

**Stage 2: Issues and Options.**

**LOCAL PLAN REPRESENTATIONS TO PART 1  
SOUTH WARWICKSHIRE PLAN**

**LAND SOUTH OF BANBURY ROAD, ETTINGTON**

On behalf of Rainier Developments

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## Document Management.

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# 1. Introduction

- 1.1. These representations are made by Pegasus Group, on behalf of Rainier Developments, in response to the Issue and Options consultation for the South Warwickshire Local Plan.
- 1.2. These representations relate to specific land covering 1.17ha at Banbury Road, Ettington ('the Site'). The Site is identified on the Location Plan at **Appendix 1** and is being promoted as a site which is an available, achievable and deliverable site which could accommodate residential development comprising circa 24 dwellings homes.
- 1.3. The Site is identified on the Council's interactive maps (South Warwickshire Local Plan ([arcgis.com](https://arcgis.com))) with Site ref: **38**, noted as being a housing/residential proposal.
- 1.4. These representations have had regard to the published consultation document and questions set out therein, accompanying documentation forming the current evidence base, and the national planning context.
- 1.5. The tests of soundness that Development Plans need to meet so as to be legally compliant and found sound, are set out in the National Planning Policy Framework 2021 (NPPF), paragraph 35:
  - **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6. These tests of soundness, along with other legal and procedural requirements associated with the plan-making process provide a contextual framework for these representations. It is





noted that the proposed changes to the NPPF published in December 2022 propose to remove the requirement for Development Plans to be 'Justified' in order to be found sound. However, at the time of writing and submission of these representations that change has not been enacted and these representations therefore still take this test into account.

1.7. These representations refer directly to the specific questions set out in the Issue and Options consultation document and also respond to the following evidence base documents where appropriate:

- South Warwickshire Local Plan Part 1 Stage 2: Issues and Options Consultation, January 2023
- Sustainability Appraisal (SA) November 2022
- Housing and Economic Development Needs Assessment (HEDNA) November 2022
- Urban Capacity Study, October 2022
- South Warwickshire Settlement Analysis, January 2023
- Evolving the Spatial Growth Options – The Story so Far – Topic Paper, August 2022

1.8. The representations are submitted via email to [swlp@stratford-dc.gov.uk](mailto:swlp@stratford-dc.gov.uk) and [swlp@warwickdc.gov.uk](mailto:swlp@warwickdc.gov.uk) as per the 'How to Comment' procedures set out by the Councils.

## 2. Chapter 3: Vision and Strategic Objectives – South Warwickshire in 2050 Issue

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

**Q-V3.2 If no, please indicate why**

- 2.1. As set out in response to the Scoping and Call for Sites consultation, Rainier supports Stratford-on-Avon and Warwick District Councils in the continued preparation of a Joint Local Plan. Working together provides the Councils with the opportunity to comprehensively develop the vision, strategic objectives, development requirements, spatial development strategy and policies that will shape detailed development proposals, taking into account changes to the national planning legislation, revisions to the NPPF and National Planning Practice Guidance (NPPG) that have occurred since the adoption of the Development Plans, adopted in 2016 (Stratford) and 2017 (Warwick) respectively.
- 2.2. Any joint Local Plan must embrace similarities between the authorities and the opportunities created (such as the provision of strategic infrastructure) whilst also recognising differences. For example, the two administrative areas at present have differing settlement hierarchies where Stratford on Avon has a much more rural population than Warwick and those differences must be taken into account in the strategic nature of spatial policies that are prepared. Notwithstanding, the Joint Plan itself provides the opportunity to set a spatial hierarchy and identification of land for development which ensures the existing character of the area as a whole is preserved and enhanced.

### *National Requirements for Plan-Making*

- 2.3. Paragraph 33 of the NPPF requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The joint Local Plan will ensure that an up-to-date Local Plan for 'South Warwickshire' will be in place to support growth and meet future development needs. Rainier supports the Councils' proactive approach to progressing a joint Local Plan to ensure that an up-to-date policy framework exists for the 'South Warwickshire' area, to guide growth to 2050 and to ensure that development is genuinely plan-led.

### *Vision and Strategic Objectives*

- 2.4. The plan's Vision seeks to *"meet South Warwickshire's sustainable development needs to 2050"* and *"provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time."* These representations are broadly supportive of the vision as presented, which accords with para 7 of the NPPF which states that the purpose of the planning system is *"to contribute to the achievement of sustainable development."*
- 2.5. The five overarching principles which then set out the basis on which policies will be formed and thus how the Vision will be delivered, do not match the Vision as drafted. For example, the delivery of 'homes and jobs' does not appear in any of the over-arching principles accompanying the Vision. Whilst the detail of the Issues and Options consultation documents goes onto talk about the delivery of growth, an over-arching principle to underpin the Vision should be developed, from which detailed policies will flow. Such a principle would also tie in to the Strategic Objectives which follow, which do set out a number of objectives to deliver South Warwickshire's development needs.
- 2.6. The Vision places significant emphasis on responding to the 'climate emergency'. Although this principle in general is supported, and it aligns with the Government's aspirations for achieving net zero carbon emissions, it is also important that this does not dominate the Vision and Strategic Objectives of the Plan to the detriment of delivering a balanced, sustainable strategy which achieves the delivery of development to meet identified needs.
- 2.7. The Vision also makes reference to 'beauty' stating that this will create spaces where people want to be, which respect and reflect the existing beauty and heritage of the area. This aspiration is supported in principle and it is acknowledged that national policy is pursuing 'beauty' in planning, however there is a concern that as a concept this is not well defined and will need to be supported by more detailed design which reflect on what beauty might mean in practice.

### 3. Chapter 4: Meeting South Warwickshire's Sustainable Development Needs

Q-I1: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are comment on

- 3.1. The Issues and Options document is supported by a sustainability Appraisal ('the SA'), prepared by Lepus Consulting. The purpose of the SA is to assess the sustainable development implications of the proposals presented in the Issues and Options consultation document, where the SA outputs will help the Authorities to identify sustainable development options and prepare a plan which is *"economically, environmentally and socially sustainable"*.
- 3.2. NPPF paragraph 32 identifies that local plans should be informed throughout their preparation by a SA which meets the relevant legal requirements, and which should demonstrate how the Plan has addressed relevant economic, social and environmental objectives.
- 3.3. To support the Issues and Options consultation the SA has considered different locational reasonable alternatives. These include the 5 no. growth options proposed, 7 no. new settlement locations (for development of no less than 6,000 homes), 32 no. Broad Locations for development around the Main settlements (to up to 2,000 homes), and 22 no. Small Settlement Locations for development of between 50-500 homes.
- 3.4. The SA then used the SA Framework to evaluate how the different reasonable alternatives perform against sustainability objectives. The Sustainability Objectives are:
  - **Climate Change** – Reduce the SWLP<sup>1</sup> authorities' contribution towards the causes of climate change
  - **Flood Risk** – Plan for anticipated levels of climate change

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<sup>1</sup> SWLP = South Warwickshire Local Plan



- **Biodiversity and Geodiversity** – Protect, enhance and manage biodiversity and geodiversity
- **Landscape** – Protect, enhance and manage the quality and character of landscapes and townscapes
- **Cultural Heritage** – Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance
- **Environmental Pollution** – Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution
- **Natural Resources** – Protect and conserve natural resources including soil, water and minerals
- **Waste** – Reduce waste generation and disposal and support sustainable management of waste
- **Housing** – Provide affordable, high quality and environmentally sound housing for all
- **Human health** – Safeguard and improve community health, safety and wellbeing
- **Accessibility** – Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel
- **Education** – Increase access to education and improve attainment to develop and maintain a skilled workforce
- **Economy** – Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth

3.5. The significance of effects is assessed in accordance with Table 2.1 in the SA:

Table 2.1: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Adverse Impact	The proposed option prevents the achievement of the SA Objective to some extent. Mitigation solutions are achievable, and or complex, with a relatively low level of intervention.	-
Major Adverse Impact	The proposed option prevents the achievement of the SA Objective to a significant extent. Mitigation solutions are likely to be complex, if at all possible. A high level of intervention is required.	--

3.6. The principle and broad approach of the SA is supported and it is recognised that the SA is at an early stage, however the SA only considers a limited number of settlements and excludes some settlements that should be considered as sustainable locations for growth, such as Ettington. As the Plan progresses it will be necessary to undertake a wider analysis of other settlements as these are reasonable alternatives.

**Q-I2: Please select the option which is most appropriate for South Warwickshire:**

**A: Set out infrastructure requirements for all scales, types and location of development**

**B: Focus on strategic infrastructure relating specifically to the growth strategy**

3.7. It will be necessary for the South Warwickshire Local Plan to consider infrastructure requirements across the plan area, both strategic and non-strategic. It is suggested that the adoption of a consistent approach to infrastructure across the plan area would be beneficial, would provide certainty for those involved in the planning process and would simplify the viability study of the Local Plan which is now a national requirement.

3.8. It is recognised that elements of the growth strategy may require specific strategic infrastructure in order to ensure deliverability and the Plan will need to clearly identify these requirements, along with the delivery mechanisms to secure this. For non-strategic infrastructure, a less detailed approach is likely to be sufficient which considers different



areas and types/scales of development. However, it will be necessary for both to inform the plan-making process going forward.

**Q-I3: Please select the option which is most appropriate for South Warwickshire:**

**A: Establish a South Warwickshire CIL (or emerging Infrastructure Levy) to support the delivery of the Plan**

**B: Each District to produce its own Levy**

- 3.9. It is acknowledged that both Districts currently have CIL and that the charging schedules have been developed independently. It is also noted that the Plan acknowledges that it is possible to charge different rates of CIL in different zones within a single levy. If it is the Council's intention to review CIL then it would be logical to review this jointly alongside the Local Plan process. This allows for infrastructure costs to be properly understood and suitable delivery mechanisms identified, including potentially CIL or developer obligations. This should inform the viability study of the Plan to ensure that obligations do not undermine delivery of the Plan.

**Q-I5: Please add any comments you wish to make about infrastructure, viability and deliverability**

- 3.10. The NPPF para 34 requires Local Plans to set out the contributions expected from development including affordable housing requirements, plus other infrastructure such as education, health, transport, flood and water management, green and digital infrastructure. The NPPF states that such contributions should not undermine the deliverability of the Plan.
- 3.11. In developing policies that will set out development contributions expected from developments detail viability work must support the Local Plan process. Such viability work should be based on a detailed, site-specific evidence base that will ensure planning applications which comply with development plan policies will be viable, without the need for further viability work to be undertaken at the application stage as intimated at NPPF para 58.

**Q-S3.2: Please select the option which is most appropriate for South Warwickshire:**

**2A: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be provide that the development is in a sustainable location or would increase the sustainability of the area.**

**2B: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location.**

**2C: None of these.**

3.12. It is acknowledged that national policy encourages the reuse and redevelopment of brownfield land. However, as identified by Option 2A, it is important that brownfield development should reflect the identified growth strategy in order to ensure that sustainable development is achieved.

3.13. It should be noted that the Urban Capacity Study (October 2022) established that it is unlikely to be possible to meet current development needs without significant greenfield development. Whilst the reuse of suitable brownfield land, in line with the growth strategy and/or in sustainable locations should be encouraged by planning policy, it will not avoid the need for greenfield development as part of the South Warwickshire Local Plan.

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

**Yes | No | Don't Know**

3.14. Growth at existing settlements across the Joint Plan area should form part of the overall Plan strategy, as this would accord with the differing current pattern of spatial development across the two administrative areas.

3.15. Warwick focuses development around its four main urban areas, whilst Stratford's identified Local Service Villages accommodate a proportion of development as well as its main towns.

3.16. In order to develop the most sustainable pattern of development, growth at existing settlements should be in sustainable locations. It is important that appropriate levels of growth are apportioned to existing settlements in order to maintain the vitality and viability of settlements, support new and existing infrastructure requirements and provide an appropriate mix of housing for the area.



- 3.17. Stratford-upon-Avon, identified as the Main Town is a sustainable location for development and development at the Site would allow for a sustainable development close to existing services and public transport.
- 3.18. As set out in the Sustainability Appraisal, the site is within the Broad Location 'Stratford Northeast' which the SA shows is least constrained in terms of environmental receptors (see Table at 4.15.1).
- 3.19. It is clear that this Site (Call for Sites ref: 38) is located in an entirely sustainable location and should be positively considered as a location for 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.**

- 3.20. The Site falls within Stratford Northwest for the purposes of the Settlement Design Analysis which forms part of the Council's evidence. The site is within Parcel 1. It scores a B in terms of accessibility (green) which is the joint highest score within this analysis area. It is not identified as having any landform constraints. It has retail, jobs, economy, places to meet and open space, leisure, recreation and wellbeing within 800m of the site. The density map does not reflect the existing residential development to the south of this Site. The plan should be updated to include this.

#### **Issues S6: A Review of Green Belt boundaries**

- 3.21. The Issues and Options consultation document does not set out any specific question on Green Belt matters, but these representations support a review of the Green Belt boundary as part of the Plan making process.
- 3.22. As set out in the NPPF para 136, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of Local Plans. Moreover, strategic policies should establish the need for changes to Green Belt, and where proposed, the amended boundaries should be able to endure in the long term, i.e. Green Belt boundaries will not need to be altered at the end of the plan period.
- 3.23. NPPF para 137 requires exceptional circumstances to include evidence of the examination of all other reasonable options for meeting an identified need for development. Importantly, in

reviewing Green Belt boundaries sustainable patterns of development should be taken into account.

3.24. The Green Belt is tightly drawn around, and indeed, washes over, a number of existing settlements across the Plan area. In proposing, assessing and review growth options, where the most sustainable form of development is likely to be around existing settlements, it is therefore imperative that the Local Plan evidence base includes a Green Belt review. The Councils' recognition of this in relation to a number of the proposed growth options is supported.

3.25. If a Green Belt boundary review is not undertaken, development will need to 'jump the Green Belt' which would result in an isolated pattern of development.

**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 | Neutral | Inappropriate strategy**

**Option 2: Sustainable Travel – Appropriate strategy | Neutral | Inappropriate strategy**

**Option 3: Economy – Appropriate strategy | Neutral | Inappropriate strategy**

**Option 4: Sustainable Travel and Economy – Appropriate strategy | Neutral | Inappropriate strategy**

**Option 5: Dispersed – Appropriate strategy | Neutral | Inappropriate strategy**

3.26. It is noted that the Issues & Options document has reduced the previous seven growth options presented in the Scoping Consultation to five options as outlined above through refining and combining options, including Option 2 sustainable travel (combination of rail and bus corridor) and Option 3 economy (combination of socio-economic and enterprise hub options). In this consultation document, Option 4 sustainable travel and economy effectively combines Options 2 and 3. It is clear from this process that the growth option to be pursued will represent a combination of all five options outlined above.

3.27. The options now presented in the Issues and Options, apart from Option 5: Dispersed, perform broadly similarly to each other in the SA (Table 7.1) suggesting not one option may have significantly more or less impact than any of the others when considered against the

SA Framework. At this stage, the SA has not considered any mitigation or site-specific options for growth within settlements identified within the 'dispersed' option (5). There could be significant variance in how each settlement and individual sites would perform against the SA objectives. All of the growth options could deliver sustainable development and a combination of all options will be the most appropriate option for the development of the Plan going forward.

3.28. By necessity, the strategy will need to identify areas outside existing settlement boundaries for growth/development. The Urban Capacity Study identifies capacity for 6,145 dwellings within the existing urban boundaries. If the Plan proceeds with the housing figures set out in Table 9 of the Issues and Options consultation at 1,679 dwellings per annum the Urban Capacity Study would only be able to deliver a 3.66 year supply of housing. Land from other sources will therefore be required and it is important that all options are considered in taking the Plan forward.

3.29. Combining sustainable travel (including rail) and economy will naturally direct most growth to the larger, more sustainable settlements. However, it is important that appropriate, proportionate growth is directed to smaller settlements in order to support the continued viability and vitality of these settlements going forward. This would include supporting or enhancing sustainable travel options at these locations. This needs to be positively planned for as part of the South Warwickshire Local Plan and as such an element of dispersal should form part of the final growth option. This will require a careful consideration of all of the options, including growth at existing main settlements, growth at smaller existing settlements, proximity to services and jobs, availability of infrastructure or opportunities for infrastructure delivery and a Green Belt boundary review to ensure development is not isolated beyond the defined Green Belt boundaries.

**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?**

**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?**

**Limit of 10 | A higher limit | A lower limit**

- 3.30. The supporting text for this question confirms that the aim of this approach would be to allow for development within or adjacent to existing settlements. This provides greater scope of these settlements to accommodate growth than the current infill only approach. The proposed approach to allow for suitable development within or adjacent to existing settlements is supported and will allow for suitable growth.
- 3.31. An across the board threshold limit of 10 dwellings is not supported. The amount of development different settlements can accommodate will vary significantly depending on various factors, such as existing services and facilities, local need for housing and the suitability of the proposed site to accommodate a certain level of development.
- 3.32. In addition, developments of 10 or fewer dwellings are exempt from affordable housing. Even where a lower threshold is set, developments of this scale generally result in a commuted sum towards affordable housing elsewhere. This is due to a variety of factors, including that registered providers often will not take on a small number of dwellings in one location. It is clearly preferable to have affordable housing delivered on site wherever possible to meet local needs. Setting a more flexible threshold that would allow for a higher level of development where appropriate would support greater on-site affordable housing provision.

**Q-S9: Please select the option which is most appropriate for South Warwickshire**

**Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.**

**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.**

- 3.33. The South Warwickshire Local Plan provides the opportunity to review all settlement boundaries and ensure they will be fit for purpose across the plan period. Saving all existing settlement boundaries is unlikely to be effective in positively planning for plan-led growth across the plan period. This should apply all settlements as part of the exercise will be to assess which settlements which would benefit from a defined boundary.
- 3.34. To be found sound, the Plan must be prepared: Positively, in a way that is aspirational, but deliverable, and it should set out a framework for addressing housing needs and other economic, social and environmental priorities (NPPF paragraphs 15 and 16). To shape the spatial strategy for the Plan and ensure all reasonable alternatives are considered, a review



of existing settlement boundaries will be required to identify sufficient land, in sustainable location to meet the development needs of the Plan.

- 3.35. In addition, settlement boundaries will need to be reviewed and amended to take account of new allocations.
- 3.36. For example, the Green Belt boundary and development boundary for Ettington should be reviewed which would allow for the inclusion of this Site (Call for Sites ref: 38) within the development boundary to deliver sustainable residential growth.

## 4. Chapter 6: Delivering homes that meet the needs of all our communities

**QH1-1: 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 | No | Don't Know**

- 4.1. Paragraph 11 of the NPPF requires that strategic policies should as a minimum provide for the objectively assessed need for housing as well as any needs that cannot be met in neighbouring areas. Paragraph 60 sets out the Government's objective of "significantly boosting" the supply of homes and paragraph 61 provides additional guidance identifying that strategic policies should be informed by the minimum local housing need identified by the standard method as well as any unmet needs from neighbouring areas.
- 4.2. The Planning Practice Guidance (PPG) (paragraph 2a-002) again confirms that the standard method provides only the minimum number of homes expected to be delivered but it does allow authorities to diverge from the Standard Method where this can be justified by exceptional circumstances: where such an alternative reflects current and future demographic trends including migration and market signals.
- 4.3. The HEDNA supporting the Issues and Options Consultation has assessed matters of housing need and requirements in great detail across the Coventry and Warwickshire Housing Market Area in which 'South Warwickshire' is located. In coming to the recommendations on proposed housing need (dwellings per annum) across the Housing Market Area the report appears to have followed the relevant Government guidance in demonstrating exceptional circumstances supporting a trend-based approach to housing need for the Joint Plan area.
- 4.4. The modelling of new demographic projects which take account of Census data releases and specific matters relating to the population in Coventry in particular, as part of the housing market area, but also including an assessment of Age Structures across the Housing Market Area (HMA), migration and demographic interactions is supported in principle. The trend

based figures, which equate to an overall housing need across the Joint Plan area of 1,679 dwellings per annum is supported in principle.

- 4.5. The HEDNA also identifies that Warwick has the highest levels of migration of population from Coventry, and that Stratford-on-Avon forms part of the Greater Birmingham Housing Market Area and the authorities should respectively consider planning for unmet need from Coventry and the Greater Birmingham HMA respectively. Whilst the number of homes which may be required in Coventry is likely to reduce based on the overall need being lower in the HEDNA than the 2014 sub-regional based household projections, the unmet need in the Greater Birmingham and Black Country HMA in particular is well evidenced.
- 4.6. The GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) identifies the housing shortfall of the GBBCHMA as 67,160 dwellings. The now revoked Draft Black Country Plan 2018–2039 showed a shortfall of circa 28,000 homes in the Black Country alone. Birmingham City Council have recently suggested a potential shortfall of over 78,000 dwellings. Further, the ‘Mind the Gap’ Barton Willmore Paper dated March 2021 and ‘Falling Short – Taking Stock of Unmet Needs across GB&BCHMA’ paper by Turley in August 2021, both commissioned by HBF Members concluded that the significant unmet needs in the GBBCHMA exist now, and will continue to exist in the future.
- 4.7. The Black Country shortfall identified is considered to remain relevant to the Plan-making process and the recent letter from the Inspectors examining the Shropshire Local Plan confirms that the scale of need and unmet need remains relevant to Plan-making. Para 14 of that letter (see **Appendix 2**) concluded that *"Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear."*
- 4.8. It is important to stress that these shortfall figures do not take into consideration the 35% uplift applied to Birmingham introduced in December 2020 as the adopted Birmingham Development Plan. The Black Country housing shortfall also does not consider the 35% uplift applied to Wolverhampton City Council in May 2021. Such considerations should also feed into the proposed housing targets that are set in the South Warwickshire Plan going forward and this could increase the requirement even further.

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



- 4.9. There is an acute recognition in the Issues and Options consultation documents of an affordability problem across South Warwickshire Plan area, where those on low incomes and young people struggle to access the housing market.
- 4.10. Warwick District Council's latest 'Authority Monitoring Report' (AMR) (for the period 2020-2021) indicates that against an annual requirement of 280 affordable dwellings since the beginning of the currently adopted Plan period in 2011 (within its own area), the Council have delivered 841 affordable dwellings (out of a total requirement for 2,800), 30% of the target.
- 4.11. Stratford-on-Avon's latest AMR for the period 2021-2022 (published December 2022) identifies that in the current Core Strategy plan period of 2011-2031, 3,204 affordable dwellings have been provided out of a total 10,019 dwellings (net) built. This equates to 37% of all dwellings and is just above the Plan's affordable housing policy requirement of 35% of all dwellings to be affordable.
- 4.12. Notwithstanding Stratford-on-Avon's marginal reported over delivery, the HEDNA considered the affordability issue across the District further. It identifies at Table 8.45 that the estimated annual need for affordable housing (rented and affordable home ownership) across Stratford-on-Avon and Warwick is 1,386 dwellings per annum.
- 4.13. Whilst it is recognised that these are 'net' figures and not 'newly arising need', PPG paragraph 2a-024 makes provision to encourage local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need: *"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probably percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes."*
- 4.14. The Issues and Options consultation recognises that the area has an acute affordability problem and it is suggested that to address this, the Plan could consider providing housing above the 'minimum' need, to boost supply, and in turn deliver additional affordable housing.

**Q-H3: Please select all options which are appropriate for South Warwickshire**

**Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.**



**Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.**

4.15. If the Council are to include a policy requiring new developments to deliver dwellings which comply with Nationally Described Space Standards (NDSS), it must be fully justified. Such a requirement must not make development unviable and must set out such evidence in a proportionate manner to justify its inclusion, as set out in Footnote 49 of the NPPF which states that *“Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”*.

4.16. Further, the Planning Practice Guidance section on Housing: Optional Technical Standards (paragraph O20) states that:

*‘Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

4.17. If the use of NDSS is subsequently justified and pursued through a policy, that policy should be sufficiently flexible to recognise that well-designed house types, which fall slightly below will be acceptable, particularly on sites where the majority of the dwellings comply. The policy should also make provision for additional flexibility in relation to affordable housing as many registered providers have their own requirements.



**Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.**

- 4.18. It is unnecessary for the inclusion of an M4(2) and or M4(3) policy. The Building Regulations 2010 'Access to and use of buildings' Approved document Part M already provides specific requirements for M4(2) dwellings in relation to Accessible and Adaptable Homes and M4(3) M4 (3)(2)(a) dwellings in relation to Wheelchair Adaptable Homes housing. As such, it is therefore not necessary for this to be repeated in any policy, also because developers are already aware they need to deliver to this standard.

**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**

- 4.19. This is discussed in answer to Question H1-1.

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

**Option 5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5–20 homes in size to be developed only for self and custom build homes**

**Option 5b: Require large development of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.**

**Option 5c: 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**

- 4.20. As set out in the Planning Practice Guidance (Paragraph: 016 Reference ID: 57-016-20210208), The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) sets out the legal definition of self-build and custom housebuilding, and also sets out the requirement for each relevant authority to keep a register and publicise the register. Furthermore, Self-build or custom build will help diversify the housing market, as per PPG paragraph 16a Reference ID: 57-016a-20210208.

- 4.21. Stratford-Upon-Avon District's Self Build & Custom Housebuilding Register had 278 people on it as of 31st March 2022. Warwick's Register had 95 people on it in 2019, but that is the latest published position.
- 4.22. Table 13.1 of the HEDNA identifies that serviced plot demand for self-build dwellings is 63 plots per annum which is 4% of the purported 1,679 dwelling/annum housing requirement set out in the Issues and Options consultation.
- 4.23. The emerging Stratford Site Allocations Plan (SAP) has identified specific sites to deliver self-build and custom housing through allocations. It is suggested that the South Warwickshire Local Plan should continue this approach, bring forward the allocations the SAP identified in the most recent Preferred Options document and identify similar suitable sites in Warwick District to ensure a spread across the plan area. This should be reflected in a specific self-build and custom housing policy.
- 4.24. This Site is identified as a self-build and custom housing site in the most recent Stratford SAP Preferred Options document (see policy reference SCB.3). This allocation should be carried forward to the South Warwickshire Local Plan to ensure alignment and consistency between Plan documents and to ensure that this specific type of housing is delivered by the South Warwickshire Plan.

## 5. Chapter 7: A climate resilient and Net Zero Carbon South Warwickshire

**Q-C4.1: Please select all options which are appropriate for South Warwickshire**

**Option C4.1a: Do not have a policy and allow new developments to comply with the national regulation requirements, which may change over time**

**Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments**

**Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards**

**Option C4.1d: None of these**

- 5.1. If a net zero carbon policy is to be employed by the Council it must be fully evidenced and justified, and included in viability considerations.
- 5.2. The Building Regulations Part L 2021 Target for Fabric Efficiency would be applicable to all proposed dwellings and sets the Government's standards for energy efficient. The Council does not need to set local efficiency standards to achieve the shared net zero goal.

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

**Option C6.1a: Include a policy that required new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business as usual' approach to construction**

**Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods**

**Option C6.1c: None of these**

- 5.3. Whilst the value of Whole Life-Cycle Carbon assessments is recognized and there is no in principle objection to the need for some forms of post construction, pre-occupation



assessment, if a policy is to be pursued on this matter there are a number of key considerations:

- Once sold, properties will be owned by the purchaser and mortgagees. Any policy would need to be carefully worded such that it would not require the sharing of energy use, air quality and overheating risk data with a third party, where the developer no longer owns the dwelling as this could raise GPDR issues. Enforcement of such a policy for future owners and occupiers could also fail the test of conditions on any subsequent planning permission.
- The purpose of such information would also need to be clearly set out. It will not be possible to post factum make alterations to the constructed buildings, so what would be the benefit or purpose of such a significant amount of data collation? If the purpose is to inform and advise as to future construction methods, then this could be equally achieved by an informed and targeted research exercise by organisations such as the BRE in advising Governments and through amendments to Building Regulations.

**Q-C9.1: Please select the option which is most appropriate for South Warwickshire**

**Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity**

**Option C9.1b: DO not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity**

**Option C9.1c: None of these**

- 5.4. Rainier are supportive of the need to address net losses to biodiversity through the provision of enhancement to deliver an overall net gain. The Environment Act will require all development to provide at least a 10% Biodiversity Net Gain (BNG) increase and there would be no objection to this being carried through into a local policy. Indeed, it would reflect one of the core principles of the NPPF to conserve and enhance the natural environment.
- 5.5. Any such policy though, should be drafted to provide as much flexibility as possible. The test is whether the 10% BNG is delivered, not the method by which it is delivered. It is important that the way in which 'net gains' are calculated is given careful consideration and a pragmatic



view should be taken in terms the delivery of biodiversity enhancements where there are clear landscape and habitat improvements, rather than being wholly reliant on the output of a rigid calculator, in particular where this could impede viability and thus the delivery of much needed housing. It should also allow for contributions to be made towards off-site mitigation with suitable receptor sites or projects identified through the Local Plan process to secure the deliverability of development.

## 6. Chapter 8: A well-designed and beautiful South Warwickshire

**Q-D2: Please select all options which are appropriate for South Warwickshire**

**Option D2a: Develop a South Warwickshire Design Guide**

**Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change**

**Option D2c: Develop design guides/codes for strategic development sites/locations**

- 6.1. In principle, the introduction of design guides and design codes would accord with national policy where NPPF paragraph 129 states that "*Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale...*"(our emphasis).
- 6.2. The Government also has a National Design Guide and National Model Design Code which are in place to guide the design of development.
- 6.3. Rainier therefore agree that the principle of Design Codes/Design Guides to guide development is acceptable.
- 6.4. However, the development of such policies should be justified in terms of the specifics of the development that would justify the introduction of a site-specific design code/guide that goes beyond the detailed guidance in the National Design Code. This is likely only to be necessary for larger strategic sites or those with particular design considerations, rather than being a default requirement for all sites.
- 6.5. In addition, design codes/guides are not mandatory as set out in the NPPF, and the desire for such a policy tool to be utilised should not hold up development coming forward if such a tool is not in place. Further, even where introduced there needs to be some element of flexibility to allow developments to come forward even if they are not fully strictly in accordance with all criteria. Site specific matters and failure to comply with all criteria, where the alternative would not have detrimental impacts should not be used as a blanket reason to refuse development. Self-build and custom housing sites are likely to require a different



approach to design codes compared to other types of development and this should be reflected in a specific self-build and custom housing policy.

**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 D3b: Include a policy which specifies a minimum density require across South Warwickshire, whilst emphasising that the maximum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District – i.e. minimum 30d.p.h.**

**Option D3c: Identify appropriate density ranges for different locations/areas across South Warwickshire and specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.**

**Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.**

**Option D3e: None of these**

- 6.6. There is no in principle objection to a potential policy on housing densities. However, a blanket approach to density is unlikely to be effective. Rather, a site specific/flexible approach to density should be considered. A minimum density may be set out, but where additional development could assist the delivery of services and facilities, sites could be encouraged to exceed this minimum density where it could be done in a manner consistent with other development plan policies.

**Q-D4.1: Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?**

**Q-D4.2: If no, please indicate why**

- 6.7. The inclusion of a policy on the design of safe and attractive streets is supported in principle. However, any design elements must be fully evidenced and justified and should take into





account Warwickshire County Highways Authority design standard, in particular where departure from those standards could affect the future adoption of development proposals.

## 7. Chapter 11: A biodiverse and environmentally resilient South Warwickshire

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

**Option B3a: Introduce Special Landscape Areas across all of South Warwickshire**

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

**Option B3c: Discard Special Landscape Areas and bolster general landscape policy**

- 7.1. Special Landscape Areas currently only exist within Stratford-on-Avon District and were introduced in the currently adopted Core Strategy (2016), as a result of information provided in the Special Landscape Area Study (2012).
- 7.2. Such designation has no basis in national guidance or policy and are not included in Natural England's approach. Rather, paragraph 174 of the NPPF and others seek to conserve and enhance the local environment, ensure that policies take into account landscape implications arising from development, consider landscape and visual impacts, and protect 'valued landscapes'.
- 7.3. Any landscape policy should reflect the content of national guidance, rather than continuing with or introducing additional policies and designations that have no policy basis, as they are not necessary, are not consistent with national policy and are not justified.

**Q-B4: Please select the option which is most appropriate for South Warwickshire**

**Option B4a: Maintain the current policy approach, without the use of a buffer**

**Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape**

- 7.4. Paragraph 176 of the NPPF requires 'great weight' to be given to conserving and enhancing 'landscape and scenic beauty' in, inter alia, Areas of Outstanding Natural Beauty (AONB). It

also requires “...development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

- 7.5. The requirement for development within the 'setting' of AONBs to be sensitively located and designed renders the provision of a policy on this matter unnecessary. National policy guidance seeks to protect AONBs and their setting, and a policy on this matter would be repetitive and is unnecessary.

**Q-B8.1: Do you agree that the plan should include a policy avoiding 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?**

**Yes | No | Don't Know**

- 7.6. Para 174 b) of the NPPF states that “*planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside ... including the economic and other benefits of the best and most versatile agricultural land.*” In addition, PPG paragraph 001 Ref ID 8-001-20190721 states that the quality of farmland should be utilised to inform choices about its future use within the planning system.
- 7.7. Any policy should avoid taking a blanket approach as there will be circumstances where development on best and most versatile land is appropriate. This may also apply to some allocations. The policy should be sufficiently flexible and allow for cases when the planning balance favours approval.

## 8. Chapter 12: Plan Content

**Q-P1.3: Do you agree with the selection of policies to be addressed in the Part 1 plan? Yes | No | Don't Know**

**Q-P1.4: If not, please indicate why**

- 8.1. There is no in principle objection to the proposed list of policies as set out in the Issues and Options consultation. However, in developing a robust and justified evidence base the Plan should not rule out identifying sites for development that are not 'strategic' in the Local Plan Part 1. This could assist in facilitating the delivery of sites in advance of the Local Plan Part 2 and would also come out of the settlement boundary review that these representations suggest is required to inform the Local Plan Part 1. This would clearly fall within the remit of allocation of other sites as necessary for short-term development.
- 8.2. There is a degree of overlap between the proposed content for the Part 1 and Part 2 Plans, particularly regarding strategic allocations and smaller and non-strategic site allocations which effectively appear in both. The Plan will need to be clear which sites are being proposed for allocation now, what is being left for Part 2, why this has been done and the justification for this approach.

## 9. Land South of Banbury Road, Ettington

- 9.1. Rainier Developments is promoting land south of Banbury Road, Ettington for residential development, inclusive of on-site green infrastructure.
- 9.2. The Site comprises an agricultural field immediately to the south of Banbury Road. Land to the north of Banbury Road (opposite the site) is comprised of residential development, as is the land immediately adjoining to the site to the north-west. The Site is logically located to round-off the village and would not disrupt the settlement pattern as it would not extend development beyond the existing development line to the north of Banbury Road.
- 9.3. The site is not in the Green Belt. The site is entirely within Flood Zone 1 with a small area of surface water flood risk, close to Banbury Road. This could be addressed by way of a suitable sustainable drainage scheme. The closest designated heritage asset is 67 and 69 Banbury Road which is a Grade II Listed Building. This is located north of the site and separated by existing built development.
- 9.4. The northern part of the site (immediately adjoining Banbury Road) is allocated in the Ettington and Fulready Neighbourhood Plan (Made December 2018) as a reserve allocation for around 8 dwellings (please see policy extract enclosed at **Appendix 3**). The remainder of this site is identified as a Self-Build and Custom Housing Allocation in the Stratford-on-Avon Site Allocation Plan (SAP) Preferred Options (July 2022) which identifies the site as having capacity for approximately 16 dwellings (please see policy extract and plan enclosed at **Appendix 4**). This is an approximate figure and the Illustrative Masterplan (please see **Appendix 5**) demonstrates that the Site could accommodate circa 24 dwellings.
- 9.5. It is clear from the existing and proposed allocations that the site is considered to be entirely suitable to accommodate residential development and this should be acknowledged through a suitable allocation in the South Warwickshire Plan.
- 9.6. As discussed in preceding sections, Stratford-on-Avon District Council have undertaken work to identify sites to deliver self-build and custom housing. This is considered to be a better approach compared to allocating a small percentage of plots on strategic sites which are unlikely to be aligned with self or custom builders aspirations for more unique properties and design. The provision of serviced plots on smaller sites will better fulfil this housing need. It is therefore suggested that the self-build and custom housing allocations from the SAP



Preferred Options are carried forward into the South Warwickshire Plan and a similar approach is taken to identify suitable sites in Warwick District.

- 9.7. At this stage, the Sustainability Appraisal (SA) includes two references to self and custom build housing, both in the context of meeting overall housing needs (SA Objective 9). It is recognised that this is an early stage of the plan-making process and that the SA will evolve as the Plan progresses. Going forward, the SA should consider the reasonable alternatives for meeting self and custom build housing need, including making specific site allocations. This should include consideration of sites for allocation.
- 9.8. It is clear that this Site is unconstrained, has been identified in the SHLAA as potentially deliverable and is well-placed within Ettington to accommodate development. This is reflected by the allocations in the Neighbourhood Plan and the SAP Preferred Options. This should be carried forward to the South Warwickshire Plan and the Site should be allocated.

### **Summary**

- 9.9. In accordance with national policy, this section sets out the suitability, achievability and deliverability of this Site.

### **Suitability**

- 9.10. The Illustrative Masterplan shows how the site could accommodate circa 24 dwellings with an access from Banbury Road. A connection to the playing fields to the south would be feasible if this is something the owners of the playing fields considered this to be appropriate.
- 9.11. The site benefits from a sustainable location in Ettington is well placed to meet the housing needs of the area. The site is well-placed to ensure easy access to a range of services and facilities including the playing fields, community centre and primary school.
- 9.12. The site is not subject to any statutory nature or heritage designations. The site is entirely within Flood Zone 1 which represents the lowest risk of flooding. The Site could deliver sustainable drainage systems (SuDS) as part of any development.
- 9.13. In view of the above, there are no known constraints which would prevent development of this site.



### **Deliverability**

- 9.14. Rainier have a land interest in the Site and are promoting the site for residential development.
- 9.15. Rainier is a strategic land and development company operating across the UK and with a strong track record for delivering high-quality development.
- 9.16. Rainier's willingness for residential development to be delivered on this site is demonstrated through the submission of this representation and previous representations throughout the preparation of the South Warwickshire Local Plan.
- 9.17. As set out above, there are no known constraints which would prevent the delivery of residential development on this site.

### **Availability**

- 9.18. Rainier have a land interest in this Site and are actively promoting the Site for residential development. The site is immediately available and could deliver housing in the early part of the Plan period.



## 10. Conclusion

- 10.1. This representation has been prepared by Pegasus Group on behalf of Rainier Developments.
- 10.2. Rainier are promoting Land South of Banbury Road for self-build and custom housing development. The land is sustainably located adjacent to the built development edge of settlement and has previously been identified as a reserve allocation (Neighbourhood Plan) and self-build and custom housing site (SAP Preferred Options). This land is suitable, available and deliverable and should be identified as a location for this development as part of the South Warwickshire Local Plan.
- 10.3. This representation demonstrates that there are no significant constraints that would preclude the development of the site for residential development. The Illustrative Masterplan shows how circa 24 dwellings can be accommodated on the site with access from Banbury Road and potential for future linkages towards the existing playing fields.
- 10.4. Rainier welcome the opportunity to comment at this early stage of the plan preparation. If the Council require any further information in respect of the site to assist in the accurate assessment of this site, this can be provided upon request.





## Appendix 1: Site Location Plan






**Do not scale from this drawing.**

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 Site boundary (1.17ha)

Rev.	Date	Description
		Land off south of Banbury Road ETTINGTON

**Location Plan**

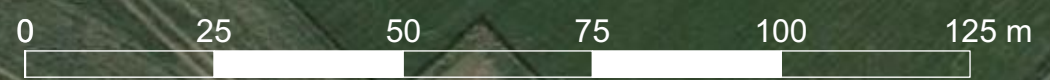
Job ref: 200	Drawing number: LO2	Revision: -
Scale: 1:1,000 @ A3	Date: October 2019	



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## Appendix 2: Shropshire Local Plan Inspector Letter

**ID28**

**Shropshire Council. Examination of Shropshire Local Plan 2016-2038**

**Inspectors:** Louise Crosby MA MRTPI, Carole Dillon BA (Hons) MRTPI and Nick Palmer BA (Hons) BPI MRTPI

**Programme Officer:** Kerry Trueman

Tel: 07582 310364, email: [programme.officer@shropshire.gov.uk](mailto:programme.officer@shropshire.gov.uk)

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Mr West  
Planning Policy  
Shropshire Council  
PO BOX 4826  
Shrewsbury  
SY1 9LJ

15 February 2023

Dear Mr West

**Inspectors' Interim Findings following stage 1 hearings sessions**

1. Set out below are our interim findings in relation to a number of matters following the stage 1 hearing sessions in July last year and January this year. Some of these findings require the Council to do additional work and some are just confirming Main Modifications (MMs) that were agreed at the hearings and other matters that were discussed, such as updating the evidence base.

*Duty to Cooperate (DtC)*

2. Following the hearing sessions, we wrote to you on 26 July 2022 (ID17) asking for you to provide more information in relation to the DtC and the activities that took place in relation to this prior to the submission of the Plan for examination.
3. We have now received this and had a chance to consider it and hear from the Council and representors on the matter at a further hearing session on 17 January 2023. Consequently, we can confirm that we are satisfied that the Council has met the legal duty set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), in so far as it imposes a duty on a local planning authority to co-operate with other local planning authorities, the County Council and prescribed bodies or other persons by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document so far as relating to a strategic matter to maximise the effectiveness of the activity of plan preparation. Therefore, the examination can proceed.

## Next Steps

4. Before we proceed to stage 2 hearing sessions there are a number of matters where we consider more work is necessary to make the plan sound and these are set out below. We have also taken this opportunity to set out our thoughts on other matters which we said we would give further thought to at stage 2 of the examination.

## *Plan Period*

5. During the matter 1 hearing session the Council agreed to consider whether the Plan period and Local Housing Needs Assessment should be aligned along with any implications of doing so, including those relating to the Housing Requirement set out in policy SP2 and the supply of sites identified in Policies S1 to S21. Please advise what stage the Council have reached with this.

## *Saved Policies*

6. During the matter 3 hearing session the Council agreed to review the means by which the necessary SAMDev policies would be “saved” to ensure that they will, as intended, remain extant for Development Management purposes should the Plan be adopted. Can you please provide further information on how the Council intends to do this, along with any necessary MMs.

## *Gypsy and Traveller Transit Site Provision*

7. During the matter 5 hearing session the Council agreed to provide a cabinet report and minutes regarding new transit site provision for the Gypsy and Travelling community. Can this please be placed on the examination website.
8. Also, as part of the matter 5 hearing session, the Council provided an updated position in respect of the need and supply of pitches. Using this data can the Council please update Table 7.9 and the GTAA conclusion and executive summary as an addendum to the 2019 GTAA Update – Final Report. The Plan’s relevant supporting text should be reviewed in view of this.
9. The Council will be aware of the judgment *Lisa Smith v SSLUHC* [2022] EWCA Civ 1391 of 31st October 2022, regarding the interpretation of the Planning Policy for Traveller Sites and the application of that policy to Gypsies and Travellers who have ceased to pursue nomadic lifestyles. Can the council please consider whether, in light of this judgment, they wish to review the traveller site needs in the GTAA, and if not, the justification for this?

## *Unmet Housing and Employment Land Needs of the Association of Black Country Authorities (ABCA) and Policy SP2*

10. The Council has identified the need for housing in the County as being 28,750 homes (1430 dwellings per annum) over the Plan period, based on the ‘high growth scenario’ and 300 ha of employment land based on a ‘balanced employment growth scenario’, as set out in the Sustainability Appraisal and Site Assessment Environmental Report, dated December 2020 (SA). The housing

requirement figure in policy SP2 is around 30,800 homes (1400 dwellings per annum) and the employment land requirement is around 300ha. The increase in the total quantum of housing is to take account of the different time period. The annual requirement is virtually the same. However, it is the Council's intention that the Plan should provide 1,500 new homes and 30ha of employment land over the plan period in order to help address a need for housing and employment land in the Black Country, that would otherwise not be met. We consider the question of this unmet need further below.

11. At the hearings, the Council suggested that these 1,500 new homes and 30ha of employment land is accounted for within the aforementioned housing and employment land requirement in policy SP2. We cannot see how. They are not mentioned in the SA and form no part of the growth scenarios considered therein. Consequently, we are concerned that there has been a conflation of housing need and housing requirement and also employment land need and employment land requirement – but these are two distinctly different things.
12. You will appreciate that we need clarity on this point, and the Plan itself must also be equally clear. We therefore ask that the Council provides us with a Topic Paper that unambiguously sets out the need for housing over the plan period and the local plan's housing requirement and the same for employment land. On the face of it, it seems to us that the latter is likely to be the sum of Shropshire's housing/employment need plus the 1,500/30ha homes/employment land relating to unmet need in the Black Country – whatever the case may be, these requirement figures should be made clear in the Plan, through a main modification to policy SP2.
13. This strategic issue crosscuts a number of important matters, including the Plan's development requirements, spatial distribution, Green Belt release and site allocations. As such, it has resulted in a great deal of discussion during the hearing sessions to date. The Council's approach to identifying the housing and employment land needs derived within Shropshire itself is sound. In principle, the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need.
14. Since the initial stage 1 hearings the joint plan making arrangements for the ABCA Councils have materially changed as these four separate councils are now preparing individual plans. The councils are all individually preparing their respective evidence bases, but utilising some of the existing joint evidence that has already been prepared. As a consequence, their anticipated adoption dates will be later than that of the previously proposed joint plan. Despite this new plan making context, there is no reason before us to find that the identified unmet needs in the Black Country area will disappear.

15. However, we are mindful that confirmation of the exact quantum requires the examination of these plans which is some time away and other councils will also be assisting in meeting some of the unmet needs since it is not and should not be the sole responsibility of Shropshire Council to meet all of ABCAs unmet needs for housing and employment land. This would be highly unlikely in any event given the emerging scale of unmet need, the Green Belt constraint within Shropshire, particularly in the part closest to the boundary with ABCA areas and also the AONB constraint in the southern part of the plan area. Nonetheless it remains an important strategic cross boundary matter that should not be deferred.
16. It is clear is that the unmet housing and employment needs being accommodated in Shropshire is the starting point as there is agreement to revisit the unmet need with a view to providing further assistance once the local plans for the ABCA councils have been examined and adopted. As set out above this is likely to be a number of years away given the stage they are currently at.
17. However, it was not until a point between the Regulation 18 and 19 stages of the plan making process that the Council agreed to accommodate 1500 dwellings and 30ha of employment land to support the unmet needs emerging in the ABCA area. This was after most of the evidence base had been completed, including the SA.
18. Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires that an environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The SA will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects.
19. We are concerned that the objectives and geographical scope of the Plan changed when the Council agreed to accommodate some of the unmet needs of the Black Country, but unfortunately the SA was not revisited. The SA is based on meeting only the needs of Shropshire. It tested different housing and economic growth options as well as different distribution options, but these were all based on just meeting the needs of Shropshire.
20. Further SA work therefore needs to be undertaken to assess the likely effects of the proposed strategy – which is based on meeting Shropshire’s housing and employment needs and contributing towards unmet needs from the Black Country. In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.
21. If the intention is to contribute towards the unmet need from the Black Country, then for effectiveness this distinction needs to be set out in the housing and employment land requirements in the Plan. In doing so the Council will also

need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.

22. If, following the additional SA work, the Council chooses to pursue the same growth option as before then it follows that the housing and employment land requirements will increase, and more sites will be required. Consideration will also need to be given to the distribution of development since accommodating some of the unmet needs may result in more sites being required in the part of Shropshire nearest the Black Country. It would therefore be helpful if, once the Council has carried out the additional SA work, the proposed strategy in relation to the housing and employment land requirement is set out in the topic paper requested at paragraph 12 above. The Plan should also make clear what the Council's strategy is, through main modifications.
23. Given the Council were planning on releasing Green Belt land to meet its own needs, it seems unlikely that the unmet needs of the Black Country could be met without the release of Green Belt land. Can the Council please provide a revised Green Belt Topic Paper setting out the exceptional circumstances for releasing Green Belt land to meet its own needs and as a separate exercise the exceptional circumstances for releasing land to meet the unmet needs of the Black Country.
24. Great importance is placed on Council's having up to date plans by national planning policy. As set out above there is a requirement to carry out additional work on the SA and to produce topic papers and some main modifications to the Plan once the SA work is complete and there a clear way forward. This is likely to require a pause in the examination whilst the work is undertaken. Once the work has been undertaken, we will take a view on whether we consider further public consultation is required. The need to carry out this additional work will delay the examination and adoption of this Plan. However, we are unable to identify an alternative remedy that would avoid such a delay unfortunately. The additional work we have identified is necessary for us to find that the Plan is sound.
25. Regardless of the outcome of this work, it is likely that there will be a further request from the individual Black Country authorities in the future to meet some more of the unmet needs, but this could be dealt with by way of an early review trigger built into policy SP2 or by relying on the statutory 5-year review process set out in the Framework. We would welcome the Council's formal views on these alternative approaches.
26. Furthermore, we note that the related indicators and targets set out in the Plan's monitoring framework only focus on delivery within the Plan area against the Plan's overall proposed development requirements. In addressing some of the unmet needs of ABCA then the Plan's performance in doing so needs to be monitored. A failure to do this would undermine the effectiveness and therefore soundness of the Plan's approach to meeting housing and employment needs. The monitoring framework will need to be reviewed in light of this concern.



27. Any changes to the Plan as a result of the above will need to form the basis of Main Modifications which should be submitted to the examination.

#### *Habitat Regulations Assessment*

28. The matter of the River Clun and nutrient neutrality was discussed at the hearings in July. Shortly after the hearings the Government issued a Written Ministerial Statement (WMS) entitled '*Statement on improving water quality and tackling nutrient pollution*'. The Council's letter of 16<sup>th</sup> September 2022 (GC16) addresses the WMS. This suggests that the WMS may alter the position of Natural England and the Environment Agency on this matter. Can the Council please approach these organisations with a view to preparing updated SoCG. Once this is done can the Council advise on the implication of the latest position for the Plan and whether any outstanding issues could be dealt with by MMs.

#### *Green Belt – RAF Cosford*

29. The Council's Green Belt Topic Paper sets out the exceptional circumstances for the release of land from the Green Belt. This includes 214.2 ha of land at RAF Cosford which is a strategic site in the Plan (policy S21). The Council proposes to inset RAF Cosford in the Green Belt, in recognition of its existing and future operational areas and requirements. Para 7.18 of the Plan says that this will enable numerous and complementary development opportunities and that in turn these will complement and facilitate delivery of the Economic Growth Strategy for Shropshire and the objectives of the Plan.
30. One of these development opportunities is the development of the Midlands Air Ambulance Charity headquarters, however we understand that this now has planning permission despite it being in the Green Belt, demonstrating that this was not a barrier to development. The RAF base has grown and developed over many years and is now also home to the RAF Museum Cosford. There is no evidence before us to demonstrate that the site's Green Belt status has in anyway prevented it being developed in a manner consistent with its use as an RAF base or indeed related activities such as training facilities and domestic accommodation.
31. Paragraph 143(b) of the Framework which advises that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open. However, it seems that the site has large areas of undeveloped land which, if developed, could harm openness of the surrounding Green Belt land. It would also make it more difficult for the Council to control future non-military related development on the site as other general development management policies would apply.
32. To summarise, we find that exceptional circumstances do not exist to justify the removal of this site from the Green Belt. Consequently, the Council will need to draft a MM to ensure that this site remains within the Green Belt and make any necessary map changes.

### *Infrastructure Delivery Plan (IDP) and Strategic Funding Statement (SFS)*

33. We still have some concerns about the gaps in the IDP and would urge the Council to treat this as a living document and aim to keep populating it when new figures become available.
34. In terms of the SFS, as set out at the hearings this should be forward facing rather than backward looking. The PPG advises that *“this should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the Plan-period”*<sup>1</sup>. Can the Council please provide a timescale for updating the SFS.

### *Five-year Housing Land Supply*

35. The Council has requested that we confirm their 5-year housing land supply as part of the examination of the Plan policies. However, the PPG<sup>2</sup> advises that, among other things, *“when confirming their supply through this process, local planning authorities will need to be clear that they are seeking to confirm the existence of a 5-year supply as part of the plan-making process and engage with developers and others with an interest in housing delivery”*. Crucially, the Council have confirmed that they did not do this and therefore we cannot confirm the 5-year housing land supply through the local plan examination process.
36. In addition, the matter of 5-year housing land supply will be considered at stage 2 of the examination once we have examined the site allocations in the Plan. We still have serious doubts over whether we can fully consider this matter and come to a conclusion on whether the Council have a 5-year supply of housing land given that many of the sites the Council are relying on are allocated in the SAMDev plan and therefore are not before us.

### *Housing Requirement*

37. The housing requirement in the Plan is expressed as ‘around’ 30,800 new homes and the employment land as ‘around’ 300ha. In our view these development requirements should be expressed as definitive minimum figures for both monitoring and effectiveness.

### *Specialist Housing/Older Persons Housing*

38. Paragraph 62 of the Framework requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including older people. The Council’s evidence shows that there is a much higher number of older people residing in the Plan area than the national average.

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<sup>1</sup> Paragraph: 059 Reference ID: 61-059-20190315

<sup>2</sup> Paragraph: 010 Reference ID: 68-010-20190722

39. Whilst there is a requirement within policy DP1 to provide older persons housing on sites of 50 dwellings or more, the amount that will need to be provided is not quantified and it is also not clear why the threshold of 50 dwellings has been chosen. The PPG advises that “*plan-making authorities should set clear policies to address the housing needs of groups with particular needs, such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period (our emphasis)*”<sup>3</sup>.
40. Whilst the PPG advises that Council’s ‘could’ provide indicative figures, we consider that as there is clear evidence of a higher-than-average need for such accommodation in this particular instance, either the policy should include indicative figures, or the Plan should contain a specific policy to deal with specialist housing.
41. Also, neither this Plan, nor the SAMDev plan appear to make any provision for this sector of the community, by allocating land for specialist housing or requiring it to be provided in some of the larger allocations. This would be another positive way in which the Council could address this matter. Please can the Council give some further consideration to this important matter.

#### *Policy SP4 – Sustainable Development*

42. The Council agreed during the hearings that they would introduce a MM to delete policy SP4 from the Plan and instead rely on national planning policy to ensure that development in the district is sustainable. This needs to be included in the list of MMs.

#### *Policy SP5 – High-Quality Design*

43. The Council agreed to look at the wording of policy SP5 and whether it should contain a reference to the National Design Guidance. Can the Council please confirm if they have done this and what the outcome was. Any changes will need to be set out as a MM.

#### *Policy SP6 – Health and Wellbeing*

44. A discussion took place at the hearings regarding criterion 5a. of this policy and whether it should refer to ‘improved’ health facilities and criterion 10 and its requirement for a Health Impact Assessment for all major development proposals. The Council agreed to give the wording in these 2 criteria further consideration. Can you please confirm the outcome of this and whether any MMs are being advanced as a result.

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<sup>3</sup> Paragraph: 006 Reference ID: 63-006-20190626

### *Policy SP10 – Managing Development in the Countryside*

45. It was agreed during the hearings that this policy wording needs to clarify that it does not apply to sites in the countryside that are allocated for development in this Plan or any other adopted development plan. This revised policy wording will need to be set out in as a MM.

### *Policy SP12 Shropshire Economic Growth Strategy*

46. We do have some concerns about the effectiveness of this policy as a great deal of it seems to be more of a vision rather than a strategic policy. Can the Council please review this policy in the context of the advice in relation to strategic policies set out in paragraphs 20 to 23 of the Framework. Proposed changes will need to be set out as MMs.

### *Policy SP13 – Delivering Sustainable Economic Growth and Enterprise*

47. It was agreed at the hearings that the text box 'Figure SP13.1', should be incorporated into policy SP13. This will need to be included as a MM.

### *Strategic Settlements and Sites*

48. We have set out our concerns above regarding the removal of the RAF Cosford site from the Green Belt. We have no further comments to make on policy S21 or policy S20 which relate to the former Ironbridge Power Station site.
49. Turning to Tern Hill and policy S19, we have concerns about the deliverability of the affordable housing that would be required in connection with the development of this proposed site allocation given the evidence set out in the Council's Viability Study 2020 (EV115.01) and the fact that the trajectory shows that 400 of the 750 proposed dwellings will be delivered after the Plan period.
50. This also leads us to find that there is a lack of evidence to demonstrate that this proposed allocation will be capable of supporting the necessary infrastructure and services planned. Given the site's location away from any main settlements, it is important that it contains a range of services to limit trips by private car. Therefore, we require evidence which demonstrates that the appropriate necessary infrastructure would be delivered at the appropriate stages in the delivery of this site to serve its occupants.
51. Finally, as discussed in detail at the relevant hearing session we have some concerns about the vagueness of some of the policy wording in policy S19. The Council agreed it would look at this with a view to improving its precision and certainty for the benefit of developers and local residents. These changes should be advanced as MMs.

### *Strategic Flood Risk Assessment*

52. The issue of whether the Council's Strategic Flood Risk Assessment (SFRA) was up to date in terms of hydraulic modelling and fluvial flood risk was raised at the relevant hearing session. It was agreed that the Council would provide a note of clarification regarding the methodology and data relied upon and whether any updating is necessary. Also, the Council should review whether the SoCG with the Environment Agency needs to be updated in view of this.

### *Local Development Scheme*

53. During the matter 1 hearing session the out of datedness of the Local Development Scheme (LDS) and the reasons for that were discussed. We would be obliged if the Council would keep the LDS under review and arrange an update. A note to this effect should be placed on the Council's examination website to inform web users of this.

### *Overall Conclusions*

54. For the reasons set out above, as things stand, the development strategy set out in the Plan is unsound and further work and main modifications will be required to progress the examination. We appreciate that there is a lot in our letter for the Council to consider. Therefore, we have not set a deadline for a response. However, it would be helpful if you could provide an indicative timescale for a response. When you respond in full to our letter can you please also provide a timetable for the additional work that is required for soundness.
55. Once we have a timescale for any additional work, we can then agree some provisional dates for the stage 2 hearings. At these hearings it is likely we will first need to re-consider some of the stage 1 matters as then the development management policies in the plan and the site allocations.
56. The Council and participants should be aware that the above comments do not represent our full findings on these matters, which shall be set out in our final report having considered any representations made in response to further public consultation and/or further hearing sessions which may be required in due course.
57. We are not inviting comments to this letter from representors, they will be given an opportunity to comment on the above matters in due course, either through representations to consultation organised by the Council, through hearing statements, appearing at hearing sessions or through the opportunity to comment on MMs.
58. Should the Council require any further clarification on any of the above matters you can contact us through the Programme Officer.

*Louise Crosby, Carole Dillon and Nick Palmer*

Examining Inspectors



## Appendix 3: Neighbourhood Plan Policy Extract

# Ettington and Fulready Neighbourhood Development Plan 2011-2031

- Residential curtilages are included within the village boundary unless an area is clearly a paddock and more appropriately defined as 'non-urban'.

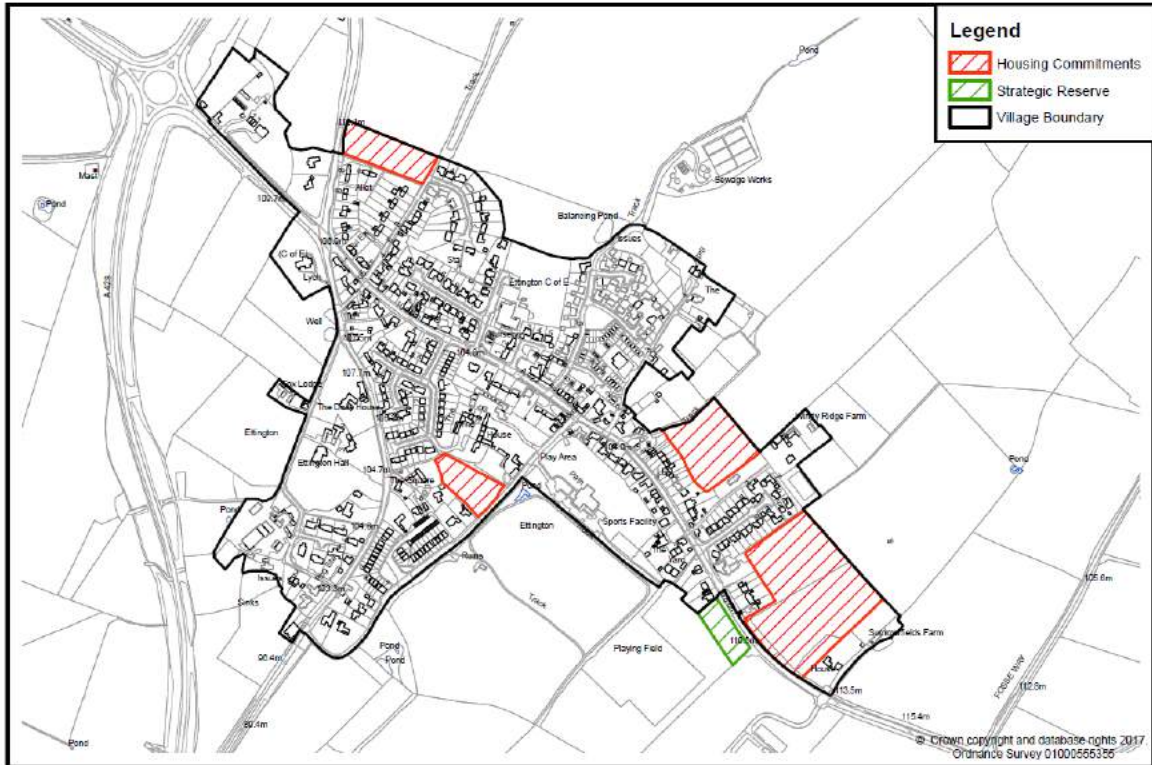


Figure 2 - Village Boundary

## Policy H2 - Strategic Reserve

This Plan supports a strategic reserve allocation on land south of Banbury Road as shown on the Figure 2 for potential future residential-led development for around 8 dwellings.

The above site will only be released during the plan period if it can be demonstrated through the submission of evidence that there is an identified housing need for its early release having regard to the criteria in Policy CS.16 of the Core Strategy 2011-2031.

Development on this site will be expected to comply with other relevant policies in the Plan including H5, IN1 and IN3.

## Explanation

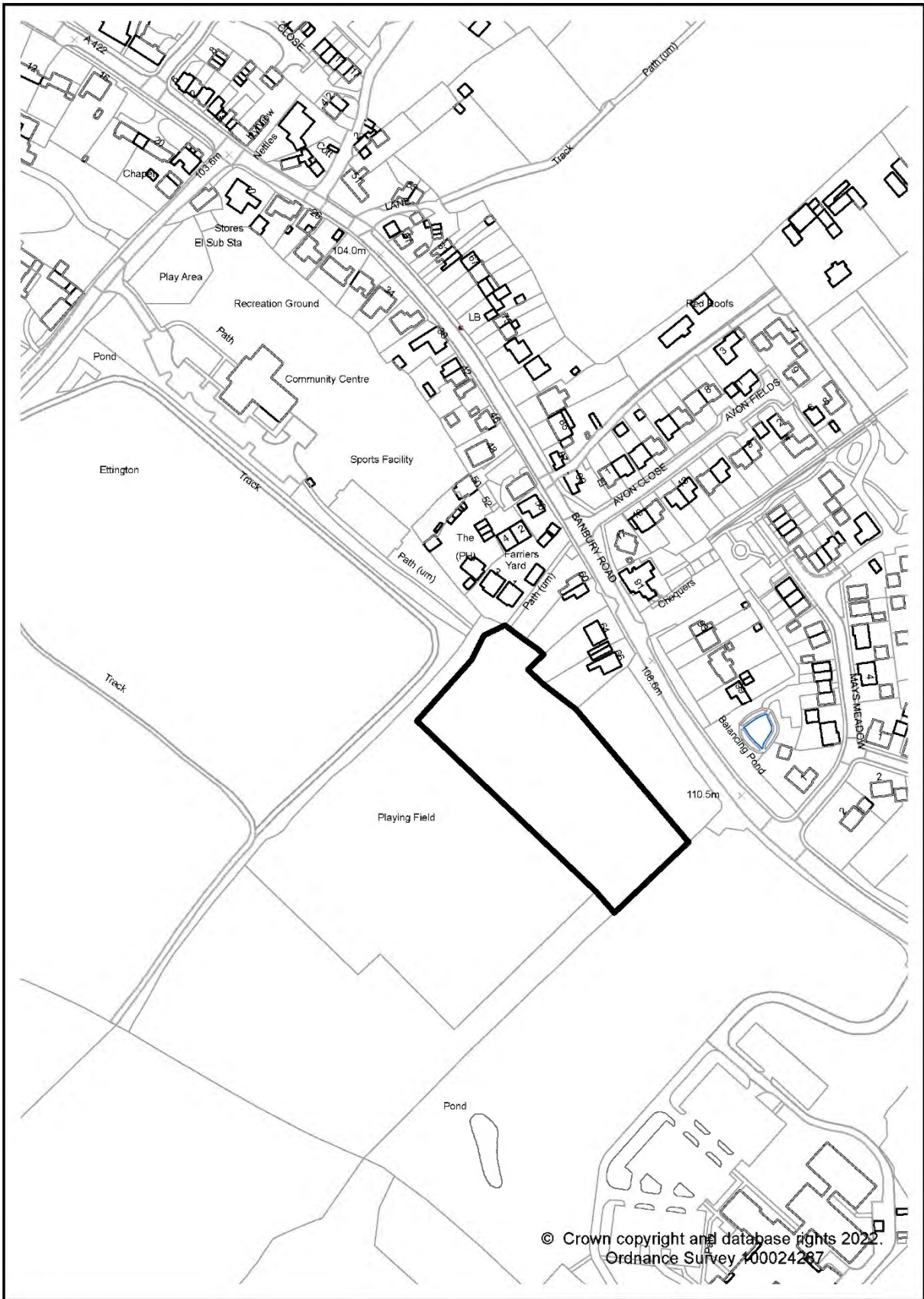


## **Appendix 4: Site Allocations Plan Preferred Options Policy Extract**



<b>Proposal SCB.2: East of Skylark Road, Alderminster</b>	
Where it is to be delivered	Land to the east of Skylark Road Approx. 3.2 hectares
What is to be delivered	Capacity for approximately 20 self-build and/or custom-build dwellings This is based on a net site area of 1.0 hectares @ 20 dwellings per hectare
When it is to be delivered	As required
How it is to be delivered	Private sector, individual plot purchasers
Specific requirements in addition to provisions of Policy SAP.7	<ul style="list-style-type: none"> <li>• Convey and manage an area of public open space on north-eastern part of the site</li> <li>• Create a hedgerow with intermittent trees along the north-eastern boundary of the site</li> <li>• Provide an access off Skylark Road only, taking into account its junction with Shipston Road</li> <li>• Assess impact of development on heritage assets adjacent to the site</li> </ul> <p>The site should come forward in two phases, with the first phase comprising no more than 10 plots.</p>

<b>Proposal SCB.3: South of Banbury Road, Ettington</b>	
Where it is to be delivered	Land to the south of Banbury Road Approx. 1.0 hectares
What is to be delivered	Capacity for approximately 16 self-build and/or custom-build dwellings This is based on a net site area of 0.8 hectares @ 20 dwellings per hectare
When it is to be delivered	As required
How it is to be delivered	Private sector, individual plot purchasers
Specific requirements in addition to provisions of Policy SAP.7	<ul style="list-style-type: none"> <li>• Provide an access off Banbury Road through reserve housing site identified in Neighbourhood Development Plan</li> <li>• Ensure ongoing use of the adjacent playing field is not affected</li> <li>• Consider scope to provide an access through the site to serve the playing field</li> </ul> <p>The site should come forward in two phases, with the first phase comprising no more than 10 plots.</p>



### SCB.3 : South of Banbury Road, Ettington

Please refer to Explanatory Note on page 118





## Appendix 5: Illustrative Masterplan





Planning permission for the erection of 32 dwellings - FULLY BUILT (SPITFIRE PROPERTIES) (App. no. 15/01342/FUL)

**Do not scale from this drawing.**  
 This drawing is for planning purposes only. It is not intended to be used for construction purposes. The accuracy of this drawing may be reliant upon survey information provided by third parties. Whilst all reasonable efforts are used to ensure drawings are accurate, edge Placemaking Group Ltd accept no responsibility or liability for any reliance placed on, or use of, this plan by anyone for purposes other than those stated above or for errors arising from third party information.  
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- Site boundary (1.17ha)
- Proposed vehicular access point
- Retained Public Right of Way
- Area reserved for attenuation
- Existing and proposed planting

**Proposal Stats:**  
 Gross site area: 1.17ha  
 Net developable area: 0.8ha  
 Open space area: 0.34ha  
 Number of proposed units: 24 units  
 Average net density: 30dph

Rev.	Date	Description
		Land off south of Banbury Road ETTINGTON
<b>Illustrative Masterplan</b>		
Job ref: 200	Drawing number: SK02	Revision: -
Scale: 1:1,000 @ A3	Date: October 2019	



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