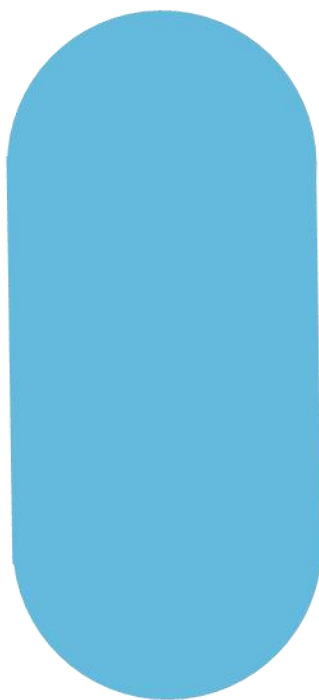
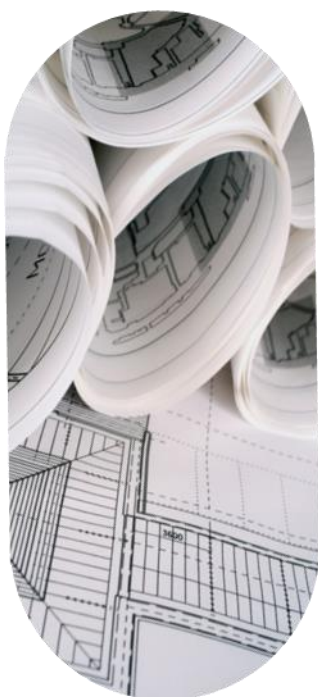


Representations

South Warwickshire Local Plan Part 1 –
Issues and Options Consultation

WILLIAM DAVIS LIMITED (STUDLEY)

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 William Davis Limited, in respect of their land interest at Holt Farm, Studley (the site). The site has been identified as Site 332 on the Interactive Map.
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the supporting documents namely:
 - a. Heritage Statement
 - b. Concept Masterplan

Chapter 3 - Vision and Strategic Objectives

Q-V3.1: Vision for the Local Plan

3. William Davis consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and William Davis consider it would be more appropriate to reference meeting unmet need from the wider Housing Market Areas. Furthermore, it is stated that unmet need 'could' be met, which should be revised to state that unmet needs 'will' be met where appropriate and agreed.
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.

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

Q-I1: Sustainability Appraisal

5. Firstly, as a general comment, it is noted from the Introduction and description of the SWLP area that the SA has focussed on what is inside the boundary administered by the two authorities. But the SA should also recognise what is beyond the boundary, and notably Redditch as a major town on its borders that has a significant influence



over the western part of the South Warwickshire area. This should be recognised in the description of the area.

6. The following comments are made in respect of the SA for Studley (C.18).
7. The Small Settlement Location for Studley (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. For example, land to the north east falls within the flood zones 2 and 3, and land to the north west would increase the risk of coalescence with Redditch. 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.
8. 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 and careful masterplanning. Agricultural land classification will of course be a factor that needs to be taken into consideration, but is not an overriding constraint upon development of a site.
9. The SA demonstrates therefore that there are no in principle impediments to growth at Studley, and this is a suitable location for growth given its accessibility to facilities and services, including those within Redditch. 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

10. Intensification is a way to optimise brownfield land and realise its effectiveness. However, William Davis 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.



11. 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

12. 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. In summary, the housing requirement is substantial and William Davis would agree with the following statement in the UCS: “we consider it impossible to meet development needs without significant greenfield development”².
13. In relation to housing allocations from the adopted Local Plans, William Davis 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 NPPF³. In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will 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.
14. The UCS also includes within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas, and are considered to be potentially suitable. As no formal assessment of these submissions has taken place, their inclusion will need to be reviewed once the Housing and Economic Land Availability Assessment (HELAA) is published. Any allowance for such sites must be deducted from the windfall allowance.

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

² Paragraph 4.6 Urban Capacity Study (October 2022)

³ Glossary of the National Planning Policy Framework (July 2021)



15. The UCS identifies an additional five sites on vacant land in the urban areas which have not yet been submitted to the Call for Sites process, but are considered potentially suitable for 328 dwellings. There is no certainty around the availability and deliverability of these sites to include them at this stage. Further, on assessment of these sites there are some serious concerns around their suitability in any case. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39 dwellings). As above, these sites have not yet been submitted to the Call for Sites process and so there is no certainty around delivery.
16. Finally, the UCS includes an assessment of the potential windfall supply with reference to the level of windfall delivery across South Warwickshire in the period 2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the sources of windfall supply, nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence as required by the NPPF⁴.

Q-S4.1: Growth of Existing Settlements

17. Yes, growth of existing settlements in South Warwickshire (and on the edge of 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, jobs, 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 William Davis's site at Holt Farm (site reference 332), which is referenced as Areas 5 and 6 within the Studley Area.
19. In respect of Connectivity, Area 5 has been assessed as 'B' (barriers are negligible and easily overcome) and Area 6 has been assessed as 'C' (barriers may be

⁴ Paragraph 71 of the National Planning Policy Framework (July 2021)



overcome but not easily). For both areas, reference is made to 'busy route on western edge'. This refers to the A435 which runs through the middle of Studley. Access can be provided onto the A435, and this route is capable of accommodating all modes of transport. Significant residential development and local facilities already exist on the same side of the A435 as these two areas, and therefore the A435 is not a barrier to facilities. There are therefore no significant barriers to connectivity to the settlement from these areas, and this should be rectified in the next iteration of the Analysis to a score of (A).

20. Reference is made to floodplain and sewage works to the east, however this is not a constraint on connectivity.
21. In respect of Landforms, it is noted there are no physical constraints on Areas 5 and 6. It is also noted that Area 5 has all five local facilities within 800m. Area 6 is deficient only in respect of healthcare, however Pool Medical Centre is within 800m of Area 6 and this should be rectified in the next iteration of the Analysis.
22. When taking account of this evidence, the comments above in relation to connectivity, it is clear that Areas 5 and 6 perform best.
23. Comments are also made here in respect of the Heritage Assessment for Studley. This finds that land to south-east of Studley has potential for development in recognition of the lack of historic environment constraints. It is recognised that the north-east of the village is considered to be effectively undevelopable from a historic environment perspective.
24. The relationship between development to the south east of Studley, and the heritage assets further north has been carefully considered by William Davis through its own masterplanning exercise. It is possible to avoid harm to the setting of the assets through the location of development, landscaping, and detailed design. In fact, the ability to provide areas of public open space (possible Country Park) within this area creates an opportunity to enable a greater appreciation of the significance of the setting of the assets to the north. William Davis and its consultants would therefore be very happy to discuss its work with the Councils to demonstrate how heritage assets to the north can be protected.



25. It is also noted the Councils are to undertake a review of the Green Belt to assess whether there are areas which no longer meet all five of the Green Belt purposes and could be removed. It is important that any assessment also has regard to paragraph 142 of the NPPF, and the need to give first consideration to previously developed land and/or land well served by public transport, and also to take into consideration the ability to offset any removal through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
26. Studley is well served by public transport connections into Redditch and other settlements, and this should be recognised in the review. Moreover, William Davis have demonstrated in its proposal for Holt Farm (site 332) that there is extensive areas of land available for compensatory improvements in terms of public access and environmental quality within a potential new Country Park.
27. In summary, this area is the most suitable location to accommodate a strategic allocation, as it is not environmentally constrained and yet the most accessible to the village and its facilities. Areas 5 and 6 have advantage over areas 8 and 9 (to the south of Studley) in terms of proximity to the village services, but also in terms of connectivity as residents of areas 8 and 9 would have to cross a main road (the A448) to access the village. Further, as there is no development south of the A448 in areas 8 and 9, this would be breaching for the first time a significant edge to the village and increasing the risk of coalescence with Sambourne.
28. William Davis therefore request land within the Areas 5 and 6 form a strategic allocation for Studley.

Q-S7.2: Refined Spatial Growth Options

29. Option 2: Sustainable Travel; Option 4: Sustainable Travel and Economy and Option 5: Dispersed all contain elements that could result in an appropriate strategy, which makes best use of existing resources and address climate change. Therefore realistically, William Davis consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.



30. 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.
31. 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.
32. 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.
33. William Davis also have the following comments on the Options.
34. William Davis query why growth at Studley does not appear in the Rail Corridors (1) Option. Given the existence of Redditch Train Station which is less than 5km from Studley, it is suggested Studley is added to the list. Its status is no different to settlements listed in Option 1, such as Cubbington, Radford Semele, and South of Coventry.
35. William Davis also query why Studley does not appear in the Economy (3) Option. Studley is within walking and cycling distance of major employment areas on the south eastern edge of Redditch, including Park Farm Industrial Estate, Washford Industrial Estate, and the Alexandra Hospital. These are much larger employment areas than found within South Warwickshire, and therefore Studley should be added to the list.
36. If the aim for the Plan is to deliver a well-connected South Warwickshire, then a settlement like Studley with its accessibility to jobs, shops, train station, and services within Redditch cannot be excluded from accommodating growth.
37. Equally important is the role Studley plays in supporting Redditch, with 31% of people who work in Studley Ward living in Redditch⁵; this should be recognised and reflected in the Plan.

⁵ [SDC Core Strategy 2011-2031 \(stratford.gov.uk\)](http://stratford.gov.uk)



38. Further, unlike most Main Rural Centres, Studley has had very limited growth directed towards it in the Core Strategy. As detailed in the latest Annual Monitoring Report (2022), only 135 net housing completions have been achieved in Studley since 2011 (just over 10 dwellings a year), the second lowest of all Main Rural Centres and significant lower than the majority, and indeed lower than a number of Category 1 and Category 2 Local Service Villages⁶.
39. The consequences of not providing for a sufficient level of housing within Studley is an increased pressure on the local housing market, increasing local house prices and worsening the already high affordability ratio. Whilst this of course impacts on those looking to move to Studley to live, it also impacts on those currently living within Studley who may be looking to purchase their first home, upsize or are in affordable housing need.
40. William Davis therefore support a strategy that includes growth at Studley.

Chapter 5 - Delivering South Warwickshire's Economic Needs

Q-E7.1: Core Opportunity Areas

41. William Davis object to option E7.1a and the exclusion of Studley and the eastern fringe of Redditch from the Core Opportunity Area. This ignores the economic importance of Redditch to this part of South Warwickshire.

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

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

42. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire and this approach is reasonable for other authorities in Coventry and Warwickshire.
43. 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

⁶ [AMR 21 22 Final Draft.pdf \(stratford.gov.uk\)](#)



circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”⁷. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.

44. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.
45. 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.
46. 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.
47. In line with the NPPF⁸, 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 guidance⁹; 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.
48. 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 soundness¹⁰, which is explored in further detail in response to Issue H4 below.
49. Bringing together comments on the UCS and Unmet Needs under Q-H4.2, William Davis 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.

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

⁸ Paragraph 61 of the National Planning Policy Framework (July 2021)

⁹ Paragraph 010 Reference ID 2a-010-20201216 of National Guidance

¹⁰ 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-H3: Minimum Space Standards

50. Whilst the provision homes of an appropriate range and size is supported, William Davis are concerned that the blanket application of Nationally Described Space Standards across South Warwickshire could significantly and negatively impact



viability in areas with high levels of unaffordability. There are already substantial existing and emerging policy and building regulations requirements (e.g. biodiversity net gain and future homes standard), combined with fluctuations in the housing market and construction costs that are impacting development viability. The cumulative effects of all proposed plan policies will need to be viability tested, in accordance with national policy. The result may be a choice between policies such as minimum space standards and a lowering of the affordable housing requirement relative to existing expectations.

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

51. 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 NPPF¹¹. 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.

52. 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

53. There are clearly significant unmet housing needs arising from the Birmingham and Black Country Housing Market Area which require addressing by this Plan.

54. Birmingham published a New Local Plan Issues and Options consultation document in October 2022. This identifies an overall housing need in Birmingham to 2042 (derived from the Standard Method) of some 149,286 dwellings, with total housing supply equating to just 70,871 – leaving a shortfall of some 78,415 dwellings.

¹¹ Paragraph 35 a) of the National Planning Policy Framework (July 2021)



55. There are significant limitations to the potential for such substantial unmet needs to be met by Birmingham's neighbouring authorities due to lack of available land in the Black Country and significant Green Belt coverage in the Black Country and elsewhere (Bromsgrove, Solihull, North Warwickshire, and Lichfield). This was evident in the work undertaken in the now abandoned Black Country Local Plan Review, which was subject to Regulation 18 consultation in 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.
56. There are strong functional relationships between Birmingham and South Warwickshire, in terms of transport connections and commuting patterns, and development in South Warwickshire can contribute towards meeting unmet needs.
57. The Councils 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.
58. 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 William Davis 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

59. 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.

60. 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.
61. 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.
62. 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 releases¹², 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-H4.3: Accommodating Housing Needs Arising from outside of South Warwickshire

63. With regard to how and where best housing shortfalls should be accommodated in South Warwickshire, William Davis consider that settlements or areas with the strongest sustainable transport connections to the conurbations where unmet housing

¹² [How the population changed where you live, Census 2021 - ONS](#)



needs are arising should be prioritised. In the case of Greater Birmingham's unmet needs, this should include Studley given its relationship to Redditch.

Chapter 10 - A well-connected South Warwickshire

Q-T1 20 Minute Neighbourhoods

64. The concept of the 20 minute neighbourhood is supported and William Davis would be content with Option T1c, meaning a bespoke policy requiring the principles of a 20 minute neighbourhood is included within appropriate development proposals. As explained elsewhere within these representations and supporting Concept Masterplan, Studley is a sustainable settlement and the Site at Holt Farm is well connected to the village centre and existing amenities, which the SWLP evidence recognises. This also aligns with recent changes to the development management system whereby Active Travel England are now a statutory consultee for development of a certain scale.

Chapter 12 - Plan Content

Q-P1.1 & P1.2 – Broad Content of the Part 1 Plan

65. William Davis are concerned that the broad scope of the Part 1 Plan is potentially too limited and by splitting plan making could leave to a lengthier overall plan production timetable than if a single plan is prepared. This has certainly been the case in Northamptonshire, where Part 2 plans were adopted years after the Part 1 plans. Whereas, South Worcestershire has demonstrated that a single joint plan can be achieved within reasonable timescales.

66. Nevertheless, it is agreed that the allocation of sites necessary for short term development should form part of the Part 1 Plan to ensure a healthy five year housing land supply. The SWLP should be mindful to provide sufficient allocations to mitigate any slippage or unexpected change in circumstances rather than rely on sites that are only deemed developable inadvertently being required to be considered deliverable in reality at Year 6 of plan adoption.



67. Section 1.4 refers to strategic sites as those '*critical*' to the delivery of the Plan. It is considered that sites that are *critical* should be extended to those required in the early part of the plan period to ensure the overall robustness of the Plan and include sites of circa 100 dwellings and over.