



Lockley  
Homes

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## **Representations to the Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Consultation Report' (Regulation 18) (January 2023).**

### **Lockley Homes**

Land to the North of Mill Lane within the Village of Broom settlement boundary, Stratford-on-Avon, Warwickshire.

#### **Prepared by**

Robin Whitehouse B. Sc. (Hons), Dip. TP, MRTPI

Director

**Goldfinch Town Planning Services (West Midlands)**

B. Sc. (Hons) Environmental Planning, Diploma in Town and Country Planning (Dip. TP), Member of the Royal Town Planning Institute (MRTPI) (London).

### **On behalf of Lockley Homes**

**6 March 2023**



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This 'Made' Representations Statement document is submitted in response to the public consultation stage on Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) Issues and Options Stage Report (Regulation 18) (January 2023) public consultation, which runs until **Monday, 6<sup>th</sup> March 2023**.

It is 'made' by Goldfinch Town Planning Services (West Midlands) **on behalf of their client Lockley Homes ('Lockley Homes')** which has a land interest at Land located immediately North of Mill Lane, within the Village of Broom settlement boundary, within the civil parish of Bidford-on-Avon, in the western part of the Stratford-on-Avon District, Warwickshire, referred to as 'the site'.

A 1:1250 scale O.S. base location plan of the site in question is enclosed at **Appendix A** of this document. Colour aerial view photographs (dated December 2020) of the site are enclosed at **Appendix B**. A list of beneficial on-site biodiversity enhancement features which a new housing development scheme coming forward for this site could potentially deliver are enclosed at **Appendix C**.

The site in question referred to above has also been submitted to Stratford-on-Avon and Warwick District Council's South Warwickshire Local Plan (SWLP) 'Call for Sites' landowner and developer consultation on the **26 May 2021** as part of the Council's earlier previous public consultation stage on the SWLP Draft 'Scoping and Call for Sites Report' (May 2021)

### Previous Local Plans Representations activity by Lockley Homes during the years 2020 to 2022

This latest Representation submitted to the SWLP (January 2023) consultation should also be considered alongside the following representations submitted by Lockley Homes since December 2020. Representations previously submitted to:

- Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) Revised Preferred Options Stage Report (**June 2022**) (Regulation 18) public consultation.
- Representation submitted to the proposed draft 'Methodology' for the Coventry and Warwickshire's emerging Housing and Employment Land Availability Assessment (HELAA) (**September 2021**) background supporting technical evidence base report.
- Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) Scoping and Call for Sites Report (**May 2021**) (Regulation 18) public consultation.
- Stratford-on-Avon District Council's draft Gypsy and Traveller and Travelling Showpeople Supplementary Planning Document (SPD) (**January 2021**) public consultation, and;
- Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) Preferred Options Stage Report (**October 2020**) (Regulation 18) public consultation.

The above representations provide important background information and context and should therefore be considered alongside this latest March 2023 Local Plan representation.

### Previous Call for Sites activity by Lockley Homes from the years 2020 to present date.

The site within the Village of Broom settlement boundary subject to this latest Local Plan Representation has also been submitted by Lockley Homes to:

- Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) (May 2021) 'Call for Sites' landowner and developer consultation on the 26th May 2021.
- Stratford-on-Avon District Council's Strategic Housing Land Availability Assessment (SHLAA) 'Call for Sites' landowner and developer consultation on the 10th December 2020.

## SWLP Issues and Options Stage Report (Regulation 18) (January 2023) public consultation

This SWLP 'Issues and Options Stage Consultation Report' (Regulation 18) (January 2023) Representations Statement document has been submitted to Stratford-on-Avon and Warwick District Council's Planning Policy Teams (Local Plans Teams) via e-mail to the following public consultation address on the **6th March 2023**


[swlp@stratford-dc.gov.uk](mailto:swlp@stratford-dc.gov.uk); [swlp@warwickdc.gov.uk](mailto:swlp@warwickdc.gov.uk)

### Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of Lockley Homes. Both Goldfinch Town Planning Services (West Midlands) and Lockley Homes accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

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<b>Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.</b>	
<b>Person(s) or Organisation Submitting Comments</b>	
Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES
Address	XXXXXXXXXXXXXXXXXX
Telephone number	XXXXXXXXXXXXXXXXXX
E-mail	XXXXXXXXXXXXXXXXXX
Data Protection:	<i>Personal contact details have been removed from this Representations Form by the District Council's in order to comply with the provisions of the Data Protection Act (2018).</i>

<b>Agent (if applicable)</b>	
Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  <b>ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES</b>
Address	XXXXXXXXXXXXXXXXXX
Telephone number	XXXXXXXXXXXXXXXXXX
E-mail	XXXXXXXXXXXXXXXXXX
Data Protection:	<i>Personal contact details have been removed from this Representations Form by the District Council's in order to comply with the provisions of the Data Protection Act (2018).</i>

Date	<b>6 March 2023</b>
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<b>Please indicate which of these best describes you / your role in responding to this consultation</b>	
Resident or Individual	
Planning Agent or Consultant	
Housing developer or Investor	<b>X</b>
Landowner	
Local Business	
Land and Property Agent or Surveyor	
Local Authority	
Public service provider. e.g. education establishment, health, etc	
Public agency / organisation	
Community or other Organisation	
Local Resident	
Statutory Consultee	
Charity	
Other (please specify in space below):	

<b><u>Type of Representation:</u></b> Is this Representation supporting or objecting to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage' (Regulation 18) (January 2023) public consultation report?			
<b>Supporting</b>		<b>Objecting</b>	<b>X</b>

## **Summary of key issues covered in this Representation**

- Lockley Homes strongly objects to the Council's proposed Local Plan making approach of producing a Stage 1 (Part 1) and separate future Stage 2 (Part 2) of the SWLP. This will cause significant confusion to the Local Plan-making process, and will result in a significant time delay in wider Local Plan delivery across the South Warwickshire Region. At a time when the local economy is emerging from the fragile post-COVID-19 economic recovery. We also strongly object to proposals to include small and medium sized housing sites within the Stage 2 (Part 2) SWLP, and only bring forward major Strategic Housing Site Allocations through the Stage 1 Plan. This proposed planning policy approach strongly conflicts with paragraphs 60 and 69 of the Revised NPPF (2021). Small and medium sized housing sites both have a critical role to play in helping to tackle the severe housing shortage and severe housing crisis present across all parts of the South Warwickshire Region, to help deal with long-standing housing shortfalls present across the local area. Small and medium sized housing sites should therefore be prioritised as a matter of urgency and brought forward at the very front of the new Local Plan period, not another 10 to 15 years from now.
- The Council's should just be producing one single version of the SWLP Local Plan for the reasons identified above.
- Use of the existing adopted Core Strategy (adopted July 2016) which is based on heavily out-of-date pre-COVID-19 economic data: A rigidly fixed template for the future spatial distribution of new housing and new employment land development across the district has already been decided by the LPA's preparing the emerging SWLP, and is being used as the place shaping agenda from the now heavily out-of-date existing adopted Core Strategy (adopted July 2016). The adopted Core Strategy (2016) now forms a heavily and long out-of-date Plan, based on a huge mountain of insufficiently robust, highly questionable pre-COVID-19 economic data (totally fixed and based on years 2014 to 2016 economic circumstances), long out-of-date, unsound background supporting technical evidence base. Using this highly questionable economic data and heavily out-of-date Core Strategy (adopted July 2016) to directly inform and heavily influence Local Plan preparation work within the emerging SWLP (2023), is in direct conflict with guidance reinforced within paragraphs 31, 35 (indent b) and 82 (indent d) of the Revised National Planning Policy Framework (NPPF) (July 2021).
- Poor quality evidence base: We object to the continued poor quality of the evidence base being used by the Local Planning Authorities to support Local Plan preparation.
- Rapidly changing set of adverse economic circumstances: Local plan preparation has refused to accept the presence of a 300-year economic

recession event now adversely affecting the SWLP area, in direct conflict with paragraphs 31 and 82 (indent d) of the Revised NPPF (2021). This recent rapid shift in adverse economic circumstances has not been shaped into Local Plan preparation.

- The ongoing failure and continued refusal to promote the most sustainable patterns of new housing development: The Council's ongoing refusal and continued failure to promote the most sustainable patterns of new housing development across the Stratford-on-Avon District within the emerging South Warwickshire Local Plan (SWLP) Review (2023). The Council's planning policy stance on this issue is highly obstructive and strongly conflicts with an extensive range of guidance from the Revised NPPF (2021) which reinforces the critical importance and need for LPA's to support new housing development proposals coming forward within the most sustainable site locations when preparing Local Plan Reviews. The Council's are taking forward an unsound Local Plan for reasons explained further below.
- Affordable Housing 35% proposed planning policy threshold: The 35% affordable housing planning policy threshold being proposed within the emerging SWLP (2023) is highly onerous, totally unreasonable, no longer justified, and no longer sustainable, and will have a highly damaging financial impact on the future viability and deliverability of new housing development schemes coming forward across the South Warwickshire Region. Due to the presence of a 300-year-economic-recession-event, combined with Russia's Spring 2022 ongoing invasion of Ukraine. Which are both causing huge adverse economic shocks across the local area and wider UK. Given these abnormal set of unprecedented adverse economic circumstances, within the emerging Local Plan Review, proposed affordable housing planning policy thresholds should therefore be significantly reduced downwards to 5%, to reflect guidance reinforced within paragraphs 31 and 82 (indent d) of the Revised NPPF (2021).
- Affordable Housing, CIL, other planning obligations requirements: The LPA is taking forward a seemingly inflexible, heavily out-of-date, unsound and highly onerous affordable housing planning policy regime, an onerous Community Infrastructure Levy (CIL) and planning obligations policy regime into the emerging SWLP Review (2023). These policies, such as affordable housing policy, are fixed and based on planning policy assumptions made 7 years ago within the existing adopted Core Strategy (July 2016), which is based on insufficiently robust and heavily out-of-date pre-COVID-19 economic data. This planning policy approach is in direct conflict with guidance reinforced in paragraphs 31 and 82 (indent d) of the Revised NPPF (2021).
- Strong Planning Policy support is being provided to significantly less sustainable sites: Other less sustainably-located sites for new housing are being prioritised first and strongly promoted within the emerging SWLP (2023) over and above more sustainable site locations. Such as the more sustainably located Lockley Homes site – see photographic evidence in Appendix Section of this Representations Statement – 2023. The Council's planning policy stance



on this issue is highly obstructive and conflicts with a range of NPPF guidance referred to below.

- Designated Green Belt locations are being prioritised for new housing development: Locations for new housing development located outside of the existing designated Green Belt are being completely overlooked by the LPA's preparing the emerging SWLP, in preference for considerable less sustainable locations located inside the Green Belt. The approach being taken towards Local Plan preparation is in direct conflict with paragraphs 141 (indent a) and 142 of the Revised NPPF (2021). We have concerns about the Council's continued refusal to promote the most sustainable patterns of development.
- Promoting the most sustainable patterns of development: Lockley Homes has a perfectly acceptable site for new housing development, located outside of the existing designated Green Belt, in a highly sustainable site location. Consistent with sustainable development focused guidance reinforced within paragraphs 7, 8 (indents a), 10, 11 (indent a), 16 (indent a), 35 (indent d), 38, and 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021), Lockley Homes maintains its view that these types of highly sustainable site locations (see photographic evidence in Appendix Section of this Representations Statement - 2023) should be selected and strictly prioritised first by the LPA's for new housing development, before considerably less sustainable site locations are selected. The Council's unreasonable and highly obstructive planning policy position approach on this issue fails the 'Sustainability' Local Plan test of 'Soundness' as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021). The ongoing failure and continued refusal to promote the most sustainable patterns of new housing development means that the Council's preparing the emerging SWLP Review are therefore taking forward an unsound and not legally compliant Plan forward to the future Examination in Public (EIP) stage. We have concerns about this scale of incompetence being taken towards Local Plan-preparation.
- The future sustainable expansion needs of existing rural village settlements located across the SWLP Plan area: In accordance with guidance reinforced within paragraph 79 of the Revised NPPF (2021), Lockley Homes would suggest that the Council's preparing the emerging SWLP (2023) should consider the future housing-led growth and sustainable expansion needs of existing rural village settlements located across the SWLP area. This matter should be one of the key spatial planning policy priority areas for the emerging SWLP Review to consider, in order to help deliver a 'More Positively Prepared Local Plan' and to promote more sustainable patterns of development - consistent with guidance reinforced within paragraphs 16 (indent a), 35 (indent a and d) and 79 of the Revised NPPF (2021).
- Sustainability Appraisal (SA): The emerging Sustainability Appraisal (SA) being used to support and heavily influence Local Plan preparation work is still continuing to refuse to promote the most sustainable patterns of new housing development across the South Warwickshire Region.
- Gypsy and traveller and travelling showpeople sites: Unsustainable levels of pitch numbers are being proposed which will promote inappropriate, damaging and unsustainable patterns of development within the local area, and cause significant residential amenity conflicts with the existing settled community, as

well as damage sensitive rural landscapes. There has also been a failure to properly consider and assess the future expansion needs of the proposed allocated new gypsy sites.

- Public consultation approach: The consultation website for the SWLP January 2023 consultation is confusing and unclear. It is not easy to locate the January 2023 SWLP public consultation document on the Council's consultation website. This approach does not bode well for an effective public consultation approach, and directly conflicts with paragraph 16 (indent c) of the Revised NPPF (2021) which confirms that: "...Plan should (indent c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees..."
- Highly onerous Climate Change Net Zero policies are being taken forward within the emerging SWLP which will place a financially damaging burden on new housing development proposals, at a time when the construction industry is facing a huge spike in the financial costs of building materials, and significant increases in skilled construction labour costs.
- On page 47 of the SWLP consultation report (Jan 2023), within the supporting background technical evidence base document titled "Heritage and Settlement Sensitivity Assessment", we have concerns that the Village of Broom settlement has been recognised as having high historic environment sensitivity. We object to this proposed planning policy approach, given that the supporting evidence to justify this is not fit for purpose or sufficiently robust.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 3 – Vision and Strategic Objectives</b>		
Question(s) and potential Options	Question V3. 1: Do you agree that the Vision and Strategic Objectives are appropriate? (Yes/ No/ Don't know)  Question V3. 2: If no, please indicate why.		
Page(s)	<b>20 to 24</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Bullet points one and five of the Vision objectives on page 21 of the SWLP (January 2023) state that:

- “...A climate resilient and Net Zero Carbon South Warwickshire – adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development.
- A biodiverse and environmentally resilient South Warwickshire – strengthening green and blue infrastructure and achieving a net increase in biodiversity across South Warwickshire...”

#### Lockley Homes response:

#### A climate resilient and Net Zero Carbon South Warwickshire

Whilst we support the principles behind the emerging Vision policy approach and the need to adapt to the effects of climate change and work towards achieving a Net Zero Carbon South Warwickshire it is important that any climate resilient and Net Zero Carbon objectives and targets included within the emerging SWLP are both realistic and capable of being delivered in accordance with guidance in paragraphs 16 (indent b) and 35 (indent c) of the Revised National Planning Policy Framework (NPPF) (2021). Paragraph 16 (indent b) is perfectly clear that: “...Plans should: (indent b) be prepared positively, in a way that is aspirational but deliverable...”

NPPF (2021) paragraph 35 (indent c) confirms that: “...Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are: (indent c) Effective – deliverable over the plan period...”

Focusing on the house building development industry, as stated above, whilst we support the principles behind the emerging Vision policy approach and the need to incorporate climate change mitigation features within new development proposals, incorporating these types of features can often significantly increase the financial build costs for new build residential schemes. At a time when the construction sector is already experiencing rapid and significant price increases in the financial costs of building materials, and increased labour costs. We would therefore advise that a precautionary policy approach is therefore taken by the LPA's preparing the emerging SWLP in relation to this issue, given the severe adverse set of economic circumstances now facing the local area, for reasons already set out within this wider Representations Statement document.

Given the above issues, it is important to ensure that a less financially onerous planning policy regime is placed on housing building development industry going forward within the SWLP (2023) to help support the future financial viability of new housing development sites during the very fragile post-COVID-19 economic recovery.

Lockley Homes maintains its view that its position on these matters is supported by guidance within paragraph 82 (indent d) of the Revised NPPF (2021) which confirms that: "...Planning policies should (indent d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices..., and to enable a rapid response to changes in economic circumstances..." The rapid and significant shift in adverse economic circumstances now facing the Local Plan area, should now be shaped into a heavily revised planning policy approach being taken forward by the LPA's within the emerging SAP for the reasons highlighted above.

#### A biodiverse and environmentally resilient South Warwickshire

Lockley Homes is a developer of very high-quality new build luxury homes, and as a developer we take our environmental responsibility very seriously, and where opportunities exist, we are keen to support biodiversity within our new residential development schemes. We therefore suggest that the Vision and Strategic Objectives of the emerging SWLP could be significantly strengthened and improved from a nature conservation new habitat creation planning policy perspective, by emphasising the important role that new housing development sites/ proposals can play in helping to promote and deliver new on-site nature conservation habitat features, integral for helping to support the delivery of Biodiversity Net Gain (BNG) across South Warwickshire. These issues are already considered in further detail within this wider Representations Statement.



**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

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Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Issue I1: Sustainability Appraisal (SA). (Section 4.1)</b>		
Question(s) and potential Options	Q-I1: Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.		
Page(s)	<b>25 to 29</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

The Sustainability Appraisal (SA) being used to support the emerging SWLP (2023) is not promoting the most sustainable patterns of new housing development to the most sustainable site locations within the South Warwickshire Region. Stratford-on-Avon District Council’s Planning Policy Team is showing a very strong level of support and notably biased favouritism towards significantly less sustainable site locations by prioritising the delivery of new housing development sites located in isolated and very peripheral farmland locations. Distantly located away from the main existing village settlement cores, in areas of distantly located farmland countryside, on the very outer fringes and periphery of existing rural village settlements. The Council’s unreasonable and highly obstructive planning policy position and approach on this issue fails the ‘Sustainability’ Local Plan test of ‘Soundness,’ as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021) as referred to below.

On this basis, both the accompanying Sustainability Appraisal (SA) being used to support Local Plan-preparation, and the emerging SWLP (2023), are both in direct conflict with paragraphs 7, 8, 10, 11 (indent a), **35 (indent d)**, 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for Local Planning Authorities (LPA’s) to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews. Competent LPA’s should be aware of this NPPF guidance and its critical importance to Local Plan-making.

The position is perfectly, this highly obstructive planning policy approach and ongoing failure and continued incompetence being taken towards Local Plan-preparation, means that the emerging SWLP Local Plan Review (2023), even at this very early stage in its Local Plan preparation, is already currently failing the ‘Sustainability’ test for Local Plan preparation tests of ‘Soundness’, as set out within paragraph 35 (indent d) of the Revised NPPF (2021). The emerging SWLP Local Plan Review (2023),

alongside its sister document Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP), are both therefore vulnerable to future Legal challenge at the later Examination in Public (EIP) stage. Given their continued failure and ongoing refusal to promote the most sustainable patterns of new housing development across the South Warwickshire Region.

It is important that these ongoing failings discussed above are now addressed within the emerging SWLP Review and its remaining Plan-preparation stages.

We have fundamental planning policy concerns in relation to proposed new housing development and new employment land growth options and proposed site allocations being brought forward through the emerging SWLP Review given that these growth options are still continuing to force through an unreasonable, unsound and inflexible set of policies and an inflexible spatial planning policy framework approach by continuing to use the existing planning policy approach already set out and fixed within Stratford-on-Avon District Council's existing adopted Development Plan – The Stratford-on-Avon District Core Strategy (2011 – 2031) (adopted July 2016). The year 2016 Core Strategy is now a long out-of-date Plan which is based on a heavily out-of-date pre-COVID-19 economic data, and an unsound set of supporting background technical evidence base documents, and unsound spatial planning policy modelling assumptions (based upon a heavily out-of-date economic landscape that existed over 8 years ago). These components are all no longer relevant and fit-for-purpose for future Plan making purposes – particularly given the shelf life timeframe of the SWLP, extending up until the year 2050!

The Council's preparing the emerging SWLP Review and its sister document - Stratford-on-Avon District Council's emerging SAP (2023), are taking forward a highly inflexible and obstructive planning policy approach by refusing to accept proposed new housing site locations that are not already on the agreed list/ closed list of sites previously agreed by the year 2016 Core Strategy referred to above. Despite the fact that these proposed new housing site allocations, such as the Lockley Homes proposed housing allocation site, are in far more sustainable site locations in comparison to many of the housing site allocations being carried over from the year 2016 adopted Core Strategy.

The position is perfectly clear, the Council's are failing to promote the most sustainable patterns of new housing development, in direct conflict with a range of NPPF guidance already referred to within this wider Representations Statement. The emerging Sustainability Appraisal (SA) being used to support SWLP Plan-preparation has failed to take onboard these fundamental issues and therefore fails the tests of 'Soundness' as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021). These issues are already considered within this wider SWLP Representations Statement (2023), as well as our extensive Representations already made to Stratford-on-Avon District Council's emerging SAP, and the earlier SWLP 'Scoping and Call for Sites Report' (May 2021) (Regulation 18) public consultation. We have concerns that the Council's are still failing to grasp these important issues, which are fundamental to the Soundness and Legal compliance (NPPF – para 35) of the emerging SAP and SWLP Local Plan Reviews.



**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Issue I2: Infrastructure Requirements and delivery. (Section 4.1)</b>		
Question(s) and potential Options	<p><b>Q-I2: Please select the option which is most appropriate for South Warwickshire Option I2a: Set out infrastructure requirements for all scales, types and location of development.</b></p> <p>Option 12a - If this detail was included within the Part 1 Local Plan, then the requirements would be established which apply equally across South Warwickshire.</p> <p><b>Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy</b></p> <p>Option 12b - In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two District.</p>		
Page(s)	<b>20 to 30</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

We do not agree with any of the potential options described above. The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council’s Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).

For reasons already set out within this wider Representations Statement (2023), we also object to the Council’s proposed Local Plan-making approach of producing a Stage 1 and Stage 2 (Parts 1 and 2) of the SWLP. This will just add a significant time delay to Local Plan delivery across the South Warwickshire Region, at a time when

the local economy is facing such considerable economic uncertainty. This does not bode well for the delivery of a certain and clear planning policy framework going forward across the South Warwickshire Region.

Placing small-scale and mediums scale housing sites within a Stage 2 SWLP is also completely unacceptable, and this proposed planning policy approach is in direct conflict with paragraphs 60 and 69 of the Revised NPPF (2021). Paragraph 69 of the Revised NPPF places considerable importance on small and medium-sized housing sites and their important contribution towards meeting the housing requirement of an area, and the fact that these sites are often built-out relatively quickly to help meet the urgent housing needs.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

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Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Issue I3: Community Infrastructure Levy (CIL). (Section 4.1)</b>		
Question(s) and potential Options	<p><b>Q-I3: Please select the option which is most appropriate for South Warwickshire</b></p> <p><b>Option I3a: Establish a South Warwickshire Community Infrastructure Levy (CIL) (or emerging new Infrastructure Levy) to support the delivery of the Plan.</b></p> <p>A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.</p> <p><b>Option I3b: Each District Council to produce its own Levy.</b></p> <p>Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances.</p>		
Page(s)	<b>31</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Page 31 of the SWLP consultation report (January 2023) states that: “...To support the infrastructure requirements set out within the Local Plan, an Infrastructure Delivery Strategy will be prepared which will set out the key pieces of new infrastructure and the climate resilience of infrastructure needed to deliver the Plan and how this will be delivered. It will be necessary to ensure that developer contributions do not undermine the deliverability of the Plan, to this end the Plan will be informed by robust delivery and viability studies to assess the impact of infrastructure requirements...”

### Lockley Homes response

Lockley Homes maintains its view that there has been a huge, substantial, unprecedented and significant recent material change, and a huge and rapid shift in highly damaging adverse economic circumstances now facing the South Warwickshire Region and the wider United Kingdom, due to the presence of the ongoing global

coronavirus pandemic (COVID-19), economic uncertainty caused by Russia's Spring 2022 invasion of Ukraine, and the subsequent severe and unprecedented economic downturn. Which is anticipated to cause one of the worst economic recessions in the UK in living memory since records began. The severity of the forthcoming recession is now acknowledged by central Government (London), who accept that the COVID-19 pandemic has caused one of the worst economic recessions within the UK not seen for the last 300 years. This is highly significant, and should now result in an urgent re-shaping of affordable housing, Community Infrastructure Levy (CIL), planning obligations, and infrastructure policies within the Council's emerging Local Plan Review.

The Council's preparing the emerging SWLP and its sister document Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) now need to begin to finally accept that their highly onerous planning policy position on these policy issues now needs to change to help support the highly fragile local economic recovery, and help support the house building development industry at a time when they are trying to bring forward sites under an incredibly challenging economic climate, which will affect the financial viability of many housing schemes. A highly onerous affordable housing and CIL/ planning obligations/ infrastructure demands approach therefore needs to be avoided within the emerging Local Plan Reviews referred to above.

**The worst global health pandemic event to affect the UK for the last 100 years, combined with the presence of one of the most severe economic recessions for the last 300 years**, should now result in a more supportive Development Management and Planning Policy approach being taken (to support the interests of the private sector development industry and rural landowners) by the LPA within the emerging SAP and SWLP Reviews in relation to unreasonable and highly onerous affordable housing planning policy requirements, Community Infrastructure Levy (CIL) planning policy requirements, and other infrastructure demands/ planning policy requirements being placed on the house building development industry, the local business community and rural landowners looking to bring forward sustainably-located new housing development sites. In order to help support the future financial viability of new housing development schemes coming forward across the district at an incredibly challenging time, and to help support the fragile post Covid-19 local economic recovery across the South Warwickshire Region.

This approach would be consistent with Government guidance reinforced within paragraph 82 (indent d) of the Revised NPPF (2021) which confirms that: "...Planning policies **should** (indent d) **be flexible** enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices..., and **to enable a rapid response to changes in economic circumstances...**"

The evidence is perfectly clear, all of the above 'pandemic-related' factors appear to have been given an insufficient level of planning policy consideration and material planning weight whatsoever by the LPA's when preparing the Council's emerging Site Allocations Plan (SAP) and emerging South Warwickshire Local Plan (SWLP). We

have concerns about this ongoing failure and continued incompetence being taken towards Local Plan preparation within the South Warwickshire Region.

**These critically important ‘pandemic-related factors’ described above therefore require critical consideration by Stratford-on-Avon and Warwick District Council’s Planning Policy Teams as part of their ongoing Plan-preparation work going forwards. To ensure that the Council’s planning policy approach is sufficiently robust, based on a platform of credible and fit-for-purpose evidence, and responds effectively to guidance in paragraphs 31, 35 (indents b and c) and 82 (indent d) of the Revised NPPF (2021).**

The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council’s Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).

The Council’s preparing the above referred to Local Plan Reviews cannot continue to load and place unreasonable planning policy demands and requirements onto the house building development industry for the reasons explained above. A heavily revised planning policy approach is therefore urgently needed to allow the Council’s Plan-making approach to respond effectively to the above NPPF guidance.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Issue S3: Using Brownfield Land for development.</b>		
Question(s) and potential Options	<p><b>Q-S3.2: Please select the option which is most appropriate for South Warwickshire Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.</b></p> <p>Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.</p> <p><b>Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location.</b></p> <p>This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.</p> <p><b>Option S3.2c: None of these</b></p>		
Page(s)	<b>40 to 42</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option S3.2c (None of these) given that the other options listed above fail to recognise the importance of sustainably located greenfield sites, and the important role that they can play in delivering new housing. We maintain our view that our site within the Village of Broom settlement should be brought forward as a matter of urgency within the SWLP Review (2023). The strong set of sustainability credentials of the Lockley Homes site is supported by robust and defensible evidence as set out in Appendix B of this Representations Statement.

As a key local stakeholder, we have continued concerns that the Council's preparing the emerging SWLP Review are ignoring the potential important role that under-utilised low quality greenfield sites, which have strong physical connections to long established existing village settlements, can play in helping to meet longstanding housing shortfalls present across the SWLP Local Plan area to help meet the development needs up until the year 2050. The Council's unreasonable and highly obstructive planning policy position and stance being taken towards these types of sites fails the 'Sustainability' Local Plan test of 'Soundness,' as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021).

There is a severe shortage of brownfield sites (previously developed land) available across the SWLP area to meet identified housing needs and longstanding housing shortfalls, given that the SWLP districts are both dominated by open countryside. Therefore, the important role and contribution that low quality, under-utilised green space areas (such as former paddock land), in well-integrated locations within the confines of existing village settlements can make towards housing supply should be increasingly recognised by the LPA's preparing the emerging SWLP.

Our views on this issue are supported by an extensive range of guidance from the Revised NPPF (2021). Most notably, paragraphs 7, 8, 10, 11 (indent a), **35 (indent d)**, 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for Local Planning Authorities (LPA's) to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews. Competent LPA's should already be aware of this NPPF guidance and its critical importance to Local Plan-making.

The position is perfectly, this highly obstructive planning policy approach, ongoing failure, continued refusal and continued incompetence being taken towards Local Plan-preparation by the Council's Planning Policy Teams, means that the emerging SWLP Local Plan Review (2023), even at this very early stage in its Local Plan preparation, is already currently failing the 'Sustainability' test for Local Plan preparation tests of 'Soundness', as set out within paragraph 35 (indent d) of the Revised NPPF (2021). The emerging SWLP Local Plan Review (2023), alongside its sister document Stratford-on-Avon District Council's unsound and not-fit-for-purpose emerging Site Allocations Plan (SAP), are both therefore vulnerable to future Legal challenge at the later Examination in Public (EIP) stage. Given their continued failure and ongoing refusal to promote the most sustainable patterns of new housing development across the South Warwickshire Region.

It is important that these ongoing, long-standing failings discussed above are now addressed within a revised planning policy approach being taken forward within the emerging SWLP Review, at its remaining Plan-preparation stages. As a key stakeholder, it is important that we highlight these failings to help strengthen the approach being taken towards future Local Plan making, to help the Council's deliver a 'Sound' and 'Legally compliant' Local Plan, which meets the various tests of Soundness as set out within paragraph 35 of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Heritage and Settlement Sensitivity Assessment.</b>		
Question(s) and potential Options	<p><b>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).</b></p> <p><b>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.</b></p>		
Page(s)	<b>47</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

**Q-S4.1** – Yes, the growth of some of the existing settlements should be part of the overall strategy. This approach would correspond well with guidance in paragraph 79 of the Revised NPPF (2021).

Paragraph 79 of the Revised NPPF (2021) states that: “...To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby...”

In accordance with the above NPPF guidance, Lockley Homes would suggest that the Council’s emerging SWLP (2023) should consider the future housing-led growth and sustainable expansion needs of existing rural village settlements located across the South Warwickshire Region. This matter should be one of the key spatial planning policy priority areas for the emerging SWLP Review to consider, in order to help deliver a ‘More Positively Prepared Local Plan,’ and to allow the Plan to promote the most sustainable patterns of development - consistent with the ‘Sustainability’ tests of Soundness for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021). Proposed housing sites such as the Lockley Homes site located within the Village of Broom settlement should be brought forward for new housing development in the SWLP as a matter of urgency, not left for consideration

within a future Stage 2/ version 2 of the SWLP in many years from now. We have ongoing concerns that the Council's preparing the emerging SWLP and its sister document – Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP), are failing to promote the most sustainable patterns of new housing development within these Local Plan Reviews. This will mean that the Plans are vulnerable to future Legal challenge as they are both failing to comply with the Sustainability test as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021). The position is quite clear, substantially less sustainable new housing development site locations are being strongly favoured by the LPA's and strongly promoted, whilst more sustainable site locations are being completely ignored and overlooked by the LPA's preparing the above Local Plan Reviews. We have concerns about this ongoing failure and continued incompetence being taken towards Local Plan preparation.

Lockley Homes maintains its view that new housing development sites coming forward within the Stratford-on-Avon District and wider South Warwickshire Region within the most sustainable site locations, should be strongly encouraged, prioritised for new housing development first, before other less sustainable site locations are allocated for new housing, and should be considered very favourably within the emerging Local Plan Review process without unnecessary delay. To help meet the urgent housing needs of local communities within the South Warwickshire Region, and to help pro-actively address long-standing housing shortfalls present across the SWLP area. This approach accords strongly with current Government policy which is now governed by a pro-growth National Planning Policy Framework which gives a presumption in favour of sustainable development, and guidance in paragraph 60 of the Revised NPPF (2021) which emphasises the need for LPA's to significantly boost the supply of new homes across the United Kingdom.

#### **Q-S4.2**

Within the supporting background technical evidence base document titled "Heritage and Settlement Sensitivity Assessment" we have concerns that the Village of Broom settlement (located within the western part of the Stratford-on-Avon District) has been recognised as having high historic environment sensitivity. **We would strongly object to these planning policy assumptions. We object to the continued poor quality of the evidence base being used to support Local Plan-preparation.**

Furthermore, in order to deliver "a More Positively Prepared Local Plan" in accordance with the tests of Local Plan Soundness as reinforced within paragraph 35 (indent a) of the Revised NPPF (2021), the Council's preparing the emerging SWLP (2023) should not view heritage designations as a site constraint to prevent new housing-led development proposals from coming forward. Given that high-quality new residential development schemes incorporating good architectural design features, and use of appropriate and sympathetic types and colours of building materials in external facing building facades (which remain sympathetic to preserving a proposal sites historic surroundings), can all help to improve the historic setting, appearance and character of both Statutory Listed Buildings (such as Grade II Listed buildings), and adjacent Conservation Areas.

Historic environment focused guidance in the Revised NPPF (2021), positively encourages new development proposals which seek to enhance the character and setting of the historic environment. This is confirmed in paragraphs 190 (indent c) and 197 (indent c) of the Revised NPPF (2021), which both strongly encourage new development proposals which seek to "...make a positive contribution to local character and distinctiveness..."

The presence of heritage designations should therefore not be viewed as a site constraint, to prevent future new housing development sites from coming forward within the emerging Local Plan area.

We have concerns that the historic environment policies being taken forward within the emerging SWLP Review are unduly onerous, highly restrictive, are not sufficiently robust, and lack sufficient ambition, and therefore fail to reflect the above NPPF guidance.

As already stated within our wider Representations within this Local Plan Representation, it is important that any heritage designations and any heritage assessments being used by Local Planning Authorities to inform future Local Plan preparation work are supported by a sufficiently robust and defensible platform of up-to-date evidence - consistent with guidance reinforced within paragraphs 31, 35 (indent b) and 192 of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Potential locations for new settlements. Issue S6: A Review of Green Belt boundaries.</b>		
Question(s) and potential Options	<p><b>Q-S5.2: Do you think new settlements should be part of the overall strategy? Yes   No   Don’t Know.</b></p> <p><b>Q-S5.3: In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree? Yes   No   Don’t Know.</b></p> <p><b>Q-S5.4: If not, what approach would you take?</b></p>		
Page(s)	<b>51 to 58</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Q-S5.2: - We consider that new settlements should be part of the overall strategy. However, we have concerns that the Council’s preparing the emerging SWLP are overlooking more sustainable site locations for new housing development, and prioritising less sustainable site locations for new housing development. This matter is discussed below and within our wider SWLP Representations Statement (March 2023).

Q-S5.3: As well as focusing new housing development alongside existing rail corridors, the LPA’s should also consider focusing new housing development near to public transport bus services routes. Development sites within existing settlements should also be strongly pursued, such as the Lockley Homes large infill site located within the Village of Broom settlement, within the western part of the Stratford-on-Avon District.

The focus of the emerging Local Plan is currently far too narrow, just to focus solely on rail corridors, and will fail to meet the objectives of paragraphs 60 (boost the supply of housing) and 79 (focus new housing development towards existing rural village settlements) of the Revised NPPF (2021). As stated, far too much priority is being placed on the importance of rail corridors – which fails to deliver “a More Positively Prepared Local Plan” in line with paragraph 35 (indent a) of the Revised NPPF (2021).

Site locations with good access to bus routes and site locations located adjacent to existing rural village settlements should be afforded significantly more planning policy weight and should be considered as favourable locations for new housing development. This planning policy approach has considerable planning policy support in paragraph 79 of the Revised NPPF (2021) which confirms that:

“...To promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive...”

To help effectively address the Climate Change Emergency within the South Warwickshire Region, the types of site locations recommended by paragraph 79 of the Revised NPPF (2021) should be urgently prioritised for new housing development by the LPA's preparing both the emerging SWLP and SAP Local Plan Reviews.

As a key local stakeholder and developer of very high quality residential schemes, we have continued concerns that both the emerging SWLP and its sister document Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP), are both failing to promote the most sustainable patterns of new housing development across the South Warwickshire Region, in direct conflict with paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for Local Planning Authorities (LPA's) to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews. Competent LPA's should already be aware of this NPPF guidance and its critical importance to Local Plan-making.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Sustainability Appraisal (SA)</b>		
Question(s) and potential Options	General observation comments in connection to the planning policy approach being undertaken by the LPA’s within the emerging Sustainability Appraisal (SA) process which is being used to support the emerging SWLP.		
Page(s)	<b>59 to 60</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

The Sustainability Appraisal (SA) being used to support the emerging SWLP (2023) is not promoting the most sustainable patterns of new housing development to the most sustainable site locations within the South Warwickshire Region. Stratford-on-Avon District Council’s Planning Policy Team is showing a very strong level of support and notably biased favouritism towards significantly less sustainable site locations by prioritising the delivery of new housing development sites located in isolated and very peripheral farmland locations. Distantly located away from the main existing rural village settlement cores, in areas of distantly located farmland countryside, on the very outer fringes and periphery of existing rural village settlements.

The Council’s unreasonable and highly obstructive planning policy position and approach being taken on this issue fails the ‘Sustainability’ test of ‘Soundness’ for Local Plan preparation, as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021).

On this basis, both the accompanying Sustainability Appraisal (SA) being used to support Local Plan-preparation, and the emerging SWLP (2023) are both in direct conflict with paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for LPA’s to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews.

Our concerns on these issues are already covered within this wider SWLP Representations Statement (March 2023), as well as our Representations to Stratford-on-Avon District Council’s emerging Site Allocations Plan (SAP) (2022).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Options 1 to 5</b>		
Question(s) and potential Options	Question Q: S7. 2: For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire.		
Page(s)	<b>63 to 73</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

We have concerns in relation to all of the proposed potential growth options as they are all failing to promote the most sustainable patterns of new housing development across the South Warwickshire Region.

Lockley Homes maintains its view that the Council’s preparing the emerging SWLP Review (2023) should be focusing new housing development proposals towards sustainably-located infill sites within and on the edge of existing rural village settlements, in accordance with guidance in paragraph 79 of the Revised NPPF (2021).

Lockley Homes has a perfectly acceptable site location suitable for new housing development. For reasons already set out within this wider SWLP Representations Statement (March 2023), this site should be supported within the emerging SWLP Review, not left for a future Stage 2 of the SWLP Local Plan to consider in many years from now.

Stratford-on-Avon District Council’s Planning Policy Team is showing a very strong level of support and notably biased favouritism towards significantly less sustainable site locations by prioritising the delivery of new housing development sites located in isolated and very peripheral farmland locations. Distantly located away from the main existing rural village settlement cores, in areas of distantly located farmland countryside, on the very outer fringes and periphery of existing rural village settlements.

The Council’s unreasonable and highly obstructive planning policy position and approach being taken on this issue fails the ‘Sustainability’ test of ‘Soundness’ for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised

NPPF (2021). As well as an extensive range of other guidance from the Revised NPPF. Most notably, paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for LPA's to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews.

Our concerns on these issues are already covered within this wider SWLP Representations Statement (March 2023), as well as our Representations to Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) (2022).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

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Date	<b>6 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs. Issue S10: Any other development strategy issues</b>		
Question(s) and potential Options	Question Q-S10. Please add any comments you wish to make about the development distribution strategy for South Warwickshire		
Page(s)	<b>74 to 76</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

We have concerns that the LPA’s preparing the emerging SWLP Review (2023) are failing to promote the most sustainable patterns of new housing development across the South Warwickshire Region.

Lockley Homes maintains its view that the Council’s preparing the emerging SWLP Review (2023) should be focusing new housing development proposals towards sustainably-located infill sites within and on the edge of existing rural village settlements, in accordance with guidance in paragraph 79 of the Revised NPPF (2021).

Lockley Homes has a perfectly acceptable site location suitable for new housing development. For reasons already set out within this wider SWLP Representations Statement (March 2023), this site should be supported within the emerging SWLP Review, not left for a future Stage 2 of the SWLP Local Plan to consider in many years from now.

Stratford-on-Avon District Council’s Planning Policy Team is showing a very strong level of support and notably biased favouritism towards significantly less sustainable site locations by prioritising the delivery of new housing development sites located in isolated and very peripheral farmland locations. Distantly located away from the main existing rural village settlement cores, in areas of distantly located farmland countryside, on the very outer fringes and periphery of existing rural village settlements.

The Council’s unreasonable and highly obstructive planning policy position and approach being taken on this issue fails the ‘Sustainability’ test of ‘Soundness’ for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised

NPPF (2021). As well as an extensive range of other guidance from the Revised NPPF. Most notably, paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for LPA's to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews.

Our concerns on these issues are already covered within this wider SWLP Representations Statement (March 2023), as well as our Representations to Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) (2022).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 6 – Delivering homes that meet the needs of all our communities. Issue H4: Accommodating housing needs arising from outside of South Warwickshire</b>		
Question(s) and potential Options	Question Q-H4-3: If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls? You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question		
Page(s)	<b>108 to 113</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

The new emerging SWLP timeframe will extend from potentially the years 2030 up until the year 2050. In terms of meeting housing shortfalls from elsewhere and deciding where to focus this new housing development within the emerging SWLP area, the future housing development growth needs of existing rural village settlements across the SWLP Plan area, and the new housing-led development expansion needs of these existing rural village settlements will therefore require careful consideration given the considerable timeframe of the new Local Plan, extending up until the year 2050. Existing village settlements, such as the Village of Broom, should therefore be given very high priority, and should be urgently prioritised for new housing development. This matter should not be left for a Stage 2/ version 2 of the SWLP Review to consider in many years from now, but should be prioritised as a matter of urgency now within the January 2023 SWLP.

In particular, in terms of considering how these existing rural village settlements (like the Village of Broom) can grow and thrive over the new Local Plan period by bringing forward sustainably located new housing development sites, such as the sustainably located Lockley Homes site currently being promoted through the emerging SWLP. The future growth and sustainable expansion needs of existing rural village settlements across the SWLP area will therefore require careful planning policy consideration to help shape their future development needs up until the year 2050. Particularly, the sustainable expansion of existing rural village settlements on the edges of their existing boundaries with new housing, the policy approach strongly promoted by guidance in paragraph 79 of the Revised NPPF (2021) as considered below. As this spatial planning approach can help to sustain the vitality of existing rural

village settlements with new sustainably located housing, allowing them to grow and thrive over the future years.

Paragraph 79 of the Revised NPPF (2021) states that: "...To promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive..."

Before promoting 'free-standing' sites located within the open countryside, including those 'free-standing' sites located within the existing designated Green Belt countryside, the emerging Stratford-on-Avon District Council emerging Site Allocations Plan (SAP) (Review) (2023) and Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) Reviews should be strictly prioritising the delivery of new housing development sites within sustainably-located large infill sites (located outside of the designated Green Belt), located within existing rural village settlements. And prioritising the delivery of new housing development within areas of farmland located on the edges of existing rural village settlements. The evidence is perfectly clear, this approach to Plan-making is strongly supported by guidance reinforced within paragraphs 11, 35 (indent d), 79, 120 (indent d), 141 (indent a), 142 and 149 (indent e) of the Revised NPPF (July 2021).

To follow a different Plan-making approach would fail the 'Sustainability' tests of Soundness for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021), and would make the emerging SAP and SWLP Local Plan Reviews, and any supporting background technical evidence base being used to accompany Plan-preparation, insufficiently robust, and therefore vulnerable to future Legal challenge at the later Local Plans Examination in Public (EIP) stages.

We have concerns about the longstanding failings being taken towards Local Plan preparation within the Stratford-on-Avon District on these matters, and Stratford-on-Avon District Council's constant ongoing refusal to promote the most sustainable patterns of new housing development within the Stratford-on-Avon District. We have concerns about the "incapable" management and leadership approach being taken towards Local Plan preparation within the Stratford-on-Avon District given the Council's Planning Policy Teams continued refusal and ongoing failure to promote the most sustainable patterns of new housing development within the emerging SAP Local Plan Review (2023). This underlines the ongoing failure and continued incompetence being taken towards Local Plan preparation within the Stratford-on-Avon District. These ongoing failings are already covered in detail within our Representations to Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) (Review) (2022).

Paragraph 120 (indent d) of the Revised NPPF (2021) confirms that: "...Planning policies and decisions should: (indent d) **promote and support the development of under-utilised land** and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure) ..."

Paragraph 141 (indent a) of the Revised NPPF (July 2021) underlines the importance and expects LPA's to encourage the use of under-utilised land for new housing development. Such as low-quality green space areas and derelict and under-utilised former paddock land, located both within and bordering existing rural village settlements - in order to help promote the most sustainable site locations for new housing development. It emphasises that these highly sustainable site locations should be prioritised first for new housing development. Before LPA's introduce changes to Green Belt boundaries and before LPA's identify sites for new housing development within the Green Belt countryside. This spatial planning policy approach to Local Plan-preparation is required in order to help protect the Green Belt from development encroachment pressures, and to help promote sustainable patterns of development as stated above. It states that: "... Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority **should be able to demonstrate that it has examined fully all other reasonable options** for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: (indent a) makes as much use as possible of suitable brownfield sites and **under-utilised land**..."

Further support is provided in paragraph 142 of the Revised NPPF (2021) which is perfectly clear in its view that: "...When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development **of channelling development towards** urban areas inside the Green Belt boundary, **towards** towns and **villages** inset within the Green Belt or **towards locations beyond the outer Green Belt boundary**. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land..."

These types of highly sustainable infill site locations (see photographs 1 and 2 in **Appendix B** of this Representations Statement document (March 2023), should be strictly prioritised first as a matter of urgency for new housing development. Before LPA's select unsustainable site locations for new housing development, located within areas of open Green Belt countryside. In free-standing new build housing settlements, located far away from existing rural village settlements, and far away from existing towns.

Competent Local Planning Authorities should ensure that their emerging Sustainability Appraisals (SA's), being prepared alongside/ to support emerging Local Plan Reviews, should take on board these critically important spatial planning policy considerations - consistent with guidance in paragraphs 11, 35 (indent d), 79, 120 (indent d), 141 (indent a), 142 and 149 (indent e) of the Revised NPPF (2021). This will help to ensure that Local Plan Reviews satisfy the Local Plan 'tests of Soundness' (Para 35 – indent d of the Revised NPPF (2021)) when these tests of soundness are being carefully

examined at future Public Local Inquiries (PLI's), as part of the Local Plan Review preparation stage.

Lockley Homes maintains its view that it has a sustainably-located site suitable for new housing development, located within an existing rural village settlement boundary. Given the very strong, defensible, clear and compelling sustainability credentials of the site as already evidenced in our earlier Representations to both the SWLP and SAP Local Plan Reviews. We consider that this site, within the Village of Broom settlement boundary, should be prioritised for future development, and included without delay as a new housing site allocation on the main Policies Map of the emerging Local Plan Reviews referred to above. This site should also be strongly encouraged within the emerging background technical evidence base documents being used to support Local Plan preparation work across the South Warwickshire Region, given this site's very strong set of sustainability credentials. This is particularly evidenced in photographs 1 and 2 of Appendix B of this Representations Statement (March 2023).

We consider that allocating this site for new housing development in the Council's emerging SAP and SWLP as suggested, would result in a More Effective, Positively Prepared and Justified Plan, consistent with guidance in paragraph 35 of the Revised NPPF (2021).

#### The Sustainability credentials of the Lockley Homes Site being promoted through the emerging SWLP (2023)

#### Site-specific designations covering the proposal site within Stratford-upon-Avon District Council's existing adopted Core Strategy (adopted July 2016)

As stated above, the proposal site falls within the Village of Broom existing settlement boundary. The proposal site falls outside of the Village of Broom designated Conservation Area boundary (Conservation Area designated July 1991). Apart from being located within the Village of Broom settlement boundary, the proposal site has no further site-specific designations within the Stratford-on-Avon District adopted Core Strategy (2011 to 2031) (adopted July 2016), which forms the current adopted Development Plan covering the proposal site.

Lockley Homes considers that the site in question should be allocated for new family housing development (use Class C3: Residential) within both the emerging SAP and SWLP for the following reasons:

- The long-established hedgerow network running along the full length of the proposal site's northern boundary, provides a permanent, long established, prominent and physically defining landscape feature which defines the extent and northern tip of the Village of Broom settlement boundary. It is important to reinforce the point that the proposal site is located fully 'inside' a long

established and permanent physically defining landscape feature, which defines the northern extent of the village settlement boundary.

- The site forms an infill development site / gap site located between two established development areas (between two existing long-established buildings). Developing these types of infill site locations for new housing development, has clear planning policy support in paragraph 149 (indent e) of the Revised National Planning Policy Framework (NPPF) (2021). This guidance also applies to heavily rural areas which are located outside the designated Green Belt.
- Developing this infill site would be in keeping with the existing character of the rural village settlement, and would not be visually intrusive on the village and the surrounding countryside. Given the sites very well integrated and very strong set of infill site characteristics, in comparison to developing areas of land located much further outside of the village settlement boundary, in isolated 'free-standing' housing sites. In areas of visually conspicuous and prominent open countryside. The proposal would therefore not be out of character from the established village settlement pattern, and would blend and integrate very well into the existing village surroundings. This proposal would also help to promote a more sustainable pattern of development, consistent with guidance in paragraphs 7, 8, 10, 11 (indent a), 16 (indent a), 31, 35 (indent d), 38, 79, 120 (indent d), 141 (indent a), 142 and 149 (indent e) of the Revised NPPF (2021).
- The proposal site would perform well against guidance in paragraph 69 of the Revised NPPF (2021) which reinforces that: "...Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly..."
- In order to meet the planning policy objectives of paragraph 69 of the Revised NPPF, these medium land parcel sized proposed housing sites should be considered as a matter of urgency now within the emerging SWLP (2023). They should not be left for a Stage 2/ version 2 of the SWLP to consider in many years from now.
- The site has very strong linkages and strong physical connections to the existing rural village settlement pattern, given that it is located 'inside' permanent, physical, long established, and prominent defining landscape features, which defines the extent of the village settlement boundary pattern. This reinforces the connectivity of the proposal site to the existing village settlement. For example, the established hedgerow network which defines the northern edge of the village settlement boundary. And secondly, due to the site forming an infill site as discussed above.
- The site can play an important role in helping to contribute towards meeting long-standing housing shortfalls across the district.
- The site forms an area of under-utilised land located outside of the designated Green Belt boundary, located in a highly sustainable infill site location, with excellent physical connections to the main village settlement. On this basis, this proposal site has considerable planning policy support when assessed against guidance reinforced in paragraphs 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021).



- This site has a key role to play in helping to deal with long-term ongoing housing shortfalls present across the Stratford-on-Avon District.
- Given the spatial land use planning characteristics of the proposal site as described in the above bullet points, developing this piece of land for new housing development would therefore not result in development encroachment in open countryside, located outside of the village settlement boundary. This proposal site therefore meets a range of sustainability policy criteria and should therefore be considered favourably for new housing development.
- These types of sustainably-located sites should be strongly encouraged and prioritised for new housing development within the emerging SWLP (2023) by the Local Planning Authorities. In order to ensure that the SWLP meets the necessary tests of Soundness for Local Plan preparation as reinforced within paragraphs 11 (indent a), 16 (indent a), and 35 (indent d) of the Revised NPPF (2021) – all of which reinforce the critical need for LPA's to promote the most sustainable patterns of development when preparing emerging Local Plan Reviews.
- The proposals will help to 'boost the supply' of new housing within the district within a highly sustainable site location – consistent with guidance in paragraph 60 of the Revised NPPF (2021).
- The proposals are fully consistent with the NPPF's policy drive to deliver more new rural homes in the most sustainable site locations, in order to help deliver much needed rural housing to meet key community needs, and to help promote sustainable patterns of development within the rural countryside, close to existing village settlements.
- The proposals strongly accord with West Midlands Mayor Andy Street's key spatial planning policy objective (i.e. making use of sustainably-located under-utilised areas of low quality green space land, located outside of the Green Belt), which seeks to focus more new housing development proposals not only towards urban brownfield sites, but also to areas of under-utilised greenfield land in rural areas, located adjacent to existing rural village settlements, located outside of the Green Belt. In order to help regenerate rural village settlements, promote the most sustainable patterns of development, and help reduce development encroachment pressures within South Warwickshire's environmentally sensitive open Green Belt countryside.
- The proposal site is located within the physical confines of the existing Village of Broom settlement and, in land use planning policy terms is spatially very well integrated into the existing village settlement, for reasons identified above.
- The proposal site has a very low level of Planning Policy sensitivity. For example, it has no designated nature conservation interest, and it has no significant historic environment interest. The site also has no recreational green space importance, as the site is fenced off from the general public (the site has fully restricted public access), and forms an area of under-utilised, and very low-quality green space. The site does not form high quality agricultural land. Therefore, the site is not the subject of any landscape/ environmental designations that would prevent new housing development of the site.
- The site is immediately available for development, is in one ownership, and has no site constraints which would affect its ability to be re-developed for new housing. The site therefore has a very strong set of scoring criteria when

assessed against the requirements of both the emerging South Warwickshire Local Plan (SWLP) (2023) 'Call for Sites Form' and Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) 'Call for Sites' Form (2022).

- The proposal site is conveniently located to sustainable transport modes, given that the proposal site closely borders a long-established bus route. The nearest bus stop is located a short distance from the proposal site close to the T-junction of High Street and Bidford Road, within the Village of Broom settlement. The proposal site therefore has good access to sustainable transport modes, to help promote more sustainable travel choices, consistent with guidance in Section 9 (Promoting sustainable transport) of the Revised NPPF (2021).
- The proposal site falls outside of the Village of Broom designated Conservation Area boundary.
- The proposals would remain sensitive to preserving appearance, landscape setting and historic character of the nearby Conservation Area through high quality design, in terms of the height, scale and massing of the new residential units, and the architectural appearance and design of external building facades. However, it is noted that the supporting background technical evidence base to support and justify this Conservation Area designation is now long out-of-date, given that the Conservation Area is relying on a 32-year-old Conservation Area Character Appraisal (CACA). This is not robust, up-to-date or credible evidence given that this evidence base is now 32 years old. The Broom Village Conservation Area Character Appraisal was adopted during July 1991. Furthermore, Conservation Areas do not preclude or prevent new development. In historic environment planning policy terms, any new development coming forward within or on the edge of an existing Conservation Area (particularly for infill sites), just has to remain sensitive to preserving the historic character, setting and appearance of the Conservation Area. It is considered that the new housing scheme will not have any adverse impacts on the Conservation Area, which has not been properly re-assessed for the last 32 years.
- This CACA and the historic environment supporting background technical evidence base and critical supporting planning policy foundations being used by the LPA to fully underpin, justify and support the Conservation Area designation is now insufficiently robust, lacks any kind of historic environment planning policy credibility as a material consideration for informing decisions on both formal planning applications and emerging Local Plan Reviews, is unsound and heavily out of date - and therefore conflicts with guidance reinforced within paragraphs 31 and 192 (indent a) of the Revised NPPF (2021). Paragraph 192 (indent a) of the Revised NPPF (2021) is perfectly clear that: "...Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to: (indent a) assess the significance of heritage assets and the contribution they make to their environment..." Paragraph 31 of the Revised NPPF (2021) confirms that: "...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..."
- The site has no landscape sensitivity. For example, the site does not fall within an Area of Outstanding Natural Beauty (AONB) or any other landscape sensitivity designations on the Policies Map of the Council's existing adopted

Development Plan – The Stratford-on-Avon District Core Strategy (2011 – 2031) (adopted July 2016).

- The proposals are helping to promote a sustainable pattern of development, and are consistent with the NPPF's policy drive to deliver more new homes within sustainable site locations. Such as infill site locations which are well integrated into existing rural village settlements.
- The residential amenity of established residential occupiers located on the proposal sites southern tip boundary, adjacent to Mill Lane, will be preserved and will not be adversely affected. Given that there is already a good level of existing visual screening available by a tall deciduous mature hedgerow network, running along the Mill Lane highway network. This tall hedgerow network provides a strong landscaped edge and good physical and visual screening as described above. The existing hedgerow network runs along the full length of the proposal sites southern tip boundary. This existing hedgerow network (containing native hedgerow tree species) has potential to be further reinforced within a future new housing development site layout, through new on-site landscaping by providing additional tree planting alongside the edge of the existing hedgerow network. Using quick growing native tree species as identified in Appendix C of this March 2023 SWLP Representations Statement.
- By using quick growing native tree species in a short time frame, this would help to provide an even more effective and reinforced higher thin green wedge screening the site from nearby residential occupiers. These measures will help to deliver Biodiversity Net Gain (BNG) enhancements within a severely ecologically damaged intensively farmed landscape. These proposals therefore have a strong level of nature conservation focused planning policy support when assessed against guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021). As well as by guidance within the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (BAP), which is highly supportive of new housing development proposals which include measures which actively seek to support the recovery of vulnerable populations of Priority Wildlife Species and the recovery of priority wildlife habitats across the South Warwickshire Region.
- It is also noted that the majority of these adjacent existing residential occupiers only contain single storey bungalows. So given their low front windows height, they will not be adversely affected as the existing hedgerow network will block views into the proposal site. With its further reinforcement as stated above, the green buffer screen would be even more effective. Residential amenity is not therefore considered to be an issue and there will be no adverse residential amenity impacts.
- The proposal site land parcel forms an area of under-utilised, very low-quality eroded and damaged green space, which has been heavily and over-grazed by horses for a number of years - with no existing on-site natural green space present. There are therefore no ecological constraints which would prevent future development on this site, given that the proposal site has no nature conservation sensitivity or interest. The site is deliverable, and the opportunity exists within a future new build housing site layout to provide net gains for biodiversity. Consistent with guidance in paragraphs 8 (indent c), 120 (indent

a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021), as well as guidance from the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan discussed above. Examples of on-site biodiversity enhancement features that could potentially be incorporated within a future new housing development site layout, to help deliver net gains for biodiversity, are included at Appendix C of Representation Statement document.

- On its northern site boundary, the proposal site immediately borders an area of severely depleted and severely ecologically damaged open countryside, which has suffered from years of uncontrolled intensive farming practices. Which has resulted in the extensive loss of a wide range of wildlife habitat features from the rural landscape. Including the removal of miles of hedgerow networks due to the expansion of arable farmland and pasture fields, loss of mature veteran and ancient trees from hedgerow networks due to widespread hedgerow destruction on a vast scale, the draining of farmland wildlife ponds and other wetland habitat features. Blanket tree removal across large expanses of open countryside, the loss of wildflower meadows and wildflower rich hedgerow field margins, etc. There is therefore an opportunity to replace some of the threatened wildlife habitat features that have already been lost from the open countryside, within a future new-build residential site layout, to help deliver net gains for biodiversity, consistent with the planning policy approach strongly encouraged in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021). These issues are considered in further detail within Appendix C of this Representation Statement.
- Guidance in paragraph 180 (indent d) of the Revised NPPF (2021) is perfectly clear in its view that development proposals whose primary objective is to conserve or enhance biodiversity should be supported by Local Planning Authorities.
- The proposals are strongly supported by guidance from the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan, which is highly supportive of new housing development proposals which include measures which actively seek to support the recovery of vulnerable and highly fragile declining populations of Priority Wildlife Species, and the recovery of priority wildlife habitats across the South Warwickshire Region.
- The proposals would help to maintain the future vitality and viability of the existing rural village settlement, by delivering a supply of much needed new housing, in a highly sustainable site location. This has considerable planning policy support when assessed against guidance in paragraph 79 of the Revised NPPF (2021) which reinforces that: "...To promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive..."
- Given its clear and compelling sustainability credentials, and very strong set of infill site characteristics, new housing development on this site would represent a logical extension to the existing Broom Village settlement. Providing a source of much needed new housing that the local community so desperately needs, to help tackle the severe housing shortage and severe housing crisis present

across the Stratford-on-Avon District. New family housing coming forward at this site location would also help to play a critical role in helping to support the future vitality of the village, consistent with guidance in paragraph 79 of the Revised NPPF (2021) as discussed above.

- The proposal site location immediately borders the Village of Broom designated Conservation Area, which is dominated by very old terraced housing and very old cottages (within the Conservation Area). Which provide residential accommodation which suffers from cramped living conditions and very poor quality indoor ventilation standards, in comparison to modern, spacious, large family new-build housing. In general, these types of very old historic properties, characteristic of the Village of Broom Conservation Area, suffer from very cramped living conditions, very poor quality indoor ventilation standards, lack of cavity wall insulation, mould within internal rooms due to damp conditions, cold internal room temperatures (due to sub-standard and very poor quality insulation standards), low floor-to-ceiling heights within small and tightly confined internal rooms spaces, problems of over-crowding due to very small habitable room sizes, and damp conditions.
- These types of poor-quality, very old, historic housing properties (which provide very sub-standard living accommodation conditions), are all associated with the greater spread of the coronavirus (COVID-19) pandemic. Due to the very sub-standard and very poor-quality living accommodation conditions as described above.
- The proposed new, high-quality, well-ventilated, well-insulated with cavity wall insulation, spacious, large, modern, family housing development scheme coming forward on this under-utilised area of very low-quality green space, within a sustainably-located infill site, would therefore significantly help to improve the living conditions, health and well-being of the local community, by delivering a supply of well ventilated, fit-for-purpose, modern residential accommodation, with good quality thermal energy efficiency standards. In a location which is currently suffering from and dominated by very poor-quality historic housing stock within the Conservation Area.
- The severe and unprecedented global coronavirus (COVID-19) pandemic, and the continued 15 months of pro-longed lockdown restrictions across the UK during the years 2020 and 2021, has highlighted and placed into very sharp focus the continued relevance of sub-standard historic housing to health.
- The coronavirus pandemic (COVID-19) represents one of the worst global health pandemics to affect the UK within the last 100 years.
- Given the above pandemic-related issues, the new housing proposals would therefore have a very strong level of planning policy support when assessed against health focused guidance in paragraphs 8 (indent b) and 92 of the Revised NPPF (2021). Paragraph 92 of the Revised NPPF reinforces that: "...Planning policies and decisions should aim to achieve healthy, inclusive and safe places..."
- These pandemic-related factors are of critical importance and should now therefore be carefully shaped into and form part of the planning balance when the Local Planning Authority is preparing the emerging Site Allocations Plan Local Plan Review.

- These emerging new housing development proposals will play a key role in helping to deliver a much needed supply of modern, energy efficient housing for the local community, in a part of the rural area which is currently suffering from and dominated by poorly insulated, sub-standard historic mid-17th century housing (built from 1st January 1601 to the 31st December 1700) and 18th century housing (built from 1st January 1701 to 31st December 1800) located inside the nearby Village of Broom Conservation Area. All these historic properties, which in some cases are now over 300-years-old, all lack cavity wall insulation and are all very energy inefficient.
- These new modern energy efficient housing development proposals are therefore coming forward at a critical time when the local Village of Broom community and the wider UK is facing a sharp pro-longed increase in energy prices during Spring 2022, due to the major increase in the energy price cap on the 1st April 2022, with an average UK household gas and electricity bill rising to £1,971 a year, and a further increase during October 2022, which could take the cost up to £3,300. The Spring 2022 huge price increase is driven by more demand on energy as worldwide economies gradually recover from the effects of the global coronavirus (COVID-19) pandemic, with supply unable to keep up with demand. Russia's Spring 2022 ongoing invasion of Ukraine has also exacerbated the issue, with some countries stopping or limiting their purchasing of Russia's oil and gas. These new modern energy efficient housing development proposals are therefore coming forward at an absolutely critical time for the local community and should therefore be strongly encouraged by the Local Planning Authority.
- A very strong town planning precedent has already been set, given that in planning policy terms, residential development has already been considered perfectly acceptable by the Local Planning Authority. Given that Stratford-on-Avon District Council has already recently granted planning approval, and supported the re-development of a nearby greenfield site for new-build family housing (Use Class C3: Residential), a short distance to the east of the proposal site, at Aspley Close. The proposal site being promoted by Lockley Homes through the emerging SWLP (2023), in spatial planning policy terms forms a significantly stronger performing infill site (in comparison to the Aspley Close site), due to its much stronger set of infill site characteristics. And the proposal site in question has increased connectivity and is better integrated into the confines of the existing rural village spatial settlement pattern. Given that it is located within very close proximity to the main central core of the village settlement, and a much closer distance to the main village High Street - in comparison to the Aspley Close site. Which is more distantly located from the central core of the village and main village High Street, and therefore displays a considerably much weaker set of sustainability credentials when assessed and compared against the Lockley Homes site.
- Allocating this site for new family housing development (Use Class C3: Residential) on the main Policies Map of the Council's emerging SWLP (2023) would result 'in a More Effective, Positively Prepared and Justified Plan, consistent with national policy'. The sustainably located emerging new housing development proposals subject to this Local Plan Representation, therefore accord very well with Government guidance in paragraph 35 of the Revised

NPPF (2021). Which, as part of the tests for soundness, expects new Local Plan Reviews (and their supporting background technical evidence base) to be 'Positively Prepared' which seek to meet the area's objectively assessed needs (NPPF para 35 – indent a), and be consistent with national policy by enabling the delivery of sustainable development (NPPF para 35 – indent d). Allocating this site for new family housing development within the Council's emerging SWLP (2023), would therefore help the Council's to deliver a 'More Effective, Positively Prepared and Justified Local Plan' Review by promoting more sustainable patterns of development, within the SWLP area. And by taking a more proactive planning policy approach towards supporting the delivery of future development proposals that can help to meet the SWLP area's objectively assessed development needs.

It is considered therefore that developing this site for new housing development, would have considerable planning policy support in paragraph 38 of the Revised NPPF (July 2021), which confirms that: "...local planning authorities should approach decisions on proposed development in a positive and creative way... Decision makers at every level should seek to approve applications for sustainable development where possible..."

Given the very strong, clear and compelling sustainability credentials of the site as evidenced further above, we consider that the above site should be prioritised for future development within the emerging SWLP (2023), and included without delay, as new housing site allocation on the main Policies Maps of the Council's emerging SWLP Local Plan Review.

As stated above, we consider that allocating this site for new housing development in the above emerging Local Plan Review as suggested, and strongly supporting this proposal site within the emerging SWLP (2023), would result in a 'More Effective, Positively Prepared and Justified Plans, consistent with national policy', in accordance with Local Plan 'tests of Soundness' as reinforced within paragraph 35 of the Revised NPPF (2021)

It would also help to promote a more sustainable pattern of development, and would help to boost the supply of new housing within the Stratford-on-Avon District, which has considerable planning policy support when assessed against guidance in paragraphs 7, 8, 10, 11 (indent a), 16 (indent a), 31, 35, 38, 60, 79, 120 (indent d), 141 (indent a), 142 and 149 (indent e) of the Revised NPPF (July 2021).

The planning balance should therefore weigh firmly in favour of these emerging proposals, given that the proposals will help to deliver the additional new homes that the local community so desperately needs, over the new Local Plan period, to help tackle the severe housing shortage and severe housing crisis present across all parts of the South Warwickshire Region.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 6 – Delivering homes that meet the needs of all our communities. Issue H6: Pitches and Plots for gypsies, travellers and travelling showpeople.</b>		
Question(s) and potential Options	Gypsy and traveller and travelling showpeople focused Questions Q-H6; Q-H6b; Q-H6c		
Page(s)	<b>117 to 118</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

We neither agree with or support any of the proposed emerging Options on pages 117 and 118 of the SWLP (2023). Consistent with our earlier representations to the SWLP Draft 'Scoping and Call for Sites Report' (May 2021) (Regulation 18) public consultation, we have concerns about the proposed planning policy approach being taken towards gypsy and travellers and travelling showpeople accommodation needs within the South Warwickshire Region within the emerging SWLP (2023).

Unsustainable levels of pitch numbers are being proposed across South Warwickshire Region which will promote inappropriate, damaging and unsustainable patterns of development within the local area, and cause significant residential amenity conflicts with the existing settled community, as well as damage sensitive rural landscapes and wildlife habitats, and place unreasonable pressures on already constrained local road networks, existing healthcare and welfare facilities and local schools.

We consider that Stratford-on-Avon and Warwick District Council's proposed planning policy approach being taken forward within the emerging SWLP (Regulation 18) (January 2023) report on this issue conflicts with the following guidance:

- Paragraphs 7, 8, 10, 11 (indent a), 16 (indent a) and 35 (indent d) of the Revised NPPF (July 2021) (which all reinforce the need for LPA's to promote sustainable patterns of development).
- Paragraphs 4 (indent k), 10 (indent e), 13 and 23 of the Department for Communities and Local Government (DCLG) 'Planning policy for traveller sites' (August 2015).

- The approach being taken towards Local Plan preparation within the emerging SWLP Review is failing the ‘Sustainability’ tests of Soundness for Local Plan preparation as set out in paragraph 35 (indent d) of the Revised NPPF (2021).
- The scale and number of pitch requirements needs to be significantly reduced within the emerging SWLP Review (2023). Proposed pitch requirements area far too excessive and unreasonable.
- We would strongly encourage the LPA’s preparing the emerging SWLP to revisit this issue and prepare a new Gypsy and Traveller Accommodation Assessment (GTAA) supporting background technical evidence base document to inform the Local Plan preparation, which contains more realistic, more appropriate and deliverable pitch numbers. The current GTAA is not fit for purpose and fails to respond effectively to the unique characteristics of South Warwickshire Region in terms of its special heavily rural countryside and historic landscapes.
- This scale of growth in new high pitch numbers being proposed would appear to be more appropriate and suitable within a very large urban area rather than small, heavily rural districts.
- The future expansion needs of these new pitches (those proposed gypsy and traveller sites allocations being brought forward through the emerging SWLP Review) and the worsening landscape impacts as they further expand and grow in future years within rural countryside has been given no planning policy consideration whatsoever by Stratford-on-Avon and Warwick District Council’s Planning Policy Teams. This underlines the ongoing failure and continued incompetence being taken towards this sensitive and critically important planning policy topic matter within the emerging SWLP Review. The one-size-fits-all naïve Planning Policy approach to Local Plan-preparation is causing huge levels of damage within the local area.
- The sustainability implications of this huge scale of growth in new pitch numbers is highly concerning.
- We have concerns about the “incapable” management and leadership approach being taken towards Local Plan-preparation by the Council’s Planning Policy Team with regards to gypsy and traveller Planning Policy matters.
- The ‘level of scale of growth’ in new pitch numbers across the Districts being proposed is very concerning in terms of the impacts of this scale of growth on the District’s continued future tourism and historic environment offer, and potential for considerable adverse and damaging landscape impacts within areas of open heavily rural countryside, and areas of historic landscape.
- These proposals will have long standing damaging economic impacts on the local tourism industry within the Stratford-on-Avon District during the post-COVID-19 fragile local economic recovery, at a time when the local economy is facing one of the worst economic recessions of a scale and severity not experienced for the last 300 years. The level of harm that the Council’s Planning

Policy Teams policies on this matter is causing to local businesses which rely on tourism income is concerning.

- The potentially considerable, adverse and highly damaging impacts of this proposed scale of growth on the Local Plan areas local distinctiveness and unique character.
- Careful ongoing dialogue is required between the LPA and affected local communities within the South Warwickshire Region so this scale of growth in new pitch numbers can be more carefully considered with local communities in accordance with advice in paragraph 16 (indent c) of the Revised NPPF (2021).
- The impacts of this proposed scale of growth on existing sensitive small rural village settlements which lack the range of services, facilities and highway infrastructure necessary to accommodate this proposed scale of growth in new pitch numbers.
- The potentially huge, adverse and highly damaging residential amenity impacts on the existing settled community.
- The damaging landscape impacts on the District's heavily rural open countryside.
- This scale of growth in new pitch numbers does not appear to be sustainable in a heavily rural area, dominated by very small rural village settlements, within areas of remote countryside.
- In its current format and proposed planning policy approach, the position is perfectly clear, the emerging SWLP Issues and Options Stage Report (January 2023) is promoting inappropriate, damaging and unsustainable patterns of development within the local area, contrary to the above NPPF and DCLG guidance.
- Lockley Homes particularly objects to any proposals to encourage new Gypsy and Traveller and Travelling Showpeople sites within the western part of the Stratford-on-Avon District, within areas of remote and isolated heavily rural countryside, within the vicinity of the Village of Broom and Bidford-on-Avon small village settlements. Given this areas heavily rural character, this wider location should be fully removed and excluded from the new gypsy and traveller sites search zone within the emerging SAP and SWLP Local Plan Reviews.
- The Council's Planning Policy position and stance on this matter, is having a damaging impact on the local area. The LPA appears keen and determined to promote unsustainable patterns of development across the district within the emerging SAP and SWLP Local Plan Reviews.
- 'Sustainability principles' should underpin and form the planning policy backbone and should be at the heart of any site selection approach taken by the LPA in the both the emerging Local Plan Review (2022) and the Council's background technical evidence being used to support Local Plan Policy, such as the GTAA.
- More needs to be done to stop Stratford-on-Avon and Warwick District Council's Planning Policy Teams from causing huge levels of environmental damage within the South Warwickshire countryside by introducing significant

levels of inappropriate harmful urbanising gypsy and traveller development within areas of open countryside. Which will result in highly damaging and adverse impacts affecting the residential amenity of the existing settled community, as well as damage the area's tourism offer and sensitive historic rural landscapes.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 6 – Delivering homes that meet the needs of all our communities.</b>		
Question(s) and potential Options	Question Q-H7: Please add any comments you wish to make about delivering homes in South Warwickshire		
Page(s)	<b>117 to 118</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes strongly objects to the Council's proposals to bring forward small and medium-sized housing sites within the proposed Stage 2 SWLP, and not Stage 1. Stage 1 is proposing to bring forward only major strategic housing site allocations. In accordance with paragraph 69 of the Revised NPPF (2021), smaller housing site allocations (smaller and medium-sized land parcels) should be brought forward as a matter of urgency, not left for many years ahead within a Stage 2 SWLP.

Paragraph 69 of the Revised NPPF (2021) attaches importance to the urgent delivery of small and medium sized sites. It confirms that:

“...Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: (indent c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes...”

Lockley Homes maintains its view that new housing development sites coming forward within the South Warwickshire Region, within the most sustainable site locations, should be strongly encouraged and prioritised for new housing development first, before other less sustainable site locations are brought forward within the emerging Local Plan Review, and should be considered very favourably within the Local Plan Review process without unnecessary delay. In order to help meet the urgent housing needs of local communities within the South Warwickshire Region, and to help address continuing long-standing housing shortfalls present across the SWLP Local Plan area. This approach to Plan-preparation strongly accords with current Government policy which is now governed by a pro-growth National Planning Policy Framework, which gives a presumption in favour of sustainable development, and guidance in paragraph 60 of the Revised NPPF (2021), which emphasises the need

for LPA's to significantly boost the supply of new homes across the United Kingdom within the most sustainable site locations.

The need for LPA's to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews is reinforced within paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021). Competent Local Planning Authorities should already be aware of this NPPF guidance when preparing emerging Local Plan Reviews.

In accordance with guidance reinforced in paragraph 79 of the Revised NPPF (2021), Lockley Homes would suggest that the Council's preparing the emerging SWLP (2023) should consider the future housing-led growth and expansion needs of existing rural village settlements located across the South Warwickshire Region. This matter should be one of the key spatial planning policy priority areas for the emerging SWLP Local Plan Review to consider, as a matter of urgency, in order to help deliver a 'More Positively Prepared Local Plan,' and promote the most sustainable patterns of new housing development - consistent with guidance in paragraph 35 (indent a and d) of the Revised NPPF (2021), and to help the SWLP respond positively to requirements of paragraphs 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF discussed below.

Paragraph 79 of the Revised NPPF (2021) is perfectly clear in its view that:

“...To promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. **Planning policies should identify opportunities for villages to grow and thrive...**”

Paragraph 120 (indent d) of the Revised NPPF (2021) confirms that: “...Planning policies and decisions should: (indent d) promote and **support the development of under-utilised land** and buildings, especially **if this would help to meet identified needs for housing where land supply is constrained** and available sites could be used more effectively ...”

Paragraph 141 (indent a) of the Revised NPPF (2021) underlines the importance and expects LPA's to encourage the use of under-utilised land for new housing development. Such as low-quality green space areas and derelict and under-utilised former paddock land, located both within and bordering existing rural village settlements, in order to help promote the most sustainable site locations for new housing development. It emphasises that these highly sustainable site locations should be prioritised first for new housing development, before LPA's introduce changes to the Green Belt boundaries, and before LPA's identify sites for new housing development within the existing designated Green Belt countryside. This spatial planning policy approach to Local Plan-preparation is required in order to help protect the Green Belt countryside from development encroachment pressures, and to help promote sustainable patterns of development as stated above. It states that: “... Before concluding that exceptional circumstances exist to justify changes to Green

Belt boundaries, the strategic policy-making authority **should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.** This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: (indent a) makes as much use as possible of suitable brownfield sites **and under-utilised land...**”

Further support for the Lockley Homes site is provided by paragraph 142 of the Revised NPPF (2021), which confirms that: “...When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development **of channelling development towards** urban areas inside the Green Belt boundary, **towards** towns and **villages** inset within the Green Belt **or towards locations beyond the outer Green Belt boundary.** Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport...”

Highly sustainable infill site locations (within areas of under-utilised low quality green space (such as former paddock land), located outside of the designated Green Belt), which display strong physical connections to the existing village settlement core and main village High Street, characteristic of the Lockley Homes site (see robust and defensible photographic evidence in photographs 1 and 2 in Appendix B of this SWLP Representations Statement), should be prioritised first as a matter of urgency for new housing development. Before the LPA's preparing the emerging SWLP Review select unsustainable site locations for new housing development. Located within areas of open Green Belt countryside, in free-standing new housing settlements, located far away from existing rural village settlements, and far away from existing towns. Competent Local Planning Authorities should already be aware of above various NPPF guidance, and the need to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews.

We have ongoing concerns about Stratford-on-Avon District Council's Planning Policy Teams unwillingness, ongoing failure and continued refusal to wanting to promote the most sustainable patterns of new housing development across the Stratford-on-Avon District (such as the sustainably-located Lockley Homes site) within the emerging Local Plan Review. This highly obstructive planning policy approach, and ongoing failure and continued incompetence being taken towards Local Plan-preparation, means that the emerging SWLP Local Plan Review (2023), even at this very early stage in its Local Plan preparation, is already currently failing the 'Sustainability' test for Local Plan preparation tests of 'Soundness'. As set out within paragraph 35 (indent d) of the Revised NPPF (2021). The emerging SWLP Plan (2023), alongside its sister document Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP), are both therefore vulnerable to future Legal challenge at the later Examination in Public (EIP) stage. Given their continued failure and ongoing refusal to promote the most sustainable patterns of new housing development across the South Warwickshire Region.



As a key local stakeholder, we are just needing to highlight these critically important Local Plan 'Soundness' issues to try and help the Council's Planning Policy Team improve its approach to future Local Plan making.

For the reasons set out within this response, we have concerns about the "incapable" management and leadership approach being taken towards Local Plan preparation within the Stratford-on-Avon District

As stated above, we have particular concerns in relation to the Planning Policy approach being taken towards Local Plan preparation within Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) (2022/ 2023). Given that the Council throughout the various SAP Plan-preparation stages is continuing to overlook more sustainable site locations for new housing development, which are located outside of the existing designated Green Belt, and which have good strong physical connections to existing rural village settlement cores. Such as the sustainably-located Lockley Homes site – supported by robust and defensible photographic evidence in Appendix B of this SWLP Representations Statement.

Stratford-on-Avon District Council's Planning Policy Team is showing a very strong level of support and notably biased favouritism towards these significantly less sustainable site locations by prioritising the delivery of new housing development sites located in isolated and very peripheral farmland locations. Distantly located away from the main existing village settlement cores, in areas of distantly located farmland countryside, on the very outer fringes and periphery of existing rural village settlements. This incompetent approach being taken towards Local Plan preparation within the Stratford-on-Avon District is in direct conflict with paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021). Which all expect LPA's to promote the most sustainable patterns of new housing development when preparing Local Plan Reviews.

This underlines the ongoing failure and continued incompetence being taken towards Local Plan preparation within the Stratford-on-Avon District by the Council's Planning Policy Team. Our concerns on these issues are already covered in extensive detail within our earlier Representations to Stratford-on-Avon District Council's emerging SAP. It is important that these ongoing failings discussed above are now addressed within the emerging SWLP Review, and its remaining ongoing Plan-preparation stages.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7.1 – A climate resilient and Net Zero Carbon South Warwickshire. Issue C2: Decentralised energy systems.</b>		
Question(s) and potential Options	<p>Question Q-C2: Please select the option which is most appropriate for South Warwickshire.</p> <p>Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments</p>		
Page(s)	<b>121 to 129</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option C2a referred to above, with some reservations.

Whilst we support the principles behind the emerging policy approach and the need to incorporate climate change mitigation features within new buildings, incorporating these types of features can significantly increase the financial build costs for new build residential schemes, at a time when the house building construction industry is already experiencing an unprecedented rapid increase in both materials and labour costs. We would advise that a pre-cautionary policy approach is therefore taken by the LPA's in relation to this issue given the severe adverse set of economic circumstances now facing the Local Plan area as discussed below. The Council's proposed planning policy approach on these issues is far too onerous and will place a highly damaging financial burden on the house building development industry within South Warwickshire. This is supported by the issues discussed below.

Impacts of the global coronavirus (COVID-19) pandemic on Local Plan preparation within the UK

According to central Government (London) estimates released by the Chancellor of the Exchequer (the now Prime Minister and former Chancellor of the Exchequer Rishi Sunak) during his Autumn Budget and Spending Review to Parliament, on Wednesday, 27th October 2021, the global coronavirus (COVID-19) pandemic has caused one of the worst economic recessions to affect the United Kingdom economy of a scale and severity not experienced across the UK for the last 300 years. Causing unprecedented record levels of Government borrowing due to the huge decline in economic activity during the years 2020 and 2021 ongoing COVID-19 pandemic, and the pro-longed 15 months of continuous lock-down restrictions, and the previous sustained long-term shutdown of the UK economy during the years 2020 and 2021.

This severe and unprecedented long-term economic recession and the irresponsible handling of the public finances by central government (London) during the years 2020 to 2022 coronavirus pandemic, is highly likely to have long lasting implications in terms of a significant and long-term economic downturn. Causing one of the worst economic recessions in living memory across the South Warwickshire Region and the wider UK. Extending a long way into the shelf life of the Council's new SWLP period once the new Local Plan has been formally adopted.

This significant economic downturn driven by the various multiple adverse economic factors discussed above all coming together at the same time, is highly likely to harm the future financial viability and deliverability of many new housing development sites, resulting in some stalled housing sites, and some new housing sites not coming forward at all across the South Warwickshire Region. Due to the very challenging set of adverse economic circumstances discussed above.

In addition, the house building industry is currently experiencing a severe spike in the financial costs of both building materials and labour costs, due to rising inflation and rapidly rising energy costs. Given the above factors, the housing market across the UK is currently very fragile.

Consistent with our earlier substantial objections to the Council's SWLP 'Scoping and Call for Sites Report' (May 2021) (Regulation 18) public consultation, Lockley Homes continues to maintain its view that the potentially massive implications of this severe UK economic recession (which will extend across the shelf life of the new Local Plan once it has been formally adopted) on both future housing delivery and future employment land delivery across the emerging Local Plan area, and how the recession will adversely affect future new housing and employment land delivery within the South Warwickshire Region and wider West Midlands Region area going forward, over the lifespan of the new Local Plan Review, once it has been formally adopted, has all been given an insufficient level of material planning policy weight and planning policy consideration by Stratford-on-Avon and Warwick District Council's Planning Policy Teams when preparing both the emerging SWLP and SAP Local Plan Reviews. Or seemingly absolutely no planning policy weight at all – which is a highly alarming situation given the unprecedented severe adverse economic landscape now facing the local area for the reasons explained above.

Local Plan preparation has refused and substantially failed to respond effectively to guidance within paragraph 82 (indent d) of the Revised NPPF (2021). Notably, the emerging Plan has substantially failed to respond effectively to the rapidly changing set of severe adverse economic circumstances now facing the Local Plan area. This underlines the ongoing failure and continued incompetence being taken towards Local Plan preparation by the Council's within the South Warwickshire Region. To make things worse, the Council's are now proposing to produce two separate versions of the SWLP – a Stage 1 SWLP and Stage 2 SWLP, which will add a significant time delay to Local Plan preparation, and substantially delay new inward investment opportunities coming forward within the South Warwickshire Region. We are concerned about the level of economic harm and damage that the Council's proposed Plan making approach is causing to the local economy. We continue to object to the "incapable" management and leadership approach being taken towards Local Plan-preparation within the South Warwickshire Region, within both the SWLP (2023) and Stratford-on-Avon District Council's emerging Site Allocations Plan (SAP) (2023).

The presence of an unprecedented severe 300-year-economic-recession-event (driven largely by record levels of central government borrowing and weak economic growth during the years 2020 to 2022 coronavirus pandemic, and Russia's Spring 2022 invasion of Ukraine) now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council's Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).

#### The implications for all climate change policies coming forward within the SWLP (2023)

Given the above issues, it is important to ensure that a less financially onerous planning policy regime is placed on the housing building development industry going forward within the SWLP (2023) to help support the future financial viability of new housing development sites during the very fragile post-COVID-19 economic recovery.

#### The impact of the sharp increase in energy prices during Spring 2022

The impact of rising energy prices during Spring 2022 and the major increase in the energy price cap on the 1<sup>st</sup> April 2022, with an average United Kingdom (UK) household gas and electricity bill rising to £1,971 a year, and a further increase anticipated during October 2022, which could take the cost up to £3,300, means that the need for modern energy efficient housing with good quality insulation standards has never been more important.

The Spring 2022 price increase is driven by more demand on energy as worldwide economies gradually recover from the effects of the global coronavirus (COVID-19) pandemic, with supply unable to keep up with demand. Russia's Spring 2022 invasion of Ukraine has also exacerbated the issue, with some countries stopping or limiting their purchasing of Russia's oil and gas.

In conclusion therefore, these emerging new housing development proposals proposed for the Village of Broom settlement will play a key role in helping to deliver a much needed supply of modern, energy efficient housing for the local community, in a part of the rural area which is currently suffering from and dominated by poorly insulated, sub-standard historic mid-17<sup>th</sup> century housing (built from 1<sup>st</sup> January 1601 to the 31<sup>st</sup> December 1700) and 18<sup>th</sup> century housing (built from 1<sup>st</sup> January 1701 to 31<sup>st</sup> December 1800) located inside the Village of Broom Conservation Area. All these historic properties, which in some cases are now over 300-years-old, all lack cavity wall insulation and are all energy inefficient. These new modern energy efficient housing development proposals are therefore coming forward at an absolutely critical time for the local community when the local area is facing a rapid increase in energy prices. These new housing development proposals should therefore be strongly encouraged by the Local Planning Authority.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7 – A climate resilient and Net Zero Carbon South Warwickshire. Issue C2: Decentralised energy systems. Issue C3: Carbon Sequestration.</b>		
Question(s) and potential Options	Question Q-C3.3: Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire.		
Page(s)	<b>124</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Whilst we support the principles behind the emerging policy approach and the need to incorporate climate change mitigation features within new buildings, incorporating these types of features can significantly increase the financial build costs for new build residential schemes, at a time when the house building construction industry is already experiencing an unprecedented rapid increase in both materials and labour costs. We would advise that a pre-cautionary policy approach is therefore taken by the LPA's in relation to this issue given the severe adverse set of economic circumstances now facing the Local Plan area as already considered in our Representations Statement (2023). The Council's proposed planning policy approach on these issues is far too onerous and will place a highly damaging financial burden on the house building development industry within South Warwickshire.

The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council's Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).



**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7 – A climate resilient and Net Zero Carbon South Warwickshire. Issue C2: Decentralised energy systems. Issue C4: New Buildings.</b>		
Question(s) and potential Options	Question C4d – None of these.		
Page(s)	<b>127</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Question C4d.

Whilst we support the principles behind the emerging policy approach and the need to incorporate climate change mitigation features within new buildings, incorporating these types of features can significantly increase the financial build costs for new build residential schemes, at a time when the house building construction industry is already experiencing an unprecedented rapid increase in both materials and labour costs. We would advise that a pre-cautionary policy approach is therefore taken by the LPA's in relation to this issue given the severe adverse set of economic circumstances now facing the Local Plan area as already considered in our Representations Statement (2023). The Council's proposed planning policy approach on these issues is far too onerous and will place a highly damaging financial burden on the house building development industry within South Warwickshire.

The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council's Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7 – A climate resilient and Net Zero Carbon South Warwickshire. Issue C5: Existing Buildings.</b>		
Question(s) and potential Options	Question C5c – None of these.		
Page(s)	<b>128</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Question C5c.

Whilst we support the principles behind the emerging policy approach and the need to incorporate climate change mitigation features within new buildings, incorporating these types of features can significantly increase the financial build costs for new build residential schemes, at a time when the house building construction industry is already experiencing an unprecedented rapid increase in both materials and labour costs. We would advise that a pre-cautionary policy approach is therefore taken by the LPA's in relation to this issue given the severe adverse set of economic circumstances now facing the Local Plan area as already considered in our Representations Statement (2023). The Council's proposed planning policy approach on these issues is far too onerous and will place a highly damaging financial burden on the house building development industry within South Warwickshire.

The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider United Kingdom economy, should now result in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews. In order to ensure that the Council's Plan-making approach on these matters is sufficiently robust, and responds effectively to guidance reinforced within paragraphs 31 (policies need to be based on a platform of the most up-to-date and sufficiently robust evidence) and 82 (indent d) (policies should remain sufficiently flexible to rapidly changing economic circumstances) of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7 – A climate resilient and Net Zero Carbon South Warwickshire. Issue C7: Adapting to higher temperatures.</b>		
Question(s) and potential Options	Question C7c – None of these.		
Page(s)	<b>131</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Question C7c.

Whilst we support the principles behind the emerging policy approach and the need to incorporate climate change mitigation features within new buildings, incorporating these types of features can significantly increase the financial build costs for new build residential schemes, at a time when the house building construction industry is already experiencing an unprecedented rapid increase in both materials and labour costs. We would advise that a pre-cautionary policy approach is therefore taken by the LPA's in relation to this issue, to help the emerging Plan to respond effectively to paragraphs 31 and 82 (indent d) of the Revised NPPF (2021). These issues already considered in our wider SWLP Representations Statement (March 2023).

Lockley Homes is promoting a proposed new housing development site through the Council's emerging SWLP Review which is coming forward within a sustainably-located infill site, within an area of under-utilised land, which forms very low quality fully restricted public access green space. The Sustainability credentials of this site are already discussed in detail within this wider SWLP Representations Statement (March 2023).

The site in question is located within the Village of Broom settlement within the western part of the Stratford-on-Avon District, immediately bordering a vast, open prairie style, severely ecologically damaged and heavily eroded rural landscape.

Which has suffered from many years of successive intensive farming practices, which has resulted in the widespread removal of hedgerow networks over a number of years on a huge 'landscape-scale' across considerable areas of South Warwickshire open lowland countryside. It has also resulted in the blanket removal of mature veteran and

ancient deciduous trees across considerable expanses of countryside, due to the extensive hedgerow clearance works described above.

The severe shortage of existing tree cover due to blanket tree removal within large expanses of the farmland landscape to the north of the Lockley Homes proposal site is supported by robust and defensible up-to-date photographic evidence in Photograph 2 (Appendix B of this Representations Statement).

Lockley Homes is proposing to introduce new tree planting measures using suitable native tree species (see Appendix C of this Representations Statement) which would help to promote increased shade cover and promote natural cooling within the Village of Broom settlement. As well as provide habitats to support biodiversity. New tree planting is critical to help rural areas adapt to higher summer temperatures. Particularly those rural countryside locations which have suffered from the intensive farming practices described further above.

Given the very limited existing tree cover present within adjoining open countryside for reasons explained above, there is a considerable opportunity for a new future high-quality residential scheme coming forward for this site to introduce significant new tree planting measures within rear residential garden spaces and within on-site landscaping screening buffer strips, using suitable native tree species to help support biodiversity. This would help introduce increased cooling measures through new tree planting (tree canopy shade cover, and natural cooling through evapotranspiration), as well as deliver net gains for biodiversity within a severely ecologically damaged rural landscape. The inclusion of this site as a new housing site allocation on the main Policies Map of the Council's emerging SWLP Review would therefore be supported by Biodiversity Net Gain (BNG) focused guidance as set out in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021). The proposals would also be supported by climate change focused guidance set out within paragraphs 153 and 154 of the Revised NPPF (2021).

Paragraph 153 of the Revised NPPF (2021) is clear that: "... Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for ... biodiversity and landscapes, and the risk of overheating from rising temperatures..."

Given the above issues, the benefits of supporting new housing developments proposals coming forward within intensively farmed landscapes which are proposing to include new greening/ tree planting measures, should be given increased prominence within the SWLP proposed policy approach. These types of new housing development proposals should be strongly supported within the emerging SWLP Review (2023), given that they can play a crucial role in helping rural areas adapt to higher summer temperatures for the reasons explained above.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 7 – A climate resilient and Net Zero Carbon South Warwickshire.</b> Issue C9: Mitigating Biodiversity loss.		
Question(s) and potential Options	Question Q-C9.2. Please add any comments you wish to make about climate responsive development design in South Warwickshire		
Page(s)	<b>133</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes is a developer of very high-quality new luxury homes, and as a developer we take our environmental responsibility very seriously, and where opportunities exist, we are keen to support biodiversity where possible within our new-build residential development schemes.

Lockley Homes considers that it is possible to provide compensatory measures to help provide new wildlife habitat features/ habitat enhancements to help deliver net gains for biodiversity, within high quality new build residential schemes. Consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021).

Lockley Homes maintains its view that this is particularly possible and relevant when progressing new build housing development schemes coming forward on low-quality green space sites. Such as under-utilised, low-quality former horse grazing paddock land, and for site locations coming forward within areas of severely ecologically damaged open countryside. Which have suffered from considerable and constant ecological damage, as a direct result of years of uncontrolled mechanized industrial-scale intensive farming practices. Which has resulted in the widescale removal of features from the rural landscape, which would have previously provided important and highly beneficial wildlife habitats. For example, such as farmland wildlife ponds and other wetland habitat features, extensive hedgerow networks previously crossing large-expanses of farmland, removal of veteran and ancient trees within hedgerow networks due to widespread hedgerow destruction. Loss of wild flower hedgerow field margins, small woodland copses, wildflower meadows, etc. These issues are considered in further detail within Appendix C of this Representations Statement (2023).

Ecologically damaged areas of sterile monoculture intensive farmland, within open countryside locations, such as ecologically damaged pasture fields and arable farmland, in particular, provide an excellent example, and significant opportunity where beneficial wildlife habitats can be delivered. To help re-introduce threatened wildlife habitat features, that have already been lost at an alarming rate from the British lowland countryside - due to years of damaging intensive farming practices as discussed above. In our view, this can help to deliver significant nature conservation enhancements and compensatory measures, to help support Biodiversity Net Gain (BNG). By providing habitats to support populations of severely declining and threatened wildlife species - consistent with approach expected by paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021).

In our view, the focus should be on replacing those threatened wildlife habitat features that have suffered particular high levels of extensive decline, and are considered to be particularly endangered, and vulnerable within the British lowland countryside - due to intensive farming practices. Most notably, this involves the replacement and re-introduction of Priority Wildlife Habitats within the countryside (priority habitats are classed as particularly vulnerable and scarce).

A good example of a priority wildlife habitat type that has experienced significant rapid decline within South Warwickshire and the wider British lowland countryside, is farmland wildlife ponds. Therefore, the introduction of small wildlife garden ponds within new housing development site layouts, provides an excellent, robust and defensible example of a type of ecologically important, and significantly declining priority wildlife habitat feature, that can be easily replicated and incorporated into new residential site layouts. Within rear residential garden spaces and as part of small Sustainable Urban Drainage (SUDS) wetland ponds delivered in on-site natural green space landscaping buffer strips. Including these features has a particularly strong level of planning policy support when assessed against guidance in paragraph 179 (indent b) of the Revised NPPF (2021). Which confirms that plans should "...promote the conservation, restoration and enhancement of **priority habitats...**" Farmland wildlife ponds are now a priority habitat type given their increasing rarity and widespread decline within the British lowland countryside.

Lockley Homes are promoting a sustainably located potential new housing development site through the emerging SWLP (2023). The site in question is located within the northern edge of the Village of Broom settlement boundary, immediately north of Mill Lane. The site is located within the civil parish of Bidford-on-Avon, within the western part of the Stratford-on-Avon District.

The site in question is located on very low-quality green space (former paddock land), which has suffered from years of horse over-grazing, which has resulted in very poor and damaging grassland habitat management. The site subsequently has no nature conservation interest. On its northern site boundary, the proposal site immediately borders an area of 'severely depleted and heavily ecologically damaged' open countryside, which has suffered from years of uncontrolled intensive farming practices.

Which has resulted in the extensive loss of a wide range of wildlife habitat features from the adjacent rural farmland landscape. Including the removal of miles of hedgerow networks due to the expansion of arable farmland and pasture fields, loss of mature veteran trees from hedgerow networks due to widespread hedgerow destruction on a vast scale, loss of hedgerow field margins. The draining of farmland wildlife ponds and other wetland habitat features. Blanket tree removal across large expanses of countryside, etc.

The above issues are supported by robust, up-to-date and defensible photographic evidence in Photograph 2 within Appendix B of this Representations Statement document (2023). Particularly evident is the blanket removal of mature trees and hedgerow networks.

Given the above issues, and for the reasons explained above and in more detail within Appendix B of this Representations Statement, Lockley Homes considers that Issue C9: (Mitigating Biodiversity loss) should increasingly recognise the important role that high quality new residential development proposals can play in helping to support the policy objectives of Issue C9.

**Lockley Homes maintains its view that it has a sustainably located site suitable for new housing development located within an existing village settlement boundary. Given the very strong, clear and compelling sustainability credentials of the site as already evidenced in our Representations, we consider that this site (within the Village of Broom settlement boundary) should be prioritised for future development and included without delay as a new housing site allocation on the main Policies Map of the Council's emerging South Warwickshire Local Plan (SWLP).**

**Allocating this site for new housing development would help to meet the policy objectives of Issue C9: 'Mitigating Biodiversity Loss' for the reasons explained above and within Appendix B of this Representations Statement (2023).**

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>3 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 8 – A well-designed and beautiful South Warwickshire. Issue D2: Design Codes and design guides.</b>		
Question(s) and potential Options	Option D2d: None of these		
Page(s)	<b>140</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option D2d referred to above. There are some concerns given the challenges being faced by Local Planning Authorities who, in many cases, simply do not have the staff resources, and staff with the specialist technical skills needed to prepare Design Guides or codes for their areas.

At a time when Local Planning Authorities across the United Kingdom are struggling and significantly under-resourced, where some Council's Development Management and Planning Policy Teams are failing and over-stretched, due to 15 years of continual ongoing financial austerity measures being imposed by Central Government (London), since the year 2008. And at a time when Local Planning Authorities (LPA's) are facing significantly high workload pressures, with very limited staff resource levels, and notable significant and severe town planning skills shortages within Local Planning Authority both Development Management and Planning Policy Teams, we would advise that a pre-cautionary approach is taken in relation to this specific planning policy topic matter. It is clear that LPA's across the South Warwickshire Region, the wider West Midlands Region, and wider UK are currently under significant pressures for the various reasons highlighted above. Council's are also grappling with the problems of managing significant budget shortfalls, which is affecting resourcing levels within LPA Planning Departments. Combined with the shortages of competent skilled town planners, urban designers, and the shortages of in-house qualified architects. These resourcing constraints realistically will affect the ability of LPA's to successfully deliver Design Guides or codes for their areas.

Good quality housing developers bringing forward high quality residential schemes, such as Lockley Homes (as evidenced in the photographs at the back of this Representation Statement which show our recent development schemes) will always adopt high quality design standards from the early concept stage of development proposals. So the principles of good design are already established, so Design Guides and codes may not always be necessary, as these matters can be satisfactorily addressed through dialogue with LPA's at the pre-application advice stage. We also

make use of other evidence where available to influence our development schemes, such as adopted Conservation Area Character Appraisals (CACA) reports.

Finally, another key point is how LPA Planning Policy Teams within South Warwickshire will deliver effective methods of engagement with local residents in the preparation of Design Guides and codes. In practice, this may prove difficult for LPA's to achieve.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 8 – A well-designed and beautiful South Warwickshire. Issue D4: Safe and attractive streets and public spaces. 20-minute neighbourhoods.</b>		
Question(s) and potential Options	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? Yes   No   Don't Know  Q-D4.2: If no, please indicate why.		
Page(s)	<b>143</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Q-D4.2: - We have some concerns in terms of how easy it would be in practice to deliver and apply this policy concept within more remote rural parts of the South Warwickshire Districts countryside. Where existing small rural village settlements are surrounded by large expanses of open countryside. And also at a time when many small shops and other services within existing villages and larger centres are closing due to the challenging retail climate caused by the worsening cost-of-living-crisis, combined with rising inflation and rising energy prices. These issues are considered below.

What is a 20-minute in rural areas: At its simplest, a 20-minute neighbourhood would allow residents to meet the vast majority of their day-to-day needs, including shopping, leisure activities, schools, healthcare and access to green space within a 20-minute walk or cycle from their home. (Source: Savills, 2023)

Given the geography and scale of the South Warwickshire Region, with dispersed small rural village settlements, surrounded by large expanses of open countryside, it is unrealistic to expect rural areas to deliver all services to all people. It is far easier to apply the principle of a 20-minute neighbourhood within large cities (for example, the concept has already been applied successfully within other parts of the world such as Melbourne City Centre, Australia). Where there are a large range of services and facilities available within a short geographic distance to meet day-to-day community needs of city dwellers. It is abundantly clear and fairly obvious that the South Warwickshire Region is completely different from these large urban city centres where the 20-minute neighbourhood concept has been previously successfully tested and delivered.



However, within heavily rural districts (with small rural village settlements, with little or no services available) characteristic of South Warwickshire, it is likely to prove difficult to apply this policy area. Particularly in more isolated parts of the South Warwickshire Region, where small rural village settlements are surrounded by large expanses of open countryside.

It is also important that 20-minute neighbourhood policy approach concept is not used as a Development Management policy tool to harm and obstruct the future delivery of new housing development proposals coming forward across the SWLP area. Given the severe housing shortage and severe housing crisis present across all parts of the South Warwickshire Region, and the urgent need to boost the supply of new housing in accordance with paragraph 60 of the Revised NPPF (2021).

Finally, it is also important that the Council's preparing the emerging SWLP have confidence that they are taking forward a policy approach that is capable of being delivered within South Warwickshire Region, in accordance with guidance in paragraph 16 (indent b) of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 8 – A well-designed and beautiful South Warwickshire. Issue D5: Protecting and enhancing heritage assets.</b>		
Question(s) and potential Options	Q-D5: Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2? Yes   No   Don't Know		
Page(s)	<b>144</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select 'No' to Question-D5 referred to above.

On page 47 of the SWLP consultation report (January 2023), within the supporting background technical evidence base document titled "Heritage and Settlement Sensitivity Assessment", we have concerns that the Village of Broom settlement has been recognised as having high historic environment sensitivity. We have concerns about the findings and historic environment planning policy assumptions being made within this emerging background evidence base document, and would question whether it is sufficiently robust and fit for purpose to inform future ongoing Local Plan preparation work going forward within both the emerging SWLP (2023) and SAP (2023) Local Plan Reviews.

It is important that any heritage designations and any heritage assessments being used by Local Planning Authorities to inform future Local Plan preparation work are supported by a sufficiently robust and defensible platform of up-to-date evidence - consistent with guidance reinforced within paragraphs 31, 35 (indent b) and 192 of the Revised NPPF (2021).

Paragraph 192 (indent a) of the Revised NPPF (2021) is perfectly clear that: "...Local planning authorities should maintain or have access to a historic environment record. This should **contain up-to-date evidence about the historic environment** in their area and be used to: (indent a) assess the significance of heritage assets and the contribution they make to their environment..." Paragraph 31 of the Revised NPPF (2021) confirms that: "...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..."

In addition, heritage designations should not be viewed as a site constraint to prevent new development, given that high-quality new residential development schemes incorporating good quality architectural design features, and use of appropriate types and colours of building materials in external facing building facades (which remain sympathetic to preserving a proposal sites historic surroundings), can all help to improve the historic setting, appearance and character of both Statutory Listed Buildings (such as Grade II Listed buildings), and nearby Conservation Areas.

Historic environment focused guidance in the Revised NPPF (2021) positively encourages new development proposals which seek to enhance the character and setting of the historic environment. This is confirmed in paragraphs 190 (indent c) and 197 (indent c) of the Revised NPPF (2021), which both strongly encourage new development proposals which seek to "...make a positive contribution to local character and distinctiveness..."

As a key local stakeholder with a strong commitment and proven track record of bringing forward and delivering very high-quality new build residential schemes within the South Warwickshire countryside, and across the wider Midlands Region (see photographic evidence of the high-quality character of our new build residential schemes at the end of this Representations Statement).

We maintain our view that the presence of heritage designations should therefore not be viewed as a site constraint within any future Local Plan policy approach to prevent future new housing development sites from coming forward within the emerging Local Plan area. Our views on this issue are supported by the above NPPF guidance.

It is critically important that any future planning policy approach taken on this issue within the emerging Local Plan Review, has a positive and pro-active development approach towards supporting the needs of the private sector house building development industry. To ensure that a sufficiently robust Local Plan-making approach is taken by the LPA, reflecting the requirements of paragraphs 190 (indent c) and 197 (indent c) of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 8 – A well-designed and beautiful South Warwickshire. Issue D5: Protecting and enhancing heritage assets.</b>		
Question(s) and potential Options	Q-D6: Please add any comments you wish to make about a well-designed and beautiful South Warwickshire.		
Page(s)	<b>144</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

#### Question-D6 response:

On page 47 of the SWLP consultation report (January 2023), within the supporting background technical evidence base document titled “Heritage and Settlement Sensitivity Assessment”, we have concerns that the Village of Broom settlement has been recognised as having high historic environment sensitivity. We have concerns about the findings and historic environment planning policy assumptions being made within this emerging background evidence base document, and would question whether it is sufficiently robust and fit for purpose to inform future ongoing Local Plan preparation work going forward within both the emerging SWLP (2023) and SAP (2023) Local Plan Reviews.

It is important that any heritage designations and any heritage assessments being used by Local Planning Authorities to inform future Local Plan preparation work are supported by a sufficiently robust and defensible platform of up-to-date evidence - consistent with guidance reinforced within paragraphs 31, 35 (indent b) and 192 of the Revised NPPF (2021).

Paragraph 192 (indent a) of the Revised NPPF (2021) is perfectly clear that: “...Local planning authorities should maintain or have access to a historic environment record. This should **contain up-to-date evidence about the historic environment** in their area and be used to: (indent a) assess the significance of heritage assets and the contribution they make to their environment...” Paragraph 31 of the Revised NPPF (2021) confirms that: “...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence...”

In addition, heritage designations should not be viewed as a site constraint to prevent new development, given that high-quality new residential development schemes incorporating good quality architectural design features, and use of appropriate types

and colours of building materials in external facing building facades (which remain sympathetic to preserving a proposal sites historic surroundings), can all help to improve the historic setting, appearance and character of both Statutory Listed Buildings (such as Grade II Listed buildings), and nearby Conservation Areas.

Historic environment focused guidance in the Revised NPPF (2021) positively encourages new development proposals which seek to enhance the character and setting of the historic environment. This is confirmed in paragraphs 190 (indent c) and 197 (indent c) of the Revised NPPF (2021), which both strongly encourage new development proposals which seek to "...make a positive contribution to local character and distinctiveness..."

As a key local stakeholder with a strong commitment and proven track record of bringing forward and delivering very high-quality new build residential schemes within the South Warwickshire countryside, and across the wider Midlands Region (see photographic evidence of the high-quality character of our new build residential schemes at the end of this Representations Statement).

We maintain our view that the presence of heritage designations should therefore not be viewed as a site constraint within any future Local Plan policy approach to prevent future new housing development sites from coming forward within the emerging Local Plan area. Our views on this issue are supported by the above NPPF guidance.

It is critically important that any future planning policy approach taken on this issue within the emerging Local Plan Review, has a positive and pro-active development approach towards supporting the needs of the private sector house building development industry. To ensure that a sufficiently robust Local Plan-making approach it taken by the LPA, reflecting the requirements of paragraphs 190 (indent c) and 197 (indent c) of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
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**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>



Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 9 – A healthy, safe and inclusive South Warwickshire. Issue W2: Health Impact Assessments for major development.</b>		
Question(s) and potential Options	Option W2b: Do not include a policy on Health Impact Assessments.  Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.		
Page(s)	<b>147</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option W2b referred to above. Lockley Homes maintains its view that Health Impact Assessments (HIA's) should be required for major new housing development proposals. We would suggest a threshold of residential schemes over 2,000 residential units. Health Impact Assessments (HIA's) should only be required for large major strategic housing site allocations.

We also have concerns that many Council's do not have the required in-house technical skills and sufficient expertise to assess HIA's when they are submitted at the Development Management Planning Application submission stage. They are also likely to place a further layer of additional bureaucracy burden on already stretched Development Management Planning Officers, who are in many cases at many Local Planning Authorities across the UK, already struggling with individual officer planning application caseloads over 150 planning application per officer.

At a time when Local Planning Authorities across the United Kingdom are struggling and significantly under-resourced, where some Council's Development Management/ Planning Policy Teams are failing and over-stretched due to 15 years of continual ongoing financial austerity measures being imposed by Central Government (London) since the year 2008, and at a time when Local Planning Authorities are facing significantly high workload pressures, with very limited staff resource levels, and notable significant and severe town planning skills shortages within Local Planning Authority both Development Management and Planning Policy Teams, we would

advise that a pre-cautionary approach is taken in relation to the proposed use of Health Impact Assessments at the Development Management planning application stage within South Warwickshire.

It is also important to ensure that if Health Impact Assessments are used by the South Warwickshire District Council's, that they (the HIA's) provide measurable and meaningful outcomes/ measurable performance targets to establish periodically whether they are in fact working effectively to help deliver high quality development proposals across the SWLP area. To ensure that they do not just merely add a further layer of additional and unnecessary bureaucracy on the private sector development industry.

It is also important to ensure that Health Impact Assessments do not place an additional, onerous and unnecessary financial burden (in terms of additional background technical evidence reports required to support planning applications) on the private sector house building development industry. At a time when the house building sector is vulnerable and fragile due to the adverse economic climate facing the UK, for the reasons already explained within this wider Representations Statement (2023). The number of background specialist technical evidence base reports now required to enable the Registration of Planning Applications, even planning applications involving relatively modest small-scale development proposals, has significantly increased within the last 10 years across all LPA Development Management Teams. The above issues are therefore relevant as they cause a time delay in registration and additional financial costs for developers.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire. Issue B1: Areas of Restraint.</b>		
Question(s) and potential Options	Option B1b: Remove Areas of Restraint designations.  Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.		
Page(s)	<b>160</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option B1b referred to above.

It is critically important that the LPA's preparing the emerging SWLP promote the most sustainable patterns of new housing development in order to ensure that the emerging Local Plan Review satisfies the 'Sustainability' test of Soundness for Local Plan preparation, as set out within paragraph 35 (indent d) of the Revised NPPF (2021).

It is noted that the LPA's preparing the emerging SWLP have a severe shortage or urban brownfield land (previously developed land sites) to meet their required housing development needs during the shelf life of the new SWLP, extending up until the year 2050. Given that the Plan area is dominated by large expanses of heavily rural open countryside. The Council's will therefore have to rely on existing sustainably-located green space areas and areas of farmland located within the vicinity of existing village settlements, in order to meet their future development needs (NPPF para 79) – to help deal with the worsening chronic housing shortage present across all parts of the SWLP area.

In accordance with guidance in paragraphs 79, 141 (indent a) and 142 of the Revised NPPF (2021), the Council should be supportive of bringing forward areas of low quality, under-utilised green space land for new housing development. Particularly those green space/ under-utilised greenfield sites located outside of the designated Green Belt. This approach has strong support within the above NPPF guidance.

On this basis, a one-size-fits-all planning policy green space protection approach is not justified, is not acceptable, and is not a sufficiently robust policy approach to take within the emerging Local Plan Review. It is important that when drafting this open

space focused policy area, that highly experienced, specialist and competent green space town planners are used, to help deliver a sufficiently robust, balanced and flexible policy approach, which effectively responds to the requirements of the NPPF. In order to ensure that the development needs of the local area can be met within sustainable site locations, and in order to ensure that villages are allowed to grow and thrive, consistent with guidance in paragraph 79 of the Revised NPPF (2021). Those most sustainable site locations such as the Lockley Homes site should be strongly supported for new housing development by the LPA within the emerging Local Plan Review.

It is important that a highly obstructive planning policy approach towards green space protection is not taken, particularly for those low quality and under-utilised green space areas characteristic of the Lockley Homes site. This is critically important given the severe shortage of urban brownfield land sites present across the South Warwickshire Plan area. We have concerns that the Council's preparing the emerging SWLP consider that it is appropriate to promote new housing development sites within the open Green Belt countryside, and ignore completely sustainable site locations such as the Lockley Homes sites. The scale of potential errors being accommodated into evidence base documents by completely overlooking and missing out sustainable development locations is quite alarming. For the scale of potential errors being incorporated into Local Plan preparation please refer to the large infill site located outside the Green Belt which has been overlooked by the LPA's in their Plan-preparation work. This underlines the ongoing failure and continued incompetence being taken towards Local Plan preparation within the emerging SWLP Review.

**Both Lockley Homes and their planning consultant Goldfinch Town Planning Services, continue to object to the "incapable" management and leadership approach being taken towards Local Plan-preparation within the emerging SWLP Review (2023). It is important that the ongoing failure to promote the most sustainable patterns of new housing development across the South Warwickshire districts is urgently addressed by the LPA's Planning Policy Teams within the emerging SWLP Review.**

Lockley Homes maintains its view that it has a sustainably located site suitable for new housing development located within an existing village settlement boundary. Given the very strong, clear and compelling sustainability credentials of the site as already evidenced in our Representations, we consider that this site (within the Village of Broom settlement boundary) should be prioritised for future development and included without delay as a new housing site allocation on the main Policies Map of the Council's emerging SWLP.

We consider that allocating this site for new housing development in the Council's emerging SWLP as suggested would result in a more effective, positively prepared and justified plan, in accordance with tests of Soundness set out in paragraph 35 of the Revised NPPF (2021).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire. Issue B5: Environmental Net Gain.</b>		
Question(s) and potential Options	<b>Option B5c: None of these.</b>		
Page(s)	<b>168</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select Option B5c referred to above. Including carbon capture policies and integrating these with Biodiversity Net Gain will place an unreasonable financial burden on the house building development industry at a time when the local economy is suffering from a severe economic recession. Placing an onerous set of policy restrictions on housing developers will have an adverse impact on the future financial viability of development sites coming forward across South Warwickshire. These issues are considered in more detail within this wider Representations Statement (2023).

The proposed planning policy approach of combining Biodiversity Net Gain (BNG) with a Carbon Capture Policy, will significantly dilute and weaken the delivery of robust and significant BNG features within new development proposals, therefore conflicting with the BNG focused policy objectives set out within paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021). Making the BNG component part of the policy undeliverable, therefore conflicting with 'deliverability policy tests' set out in paragraphs 16 (indent b) and 35 (indent c) of the Revised NPPF (2021).

Lockley Homes maintains its view that it has a sustainably located site suitable for new housing development located within an existing village settlement boundary. Given the very strong, clear and compelling sustainability credentials of the site as already evidenced in our Representations, we consider that this site (within the Village of Broom settlement boundary) should be prioritised for future development and included without delay as a new housing site allocation on the main Policies Map of the Council's emerging SWLP (2023). We are proposing to include a number of on-site biodiversity enhancement features within the site layout if this site came forward through the Council's emerging SWLP Review. These issues are considered in Appendix C of this Representations Statement (2023).

Allocating this site for new housing development would therefore help to meet the policy objectives of Issue B5: 'Environmental Net Gain.' This site should therefore be strongly supported by the LPA within the emerging Local Plan Review as a potential new housing site allocation.



**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

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Name	KARL LOCKLEY
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Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire. Issue B6: Wildbelt designations.</b>		
Question(s) and potential Options	Q-B6: Should the South Warwickshire Local Plan introduce Wildbelt designations? Yes   No   Don't Know.  Designate areas of Wildbelt across the Local Plan Area to support nature's recovery and the Wildlife Trust's goal to have 30% of our land and sea managed for nature by 2030.		
Page(s)	<b>168 to 169</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select 'No' to Question B6 referred to above. We maintain our view that areas of low-quality green space and areas of intensive farmland should not be designated as Wildbelt designations, if there is no robust, credible and up-to-date ecological survey evidence in place to support such designations. Otherwise the designations could be challenged by the private sector at future Planning Appeals as well as during the Local Plan forthcoming Examination in Public (EIP) Stage. Only those green space locations with sufficiently robust and demonstrable ecological value should be designated and form part of any Wildbelt designations. This approach is supported by guidance reinforced in paragraph 31 of the Revised NPPF (2021) which states that: "...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..."

It is also noted that huge areas of rural lowland countryside within the Stratford-on-Avon District have already been significantly damaged by years of successive intensive farming practices. **Stratford-on-Avon District Council's Planning Policy Team "appears to have been fully asleep at the steering wheel" while these damaging landscape changes have been taking place across the countryside, where little, or no action has been taken by the Council's Planning Policy Team,** despite the removal of huge sections of hedgerow networks within the rural countryside, the removal of veteran and ancient trees from hedgerow networks, draining of farmland wildlife ponds, etc.

The severe impacts of damage caused by intensive farming practices on farmland wildlife habitats is particularly evident within the open farmland landscape located immediately north of the Lockley Homes proposals site, on the northern edge of the

Village of Broom settlement. This aspect is supported by robust and defensible photographic evidence in Appendix B of this SWLP Representations Statement (2023).

To help deliver net gains for biodiversity and respond positively to guidance within paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021), the Council's preparing the emerging SWLP Review should be far more pro-active in supporting new housing development proposals coming forward within areas of intensively farmed countryside, particularly where new housing development proposals are delivering Biodiversity Net Gain (BNG) solutions to help support declining wildlife species.

Lockley Homes position on this issue is also strongly supported by guidance within the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (BAP), which is strongly supportive of new housing development proposals which include measures which actively seek to support the recovery of vulnerable populations of Priority Wildlife Species and the recovery of priority wildlife habitats across the South Warwickshire countryside.

These issues are explored in considerable detail within Appendix C of this SWLP Representations Statement (2023).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire. Issue B8: Agricultural Land</b>		
Question(s) and potential Options	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		
Page(s)	<b>170 to 171</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Lockley Homes would select 'No' to Question B8-1 referred to above. There may be areas of the best and most versatile agricultural land present on the edges of existing rural village settlements within the South Warwickshire countryside. However, greenfield sites within these areas should not necessarily be safeguarded within the SWLP (2023) given that they represent highly sustainable site locations for new housing development. This is particularly the case for areas of '*greenfield*' land located outside of the designated Green Belt. In accordance with guidance within paragraphs 79, 141 (indent a) and 142 of the Revised NPPF (2021), these types of locations on the edges of existing rural village settlements should be prioritised for new housing development.

Areas of low quality and under-utilised green space land such as the Lockley Homes site (which is located outside of the designated Green Belt) within the existing Village of Broom settlement boundary should be particularly prioritised for new housing development, without delay on an urgent basis. Given the very strong, clear and compelling sustainability credentials of the site in question as already evidenced in our Representations (March 2023), we consider that this site should be prioritised for future development and included without delay as new housing site allocation on the main Policies Map of the Council's emerging South Warwickshire Local Plan (SWLP).

These types of medium scale-sized land parcels should not be left for a Stage 2 SWLP to consider in future years, but should be considered as an urgent priority now, and brought forward for new housing within the emerging SWLP (2023). Our position on this issue has a strong level of planning policy support within the above NPPF guidance. In particular, within paragraph 79 of the Revised NPPF (2021) which is

perfectly clear that: "...To promote sustainable development in rural areas, housing should be located where it would enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive..."

Further support is provided in paragraph 69 of the Revised NPPF (2021) which attaches considerable planning policy weight to the importance of small and medium sized site land parcels. It states that: "...Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly..."

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

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Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire. Issue B8: Agricultural Land.</b>		
Question(s) and potential Options	Q-B8.2: When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?		
Page(s)	<b>170 to 171</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Q-B8.2 - Paragraph 79 of the Revised NPPF (2021) states that: "...To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby..."

Responding to question B8.2, in accordance with the above NPPF guidance, Lockley Homes would suggest that the Council's emerging SWLP (2023) should prioritise the future housing-led growth and sustainable expansion needs of existing rural village settlements located across the South Warwickshire countryside. This matter should be one of the key spatial planning policy priority areas for the emerging SWLP Review to consider, in order to help deliver a 'More Positively Prepared Local Plan,' and to allow the Plan to promote the most sustainable patterns of development - consistent with the 'Sustainability' tests of Soundness for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021).

Proposed housing sites such as the Lockley Homes site located within the Village of Broom settlement should be brought forward for new housing development in the SWLP (2023) as a matter of urgency, not left for consideration within a future Stage 2/ version 2 of the SWLP in many years from now.

We have concerns that the SWLP and its accompanying Sustainability Appraisal (SA) are both not currently promoting the most sustainable patterns of new housing development, and the approach to Plan-making is therefore failing the 'Sustainability' tests of Soundness for Local Plan preparation as reinforced within paragraph 35 (indent d) of the Revised NPPF (2021).



**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 11 – A biodiverse and environmentally resilient South Warwickshire.</b>		
Question(s) and potential Options	<p>Q-B9: Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites. Yes   No   Don't Know.</p> <p>Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non-designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.</p> <p>Q-B10: Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire.</p>		
Page(s)	<b>173</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Question B9 - Lockley Homes would select 'No' to Question B9 referred to above. It is important that there is a sufficiently robust and defensible platform of ecological evidence to support and justify any site-based nature conservation designations. Use of non-designated sites would not provide a sufficiently robust approach and could potentially be vulnerable to challenge at future Planning Appeals and challenge at the future SWLP Review Examination in Public (EIP) stage.

Question B10 - Lockley Homes maintains its view that new housing development sites coming forward within well-integrated infill site locations immediately alongside existing rural village settlements, within areas of intensive farmland should be supported for new housing development within the emerging SWLP for reasons

already set out within this Representations Statement (2023). The emerging Local Plan Review should have a much more supportive and pro-active planning policy approach towards supporting new housing development proposals coming forward near to areas of intensive farmland in circumstances where meaningful Biodiversity Net Gain (BNG) features are being delivered within the new housing development site layouts. These aspects are covered in further detail within Appendix C of this Representations Statement (2023).

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

Name	KARL LOCKLEY
Job title	DIRECTOR
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**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 12 – Plan content</b>		
Question(s) and potential Options	Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan? Yes   No   Don't Know.  Q-P1.2: If no, please indicate why.		
Page(s)	<b>174 to 177</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Question P1.1 - Lockley Homes would select 'No' to Question P1.1 referred to above. Producing two separate Local Plans – Parts 1 and 2 will add significant confusion and a major time delay to the Local Plan making process. This will cause significant uncertainty for housing developers, rural landowners, local businesses, local communities and other key stakeholders. Our concerns about the Council's proposed Plan-making approach are set out below.

Page 174 (Chapter 12) of the SWLP (January 2023) states that: "...The South Warwickshire Local Plan will be divided into two parts. Part 1 would be a single document, while Part 2 could consist of multiple documents. Neighbourhood Development Plans would form part of the wider Development Plan for South Warwickshire, but would not fall within either Part 1 or Part 2...."

Lockley Homes strongly objects to the Council's proposed Local Plan-making approach of producing a Stage 1 and Stage 2 (Parts 1 and 2) of the SWLP. This will just add a significant confusion to the Plan-making process, and will result in a significant time delay to Local Plan delivery across the South Warwickshire Region. At a time when the local economy is facing such considerable economic uncertainty. This does not bode well for the delivery of a certain and clear planning policy framework going forward across the South Warwickshire area.

Page 174 of the SWLP (January 2023) states that 'smaller and non-strategic housing site allocations' will be brought forward under Part 2 of the Local Plan. In response, Lockley Homes considers that placing small-scale and medium scale housing sites within a Stage 2 SWLP is completely unacceptable situation. This proposed planning policy approach is in direct conflict with paragraphs 60 and 69 of the Revised NPPF (2021). Paragraph 69 of the Revised NPPF places considerable importance on small

and medium-sized housing sites and their important contribution towards meeting the housing requirement of an area, and the fact that these sites are often built-out relatively quickly to help meet the urgent housing needs.

These important small and medium-sized housing sites should be brought forward as a matter of urgency within the emerging SWLP at the very front of the Local Plan period, in order to help boost the supply of new homes, consistent with paragraph 60 of the Revised NPPF (2021). These types of small housing sites have a key role to play in helping to deliver a much-needed supply of new homes to help tackle long-standing housing shortfalls present across the South Warwickshire Region.

Relying on large Strategic Housing Sites to support the front of the Local Plan period (Stage 1/ Part 1) also has considerable risks, given that the local area is currently facing significant economic pressures/ the local area is facing a 300-year-economic-recession-event, and severe volatility in the residential mortgages market due to rising inflation. This approach to Plan making may not therefore be deliverable and would fail deliverability tests set out in paragraphs 16 (indent b) and 35 (indent c) of the Revised NPPF (2021). This would affect the 'Soundness' of the overall proposed Plan-making approach, given that the Local Plan could be challenged against the above NPPF guidance.

We suspect that the Councils preparing the emerging SWLP are already aware that they are taking forward an unsound Plan-making approach that fails tests of Soundness in paragraph 35 (indent d) of the Revised NPPF (2021) – given the Plans continual ongoing failure and continued refusal to promote the most sustainable patterns of new housing development within the South Warwickshire Region. This is supported by evidence given the highly obstructive planning policy approach being taken against the Lockley Homes site within the Village of Broom settlement. Which represents a highly sustainable site location for new housing. Moving smaller and medium sized sites to some time in the distant future to be considered within a SWLP Stage 2/ Part 2 Plan version, is therefore helping the Council's avoid the issue of why the Council's are still refusing to promote the most sustainable patterns of new housing development coming forward within the South Warwickshire Districts. We find this highly obstructive approach being taken towards Local Plan preparation very concerning.

The Council's Planning Policy Teams stance on these issues is in direct conflict with paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for Local Planning Authorities (LPA's) to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews. Competent LPA's should already be aware of this NPPF guidance and its critical importance to Local Plan-making.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

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Name	KARL LOCKLEY
Job title	DIRECTOR
Organisation	LOCKLEY HOMES

**Agent (if applicable)**

Name	ROBIN WHITEHOUSE
Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 12 – Plan content</b>		
Question(s) and potential Options	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.		
Page(s)	<b>176 to 177</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Questions P1.3 and Q-P1 4: - Lockley Homes would select 'No' to Question P1.1 referred to above. Producing two separate Local Plans – Parts 1 and 2 will add significant confusion and a major time delay to the Local Plan making process. This will cause significant uncertainty for housing developers, rural landowners, local businesses, local communities and other key stakeholders. Our concerns about the Council's proposed Plan-making approach are set out below.

Page 174 (Chapter 12) of the SWLP (January 2023) states that: "...The South Warwickshire Local Plan will be divided into two parts. Part 1 would be a single document, while Part 2 could consist of multiple documents. Neighbourhood Development Plans would form part of the wider Development Plan for South Warwickshire, but would not fall within either Part 1 or Part 2...."

Lockley Homes strongly objects to the Council's proposed Local Plan-making approach of producing a Stage 1 and Stage 2 (Parts 1 and 2) of the SWLP. This will just add a significant confusion to the Plan-making process, and will result in a significant time delay to Local Plan delivery across the South Warwickshire Region. At a time when the local economy is facing such considerable economic uncertainty. This does not bode well for the delivery of a certain and clear planning policy framework going forward across the South Warwickshire area.

Page 174 of the SWLP (January 2023) states that 'smaller and non-strategic housing site allocations' will be brought forward under Part 2 of the Local Plan. In response, Lockley Homes considers that placing small-scale and medium scale housing sites within a Stage 2 SWLP is completely unacceptable situation. This proposed planning policy approach is in direct conflict with paragraphs 60 and 69 of the Revised NPPF (2021). Paragraph 69 of the Revised NPPF places considerable importance on small and medium-sized housing sites and their important contribution towards meeting the

**120**



housing requirement of an area, and the fact that these sites are often built-out relatively quickly to help meet the urgent housing needs.

These important small and medium-sized housing sites should be brought forward as a matter of urgency within the emerging SWLP at the very front of the Local Plan period, in order to help boost the supply of new homes, consistent with paragraph 60 of the Revised NPPF (2021). These types of small housing sites have a key role to play in helping to deliver a much-needed supply of new homes to help tackle long-standing housing shortfalls present across the South Warwickshire Region.

Relying on large Strategic Housing Sites to support the front of the Local Plan period (Stage 1/ Part 1) also has considerable risks, given that the local area is currently facing significant economic pressures/ the local area is facing a 300-year-economic-recession-event, and severe volatility in the residential mortgages market due to rising inflation. This approach to Plan making may not therefore be deliverable and would fail deliverability tests set out in paragraphs 16 (indent b) and 35 (indent c) of the Revised NPPF (2021). This would affect the 'Soundness' of the overall proposed Plan-making approach, given that the Local Plan could be challenged against the above NPPF guidance.

We suspect that the Councils preparing the emerging SWLP are already aware that they are taking forward an unsound Plan-making approach that fails tests of Soundness in paragraph 35 (indent d) of the Revised NPPF (2021) – given the Plans continual ongoing failure and continued refusal to promote the most sustainable patterns of new housing development within the South Warwickshire Region. This is supported by evidence given the highly obstructive planning policy approach being taken against the Lockley Homes site within the Village of Broom settlement. Which represents a highly sustainable site location for new housing. Moving smaller and medium sized sites to sometime in the distant future to be considered within a SWLP Stage 2/ Part 2 Plan version, is therefore helping the Council's avoid the issue of why the Council's are still refusing to promote the most sustainable patterns of new housing development coming forward within the South Warwickshire Districts. We find this highly obstructive approach being taken towards Local Plan preparation very concerning.

The Council's Planning Policy Teams stance on these issues is in direct conflict with paragraphs 7, 8, 10, 11 (indent a), 35 (indent d), 38, 79, 120 (indent d), 141 (indent a) and 142 of the Revised NPPF (2021) – which all reinforce the need for Local Planning Authorities (LPA's) to promote the most sustainable patterns of new housing development when preparing emerging Local Plan Reviews. Competent LPA's should already be aware of this NPPF guidance and its critical importance to Local Plan-making.

**Representations by Lockley Homes to Stratford-on-Avon and Warwick District Council's emerging South Warwickshire Local Plan (SWLP) 'Issues and Options Stage Report' (Regulation 18) (January 2023) public consultation.**

**Person(s) or Organisation Submitting Comments**

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Organisation	GOLDFINCH TOWN PLANNING SERVICES (WEST MIDLANDS)  ALL REPRESENTATIONS BEING SUBMITTED ON BEHALF OF LOCKLEY HOMES
Date	<b>6 March 2023</b>

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 12 – Plan content</b>		
Question(s) and potential Options	Proposed 35% Affordable Housing planning policy threshold.		
Page(s)	<b>181</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

Page 181 (Policy CS.19 – Housing Mix and Type) states that: “...Affordable Housing requirements and thresholds dependent on location. Requirement for 35% requirements relating to on-site provision, affordability and tenure, on-site integration and delivery...”

#### Lockley Homes response:

Lockley Homes maintains its view that there has been a huge, substantial, unprecedented and significant recent material change, and a huge and rapid shift in highly damaging adverse economic circumstances now facing the South Warwickshire Region and the wider United Kingdom, due to the presence of the ongoing global coronavirus pandemic (COVID-19), economic uncertainty caused by Russia’s Spring 2022 invasion of Ukraine, and the subsequent severe and unprecedented economic downturn. Which is anticipated to cause one of the worst economic recessions in the UK in living memory since records began. The severity of the forthcoming recession is now acknowledged by central Government (London), who accept that the COVID-19 pandemic has caused one of the worst economic recessions within the UK not seen for the last 300 years. This is highly significant, and should now result in an urgent re-shaping of affordable housing, Community Infrastructure Levy (CIL), planning obligations, and infrastructure policies within the Council’s emerging Local Plan Review.

The Council’s preparing the emerging SWLP and its sister document Stratford-on-Avon District Council’s emerging Site Allocations Plan (SAP) now need to begin to finally accept that their highly onerous planning policy position on these policy issues now needs to change to help support the highly fragile local economic recovery, and help support the house building development industry at a time when they are bringing forward sites under an incredibly challenging economic climate, which will affect the

financial viability of many housing schemes. A highly onerous affordable housing and CIL/ planning obligations/ infrastructure demands approach therefore needs to be avoided within the emerging Local Plan Reviews referred to above.

**The worst global health pandemic event to affect the UK for the last 100 years, combined with the presence of one of the most severe economic recessions for the last 300 years**, should now result in a more supportive Development Management and Planning Policy approach being taken (to support the interests of the private sector development industry and rural landowners) by the LPA within the emerging SAP and SWLP in relation to unreasonable and highly onerous affordable housing planning policy requirements, Community Infrastructure Levy (CIL) planning policy requirements, and other infrastructure demands/ planning policy requirements being placed on the house building development industry, the local business community and rural landowners looking to bring forward sustainably-located new housing development sites. In order to help support the future financial viability of new housing development schemes coming forward across the district at an incredibly challenging time, and to help support the fragile local economic recovery across the district.

This approach would be consistent with Government guidance reinforced in paragraph 82 (indent d) of the Revised NPPF (2021) which confirms that: "...Planning policies **should** (indent d) **be flexible** enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices..., and **to enable a rapid response to changes in economic circumstances...**"

The rapid change in economic circumstances as described above now facing the South Warwickshire Region Local Plan area (which has had a huge and devastating impact on the local economy) should now therefore be carefully shaped into the Plan-making approach being taken by the District Council's going forwards within both the emerging SAP and SWLP Local Plan Reviews, and their policy formulation. To ensure that the plan-making approach taken within the emerging Local Plan Reviews is based on a platform of sufficiently robust and up-to-date evidence, is deliverable, and responds effectively to the rapid change in severe adverse economic circumstances now facing the local area, consistent with guidance reinforced within paragraphs 31, 35 (indent b) and 82 (indent d) of the Revised NPPF (2021).

The severe and unprecedented global coronavirus (COVID-19) pandemic, and the continued 15 months of pro-longed lockdown restrictions across the UK during the years 2020 and 2021, has highlighted and placed into very sharp focus the continued relevance and importance of the need for LPA's to build-in sufficient planning policy flexibility when they are drafting policies within emerging Local Plan Reviews, for the reasons clearly set out above.

These 'pandemic-related factors' are of critical importance and should now therefore be carefully shaped into and form part of the planning balance when preparing the Council's emerging SAP and SWLP Local Plan Reviews as the Plans move forward to their next stage of Local Plan preparation.

The evidence is perfectly clear, all of the above ‘pandemic-related’ factors appear to have been given no planning policy consideration and material planning weight whatsoever by the LPA’s when preparing the Council’s emerging Site Allocations Plan (SAP) and emerging South Warwickshire Local Plan (SWLP). We have concerns about this ongoing failure being taken towards Local Plan preparation by the Council’s Planning Policy Teams, who after all, are supposed to be experts in Local Plan preparation.

In particular, we consider that any new policies contained within the new emerging SWLP covering policy areas such as affordable housing policy, will need to be substantially revised and current planning policy affordable housing threshold levels substantially reduced, to help ensure that the future financial viability of new residential development schemes coming forward across the South Warwickshire Region is not adversely affected and site viability severely harmed.

**The affordable housing planning policy origins and foundations are sitting on top of a huge mountain of unsustainable and insufficiently robust evidence, given that the affordable housing policy is being directly carried over from the existing Stratford-on-Avon District Council’s existing adopted Core Strategy (adopted July 2016), which is forged, set and fixed on highly questionable, insufficiently robust, heavily out-of-date pre-COVID-19 economic data. This Core Strategy (adopted July 2016) no longer has any planning policy credibility to dictate the 35% affordable housing policy trigger threshold, and to carry this over and force-it-through into the emerging SWLP (2023). The Council’s planning policy on these issues is no longer defensible and fails clear tests in paragraph 31 of the Revised NPPF (2021) which reinforces that: “...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence...”**

The evidence would seemingly suggest that the Council’s evidence base on these issues is unsound, and no longer fit for purpose to inform future Plan preparation work going forward within the emerging SAP and SWLP Local Plan Reviews.

**The Council’s preparing the emerging SAP and SWLP Local Plan Reviews now need to face the reality of the new economic situation, and start to begin to finally accept that times have now significantly changed and moved on since the year 2016 Stratford-on-Avon District Core Strategy was adopted.**

**We would suggest that a 5% affordable housing planning policy threshold going forward within the emerging SWLP Local Plan Review (2023) would be more appropriate given the massive long-term shift in the adverse economic conditions now facing the Local Plan area as described in detail above.**

Similar to affordable housing, the same issues equally apply to LPA Community Infrastructure Levy (CIL) excessive, onerous and highly damaging planning policy requirements and unreasonable planning policy demands. The existing planning policy evidence base that underpins and provides the current planning policy platform and policy foundations to support the current CIL planning policy regime across the

South Warwickshire Local Plan Review area, now lacks any kind of planning policy credibility given that its policy assumptions are now based on a heavily out-of-date and unsound set of economic circumstances.

The existing planning policy approach therefore places an unreasonable, highly damaging, excessive and onerous financial burden on the house building development industry, due to wholly unreasonable and heavily out-of-date CIL planning policy requirements. The existing planning policy approach and unreasonable policy regime therefore needs to be urgently revisited and heavily revised within the emerging SWLP Local Plan Review, and more appropriately shaped towards reflecting the heavily adjusted set of long-term adverse economic circumstances now facing the Local Plan area as described above.

**The presence of an unprecedented severe 300-year-economic-recession-event now facing the South Warwickshire Region and wider UK economy should now play a prominent role in an urgent and major re-shaping of all Policies coming forward within the emerging SWLP and SAP Local Plan Reviews, in particular, those policies covering affordable housing, CIL, planning obligations, infrastructure planning policy requirements, etc. In order to ensure that the Council's planning policy Plan-making approach on these matters is sufficiently robust and responds effectively to NPPF guidance referred to within this response.**

The approach described above, would correspond well to guidance in paragraph 31 of the Revised NPPF (2021) which is perfectly clear that: "...The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..." As well as by guidance in paragraph 82 (indent d) of the Revised NPPF (2021) referred to further above

**These critically important 'pandemic-related factors' described above therefore require critical consideration by Stratford-on-Avon and Warwick District Council's Planning Policy Teams as part of their ongoing Plan-preparation work going forwards. To ensure that the Council's planning policy approach is sufficiently robust, based on a platform of credible and fit-for-purpose evidence, and responds effectively to guidance in paragraphs 31, 35 (indents b and c) and 82 (indent d) of the Revised NPPF (2021).**

Please specify which part of the Plan you are commenting on			
Section/ Issue/ Policy/ Proposal.	<b>Chapter 6 – Delivering homes that meet the needs of all our communities. Issue H6: Pitches and Plots for gypsies, travellers and travelling showpeople.</b>		
Question(s) and potential Options	Gypsy and traveller and travelling showpeople focused Questions Q-H6; Q-H6b; Q-H6c		
Page(s)	<b>117 to 118</b>	Paragraph(s)	
Do you support		Or Object	<b>X</b>
Please provide your comments and other reasons below			

We neither agree with or support any of the proposed emerging Options on pages 117 and 118 of the SWLP (2023). Consistent with our earlier representations to the SWLP Draft 'Scoping and Call for Sites Report' (May 2021) (Regulation 18) public consultation, we have concerns about the proposed planning policy approach being taken towards gypsy and travellers and travelling showpeople accommodation needs within the South Warwickshire Region within the emerging SWLP (2023).

We consider that Stratford-on-Avon and Warwick District Council's proposed planning policy approach being taken forward within the emerging SWLP (Regulation 18) (January 2023) on this issue conflicts with the following guidance:

- Paragraphs 7, 8, 10, 11 (indent a), 16 (indent a) and 35 (indent d) of the Revised NPPF (July 2021) - which all reinforce the need for Local Planning Authorities to promote the most sustainable patterns of development when preparing emerging Local Plan Reviews.
- The scattered distribution of gypsy and traveller sites across a large area (including areas of open countryside) is promoting heavily unsustainable patterns of development, contrary to the above NPPF guidance.
- The sustainability implications of this scale of growth in new pitch numbers is concerning.
- Paragraphs 4 (indent k), 10 (indent e), 13 and 23 of the DCLG 'Planning policy for traveller sites' (August 2015).
- The 'level of scale of growth' in new pitch numbers across the South Warwickshire countryside being proposed within the emerging SWLP is very concerning in terms of the impacts of this scale of growth on the district's historic rural landscapes, areas of natural green space, environment offer, and potential

for considerable adverse and damaging landscape impacts within areas of open heavily rural countryside.

- The damage to the areas local economy, such as the tourism industry.
- The potentially considerable, adverse and damaging impacts of this proposed scale of growth on the Local Plan areas local distinctiveness and unique character, and sensitive rural landscapes.
- We have concerns about the “incapable” management and leadership approach being taken towards Local Plan-preparation with regards to gypsy and traveller Planning Policy matters.
- Careful dialogue is required between the LPA and affected local communities within the SWLP coverage area so this scale of growth in new pitch numbers can be more carefully further explored with local communities - in accordance with advice in paragraph 16 (indent c) of the Revised NPPF (2021), which reinforces that: “...Plans should (indent c) be shaped by early, proportionate and effective engagement between plan-makers and communities...”
- The impacts of this proposed scale of growth on existing sensitive small rural village settlements which severely lack the range of services, facilities (schools, healthcare facilities, welfare facilities) and highway infrastructure necessary to accommodate this proposed scale of growth in new pitch numbers.
- Both the emerging SWLP Local Plan (2023) and the accompanying Gypsy and Traveller supporting background technical evidence base are both promoting highly unsustainable patterns of environmentally damaging development across the South Warwickshire Region.
- The potentially huge adverse and highly damaging residential amenity impacts on the settled community raises concerns has not been given sufficient material planning consideration within the emerging SWLP.
- The highly damaging landscape impacts on the South Warwickshire Districts heavily rural open countryside.
- The future expansion needs of these new pitches (allocated gypsy and traveller sites) and the worsening landscape impacts as they expand and grow in future years within rural countryside has all been given an insufficient level of Planning Policy consideration by the LPA’s.
- This scale of growth in new ‘high pitch numbers’ being proposed would appear to be more appropriate and suitable within a large heavily urbanised area rather than a small, heavily rural Districts characteristic of South Warwickshire.
- This scale of growth in new pitch numbers does not appear sustainable in a heavily rural area, dominated by small rural village settlements, within remote areas of countryside.
- In its current format and proposed planning policy approach, the position is perfectly clear, the emerging SWLP (January 2023) is promoting inappropriate, damaging and unsustainable patterns of new gypsy and traveller development within the local area, contrary to the above NPPF (2021) and DCLG guidance.
- ‘Sustainability principles’ should underpin and form the planning policy backbone and should be at the heart of any site selection approach taken by



the LPA's in the both the emerging SWLP Local Plan Review (2023) and the Council's accompanying GTAA background technical evidence being used to inform and support Local Plan preparation.

- More needs to be done to stop Stratford-on-Avon District Council's Planning Policy Team from causing huge levels of environmental damage within the local area, by introducing significant levels of inappropriate harmful urbanising gypsy and traveller development within sensitive open countryside locations. Which will result in highly damaging and adverse impacts affecting the residential amenity of the existing settled community, as well as damage the area's unique rural identity, tourism offer and historic countryside landscapes.

## **Conclusion**

Unsustainable levels of pitch numbers are being proposed across South Warwickshire which will promote inappropriate, damaging and unsustainable patterns of development within the local area, and cause significant residential amenity conflicts with the existing settled community, as well as damage sensitive rural landscapes and wildlife habitats, and place unreasonable pressure loads on road infrastructure, existing healthcare and welfare facilities, and local schools.

The Council's SWLP 'Issues and Options Stage Report' (Regulation 18) (January 2023) is promoting both irresponsible and unsustainable patterns of development across the district's, in direct conflict with the 'Sustainability' test of 'Soundness' for Local Plan preparation as reinforced within paragraph 35 (indents d) of the Revised NPPF (2021).

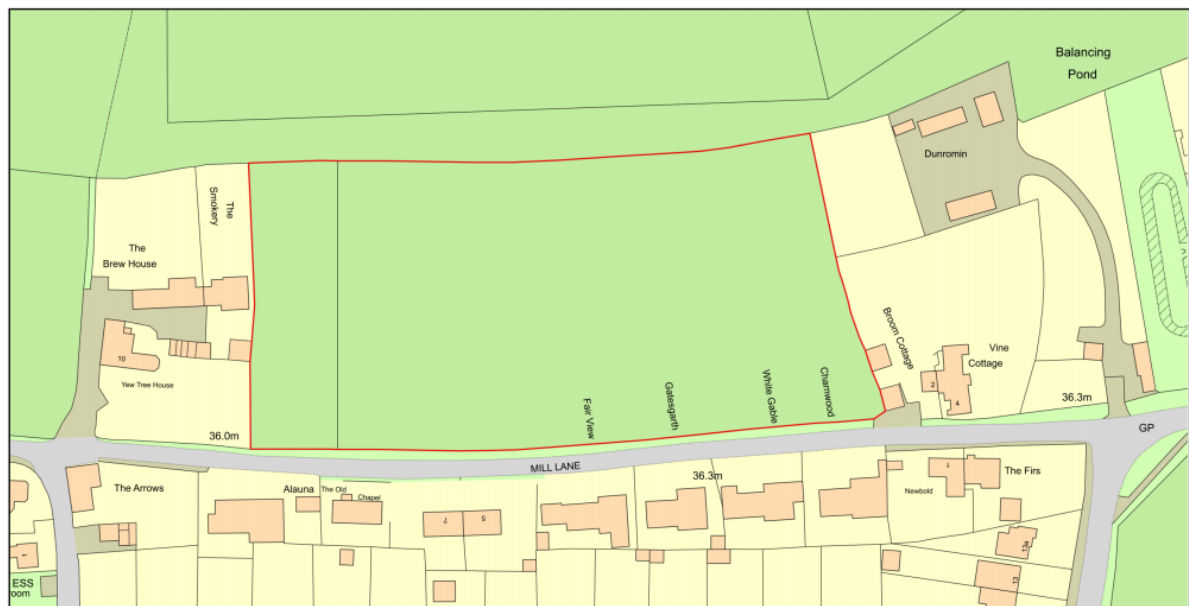
# APPENDIX A

## Site location plan

Land located immediately North of Mill Lane within the Village of Broom settlement boundary (within the civil parish of Bidford-on-Avon, within the western part of the District), Stratford-on-Avon, Warwickshire.

O.S base site location plan with proposal site boundary outlined in red ink (scale 1:1250). Site land parcel size: **0.95 Hectares**

Mill Lane, Broom



Plan Produced for: Ian O'Gorman  
 Date Produced: 10 Dec 2020  
 Plan Reference Number: TORQM20345145235637  
 Scale: 1:1250 @ A4



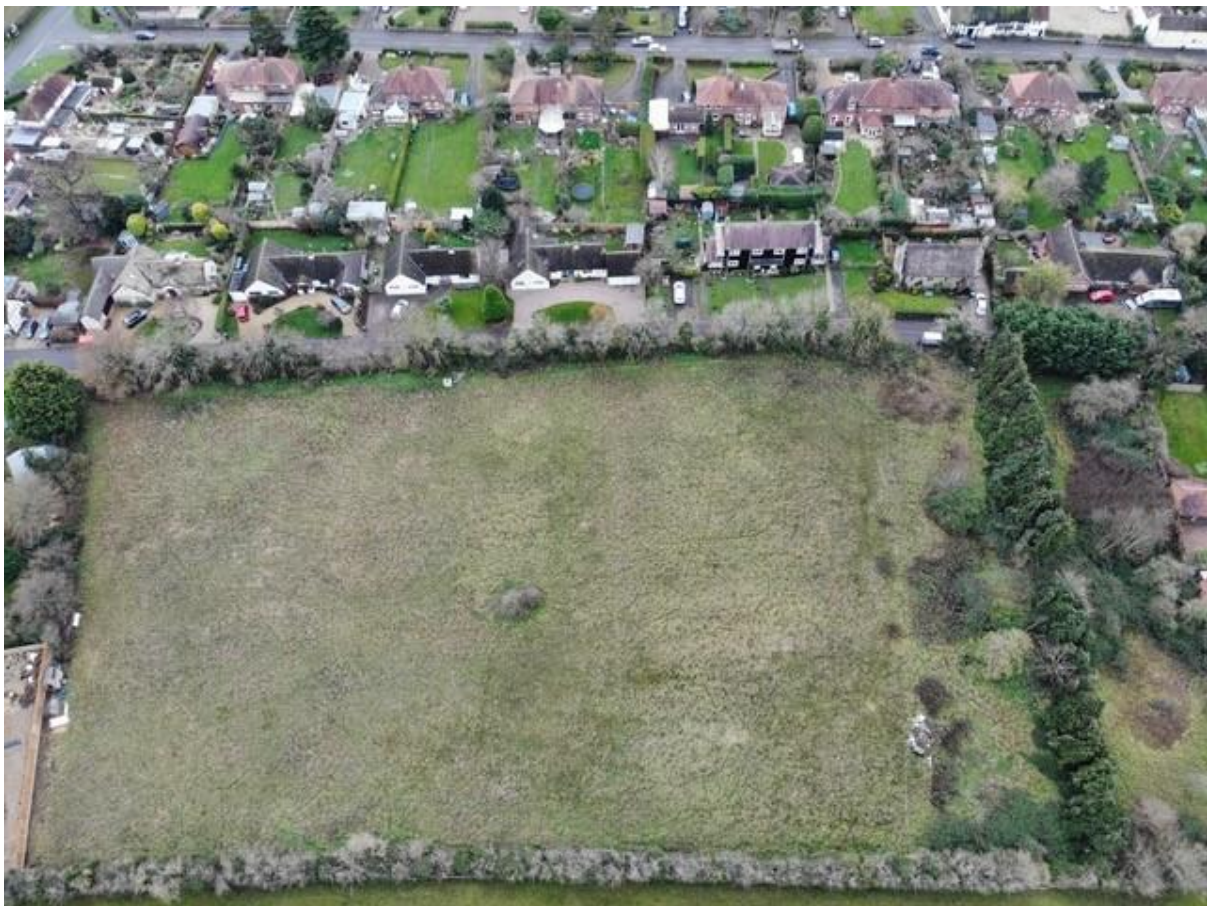
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## **APPENDIX B**

### **Colour aerial photograph views of the proposal site.**

(Aerial view photographs were taken during December 2020)

**Photograph 1-** Showing established residential occupiers bordering the proposal sites southern boundary, located along Mill Lane. Photograph shows effective screening provided by mature deciduous hedgerow network located along Mill Lane, running along the southern tip of the proposal site. This existing green space buffer screening has potential to be further reinforced within a future new residential site layout, with new tree planting to increase its effectiveness even further (see Appendix C of this Representation Statement).



**Photograph 2** – Showing robust and defensible evidence of the proposal sites very strong infill site characteristics within the confines of the existing rural village settlement, and the fact that the proposal site is located inside permanent, long established, and physical landscape features (e.g. the mature hedgerow network separating the site from large expanses of pasture farmland open countryside), which define the extent of the village settlement. In land use spatial planning policy terms, the proposal site is also well integrated into the confines of the existing rural village spatial settlement pattern, given that it is located adjacent to the central core of the village settlement, and within very close proximity to the main village High Street.

In spatial planning policy terms, the proposal site is therefore very well integrated into the existing village surrounds, and displays a very strong set of defensible infill site characteristics.

In the below photograph, note the robust and up-to-date evidence which shows the highly damaging impacts of years of successive and uncontrolled intensive farming practices, within the pasture fields and arable farmland immediately bordering the proposal sites northern boundary. Which has resulted in widespread hedgerow removal over a number of years, on a huge 'landscape-scale' across vast areas of countryside, and also the removal of a wide-range of other beneficial farmland wildlife habitat features. Such as the removal of wildflower meadows, lowland heath habitats, farmland wildlife ponds and other wetland habitat features, blanket tree removal of mature veteran and ancient deciduous trees across vast areas of countryside, due to uncontrolled widespread hedgerow destruction on an alarming vast landscape-scale. The removal of wildflower hedgerow field margins, etc. This has all created a vast, open, sterile, prairie style, **'severely ecologically damaged and heavily eroded rural landscape'** which now has no biodiversity interest.



**APPENDIX C: On-site biodiversity enhancement features that have potential to be incorporated within a future new-build housing development site layout to help deliver net gains for biodiversity, consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and paragraph 180 (indent d) of the Revised NPPF (2021).**

Lockley Homes is a developer of very high-quality new luxury homes, and as a developer we take our environmental responsibility very seriously, and where opportunities exist, we are keen to support biodiversity where possible within our new-build residential development schemes.

The proposal site forms an area of fully restricted access very low-quality green space which has no nature conservation interest, primarily given the sites former use as a pasture field heavily and closely grazed by horses over a number of years. On its northern boundary, the proposal site immediately borders a severely damaged rural landscape containing areas of open countryside (pasture fields and arable farmland) which have suffered from years of damaging mechanized industrial-scale intensive farming practices. In addition to the damaging rural landscape impacts, years of successive intensive farming practices on vast areas of farmland immediately to the north of the proposal site has resulted in the widespread removal of features from the rural landscape which would have previously provided beneficial wildlife habitats. This includes the widespread removal of miles of hedgerow networks across large expanses of countryside bordering the proposal site and the resultant habitat fragmentation and severance of important connecting wildlife corridors within the countryside, removal of stand-alone veteran and ancient native tree species from boundary hedgerows (such as Oak, Elm, Beech, Ash) (due to widespread hedgerow destruction on an alarming and vast scale within the surrounding countryside). The draining of farmland wildlife ponds and other wetland habitat features, livestock and horse over-grazing of pasture fields, and blanket tree removal due to destruction of miles of hedgerow networks and small woodland copses. Irreparable damage caused to species rich wildflower meadow grasslands and field margins containing insect-rich and seed-rich foraging habitat and weedy field margins along hedgerows (these habitats would have been beneficial for once common farmland bird species which are now in severe decline both locally within the South Warwickshire area and across the wider UK). Due to the removal of hedgerows to expand arable farmland crop production and increasing use of pesticides and herbicides chemical pesticide sprays within modern farming practices - across vast areas of arable farmland and pasture fields bordering the proposal site.

The above issues are supported by robust, credible and up-to-date evidence in **Photograph 2 (Appendix B)** above which shows the amount of landscape and ecological habitat damage caused to vast areas of countryside bordering the proposal sites northern boundary due to years of uncontrolled and highly damaging intensive farming practices. This intensively farmed open prairie landscape which has now been created (see Appendix B Photograph 2 above) devoid of any wildlife habitat features, now has very limited value for wildlife species. Including the severely declining various farmland bird species described below, amphibian species (common frogs, common



toads and newts), mammal species such as field voles, hedgehogs and foraging bats, reptile species (including grass snakes, common lizards and slow worms), etc.

This pattern of significant and widespread farmland wildlife habitat destruction is reflected across vast areas of countryside within the wider South Warwickshire Local Plan (SWLP) area due to years of uncontrolled intensive farming practices which, for example have had a hugely damaging impact on a range of once common farmland wildlife species. For example, the UK Hedgehog population (which has suffered an alarming 95% decline across the United Kingdom (UK) since the 1950s), Brown Hares (which have declined by an alarming 80% across the UK within the last 100 years) (source: PTES and BHPS), severe declines in amphibian species (common frogs, common toads and newts), Bats, reptile species such as slow worms, common lizards, adders and grass snakes. As well as significant and alarming population declines in a wide range of once common farmland bird species. Notable examples include Linnets, Grey Partridge, Yellowhammers, Skylarks, Starlings, Turtle Dove, Corn Bunting, Bullfinch, Tree Sparrows, House Sparrows, Barn Owls, Lapwings and Swifts, which have all suffered significant population declines, both locally within the South Warwickshire Local Plan (SWLP) area and across the wider UK.

Advice from the Royal Society for the Protection of Birds (RSPB) suggests that **Swift** numbers have almost halved in the last 20 years across the UK. With significantly falling population numbers, there are now less than 90,000 breeding pairs of Swifts arriving in the United Kingdom (UK) every summer, down from almost 150,000 pairs two decades ago. As stated above, Swift population numbers have more than halved by 58% since the year 1995. Part of this decline is being linked to a reduction in potential nesting sites within buildings.

Both the RSPB and the Swift Conservation groups across the UK acknowledge that the inclusion of Swift nest boxes within new housing development proposals can therefore play an important role in helping to provide habitat features to help support fragile populations of this severely declining bird species as they return to the UK to breed every summer.

During the year 2021, Swifts have now recently been placed onto the Red listed bird species by a coalition of government wildlife bodies and bird charities, including the RSPB, meaning that this bird species is now considered to be of high conservation concern. Birds are placed on the red list of the Birds of Conservation Concern report by a coalition of government wildlife bodies and bird charities either because their populations have severely declined in Britain, or because they are considered under threat of global extinction.

Advice from the RSPB suggests that there has been a severe decline in the UK **house sparrow** population, recently estimated as dropping by 71% between the years 1977 and 2008, with substantial declines in both rural and urban populations.

Inclusion of House Sparrow Terraced Nest Boxes within new-residential development proposals can therefore help to play an important role in helping support this severely declining bird species which is now also classed as a Red listed bird species, meaning

that they are now considered to be of high conservation concern by the above environmental groups, given their recent substantial population declines in both urban and rural areas across the UK.

Advice from the RSPB suggests that the UK tree sparrow population (which was once a common lowland farmland bird species within rural hedgerows) has suffered a severe decline, estimated at 93% between the years 1970 and 2008. This is as a direct result of the impact of intensive farming practices within the British lowland countryside. RSPB advice suggests that use of hole nest-boxes placed in rural farmland hedgerows, use of low-input crop management within arable farmland, the creation of field margins or creation of wetlands to create insect-rich habitats can be beneficial to help support this declining bird species.

According to a BBC News article (Nature loss linked to farming intensity – 14<sup>th</sup> September 2016), more than 50 conservation groups say the “policy driven” intensification of farming is a significant driver of nature loss in the UK. The State of Nature report assessed 8,000 UK species and found that 1 in 10 are threatened with extinction. More than half of once common farmland bird species (56%) including the turtle dove and corn bunting are in danger of extinction and their numbers are still declining. Skylark numbers have also fallen by 60% since the 1970s. Turtle Dove numbers having crashed by over 90% since 1970.

Plants, insects and butterflies have also suffered, with the abundance of butterfly species such as the high brown fritillary having diminished by 57% since 1990. Some 12% of farmland species are now on the endangered Red List, including plants such as the Shepherd-needle and corn marigolds. The Report Authors pointed to the increasing use of pesticides and herbicides, increased fertiliser use, the loss of hedgerows from farms, drainage of ponds and other wetland habitat features within farmland, and changing farming practices as a key driver in the reduction of a wide range of once common farmland wildlife species. (Source: RSPB)

Research from the Royal Horticultural Society (RHS) (London) suggests that during the past century, nearly 70% of ponds have been lost from the British countryside. This has resulted in widespread and alarming declines in once common amphibian species (common frogs, common toads and newts) from open farmland areas both locally within the South Warwickshire countryside and across the wider UK. A citizen-science study has found that one of Britain's best-loved amphibians may soon be a rare sight. A new paper led by the charity Froglife along with experts from Switzerland revealed that the UK's common toad population has dropped by a staggering 68 per cent in the past 30 years. Habitat loss and degradation is one of the greatest threats to amphibian species within the UK.

Given the above issues and the amount of damage and uncontrolled wildlife habitat destruction caused within the open countryside bordering the proposal site for the reasons explained above, by re-introducing some of the threatened wildlife habitat features described below, there is an opportunity for a future high-quality new housing development proposal coming forward on this sustainably located very low-quality green space site (which currently lacks any nature conservation interest) to help

deliver net gains for biodiversity, consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021).

This NPPF guidance recognises that new development proposals can play an important role in helping to improve biodiversity levels by incorporating new on-site biodiversity enhancement features to help assist in the replacement of threatened wildlife habitat features that have otherwise already been lost from the open countryside due to years of successive damaging intensive farming practices as described above. Some habitat features such as small wildlife ponds, inclusion of bat boxes, new native species tree planting and use of wildflower seed mixes (containing endangered farmland flower species) within on-site landscaping can be easily replicated within new housing development site layouts.

Given the range of beneficial wildlife habitat features which have potential to be included and replicated within a future new housing development site layout as described below, as developers we suggest that allocating this piece of land for new housing development on the main Policies Map of the Council's emerging Site Allocations Plan (SAP) Review would therefore help Stratford-on-Avon District Council to deliver a more effective, positively prepared and justified plan, in accordance with guidance in paragraph 35 of the Revised NPPF (2021). As well as ensuring that the planning policy approach taken by the local planning authorities within the emerging SAP Review helps to promote more sustainable forms of development (with an emphasis on biodiversity retention and enhancement), consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and 180 (indent d) of the Revised NPPF (2021). As developers in our view, development proposals that seek to satisfy the above NPPF guidance and which display a very strong set of sustainability credentials should therefore be supported without delay by the Local Planning Authorities within the emerging SAP review. Particularly given that:

**Guidance in paragraph 180 (indent d) of the Revised NPPF (2021) is perfectly clear in its view that development proposals whose primary objective is to conserve or enhance biodiversity should be supported by Local Planning Authorities.**

There is a significant opportunity therefore for a future new residential scheme coming forward on this very low-quality green space site to effectively respond to the above NPPF guidance and provide beneficial on-site biodiversity enhancement features. Examples of declining wildlife habitat features that have been lost at an alarming rate within farmland bordering the proposal site and within the surrounding South Warwickshire countryside, due to years of successive and highly damaging intensive farming practices, that could potentially be incorporated into a proposed future new-build housing development site layout, to help deliver net gains for biodiversity, could include:

- Inclusion of native tree species planting within an on-site landscaping screening buffer strip running along parts of the southern tip boundary bordering Mill Lane, and tree planting within rear residential garden spaces. Using appropriate



native tree species beneficial for wildlife such as Hawthorn, Silver Birch, Hazel and native UK fruit trees (Damson, Apple, Pear, Cherry and Plum trees), which are all suitable for small and confined rear residential garden spaces and landscaping screening buffer strips.

- The above tree planting measures would help provide improved foraging habitat for bats and provide a habitat for garden bird species. It is noted that widespread tree removal has taken place within very large expanses of immediately adjacent open farmland to the north of the proposal site due to years of highly damaging intensive farming practices. Introduction of new native tree species planting enhancements will therefore prove highly beneficial for wildlife given the character of the adjacent severely damaged farmland landscape, where large-scale tree removal has taken place. Particularly along farmland hedgerow networks which have now all but largely disappeared from the damaged rural landscape.
- Inclusion of small wildlife ponds within some of the rear residential garden spaces to provide a habitat for severely declining amphibian species (common frogs, common toads, newts), dragonflies and garden bird species. There are no existing wildlife pond habitats remaining within huge expanses of intensive farmland to the north of the proposal site. Replicating this severely endangered farmland habitat type to help support biodiversity within a new residential site layout by re-introducing small wildlife ponds would therefore have a very strong level of nature conservation focused planning policy support when assessed against guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021). Given that this particular habitat type is now disappearing at an alarming rate from the British lowland countryside due to widespread habitat destruction. Resulting from years of uncontrolled and damaging intensive farming practices as described above.
- Given their severe decline and increasing rarity within the British lowland countryside, farmland wildlife ponds are now classed as a Priority Habitat type. The proposals to provide new small wildlife ponds (re-introduction of a Priority Habitat) within a heavily rural location dominated by large expanses of intensive farmland would therefore have a strong level of nature conservation focused planning policy support when assessed against guidance in paragraph 179 (indent b) of the Revised NPPF (2021) which confirms that plans should "...promote the conservation, restoration and enhancement of priority habitats..."
- Inclusion of bat boxes and/or bat bricks (on south facing external building facades) and swift nest boxes and/or swift bricks high-up on north facing external facades of new residential dwellings. The blanket widespread removal of mature veteran or ancient trees from vast hedgerow networks within open farmland areas adjacent to the proposal site, due to years of damaging and uncontrolled intensive farming practices within the South Warwickshire countryside has resulted in widespread habitat loss for bats. Which rely on crevices within veteran or ancient trees for roosting and breeding, as well as use of these trees for foraging habitats given that these mature trees support large populations of insects. There is therefore a 'significant biodiversity enhancement opportunity' for a new future housing development proposal

coming forward on this proposal site to deliver net gains for biodiversity by providing replacement roost habitat by including new bat boxes on the external facades of new residential dwellings.

- Inclusion of bat poles within on-site natural greenspace areas and around wetland SUDs.
- Inclusion of House Sparrow terraced nest boxes high-up on north facing external facades of new residential dwellings. These features will be beneficial given that the house sparrow population across the UK is estimated to have crashed by 71% between the years 1977 and 2008 with substantial declines in both rural and urban populations.
- Inclusion of Tree Sparrow nest boxes within site hedgerows within the southern and northern tips of the proposal site. These features will be beneficial given that the tree sparrow population across the UK is estimated to have suffered a huge decline of 93% between the years 1977 and 2008 within the British lowland countryside. Hedgerows are a key habitat feature of this once common farmland bird species.
- Inclusion of bird hole nest boxes (suitable for small woodland bird species – blue tits, great tits, wren, coal tit, long tailed tit, etc) on north facing garden fencing and attached to new sapling trees within on-site landscaping areas screening buffer strips/ on tree saplings within rear garden spaces. The blanket removal of veteran and ancient trees from the farmland landscape bordering the proposal sites northern boundary due to years of intensive farming practices has resulted in a severe shortage of natural nest sites for hole nesting bird species. The introduction of artificial nest-box features will therefore have a beneficial role to play in helping to replace significantly declining wildlife habitat features which have otherwise already been lost from the open countryside.
- Inclusion of shrub and flower species (e.g. Lavender and native wild flowers) beneficial for insect pollinators (bees, moths) within on-site landscaping.
- Incorporation of Hedgehog gates within rear garden fencing helping to create a connecting wildlife corridor through rear residential garden spaces to connect to rural fringe farmland (helping to support a connected landscape and maximize the biodiversity value of residential gardens). These features are also beneficial in helping amphibian species (frogs, common toads and newts) to move from adjacent green space areas within rural fringe farmland through residential rear garden spaces to access garden wildlife ponds. Pond habitats are now of huge importance within the countryside for reasons identified within this section Appendix C.
- Inclusion of natural greenspace thin linear dry swale Sustainable Drainage Systems (SDS) within on-site landscaping buffer strips along one of the edges of the site boundary (to help provide on-site climate change mitigation features consistent with guidance in Section 14 (Meeting the challenges of climate change) of the Revised NPPF (2021) to help reduce surface water run-off during severe storm rainfall events, and also to help provide beneficial wildlife habitat features).
- Retention and appropriate enhancement (using native hedgerow species planting to restore parts of the hedgerow network) of some established existing site boundary features such as boundary hedgerows.

- Use of wildflower seed mixes within on-site landscaping using native seed mixes which contain endangered once common farmland native flower species, such as shepherd-needle, cowslips and corn marigolds.

## **Bat Boxes**

(All photographs for illustrative purposes only. Actual designs used within any future new development scheme may vary from those shown in the photographs).

**To help deliver net gains for biodiversity**, a small number of wooden Bat Boxes or Bat Bricks could potentially be included high-up on the external building facades on south facing elevations of the proposed new-build residential dwellings. Photographs for illustrative purposes only.

Figures 1 – Various Bat Box designs: Wooden and woodcrete bat boxes, and bat bricks incorporated into external facing brickwork within new build residential schemes.

(Photograph's source: Istock Brick, Schwegler and Goldfinch Town Planning services (West Midlands))



**Figures 2 - Bat pole incorporated within a natural green space area.**

(Photograph source/ photograph credit: NJDEP Division of Fish and Wildlife, New Jersey, USA)





**Figure 3** - Summer Maternity Roost and Winter Hibernation Roost bat boxes installed as part of a nature conservation habitat enhancement project. (Bat boxes manufactured and supplied by Goldfinch Town Planning Services (West Midlands)).

Photographs copyright (2023): Goldfinch Town Planning Services (West Midlands).



### **Swift Nest-boxes**

**To help deliver net gains for biodiversity**, a small number of either wooden Swift Nest Boxes or Swift bricks could potentially be included high-up on the external building facades of the residential dwellings at roof gutter level on north facing building elevations. Photographs for illustrative purposes only. Actual designs used within any future new housing site layout may vary from those as shown in the photograph. (Photograph's source: RSPB)

**Figure 4 – Example of Swift Nest Box Brick being incorporated into external facing brickwork within a new build residential scheme.**



Figure 5 - Nest Box features for small woodland bird species included within private residential gardens:

Part of a package of on-site biodiversity enhancement features delivered by Goldfinch Town Planning Services within a recently constructed new build residential estate. This nest box provides a habitat for great tits and other hole nesting small bird species (blue tit, coal tit, wren, goldcrest, nuthatch, long tailed tit, etc) typically found within woodland environments. Similar features could be incorporated within rear garden spaces and within on-site landscaping buffers within the proposal site to help replace threatened wildlife habitat features that have otherwise already been lost from the open countryside. This is an example of how biodiversity enhancement features can be easily incorporated into high-quality new build residential schemes to help deliver net gains for biodiversity, consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b) and paragraph 180 (indent d) of the Revised NPPF (2021).

Nest boxes are becoming increasingly important for hole nesting bird species (see below) and bats as natural nest sites such as holes in very old and decaying trees (located within farmland hedgerows) disappear from the rural landscape due to the removal of veteran and ancient trees as part of widespread hedgerow clearance works within areas of open countryside, due to years of uncontrolled and damaging intensive farming practices. These landscape characteristics are particularly evident within the intensively farmed landscape to the north of the Village of Broom proposal site where miles of hedgerow networks and mature trees have been removed from the open countryside.

Photograph: 32mm entrance hole diameter nest box attached to sapling Pear Tree within rear residential garden space currently being used by great tits.

(Photograph source: Goldfinch Town Planning Services (West Midlands)).

Photograph copyright (2023) Goldfinch Town Planning Services (West Midlands) and Lockley Homes

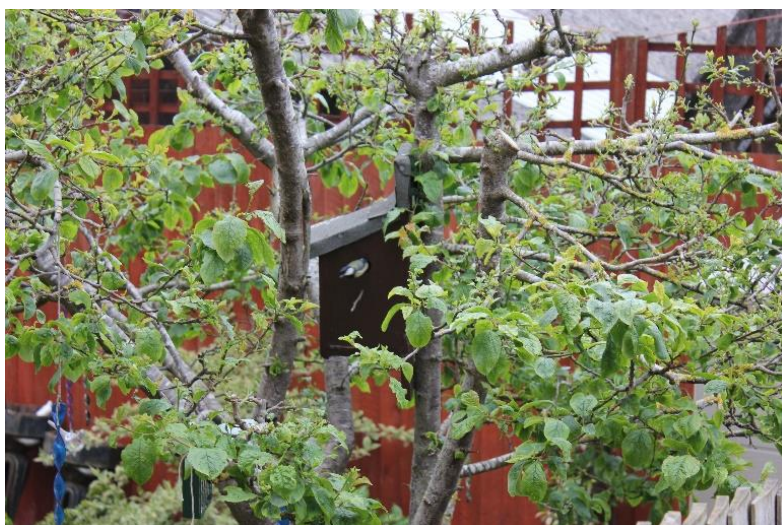


Figure 6 – House Sparrow Terrace Nest Box included within a new-build residential scheme.

House Sparrows are now classed as a Red listed bird species, meaning that they are now considered to be of high conservation concern by the (RSPB), due to their recent substantial population declines in both urban and rural areas across the United Kingdom.

Photograph and product source: Schwegler wood-concrete biodiversity solutions.





**Figure 7 - A selection of some of the once common lowland farmland bird species which are now in severe decline across the UK due to intensive farming practices and loss of nesting habitats.**

Swifts and House Sparrows have been particularly affected by the loss of nesting habitats. The nest-box features outlined in Appendix C of this Representations Statement can therefore help to support these specific bird species which are now both on the Red list of threatened bird species due to their substantial population declines across the United Kingdom.

**Swift**



(Source: RSPB)

**Starling**



(Source: RSPB)

**Linnet**



(Source: RSPB)

**House Sparrow**



(Source: RSPB)

**Tree Sparrow**



(Source: RSPB)

**Yellowhammer**



Source: Birdspot

**Skylark**



Source: RSPB

**Lapwing**



Source: RSPB

**Figure 8 - A selection of some of the once common lowland farmland amphibian, mammal and reptile species which are now in severe decline across the United Kingdom (UK) countryside due to intensive farming practices.**

The species below are in severe decline due to intensive farming practices and loss of key habitat features. In particular, the loss of wildlife ponds from the open countryside has had a devastating impact on a wide range of UK amphibian species. The recent severe decline of the common toad population across the UK is of particular concern for ecologists. Recent research in 2016 by the charity Froglife and the University of Zurich has shown that common toad populations have declined across the UK by 68% over the past 30 years.

**Smooth Newt**



(Source: Wildlifetrusts.org)

**Common Toad**



(Source: Natural History Museum, London)

**Common Frog**



(Source: Natural History Museum)

**Hedgehog**



(Source: British Hedgehog Preservation Society)

**Slow Worm**



(Source: The Amphibian and Reptile Conservation Trust)

**Common Pippistrelle Bat**



(Source: Wildlifetrusts.org)

**Grass Snake**



(Source: Wildlifetrusts.org)

**Common Lizard**



(Source: Wildlifetrusts.org)



Figure 9 – Use of native tree species within new on-site landscaping to help deliver both rural landscape enhancements and net gains for biodiversity. These trees are suitable for small development sites.

Photograph 2 (Appendix B) further above provides robust, up-to-date and defensible colour aerial view photographic evidence of the blanket tree removal that has taken place within large areas of ecologically damaged countryside to the north of the Village of Broom proposal site due to years of uncontrolled and damaging intensive farming practices. Introduction of new native tree species planting within a future new housing development site layout would therefore help to introduce beneficial new biodiversity enhancement features into the surrounding ecologically damaged landscape.

**Hawthorn** (*Crataegus monogyna*)



**Silver Birch** (*Betula pendula*)



**Hazel** (*Corylus avellana*)



(Above - Photograph's source: Goldfinch Town Planning Services (West Midlands)).  
Photograph's copyright (2023) Lockley Homes and Goldfinch Town Planning Services (West Midlands).

### Figure 10 - Use of a Beech hedgerow along a residential garden boundary

This Beech hedgerow within a private residential garden space provides a more visually attractive alternative boundary treatment feature in comparison to the use of the more traditional wooden garden fencing. This natural boundary feature using native tree species also helps to deliver net gains for biodiversity, consistent with guidance in paragraphs 8 (indent c), 120 (indent a), 174 (indent d), 179 (indent b), and paragraph 180 (indent d) of the Revised NPPF (2021).



(Above - Photograph source: Goldfinch Town Planning Services (West Midlands)).

Photograph copyright (2023) Lockley Homes and Goldfinch Town Planning Services (West Midlands).



## **Inclusion of small wildlife ponds within rear residential gardens**

Research from the Royal Horticultural Society (RHS) (London) suggests that during the past century, nearly 70 per cent of ponds have been lost from the British countryside, meaning that creating new small wildlife ponds in private residential gardens within new-build housing estates now has increased importance for wildlife. The decline is largely due to modern industrial-scale mechanized intensive farming practices within the British lowland countryside, which has resulted in severe declines in amphibian species due to the widespread habitat destruction of farm ponds and other wetland habitat features to expand areas of arable farmland and pasture fields for horse and livestock grazing.

This aspect is illustrated well in **Photograph 2 (Appendix B)** further above which shows an area of damaged farmland to the north of the proposal site where farmland wildlife habitat features have been removed over a long period of time due to expansion of horse grazing pasture fields and arable farmland. The result is the creation of an open prairie style landscape which has no nature conservation interest as all of the farmland wildlife habitat features (including miles of hedgerows and small wildlife ponds) have been fully removed from the rural landscape. These sterile intensively farmed landscapes have no benefit for nature conservation.

In accordance with the nature conservation focused NPPF guidance referred to further above, new-build residential schemes coming forward within areas of intensively farmed open countryside (similar to the proposal site) can therefore have an important role to play in helping to replace threatened Priority Wildlife Habitat features that have otherwise already been lost from the open countryside. Small wildlife garden ponds provide an excellent, robust and defensible example of a type of ecologically important and severely declining wildlife habitat feature that can be easily replicated and incorporated into new residential site layouts. Including these features has a particularly strong level of planning policy support when assessed against guidance in paragraph 179 (indent b) of the Revised NPPF (2021) which confirms that plans should “...promote the conservation, restoration and enhancement of priority habitats...” **Farmland wildlife ponds within the open countryside are now classed as a Priority Habitat type given their severe decline and increasing rarity within the British lowland countryside.**

### **Figure 11**

Photographs for illustrative purposes. (Photograph's source and credit: Michelle Harris)



Figure 12 - Hedgehog gates included within rear residential garden fencing to allow hedgehogs and amphibian species (frogs, common toads and newts) to move between residential gardens and access gardens from rural fringe countryside.

There are estimated to be just 1 million hedgehogs left in the UK, representing a 97% fall in the population from the 30 million estimated to have been present within the UK during the 1950s. The number of hedgehogs living in the British countryside has plummeted by more than half since the year 2000. One of the dominant drivers for population declines in the British countryside is the widespread removal of hedgerows from the British countryside due to years of intensive farming practices. Widespread hedgerow removal is evident in the open farmland bordering the proposal sites northern boundary for reasons explained further above. (Source: People's Trust for Endangered Species (PTES) and the British Hedgehog Preservation Society (BHPS)).

Figure 12 - Entrance hole cut into the bottom of a wooden fencing panel to allow access for hedgehogs. This requires an entrance hole of 13 centimetres (cm) x 13cm which should be cut into the bottom of a wooden fencing panel (on fencing panels within different parts of the garden) to form a continuous wildlife corridor connecting through the network of rear residential gardens.

Photograph source: Goldfinch Town Planning services (West Midlands).

Photograph copyright (2023) Goldfinch Town Planning Services (West Midlands).



Figure 13 - Specially made concrete gravel board incorporating a hedgehog gate.

Photograph and product source: Fabcast Fencing (Stoke-on-Trent) (Facebook).

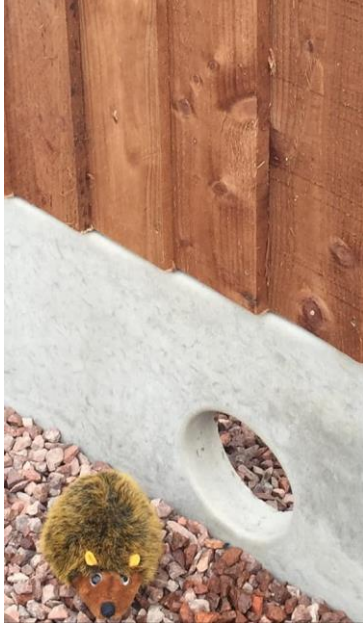


Figure 14 – Improving the habitats for insect pollinators, butterflies, field voles and foraging bats and to support declining farmland meadow flower species:

Due to the large-scale removal of wildflower rich hedgerow field margins to expand arable farmland and increasing use of pesticides and herbicides chemical pesticide sprays within modern farming practices within the South Warwickshire countryside, there has been a significant decline in once common farmland wild flower species across the SAP and SWLP areas. This is particularly evident within large expanses of sterile open farmland immediately bordering the northern boundary of the proposal site (see Photograph 2 in Appendix B further above). Where years of successive and uncontrolled intensive farming practices have had a particularly damaging impact on farmland wildlife habitat features due to the extensive destruction of hedgerow wildflower field margins, due to the removal of vast sections of hedgerow networks within farmland, the destruction of wildflower meadows and other farmland wildlife habitat features.

This unfortunate position is reflected at the national level across the UK, where 97% of wildflower meadows have been lost from the British countryside since the 1930's, due to modern intensive farming practices. Species rich grasslands now only cover a mere 1% of the UK's land area. Wild flower meadows are now one of the rarest habitats in the UK. (Source: Kew Royal Botanic Gardens (London)). These wildflower habitat features have largely disappeared from the SWLP area.

New residential schemes can help to re-introduce threatened wildlife habitat features such as field margin wildflower meadow habitats within new on-site landscaping buffers and within rear garden spaces to help support biodiversity levels and farmland habitat features, which as stated above have suffered an alarming 97% decline across the UK and have now been largely lost from the open countryside

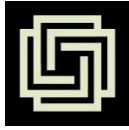
Photograph showing the use of wildflower seed mix included within a public parkland within the West Midlands.

(Photograph source: Goldfinch Town Planning Services (West Midlands).

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### **Goldfinch Town Planning Services (West Midlands)**

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Goldfinch Town Planning Services provide the following services to the house building development industry and both urban and rural landowners:

- Site feasibility studies and development site appraisals
- Land promotion activities
- Local Plan Planning Policy specialists
- Preparation of Planning Statement Reports to support formal Planning Applications
- Preparation of Pre-Application Planning Statement Reports to support emerging pre-application proposals
- Ability and knowledge to promote sites and influence policy through the local plan process.
- Preparation of Representations for housing developers to promote potential new housing development sites through Local Planning Authority (LPA) emerging Local Plan Reviews, on both greenfield and urban brownfield sites.
- General development site promotion work through the planning process.
- Green space planning policy specialists
- Greenfield housing development site promotion specialists
- Urban brownfield land (previously developed land) new housing development site promotion specialists
- Promotion of housing development sites ranging from very small, medium through to large-scale strategic housing development sites.
- Expert witness at Public Local Inquiries specialising in promoting urban brownfield land and greenfield housing development sites through the Local Plan Review process.
- Objections to other planning applications which could potentially have a damaging impact on our client's land interests.
- Tracking and monitoring service available for housing developers and urban/ rural landowners to monitor progress of LPA emerging Local Plan Reviews and subsequent public consultation timescales, to assist in timely site promotion work at all Local Plan various public consultation stages.
- Ecological services including incorporation of on-site and off-site nature conservation habitat features as part of new housing development proposals and habitat mitigation solutions.
- Supply and installation of bat boxes for habitat mitigation and habitat restoration work.
- Rural farmland nature conservation habitat mitigation specialists.
- Bat habitat mitigation specialists.
- Bat Emergence Surveys (dusk surveys).
- Bat foraging activity and commuting route dusk surveys.