



**LRM**  
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# **South Warwickshire Local Plan Part 1**

## **Issues and Options Consultation**

**Representations on behalf of Hallam Land Management Limited**

**March 2023**



## **Report Control**

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# 1 Introduction

- 1.1 These representations have been prepared on behalf of Hallam Land Management Limited (hereafter Hallam) in response to the South Warwickshire Local Plan Part 1 Issues and Options consultation. Previously, in 2021, representations were submitted in response to the Scoping exercise.
- 1.2 Separately a Call for Sites submission has been made in respect of the land Hallam control at one of the plan area's main towns, Stratford-upon-Avon.
- 1.3 This response is directed at various of the questions posed on the consultation document, mainly those concerned with spatial strategy and development requirements.
- 1.4 We set out our firm view that the Local Plan strategy will need to include a pre-eminent role for Stratford-upon-Avon; it is plain from the assessment of the five spatial options that development at Stratford-upon-Avon is a consistent element of whichever of those is chosen.
- 1.5 In all likelihood, from the available evidence, a hybrid strategy will evolve which blends development in sustainable transport corridors and a focus on main settlements. Stratford-upon-Avon will have an important role in such a strategy. A concentration of new development at Stratford-upon-Avon will deliver many benefits that align with the intended vision for South Warwickshire.
- 1.6 It is plain from the evidence of current and future development needs that, whilst as a matter of principle, a priority should be afforded to the identified available and deliverable previously developed land, greenfield sites will be a legitimate form of development land in order to meet objectively assessed needs in the plan period.
- 1.7 Locating development to the south-east of the Stratford-upon-Avon performs best in terms of the meeting the Sustainability Appraisal's objectives.
- 1.8 The south east of the town has the additional advantage of not being designated as Green Belt; regardless of whether there are exceptional circumstances across the plan area to justify the Green Belt boundary being amended, development to the south east of Stratford-upon-Avon should be identified in the first instance and in preference to locations to the north of the town.
- 1.9 Land to the west of Banbury Road (south of Trinity Way) was identified as a 'reserve housing site' within Policies SAP.1 and SAP.2 of the 2019 Proposed Submission Site Allocations Plan. Reflecting the established spatial strategy to focus development at the most sustainable settlement in the District,



it is one of two large sites contiguous with Stratford-upon-Avon's existing urban area considered suitable for future development. Its characteristics and its suitability for future development endure irrespective of this new Local Plan process.

1.10 Our representations are structured as follows:

1.11 Section 2 comments on the proposed Vision and Strategic Objectives

1.12 Section 3 considers how the development needs to 2050 should be met

1.13 Section 4 considers the number of new homes that should be provided.

1.14 These representations are also accompanied by a Vision Document in relation land south of Trinity Way, to the south east of Stratford-upon-Avon.



## 2 Vision and Strategic Objectives

- 2.1 This Section of our representations comment on the proposed vision and associated strategic objectives. They address Question-V 3.1.

### Vision

- 2.2 In overall terms the suggested Vision is unobjectionable. However, some minor redrafting would strengthen it as a statement of intent:

*The vision is to meet South Warwickshire's development needs to 2050 in a sustainable manner and responding to climate change. The local plan will ensure that sufficient homes are built for current and future residents and land is provided for new jobs to boost and diversify the local economy, in suitable locations, at the right time. New infrastructure will be provided to support new growth.*

- 2.3 The five overarching principles are equally unobjectionable when seen in the context of the Vision as a whole and the supporting strategic objectives.

### Strategic Objectives

- 2.4 The Strategic Objectives are important in providing a greater level of understanding as to how the Vision will be delivered. In other words, what is the practical effect of having this Vision.
- 2.5 We agree with the breadth of the Strategic Objectives and in particular those associated with “Meeting South Warwickshire’s Sustainable Development Needs”.
- 2.6 This will require planning policies and proposals that ensure a sufficient number and range of homes are provided to meet the needs of present and future generations. In this context Sustainability Objective 9 concerning Housing is important. Where policies and proposals are shown to contribute a positive beneficial effect, these should be cornerstones of the Local Plan.
- 2.7 This is particularly germane to considerations as to the overall amount of new housing to be provided and where in the plan area which we discuss in later sections of our response.



## 3 Meeting South Warwickshire's Sustainable Development Needs

- 3.1 This Section of our representations comment on matters set out in section 4 of consultation document which relate to *Meeting South Warwickshire's Sustainable Development Needs* and the various options for how development needs over the next 25 years might be met. This addresses Question-S7.2.

### South Warwickshire's Development Requirements

- 3.2 We agree with the premise that the Local Plan's primary role is to promote a sustainable pattern of development that seeks to meet the needs of South Warwickshire, align growth and infrastructure, improve the environment, mitigate climate change and adapt to its effects.
- 3.3 This inevitably requires a number of considerations to be balanced alongside and together in order to arrive at an overall strategy and plan. This will include a degree of prioritisation and choice. It is symptomatic of this stage of the plan making process that the overall strategy is dependent on the selection of individual sites and vice versa; in other words this is an iterative process.
- 3.4 However, this needs to be guided by high level principles; a commitment at the outset to provide sufficient land for the overall amount of new development that is forecast, a spatial strategy that is aimed at achieving the most sustainable pattern of development; and avoiding and minimizing unacceptable environmental effects whilst achieving environmental benefits wherever possible.
- 3.5 Our representations have been prepared in this context, albeit we comment specifically in relation to the scale of housing required in response to Matter 5.

### Development Distribution Strategy for South Warwickshire

- 3.6 A fundamental part of the Local Plan will be to ensure that the future development requirements are distributed in a manner that achieves the most sustainable pattern of development. This concept has different interpretations and requires a balanced approach, but the underlying premise of situating new development at and adjacent to the main urban areas must be the starting point in order to capitalize to the fullest extent on the sustainable pattern of development this will achieve.
- 3.7 It is an unavoidable fact that the main settlements in the plan area – Stratford-upon-Avon, Leamington Spa, Warwick – are those locations that have services and facilities commensurate with their role and



function. In hierarchical terms, these settlements are pre-eminent locations. This is borne out by the evidence of the Spatial Options background paper and the Sustainability Appraisal. In this regard, only Stratford-upon-Avon features as a settlement consistent with each of the Spatial Options.

- 3.8 It is evident that the favored spatial options are those that afford a priority to accessibility to services and facilities, enabling movement by active travel and public transport, and supporting economic growth, whilst protecting areas with important environmental attributes. In effect this points towards a blended strategy, or the hybrid strategy referred to in the consultation document.
- 3.9 The consultation document refers to this approach as providing a balance of growth at existing main settlements, some growth at new settlement scale on the rail lines, and more modest growth in smaller settlements, which can contribute to enhancing the viability of village centres and provide affordable housing.
- 3.10 In developing this blended spatial strategy to guide the location of new development, it is unarguable that Stratford-upon-Avon will be a cornerstone of whatever strategy is chosen. In this regard, the fundamental objective is to ensure Stratford-upon-Avon best contributes to the overall strategy. To achieve this requires the overall contribution of development land at Stratford-upon-Avon to be the building block in the first instance so that, as a suitable location, it can maximise its influence on the blended strategy that effectively follows.
- 3.11 This approach would have the following benefits:
- Align with the objective of reducing carbon emissions; the greater the degree of concentration at main settlements the lesser the carbon emissions (Figure 2 refers);
  - Capitalise on the availability of services and facilities and the promotion of active travel;
  - Contribute to the vitality and viability of the town centre;
  - Support labour supply in the “Core Opportunity Area” in the context of an ageing population overall;
  - Maintain the West Midlands Green Belt in the north of the plan area;
  - Limit development in the Area of Outstanding Natural Beauty in the south of the Plan area
  - Avoid the negative effects of the dispersal strategy illustrated in the Sustainability Appraisal (Table 7.1 refers)

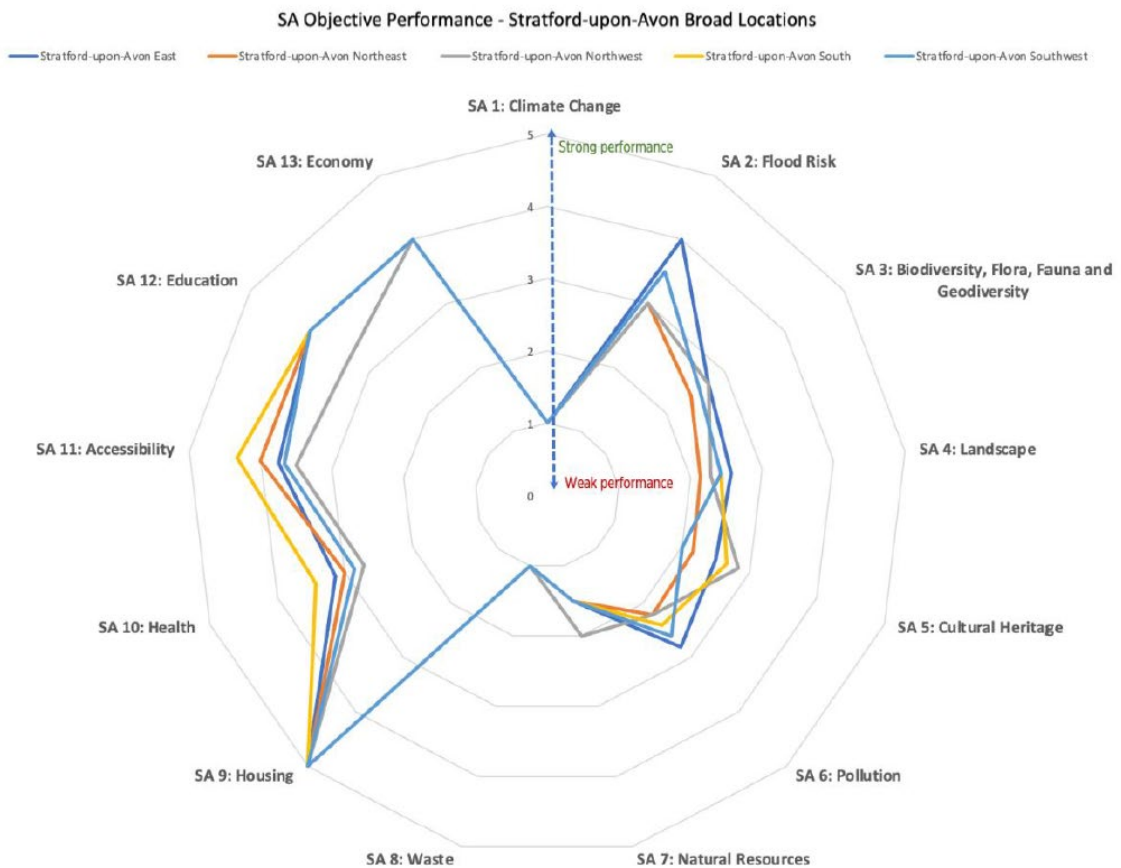




- 3.12 A strategy that promotes large scale development adjacent to Stratford-upon-Avon’s existing urban area could also achieve a commensurate scale of nature based solutions and investment in renewable and low carbon energy generation to mitigate the effects of and adapt to climate change.
- 3.13 Whilst the blended strategy described above refers to new settlements, as a matter of approach, this can only represent part of a development strategy in the longer term; experience from elsewhere in the country suggests lead in times from policy formulation to development and build out being a great many years. As such, a new settlement cannot represent a means of meeting short and medium term needs. This Option would inevitably need to be complementary to development at existing settlements which are suitable in the first instance as a matter of principle.

### Direction of growth at Stratford-upon-Avon – the South East of the town

- 3.14 In the preceding paragraphs we have set out how the spatial strategy should afford a role to Stratford-upon-Avon as a focus for new development. Although there is no consultation question in relation to directions of growth at Stratford-upon-Avon, the evidence base is particularly instructive as to the advantages of development to the south-east of the town.
- 3.15 The Evaluation of Broad Locations in the Sustainability Appraisal alights upon this location as the best performing of those around the town. It is the most suitable in terms:
- Planning for anticipated levels of climate change (i.e., flood risk)
  - Protecting, enhancing and managing the quality and character of landscapes and townscapes;
  - Mitigating adverse impacts from existing air, water, soil and noise pollution and avoiding generating further pollution; and
- 3.16 The graphic overleaf illustrates the inescapable relative overall and “strong” performance of this location.



**Extract from the Evaluation of the Broad Locations at the Main Settlements (Section 4 of SA)**

**Accessibility and Permeability**

- 3.17 The Settlement Analysis similarity affords a positive view of south east of the town. In terms of permeability or conversely the absence of barriers to integration, none of the town’s urban edges are Categorised as A, so whilst areas 6, 7, 8 and 9 in the south east of the Town, which correspond to Trinity Way and Banbury Road, are Categorised as B, this is the highest ranking across the settlement as a whole.
- 3.18 In conjunction with a permeable edge, three of these four locations score the highest in terms of accessibility to services and facilities within 800m. Whilst a small number of locations exhibit this degree of accessibility, none of the other urban edges around the Town achieve a combination score of B and 5 together. In these terms, areas 7, 8 and 9 in the south east area are especially well related, and perform better than the area of land (6) identified as a proposed allocation in the Stratford-on-Avon Site Allocations DPD.



## Heritage

- 3.19 Of note from the written analysis is that the eastern area is said to have heritage constraints that reduce its performance for this environmental consideration. However, what is referenced is East Tiddington Roman Settlement which is some distance away from the likely development areas centred on Trinity Way and Banbury Road, and would not represent a genuine constraint to new development in those locations.
- 3.20 The Heritage Sensitivity Assessment records on page 198 the following in relation to the south east part of the town:
- This area runs from the southern edge of Tiddington round to the eastern side of Shipston Road. Extensive modern development on the western side means that the historic core is less sensitive to change in this area. A single group of Listed Buildings are located at Alveston Hill Farm and their rural setting would need to be considered in any development. However, this area may be able to accommodate development.
- 3.21 In the RAG analysis that follows the following points are made alongside a green score: The south east area only contains a single group of designated assets and does not impinge on any of the conservation area boundaries. The rural setting of these designated assets will need to be considered in any planning proposals. This area may be able to accommodate development.”
- 3.22 The diagrams on page 201 and 202 of the Heritage Sensitivity Assessment illustrate the comparative extent of designated and undesignated heritage assets around the town, with relatively few located in the south east.
- 3.23 For all of these reasons a considered view of the south eastern area indicates that cultural heritage is not a constraint to new development in the location.

## Landscape

- 3.24 We note that a Landscape Assessment for the plan area as a whole is being prepared and is not available at the present time. We expect such an assessment to acknowledge that land south of Trinity Way is not designated for its landscape or historic importance; it does not fall within a Special Landscape Area, or Conservation Area and; it does not form the setting of any listed buildings.
- 3.25 The character of Stratford-upon-Avon, to the south east of the town, is suburban, comprising post war housing with some modern infill. The interface between the urban and rural area is typically abrupt, with existing housing turning its back to Trinity Way behind hedge and fenced boundaries. Whilst the Site itself is not unattractive, it is not considered to be remarkable or exceptional. The field structure



is poorly defined, the edge of the town exerts an urbanising influence over the area, and its intensive arable uses result in a site with a medium aesthetic appeal and/or amenity value.

### Green Belt

- 3.26 We recognise that certain of the assessment work has been undertaken with a “policy off” position applied to the Green Belt designation that extends long the northern edge of the town. However, Green Belt policy in the NPPF only permits the amendment of the Green Belt where exceptional circumstances exist (para 140 refers). For exceptional circumstances to be justified, it is necessary to examine fully all other options for meeting the identified need for development. This requires an assessment of Green Belt and non-Green Belt locations.
- 3.27 In this instance, development to the south-east of the town can be seen to perform better than Green Belt locations and, on this basis, the exceptional circumstances would not be justified. In the context of the great importance afforded to Green Belt, locations subject to that designation would need to exhibit characteristics that are materially better than non Green Belt locations in order to be preferred as future development locations. That plainly is not the case at Stratford-upon-Avon and those non Green Belt locations should form the identified allocations in the first instance.



## 4 Delivering homes to meet the needs of all our communities

4.1 In this section, our representations comment on various options as to how the housing challenges can be met. Our response is directed at Question H 1-1.

### Providing the right number of new homes

4.2 Stratford-on-Avon and Warwick are the least affordable areas in the Coventry and Warwickshire sub-area.<sup>1</sup> It is imperative therefore that this characteristic is attributed a particular importance in determining the right number of new homes to be provided. The affordability problem will simply be compounded if the Local Plan provides too few houses, either by a deliberate policy choice not to meet the objectively assessed level of housing need in full at the outset, or by an embedded housing land strategy that isn't sufficiently robust to ensure those needs are met.

4.3 It is instructive that the Housing and Employment Development Needs Assessment has illustrated that a higher housing requirement is generated for Stratford-on-Avon and Warwick in the context of the evidenced demographic characteristics. These factors and the associated analysis is described in section 5 of the HEDNA.

4.4 The effect of this analysis is to identify an overall housing requirement for the Local Plan area greater than that derived from the output of the Government's Standard Method. This is shown in Table 9 of the consultation document and summarised below:

	Standard Method 2014 based household projections	Standard Method using revised demographic projections
Stratford-on-Avon (dpa)	564	868
Warwick (dpa)	674	811
Plan Area (dpa)	1238	1679
Plan Area (25 years)	30,950	41,975

4.5 We agree with the view expressed in the consultation document that *“whilst it may be tempting to want to apply the 2014-based figures because they are lower for South Warwickshire, given that Coventry looks unable to accommodate all of its own housing needs, it would most likely fall to*

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<sup>1</sup> Table 5.1 of the HEDNA



*South Warwickshire to accommodate a significant quantum of that need. The outcome would then most likely be similar levels of housing as shown in the 10-year trend-based projection". It would be wrong therefore to develop a Local Plan that was not based on the scale of housing which the adjusted figures above imply. On this basis, the housing requirement should be the higher of the two figures suggested above.*

- 4.6 Based on the evidence of potential existing housing supply in the Urban Capacity study this would suggest a residual need for some 22,000 new homes to be provided over the plan period.
- 4.7 In this regard, if in due course the housing number is for some reason considered to be less, the Local Plan would simply have identified a strategy and associated supply of housing land that would endure for several more years after the end date of the plan. No disadvantage arises from this because it is inevitable logic that the need for development land wont simply cease at 2050.

#### Consultation on the NPPF

- 4.8 We are aware that the Government are currently consulting on potential revisions to the NPPF which concern, *inter alia*, the approach to meeting housing needs. In our view, none of those potential alterations represent a fundamental change to the plan making process in this instance.
- 4.9 It remains the case that the cornerstone of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner (§2).
- 4.10 The social dimension of sustainable development is still as drafted previously: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.



## 5 Summary

- 5.1 This response to the South Warwickshire Local Plan Issues and Options has been prepared on behalf of Hallam Land Management Limited.
- 5.2 We have identified that, irrespective of the current consultation relating to the NPPF, it is firmly the case that Local Plans should continue to provide a sufficient supply of housing land to meet identified needs. In this regard, we agree that the housing requirement should be based on the HEDNA exercise which indicates a need over the plan period of some 40,000 new homes.
- 5.3 Based on the evidence of potential existing housing supply this would suggest a residual need for some 22,000 new homes to be provided over the plan period. This is going to require new land allocations. Having already prioritised previously developed land, the allocation of greenfield land is a legitimate proposition in order to meet the identified needs. It follows that the Spatial Strategy will need to guide those new land allocations to sustainable locations.
- 5.4 The Spatial Strategy is likely to require a hybrid approach which directs new development to those locations which are the most accessible, which are commensurate with existing centres that have an established range of services and facilities and where future economic growth is likely to be greatest. This approach clearly favours new development being directed to Stratford-upon-Avon, which was the only settlement to appear in each of the Options considered.
- 5.5 Although there is no consultation question in relation to directions of growth at Stratford-upon-Avon, the evidence base is particularly instructive as to the advantages of development to the south-east of the town.
- 5.6 The accompanying submission regarding the land controlled by Hallam Land Management Limited at Trinity Way illustrates further the many advantages of new development in this location.
- 5.7 In preparing the next version of the Local Plan, we would propose that land at Trinity Way is allocated for a housing-led mixed use development.