (0) 121 634 8433

55 Colmore Row
Birmingham B3 2AA
T: +44 (0) 121 200 4500
F: +44 (0) 121 633 3666
savills.com

Dear Andrew

**SOUTH WARWICKSHIRE LOCAL PLAN: ISSUES AND OPTIONS REPRESENTATIONS
BARRATT DAVID WILSON HOMES (MERCIA)
LAND AT WARWICK PARKWAY**

Introduction

Savills has been instructed by Barratt David Wilson Homes (Mercia), referred to hereafter as “BDWH” to promote circa 48 acres of land to the north west of Warwick Parkway Railway Station to the emerging South Warwickshire Local Plan (“SWLP”). This letter provides responses on behalf of BDWH to some of the questions posed within the Issues and Options consultation document. Further site-specific information is being submitted under separate cover to the Call for Sites consultation process.

Representations

Chapter 3

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

Yes - the focus for the Vision is considered to be appropriate.

It is appropriate for the focus in the Vision to be on the delivery of homes and jobs and to identify that this will include, where appropriate, unmet need from neighbouring authorities. The 5no. elements of the Vision are considered to be relevant and valid. The site BDWH is promoting to the north west of Warwick Parkway Railway Station is an example of a site that will fully address each of the 5no. main areas set out within the collective Vision.

However it is noted that 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.

Having reviewed the Sustainability Appraisal, we wish to make comments in relation to Broad Area B.30 Warwick Northeast. The southern end of this broad area contains the land that BDWH is promoting to the north



west of Warwick Parkway Railway Station (as set out in the Vision Document submitted to the Call for Sites process accompanying this letter). These comments are set out in **Appendix A** of this letter.

Firstly, it is entirely appropriate to include this broad area as a potential option for the consideration of development in the future, given its location on the western edge of Warwick, which is one of the largest and most sustainable settlements within the SWLP boundary. The proximity of this broad area to the Warwick Parkway Railway Station, which provides public transport connectivity within the District and beyond, makes it a highly sustainable location.

However, the approach taken to assess the Broad Areas within the Sustainability Appraisal process results in the overgeneralisation of some of the impacts due to the size of the areas being assessed. The review of reasonable alternatives ought, therefore, to assess specific opportunity sub-areas within these Broad Areas.

One of these specific opportunity sub-areas that should be assessed needs to be the land to the north west of Warwick Parkway Railway Station on the basis that this is a self-contained area which is separated from the remainder of B.30 by the Birmingham Road (A4177). The site is bound by the Birmingham Road (A4177) to the north, the Grand Union Canal to the south, the Old Budbrooke Road to the east and an existing hedgerow to the west. In this regard we have re-appraised this sub-area on its own merits against the criteria used within the Sustainability Appraisal. The output from this process, included in Appendix A, highlights that the appraisal outcome for this sub-area is more positive than the appraisal outcome included within the Sustainability Appraisal for the Broad Area as a whole, notably in relation to: Ancient Woodland; ecological designations; access to leisure, food store and PROWs; and potential for delivering some employment floorspace.

The Vision Document which is being submitted alongside these Issues and Options representations demonstrates the potential that the BDWH land to the north west of Warwick Parkway Railway Station offers for delivering residential development and green infrastructure in a way which connects and assimilates development into the wider landscape context.

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

Option 12a: Set out infrastructure requirements for all scales, types and location of development

Infrastructure requirements, and how they are considered alongside the housing requirements of South Warwickshire, are key for the Local Plan. The NPPF requires Local Planning Authorities (LPAs) to plan for, and allocate, sufficient sites to deliver the strategic priorities of the area (see NPPF paragraph 23). The extent and costs for the supporting infrastructure required should be understood at an early stage.

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

Option 13a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan

Whilst it would be simpler to have a single levy for the whole of South Warwickshire, market characteristics are important when deciding on an appropriate level of CIL levy (as evidenced by the different rates between the LPAs at present). These area-based characteristics could be picked up through the appropriate use of zoning across this wider area under a single South Warwickshire CIL. It is important to consider the viability of individual sites when determining the CIL charging rates (see PPG Paragraph: 021 Reference ID: 25-021-20190901).

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

Infrastructure, viability and deliverability are all key considerations in the production of the SWLP. At this stage, key documents such as the Infrastructure Delivery Plan (IDP) and Housing and Economic Land Availability Assessment (HELAA) are yet to be produced, and therefore the key underlying assumptions of any viability work are unknown. Once evidence base documents such as the IDP and HELAA are available, the Councils should undertake a detailed viability assessment to inform the preferred options consultation.

To ensure that the SWLP is consistent with national policy, as required by NPPF paragraph 35, any requests for contributions should be made in compliance with the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, and confirmed at paragraph 57 of the NPPF. As identified in NPPF paragraph 34 the policies and levels of contributions included within the Local Plan should not undermine the viability and deliverability of the Local Plan.

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

Chapter 11 of the NPPF encourages effective use of land, including: taking into consideration the need for different types of housing; the desirability of maintaining an area’s prevailing character and setting; and the use of minimum density standards for city and town centres and other locations that are well served by public transport.

There is role for the intensification of development in certain areas of the SWLP area as part of the wider strategy. However development site character and context will vary significantly across the SWLP area, both within town centres and outside of the town centres. Planning policies will need to be sufficiently flexible to be able to accommodate this. Accordingly option S2b will enable a well-planned best use of available land, incorporating intensification where appropriate but without prejudicing the need to reflect context and character on a site-by-site basis, particularly on the rural fringes of settlements.

The PPG¹ cautions that measuring ‘dwellings per hectare’ can: *“encourage particular building forms over others, in ways that may not fully address the range of local housing needs... It is therefore important to consider how housing needs, local character and appropriate building forms relate to the density measures being used.”* Therefore it is important that future policy wording should allow for density and the approach to intensification to be determined on a site by site basis.

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

The limitations of the Urban Capacity Study (Arup 2022) are highlighted in the report. The study is a theoretical exercise only. It is not intended to conclusively establish the urban housing capacity of South Warwickshire over the period to 2050. Instead it simply indicates a current potential urban housing capacity. More detailed work is required to confirm actual capacity. It is important to note that the study has not been informed by the outcome of an area-wide HELAA.

The Urban Capacity Study concludes that there is a potential 19,950 housing supply (including windfall sites) and states that there is an additional potential up to 3,400 dwellings capacity that could be delivered on car parks. This means that in total up to 23,350 dwellings may be able to be delivered in urban areas in South Warwickshire. This assumes that all sites identified in the urban capacity study are deliverable and viable, and that the upper number of dwellings to be delivered on car parks is achievable. All of these assumptions require further testing, including on a viability basis, once the HELAA has been published.

This identified capacity compares to a total baseline housing need in the area of 41,975 dwellings as calculated from the trend based calculation in the HEDNA, assuming a plan period from 2025-2050. This results in a c.18,625 dwelling shortfall (which could be higher once any cross-boundary apportionment of development from Coventry and / or Birmingham has been taken into consideration). The study concludes that it is unlikely to be possible to meet current development needs without significant greenfield development. However, in light of the figures set out above, the study should categorically conclude that a significant amount of greenfield development in sustainable locations will be required.

¹ Planning Practice Guidance: Paragraph: 005 Reference ID: 66-005-20190722.

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.

Paragraph 119 of the NPPF is clear that planning policies should make effective use of land, including as much use as possible of previously-developed or “brownfield” land. Furthermore, NPPF paragraph 120 states that planning policies should give substantial weight to the value of using suitable brownfield land. Nevertheless this should be viewed in the context of NPPF paragraph 73, which identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing villages and towns, provided that they are well located.

Although significant encouragement is given to the development of brownfield land, it is still necessary to provide an adequate justification for the use of brownfield land in accordance with the strategy for the sustainable distribution of growth within the Local Plan area. It should not be the case that brownfield land should be considered over all other options if the specific sites are not suitable, viable, deliverable or sustainable locations for housing in line with the Councils’ strategy.

To ensure a plan led approach, the Councils’ strategy should be to follow a clear locational strategy that promotes sustainable development, which includes the optimisation of brownfield land where appropriate, whilst also acknowledging the role that greenfield land should play. This approach is consistent with option S3.2a.

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

Yes

As included in response to QS3.2, NPPF paragraph 73 identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as extensions to existing villages and towns, provided that they are well located. The growth of existing settlements can take account of the existing services, facilities and infrastructure that are already in place 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

Appendices 2 and 3 of the Settlement Design Analysis (January 2023) includes design analysis for Hampton Magna, Hatton Park and ‘Warwick North’ respectively. Both of these maps do not take into consideration the full extent of the land to the north west of Warwick Parkway Railway Station, with the exception of identifying the location of the canal and the footpath along the canal towpath. This is an omission and should be rectified to allow this area to be properly considered. This site is on the edge of Warwick Town and is included within Sustainability Appraisal Broad Area B.30. The evidence base must be consistent in its consideration of potential development locations.

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

Possibly

The delivery of new settlements could be taken into consideration as part of the wider strategy, given the potential that they could offer to make a significant contribution to new housing delivery. It should however be recognised that the delivery from large strategic sites can be very slow in the early stages of the new Local Plan period. As set out in the Lichfields ‘Start to Finish Report’ (Feb 2020) the average time from the validation of first application to completion of the first dwelling for a scheme of 2,000+ dwellings is 8.4 years. As such it is crucial that a sufficient number of non-new settlement sites are allocated to address the first 0-10 years of the plan period. This should include a mix of substantial strategic sites and smaller sites.

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 (an approach which capitalises on opportunities in proximity to existing rail corridors should be carried forward into the final chosen strategy).

This approach should be taken into account in relation to the location of new development in general, especially more substantial strategic sites, and not just limited to new settlements. South Warwickshire has some unique opportunities for locating new development close to public transport corridors, especially including rail corridors. The South Warwickshire authorities benefit from a number of railway stations which provide links to a multitude of locations across both HMAs and the wider region. Development in close proximity to these stations will improve the utilisation of these stations and potentially provide a critical mass to assist with sustaining the facilities at these stations and their viability. Further commentary in relation to this is set out in response to Q-7.2 below.

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 principles of this option should be carried forward into the final chosen strategy).

This approach embraces the benefits arising from accommodating development within or in close proximity to rail corridors in locations which are already sustainable or could be made more sustainable through the delivery of further development. This is especially true for locations near to existing stations. Proximity of new development to public transport services is an important consideration in delivering a strategy which seeks to reduce carbon emissions in response to the climate change challenges. The South Warwickshire authorities benefit from a number of railway stations which provide links to a multitude of locations across both HMAs and the wider region, some of which offer unique opportunities as the locations for sustainable development. Development in close proximity to these stations will improve their utilisation and potentially provide a critical mass to assist with sustaining their facilities and the viability of these stations.

Warwick Parkway is one of the stations listed in the Issues and Options consultation document² in relation to this Option and the site north west of Warwick Parkway Railway Station is uniquely located to achieve this Option. Warwick Parkway Railway Station is on the edge of Warwick, one of the largest and most sustainable settlements in the SWLP boundary, and there is an opportunity for accommodating a significant quantum of new residential development in close proximity to it. The public transport services from Warwick Parkway Railway Station provide convenient access to the employment, retail and leisure uses within Warwick, Leamington, Spa, Coventry and Birmingham, and thereby reducing the need to travel via private car to access these uses.

Option 2: Sustainable Travel

Appropriate strategy (the principles of this option should be carried forward into the final chosen strategy).

An approach which embraces the benefits arising from development located within or in close proximity to sustainable rail and / or bus corridors is entirely appropriate. These sustainable corridors could be made even more sustainable if additional new residential development is allowed. Proximity of new development to public transport services is an important consideration in delivering a strategy which seeks to reduce carbon emissions in response to the climate change challenges and a strategy involving a combination of both rail and bus connectivity will further enhance these reductions. The South Warwickshire authorities benefit from a number

² South Warwickshire Local Plan Part 1. Stage 2 Issues and Options Consultation. January 2023. Page 63.

of railway stations and a network of bus routes which in combination could provide links to a multitude of locations across both HMAs and the wider region. Development in close proximity to these stations and bus routes will improve the utilisation of these stations and bus routes and potentially provide a critical mass to assist with sustaining the viability of these public services and facilities.

Warwick Parkway Railway Station, together with its bus services, is one of the indicative locations listed in the Issues and Options consultation document³ that will enable this Option to be achieved. This Railway Station is on the edge of Warwick, one of the largest and most sustainable settlements in the SWLP boundary, and there is an opportunity for accommodating a significant quantum of new residential development in close proximity to it. The public transport services from Warwick Parkway Railway Station, both in terms of bus and rail services, provide convenient access to the employment, retail and leisure uses within Warwick, Leamington, Spa, Coventry and Birmingham, and thereby reducing the need to travel via private car to access these uses. The BDWH site is in close proximity to Warwick Parkway Railway Station and future residents on this site would have easy access to this important public transport hub.

Option 3: Economy

Neutral.

Option 3 seeks to locate homes close to existing or potential job opportunities. Whilst this may reduce car journeys to some extent, it is noted that carbon reduction aspirations may not be achieved, to the same extent as Options 1 or 2 unless such opportunities are conveniently located to strong sustainable forms of public transport.

Option 4: Sustainable Travel and Economy

Appropriate strategy (the principles of this option should be carried forward into the final chosen strategy).

Combining sustainable transport with economic growth is considered to be a sensible approach.

Option 5: Dispersed

Appropriate strategy (the principles of this option should be carried forward into the final chosen strategy).

Whilst the focus of future development in South Warwickshire should embrace the opportunities resulting from Option 4, this should not ignore, or allow stagnation at, other settlements in these Districts, especially the smaller ones. It is recognised that other settlements require further development to contribute to their ongoing vitality and enable them to survive. Therefore 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-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.

QS-10: Please add any comments you wish to make about the development distribution strategy for South Warwickshire.

Whilst the question is not posed under Issue S6 (Green Belt), there is a need to undertake a review of the Green Belt in order to inform the consideration of where the most suitable and sustainable sites are located and, if within the Green Belt, which areas of Green Belt can be released without significantly impairing the

³ South Warwickshire Local Plan Part 1. Stage 2 Issues and Options Consultation. January 2023. Page 65.

functions of the Green Belt within South Warwickshire. The planning system must make land available in the right places and for the right forms of development. The undertaking of a Green Belt Review is an essential part of the process of making developable land available in the most sustainable locations. NPPF paragraph 142 highlights that when drawing up or reviewing Green Belt boundaries the need to promote sustainable patterns of development should be taken into account.

In establishing the housing requirements for an area, particularly if affordability concerns are to be addressed at larger settlements surrounded by Green Belt, Green Belt cannot currently be used as: the sole justification to direct development elsewhere; or as the sole justification to artificially suppress housing delivery; or the rationale for distributing housing to less sustainable locations.

The 300,000 homes a year target set by the Government, and the subsequent response to the consultation on housing numbers in December 2020, identifies Coventry and Birmingham as being two key areas for housing growth to meet the target. South Warwickshire is adjacent to the Coventry City Council administrative area. Whilst the evidence base to underpin the new Coventry Local Plan is not yet available it is expected that Coventry City Council will be unable to meet its housing needs in full and a contribution to this unmet need should be a key part of the strategy for the SWLP from the start of the Local Plan-making process.

BDWH has undertaken a review of environmental and technical considerations relating to the residential development opportunity that it is promoting to the north west of Warwick Parkway Railway Station. It is concluded that the proposed quantum of development can be accommodated within the existing landscape context, bolstered by additional landscape planting, to avoid significant harm arising. This is set out further in a Vision Document that is being submitted in support of these representations.

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 (for South Warwickshire)

The NPPF (paragraph 61) identifies that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method, unless exceptional circumstances justify the use of an alternative approach. Such an alternative approach should reflect current and future demographic trends.

It is acknowledged that the ONS has highlighted that the 2014-based household projections gave rise to inconsistencies with the resultant housing need figure for Coventry. The South Warwickshire Councils are in a Housing Market Area (HMA) with Coventry. In this context this current Local Plan review process provides an opportunity to consider what the need for Stratford on Avon and Warwick District Councils might be if more up to date household formation figures are taken into account within the HMA. It is understood that the HEDNA approach seeks to achieve this. Whilst the output from the HEDNA results in a slight lowering of the overall HMA need on a dwelling per annum basis, it is noted that the trend-based figures identified for Warwick and Stratford-on Avon Districts represent an increase over and above the standard method based equivalents. This is influenced by the high levels of net migration projected for these Districts within the HEDNA.

It is accordingly considered to be a sensible and robust approach for the SWLP to be planning for, and identifying allocations to meet, this higher figure in order to ensure that there is a sufficient supply of homes coming forward in this area, as a minimum. Due regard should also be given through the Local Plan process to the opportunity to increase provision against this figure to both ensure that there is a sufficient supply and variety of housing sites to enable the Government's aim of significantly boosting the supply of housing (NPPF paragraph 60) to be met, but to also ensure that the issue of housing affordability within this area is also appropriately addressed.

It should also be recognised that the unmet need arising from Coventry will not be crystallised until further

evidence base reporting is published by Coventry City Council on the capacity of land within its administrative boundaries. There may therefore be a need for the SWLP to allocate additional land to assist with meeting any unmet need for Coventry, with appropriate regard given to the opportunity provided by land on the edge of existing large sustainable settlements in the SWLP boundary to assist with achieving this.

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

Getting this mix of homes right will maximise the beneficial impact that the delivery of more homes can bring. It is essential that a mix is not prescriptive and is flexible and it should be recognised that not doing so will result in a mix that becomes redundant over time and harm the social outcomes it was designed to achieve. This will especially be the case over a long plan period, where flexibility will enable the mix to be best tailored to the needs of new communities across South Warwickshire

The SWLP, and any associated CIL charging, needs to reflect the fact that the contributions and provisions expected from development arising from planning policy requirements should not cumulatively undermine the deliverability of the Local Plan. Robust regard should be given to this through the Local Plan viability assessment work when this is carried out. The unintended consequence of overloading development with additional technical, design and financial requirements could be that the amount of affordable housing being delivered ends up being reduced in order to make a development viable.

Furthermore, the supply of affordable housing, and the affordability of housing in general, is also influenced by the overall supply of housing coming forward. The SWLP should accordingly be seeking to plan for the delivery of more than the minimum number of homes identified by the HEDNA to assist with this

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

Separate affordable housing requirements for each District are likely to go most of the way towards reflecting local requirements and local viability calculations. Some large scale zoning might be appropriate within each Council's area.

Q-H3: 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 across South Warwickshire there is a strong demand for new homes and these sell, despite the adopted Local Plan provisions in force not including policy requirements which bring in these additional Technical Standards. There is therefore not considered to be a need to introduce such standards in order to deliver homes that meet market demand.

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 PPG⁴ identifies that LPAs need to take account of need, viability and timing. In relation to the M4(2) and M4(3) standards, the PPG⁵ states that 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.

⁴ Planning practice Guidance Paragraph: 020 Reference ID: 56-020-20150327.

⁵ Planning practice Guidance Paragraph:007 Reference ID: 56-007-20150327.

This evidence base needs to be made available to provide clear justification to support the inclusion of these additional technical standards alongside the Issues and Options consultation.

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 housing need within the Greater Birmingham and Black Country HMA is still under review, following the halting of the joint Black Country Local Plan. The Black Country authorities are currently reconsidering their housing needs and how this will impact on the wider HMA. In light of this, the significant housing shortfall identified by Birmingham City Council, and the likelihood that Coventry will not be able to accommodate all of its housing needs (even at the reduced trend-based level of 1,964 homes per annum), the South Warwickshire authorities will need to meet some of the unmet need from these areas.

It is noted that page 109 of the Issues and Options consultation document highlights that there is a strong argument that 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 this development that have sustainable connections to employment opportunities across the HMAs.

There is a need for the South Warwickshire Councils to continue to monitor the housing capacity studies being undertaken in the Birmingham and Black Country HMA and by Coventry City Council to assist with identifying what appropriate contributions it might need to make to assist with meeting the unmet need.

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?

Links with Coventry City arise through commuting patterns, as well as the physical location of Warwick District on the edge of the Coventry built up area. The relationship with the Birmingham and Black Country HMA is intrinsically linked to the migration / commuting patterns. Good connectivity with the primary transport infrastructure in both instances is important, notably in relation to the sustainable travel infrastructure to provide access to the relevant, employment, leisure and community facilities both within this external HMA and within the SWLP area. Sites for housing development should be located where this can be achieved. The appropriate Growth Options would be Growth Option 1 and 2.

As identified in response to Issue 6 (Green Belt) under QS-10, and in response to the identified spatial growth options, a spatial distribution strategy which capitalises on opportunities provided by the existing sustainable transport network, as well as providing good connectivity between homes and employment opportunities in main towns, is important. Locations that can achieve this through existing sustainability credentials, or can be made more sustainable through additional development should be considered for allocation. This should include appropriately located land in the Green Belt. In this regard, sites should be allocated in close proximity to existing railway stations (notably including Warwick Parkway) in order to deliver residential development to meet the needs of the SWLP and / or any additional unmet need arising from outside of the SWLP boundary.

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

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

Option H5c is appropriate for meeting any requirement arising during the Local Plan period. The requirement for custom and self-build housing plots need to be determined on a case by case basis. The very nature of self and custom build housing means that it is difficult to plan for precise locations of delivery. Such requirements should be based on local evidence such as the self and custom build register and local eligibility test⁶.

⁶ National Planning Policy Framework: Paragraph 125.

Q-H7: Please add any comments you wish to make about delivering homes in South Warwickshire

There will be a need to review the position relating to the delivery of homes in South Warwickshire when more evidence is made available to inform the needs and strategy for this area.

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?

No

Needs to be achieved by National policy.

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.

BDWH is committed to working towards carbon reduction as part of its wider business objectives. In 2021 Barratt Developments was recognised as the UK's most sustainable housebuilder in the Housebuilder Awards, following its success as the top scoring UK housebuilder by the Carbon Disclosure Project. The Barratt Building Sustainably Framework sets out Barratt Development's sustainability ambitions and targets, which include all homes to be zero carbon by 2030 and Barratt Developments to be Net Zero in its own operations by 2040.

Option C4.1a. is appropriate because Building Regulation standards change to address and accommodate best practice and the latest technology and standards. Local Plan policy is not as agile in responding to such innovation and as such is not considered to be an appropriate way to control building standards.

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

Option C6.1c: None of these

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 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. Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.

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 because new legislation will deal with this matter.

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.

Chapter 8

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 cannot 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.

Option D3a is appropriate as this would enable a more locally tailored approach to density, which seeks to make the most efficient use of land, taking into account the specific context each site. This approach could also be adapted to align with the general requirement set out within the NPPF⁷ for Local Plans to include the use of minimum density standards for city and town centres and other locations that are well served by public transport.

Chapter 9

Q-W4: Please include any comments you wish to make about a healthy, safe and inclusive South Warwickshire.

The NPPF⁸ identifies that planning policies and decisions should aim to achieve healthy, inclusive and safe places and provide the social, recreational and cultural facilities to serve the needs of the community. This includes the provision of safe and accessible green infrastructure, sports facilities and well-designed development layouts that encourage walking and cycling.

Blue infrastructure corridors, including canal corridors, can play an important role in providing spaces which encourage people to spend time outside as well as providing direct active travel routes. BDWH has submitted a separate submission as part of the Call for Sites process, supported by a Vision Document, which outlines the opportunity that the allocation of land to the north west of Warwick Parkway Railway Station, adjacent to the Grand Union Canal, for residential development can provide in facilitating the creation of healthy active communities.

Chapter 10

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

QT1b: 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

⁷ National Planning Policy Framework: Paragraph 125.

⁸ National Planning Policy Framework (2021). Paragraphs 92-93.

developments can be determined on a site by site basis.

Chapter 11

Q-B2: Please select the option which is most appropriate for South Warwickshire

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

Option T2b provides a greater degree of flexibility to take site-specific and location-specific factors into consideration and encourage a modal shift away from the use of the private car in order to address climate change objectives and create more sustainable communities.

The NPPF⁹ states that transport issues should be considered from the earliest stages of plan-making. Therefore the choice of site allocations should be taking into consideration the accessibility of development sites to public transport (bus and / or rail networks) and active travel networks (such as footpaths and canal towpaths) to ensure that there are alternative travel options available for residents living in the new developments and opportunities to improve existing networks to serve new developments.

To this end the SWLP should allocate sites within sustainable travel corridors, particularly rail corridors, for residential development to assist with meeting the sustainable housing need for the Local Plan period. Allocating development in locations with good access to existing public transport services also provides the opportunity to increase the patronage for, and therefore the viability of, these services.

The site being promoted by BDWH to the north west of Warwick Parkway Railway Station provides a genuine opportunity to accommodate residential development in a location which benefits from existing rail, bus, walking and cycling networks (including a canal corridor).

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

Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District

There is no requirement on a national basis for Strategic Landscape Areas to be in place.

Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations?

No

“Wildbelt” is not a recognised land use defined in the NPPF which Local Plans need to accommodate.

Q-B8.1: Do you agree that the plan should include a policy avoiding a 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 included in the NPPF.

Chapter 12

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

⁹ National Planning Policy Framework (2021). Paragraph 104.

No

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

The Part 1 Plan seeks to cover a very broad range of issues and topics, some of which (as identified through the representations above) are considered to introduce matters which go beyond current national requirements and / or are not yet fully understood (such as “wildbelts”). The logic for following a 2-part Local Plan production process, which necessitates the allocation of fewer sites within the SWLP area in the Part 1 Plan, is also questionable.

The NPPF¹⁰ requires Local Planning Authorities (LPAs) to plan for, and allocate, sufficient sites to deliver the strategic priorities of the area. BDWH considers that it would be more efficient for the South Warwickshire LPAs to achieve this via progressing a single Local Plan. This would ensure that there is suitable confidence that the infrastructure to deliver all of the housing supply is available and has been suitably planned for.

It is not considered to be either necessary or efficient for the emerging Local Plan to be split into two parts. It should also be noted that the Government is seeking to speed up the Plan-making process (as evidenced by some of the proposals being mooted through the Levelling Up and Regeneration Bill) and this does not align with the sort of two-part approach being sought by the South Warwickshire authorities.

It is therefore considered that the production of a single Local Plan would be the simplest and most transparent option for enabling the South Warwickshire authorities to provide certainty and demonstrate at the earliest opportunity that it has an up-to-date deliverable Development Plan that can achieve the NPPF site allocation and land supply requirements, backed up with a robust plan for the delivery of infrastructure.

Conclusion

In conclusion BDWH recognises that the LPAs preparing the SWLP face a significant challenge in meeting their housing needs for the SWLP period, which could be even greater when cross-boundary needs are taken into account. There will be a need to release greenfield land in sustainable locations in order to meet this need and a need to undertake a Green Belt Review to inform this. In order to address climate change issues there will also be a need to review opportunities to accommodate growth in proximity to public transport corridors. BDWH is promoting land to the north west of Warwick Parkway Railway Station for an allocation within the SWLP to assist with meeting these needs.

I trust that you find this submission in order. However please do get in contact should you wish to discuss this submission in more detail.

Yours sincerely



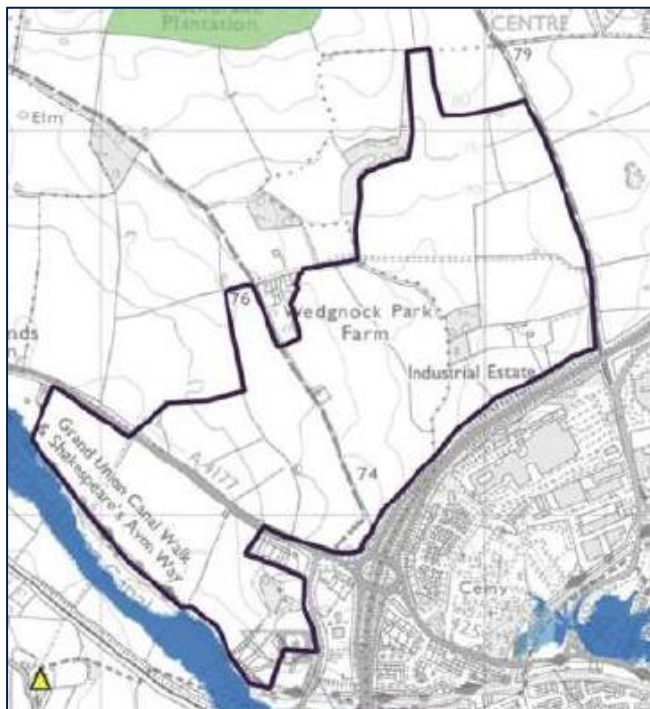
Michael Burrow
Associate Director

Enc. Appendix A – Review of South Warwickshire Issues and Options Sustainability Appraisal – Broad Area B30. Warwick Northeast.

¹⁰ National Planning Policy Framework (2021). Paragraph 23.

Appendix A: Review of South Warwickshire Issues & Options Sustainability Appraisal – Broad Area B.30 Warwick Northeast

Savills has undertaken an initial review of the Sustainability Appraisal (SA) which has been produced to inform the Issues and Options consultation version of the emerging South Warwickshire Local Plan (SWLP). The SA has, at a high level, reviewed the sustainability credentials of a number of Broad Areas being considered for development. The land being promoted by BDWH to the north west of Warwick Parkway Railway Station is at the southern end of Broad Area B.30. Savills considers that the SA scoring for the BDWH sub-area is more positive than the stated scoring for Broad Area B.30 as a whole. The Savills proposed scoring for the BDWH sub-area is presented alongside the SA in the table included within the remainder of this Appendix. Below (left) we have included a plan of broad area B.30 – Warwick Northeast, the southern end of which includes the BDWH land at Warwick Parkway (right).



It should be noted BDWH acknowledges that a number of the proposed revisions to the SA conclusions relate to its reliance on desktop evidence for a wider broad area, rather than evidence base scoped to review specific sites.

Comparison of Conclusions from the SA and Savills Input

Receptor Description	SA Score for B.30	Savills Proposed SA Score for the BDWH sub-area	SA Mitigation Potential for B.30	Savills Proposed SA Mitigation Potential for the BDWH sub-area	Site Specific Considerations
Potential Increase in Carbon Footprint	--	-	M	M	It is noted that several Broad Areas are identified as a major negative. The BDWH sub-area is much smaller and is therefore considered to result in a lesser impact.
Riparian Flood Zones	+	+	-	-	No scoring change considered to be necessary.
Surface water Flood Risk	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Habitat Sites	+/-	0	A	A	It is noted that Ensor's Pool is located in Nuneaton. The HRA covers consideration of such assets. It is not clear how the nature and location of the SAC would give rise to more than a negligible impact from the development of the site.
SSSIs	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
NNRs	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Ancient Woodland	-	0	M	-	There is no Ancient Woodland within or immediately adjacent to the BDWH sub area (or within a radius of the site that is likely to be impacted by development). The PPG states that a root protection buffer zone of 15m and buffer zone at least 15 times larger than the diameter of the tree is required in relation to Ancient Woodland. The assessment should accordingly be changed to: "Negligible Impact".
LNRs	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
LWSs	-	0	A	A/- (depending on status of LWSs)	The BDWH sub-area does not contain any LWSs. The sub-area contains a potential LWS. The level of impact and mitigation required in order to accommodate development is therefore expected to be less.

Receptor Description	SA Score for B.30	Savills Proposed SA Score for the BDWH sub-area	SA Mitigation Potential for B.30	Savills Proposed SA Mitigation Potential for the BDWH sub-area	Site Specific Considerations
LGS	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Priority Habitats	-	0	A/M	A/M	There is only one bank of woodland located in the eastern portion of the sub-area. Built development would not take place within areas of Priority Habitat.
National Landscapes / AONBs	0	0	-	-	No scoring change considered to be necessary.
Landscape Character	-	-	M	M	Consideration of development of the site in isolation would likely lead to lesser impacts on landscape character but could still be potentially discordant with the Character Areas, guidelines and characteristics set out in the 1993 Warwickshire Landscape Guidelines.
Landscape Sensitivity	N/A	N/A	N/A	N/A	N/A
Special Landscape Areas	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Country Parks	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Views for ProW Users	-	-	M	M	No PRoW within the sub-area but development in the sub-area may impact on views experienced by users of the Grand Union Canal towpath.
Coalescence	0	0	-	-	No scoring change considered to be necessary.
Grade I Listed Building	0	0	-	-	Development in the sub-area is not considered to impact on a Grade I Listed Building or its setting.
Grade II* Listed Building	0	0	-	-	Development in the sub-area is not considered to impact on a Grade II* Listed Building or its setting.
Grade II Listed Building	-	0	M	-	Grade II listed building is shown to be located 0.5km from the site. Development in the sub-area is not considered to impact on a Grade II Listed Building or its setting.
Registered Parks and Gardens	0	0	-	-	The sub-area does not provide an opportunity to potentially enhance a Registered Park and Garden or its setting.

Receptor Description	SA Score for B.30	Savills Proposed SA Score for the BDWH sub-area	SA Mitigation Potential for B.30	Savills Proposed SA Mitigation Potential for the BDWH sub-area	Site Specific Considerations
Conservation Area	0	0	-	-	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Scheduled Monument	0	0	-	-	The sub-area does not provide an opportunity to potentially enhance a Scheduled Monument or its setting.
AQMA	0	0	-	-	No scoring change considered to be necessary.
Main Road	-	-	A/M	A/M	The sub-area is within 200m from a main road.
Railway Line	-	-	A/M	A/M	Part of the sub-area is within 200m from a railway line.
Watercourses	-	-	-	-	The development is located within 200m of the Grand Union Canal.
Groundwater SPZ	0	0	-	-	No scoring change considered to be necessary.
ALC Grade	--	--	M/X	M/X	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Minerals Safeguarding Areas	-	-	M/X	M/X	Site is within a MSA for sand and gravel, in common with a large portion of Warwick.
Potential Increase in household waste generation	--	--	M	M	This is an issue for all sites, mitigation is possible, but will need to be confirmed at the detailed planning stage
Housing Provision	++	++	-	-	No scoring change considered to be necessary.
NHS Hospital with A&E Department	++	++	-	-	No scoring change considered to be necessary.
Access to GP Surgery	+	+	-	-	Part of the sub-area is coincident with a GP 800m zone.
Access to Leisure Facilities	-	+	M	M	The sub-area is considered to be located partially within the target distance of 1,500m from a leisure facility.
AQMA	0	0	-	-	No scoring change considered to be necessary.
Access to Greenspace	++	++	-	-	No scoring change considered to be necessary.
Access to PRoW / Cycle Path	+	++	-	-	The sub-area offers excellent access to the Grand Union Canal towpath.

Receptor Description	SA Score for B.30	Savills Proposed SA Score for the BDWH sub-area	SA Mitigation Potential for B.30	Savills Proposed SA Mitigation Potential for the BDWH sub-area	Site Specific Considerations
Bus Stop	+	+	-	-	Development proposals are partially within 400m from a bus stop providing regular services.
Railway Station	++	++	-	-	No scoring change considered to be necessary.
Connectivity	N/A	N/A	N/A	N/A	N/A
Food Stores	-	+	M	-	There is a small convenience store to the west of the sub-area.
Access to Primary School	+	+	-	-	No scoring change considered to be necessary. The analysis commissioned by BDWH has identified sufficient capacity within existing primary schools to cope with the increase in pupils arising from this proposal.
Access to Secondary School	-	-	M	M	BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.
Access to Further Education	+	+	-	-	It is not possible to achieve a higher positive scoring.
Employment Floorspace Provision	+/-	+	-	-	The proposals are expected to include the provision of a café & potential small workspace / place for remote working / meeting room etc. This will result in some employment opportunities for residents.
Access to Employment Opportunities	+	+	-	-	The site is in close proximity to Warwick Parkway station, and this allows for easy access to employment opportunities in Warwick, Leamington, Birmingham and Coventry. BDWH does not have any further site-specific information to demonstrate that the sub-area assessment would be more positive than the Broad Area assessment.

SA Scoring Key

Likely Impact	Impact Symbol
Major Positive Impact	++
Minor Positive Impact	+
Negligible Impact	0
Uncertain Impact	+/-
Minor Adverse Impact	-
Major Adverse Impact	--

Mitigation Scoring Key

Abbreviation	Explanation
A	Avoid
M	Mitigate
C	Compensate
X	Not possible
-	Not required