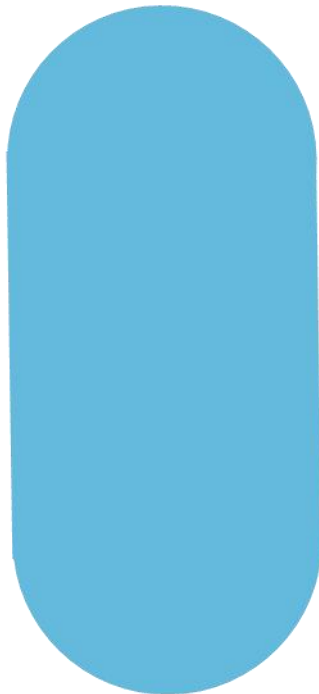


Representations

South Warwickshire Local Plan Part 1 –
Issues and Options Consultation

Rosconn Strategic Land Limited – Land east of Coventry Road,
Cubbington

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 Rosconn Strategic Land Limited, in respect of their land interest east of Coventry Road, Cubbington (the site). The site is immediately adjacent to the built up area of Cubbington, which is identified as a small settlement location. The site has been identified as Site 176 on the Interactive Map.
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal.

Chapter 3 - Vision and Strategic Objectives

Q-V3.1: Vision for the Local Plan

3. Rosconn Strategic Land consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and Rosconn Strategic Land consider it would be more appropriate to reference meeting unmet need 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 Housing Market Area and therefore should not be excluded. South Warwickshire falls within both the Coventry and Warwickshire Housing Market Area and the Birmingham and Black Country Housing Market Area it is therefore imperative that the SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire.

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

Q-I1: Sustainability Appraisal

5. The following comments are made in respect of the SA for Cubbington, which is identified as one of 22 Small Settlement Locations and a reasonable alternative development location.



6. Land east of Coventry Road, Cubbington (Site 176) is being promoted by Rosconn Strategic Land. The site is immediately adjacent to the built up area of Cubbington and also adjoins land that is currently being developed for 17 new dwellings at the former Waverley Riding School, the permission also includes widening and improvement of the existing vehicular access off Coventry Road.
7. A review of the SWLP Sustainability Appraisal indicates that the Site has been excluded from the Small Sites Location (SSL) area for Cubbington. Rosconn Strategic Land request that the SSL search area for Cubbington is amended to include land east of Coventry Road given its sustainability credentials.
8. The SSL for Cubbington (as with other settlements) covers a large area of land around all sides of the edge of the village. Some edges of the settlement will have more adverse impacts than others due to their different characteristics. Assessing the settlement edge as a whole does not allow for any distinction to be made between different areas for growth. It is difficult therefore to draw conclusions as to the appropriateness of the settlement to accommodate growth from this exercise alone. However it should be noted that the landscape is changing within the east of Cubbington, with land at the former Waverley Riding School east of Coventry Road, currently under construction for 17 dwellings (Ref: W/18/0554).
9. However, it is clear from Table 5.1 that the only major adverse impacts identified relate to landscape sensitivity and agricultural land classification. Landscape sensitivity will of course vary between areas, and can be mitigated by sensitive design. Site 176 has the advantage of being contained by built development to the south and east, HS2 to the north and east, and Coventry Road and allotments to the west. In landscape and Green Belt terms, the site is very well contained.
10. Agricultural land classification will be a factor that needs to be taken into consideration, but is not an overriding constraint upon development of a site.
11. The SA demonstrates that there are no in principle impediments to growth at Cubbington, and this is a suitable location for growth. Cubbington is amongst the best



performing settlements in relation to SA Objective 2 (Flood Risk) and SA6: (Pollution) given the lack of constraints, and is therefore one of the best performing SSLs.

12. Notwithstanding the above, the Councils will also be mindful that this is only one piece of evidence at a strategic level, and the HELAA and other evidence will need to inform the selection of allocations in due course.

Option S2-C: Intensification

13. Intensification is a way to optimise brownfield land and realise its effectiveness. However, Rosconn Strategic Land consider that this matter should be dealt with by the SWLP Part 2 Local Plan or Neighbourhood Plans if relevant, so that the implications of applying an intensification policy to a particular area can be assessed in terms of character and deliverability, which are key factors to consider.
14. Intensification is challenging and requires evidence around viability and deliverability before it can be considered to form part of the supply, and as such any intensification potential in the windfall allowance should be avoided.

Q-S3.1: Urban Capacity Study

15. 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. The following points are made in relation to how the UCS considers housing supply in the urban areas. However, it should be noted that the UCS also discusses the SWLP housing requirement and representations are made on those points under Q-H1-1 & 2.
16. In relation to housing allocations from the adopted Local Plans, Rosconn Strategic Land consider that a comprehensive review of all outstanding allocations without planning permission is required to ensure that such sites still meet the definition of developable as set out in the NPPF². In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will

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

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



increase beyond what is included within the adopted Local Plan. That review and evidence must be published prior to the next iteration of the Plan to demonstrate the capacity from the allocations can be relied upon to meet the housing need.

Q-S4.1: Growth of Existing Settlements

17. Yes, growth of existing settlements in South Warwickshire is imperative to deliver the overall growth targets, and achieve the Vision and overarching principles. The need for housing, affordable and specialist housing, green infrastructure, improved facilities and infrastructure is within the towns and villages. Those needs are best met sustainably adjacent to the settlements.

Q-S4.2: Settlement Analysis

18. The following comments are made in respect of the site promoted by Rosconn Strategic Land east of Coventry Road, Cubbington (Site 176). The site has not been assessed within the Settlement Analysis, and this should be rectified in the next iteration of the Analysis. An assessment has been undertaken of the site to assist in this process.

19. In relation to connectivity, Site 176 can access onto Coventry Road (red route) which connects directly into the settlement and can accommodate all modes of transport. There are no barriers to connectivity, and therefore the site should be assessed as (A).

20. In relation to landform, there are no flood or green infrastructure constraints on the site.

21. In relation to local facilities within 800m, the adjacent Area 13 scores 4 out of 5 with only healthcare being outside of the 800m distance. The same score would apply to Site 176 as the local surgery is beyond 800m. However, it would still be one of the best performing areas.

22. Overall, Site 176 is therefore considered a suitable location to accommodate development as there are no barriers to connectivity to the village, no constraints, and the site is within 800m of a good range of local facilities.



Q-S7.2: Refined Spatial Growth Options

23. Rosconn Strategic Land consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.
24. Firstly, the results of the high level testing of the five growth options in the supporting Sustainability Appraisal demonstrates that the options perform differently in different areas, with no one option standing out as the best performing option across all areas.
25. Secondly, it is 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.
26. 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.
27. Land east of Coventry Road, Cubbington aligns with all 5 refined spatial growth options, Rosconn Strategic Land's Site therefore points to an optimum location for new sustainable development within the District.
28. Rosconn Strategic Land support the inclusion of Cubbington in all five of the Options presented, noting that it is inherently a suitable location for growth, and a settlement that can accommodate development that will contribute towards meeting the needs of the wider urban area of Royal Leamington Spa.

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

29. Without knowing the chosen strategy, it is difficult to answer this question. However, yes, Rosconn Strategic Land agree that a threshold approach would be appropriate for any settlement listed within the growth options that is not within the chosen strategy. This would ensure those settlements are able to plan for growth to meet



their needs, particularly those settlements within designated neighbourhood areas in accordance with NPPF66.

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

30. Any limit on the size of site should have regard to the factors set out in NPPF67, namely local housing need, population of the area, and the strategy for the area. Other factors should also be taken into account such as the size and availability of suitable land identified, and the facilities available.

Chapter 5 - Delivering South Warwickshire's Economic Needs

Q-E7.1: Core Opportunity Areas

31. Rosconn Strategic Land support option E7.1a and directing employment growth to the Core Opportunity Area, which includes Cubbington.

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

Q-H1-1 & 2: Providing the Right Number of New Homes

32. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, Rosconn Strategic Land reserve its position in respect of whether this approach is reasonable for other authorities in Coventry and Warwickshire.
33. 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”³. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as

³ Paragraph 61 of the National Planning Policy Framework (July 2021)



such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.

34. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.
35. 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.
36. On the basis of the above, we consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period.
37. In line with the NPPF⁴, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to set a higher housing requirement in line with national guidance⁵; for example 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.
38. 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 soundness⁶, which is explored in further detail in response to Issue H4 below.
39. Bringing together comments on the UCS and Unmet Needs under Q-H4.2, Rosconn Strategic Land consider that the SWLP will need to plan for a level of housing growth as set out in the below Table in the order of at least 43,000 dwellings.

⁴ Paragraph 61 of the National Planning Policy Framework (July 2021)

⁵ Paragraph 010 Reference ID 2a-010-20201216 of National Guidance

⁶ Paragraph 35 a) of the National Planning Policy Framework (July 2021)



Table – SWLP Housing Requirement 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/Black Country 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)
Total Housing Requirement	68,000 dwellings +
<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
Total Housing Supply	24,779 dwellings
Indicative Housing Requirement to be found by the Plan	43,000 dwellings +

Q-H4.2: Accommodating Housing Needs Arising from outside of South Warwickshire

40. It is imperative that that 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 NPPF⁷. It is recognised that national planning policy and law 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 requirement for local authorities to address unmet needs arising from within their Housing Market Areas will be removed.

41. We consider that there are two likely sources of unmet housing needs which require consideration in the development of the SWLP: Birmingham and Black Country and Coventry and Warwickshire.

Birmingham and Black Country

42. There are clearly significant unmet housing needs arising from the Birmingham and Black Country Housing Market Area which require addressing by this Plan.
43. 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 – leaving a shortfall of some 78,415 dwellings.
44. 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 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.
45. 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.

⁷ Paragraph 35 a) of the National Planning Policy Framework (July 2021)



46. The Councils clearly need to engage with Birmingham and the Black Country authorities and others to determine an appropriate level of unmet needs to be directed to South Warwickshire. That process needs to be transparent in accordance with paragraph 27 of the NPPF, and effective in accordance with paragraph 35 c) of the NPPF. The lack of any published Statement of Common Ground showing progress made so far by the Councils is a concern that needs to be addressed before the next round of consultation. The Councils need to properly grapple with this issue, and not allow the failings of the last round of Local Plans to be repeated.
47. 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 Rosconn Strategic Land consider 5,000 dwellings to be at the lower end of what could be expected to be accommodated in South Warwickshire. At this stage of the process and in advance of those discussions, as a working assumption for the level of unmet need to be accommodated, the figure should be an additional 10,000 dwellings.

Coventry and Warwickshire

48. Although the question does not address Coventry's unmet needs, this cannot be ignored. 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 Plan period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.
49. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development. 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.



50. 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 to 2050 leaving a shortfall of some 22,000 dwellings to be met elsewhere.
51. 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 releases⁸, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This 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.

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

52. Yes, Rosconn Strategic Land support the allocation of other sites as necessary for short-term development.

⁸ [How the population changed where you live, Census 2021 - ONS](#)