

# Distribution of Development

## Introduction

- 1 This paper sets out the Council's proposed approach for the Distribution of Development across the District. The paper has been prepared to demonstrate that the emerging Local Plan offers a sustainable approach to development that is consistent with the character of the District and takes full account of local opportunities and constraints.
- 2 The paper seeks to support the modifications to the submitted Local Plan. These modifications have been prepared to address a number of key issues arising from the Inspector's initial findings (EXAM23):
  - a. The need to increase the Plan's housing requirement to take account of unmet need arising in Coventry
  - b. The need to review the approach taken to the windfalls allowance in the submission draft, resulting in the need to allocate additional housing sites
  - c. The need to ensure a 5 year housing land supply can be established following adoption of the Plan.
- 3 Addressing these issues has inevitably resulted in the need to identify additional land for housing allocations. The paper explains the process and justification for identifying this additional land in the context of the proposed allocations contained within the submitted Draft Local Plan.

## The Housing Need

- 4 Warwick District lies within the Coventry and Warwickshire Housing Market Area (the HMA). The Councils within the HMA have worked together for a number of years to establish a shared evidence base with regard to the HMA's housing need and the need of each of the individual Councils. The most recent study is the "Updated Assessment of Housing Need: Coventry-Warwickshire HMA" prepared by GL Hearn in September 2015. This provided an update to the Joint Strategic Housing Market Assessment (2013) and its Addendum (2014).
- 5 The 2015 Housing Needs study showed the HMA's Objectively Assessed Housing Need (OAN) is 4,277 dwellings per annum and that Warwick District's OAN is 600 dwellings per annum. The study has formed a key piece of evidence to support a Memorandum of Understanding (MOU) regarding the distribution of the HMA's OAN between the six Councils. This is required as Coventry City Council has demonstrated that it is unable to meet its housing need within the City's boundaries. As a result a part of this need is re-distributed to the five Warwickshire authorities.
- 6 The MOU was agreed by all the Councils in the HMA (with the exception of Nuneaton and Bedworth Borough Council) in September 2015. The agreement meant that Warwick District's housing requirement should include 332 dwellings per annum to address the shortfall arising in Coventry.

The modifications therefore seek to provide for a minimum of 932 dwelling per annum or 16,776 dwellings over the Plan Period. This results in an increase of at least 218 dwellings per annum or 3,916 dwellings over the Plan Period in comparison to the submitted Draft Local Plan, as shown in table 1 below:

Table 1

	Warwick District Objectively Assessed Need (dwellings per annum)	Portion of Coventry's unmet need to be meet in Warwick District (dwellings per annum)	Total annual requirement (dwellings per annum)	Total Requirement as set out in MoU (2011 to 2031)	Total Requirement for Local Plan Period (2011 to 2029)
Submitted Local Plan Jan 2015	606	108	714	14,280	12,860
MoU (September 2015)	600	332	932	18,640	16,776
Change	-6	+224	+218	+4,360	+3,916

- 7 As can be seen from this approximately two thirds of the Housing Requirement is Warwick District's local need and the remaining third is redistribution from Coventry.

#### **Distribution of Development: Submission Draft Local Plan, January 2015**

- 8 The Spatial Strategy of the Draft Local Plan is set out in Policy DS4:

#### **STRATEGIC POLICY DS4: Spatial Strategy**

Allocated Housing and Employment will be distributed across the District to take account of the following:

- a) in the first instance, allocations will be directed to previously developed land within the urban areas and in particular those areas where there is greatest potential for regeneration and enhancement;
- b) where greenfield sites are required for housing, they should generally be located on the edge of built up areas in sustainable locations close to areas of employment or where community facilities such as shops, bus services, medical facilities and schools are available or can be made available.
- c) Where greenfield sites are required for employment, they should only be allocated in locations which are suitable for the needs of 21st century businesses, accessible via a choice of transport modes and are in close proximity to existing or proposed housing subject to ensuring there is no undue impact on residential amenity ;
- d) limiting development on sites which would lead to coalescence of settlements to ensure settlement identity is retained;
- e) sites which have a detrimental impact on the significance of heritage assets will be avoided unless the public benefits of development outweigh the harm;
- f) areas assessed as high landscape value or other highly sensitive features in the natural environment will be avoided; and
- g) taking the national Green Belt policy in to account, sites that are currently in the green belt will only be allocated where exceptional circumstances can be justified. The following will be taken into account in considering exceptional circumstances:
  - i. the availability of alternative suitable sites outside the Green Belt;
  - ii. the potential of the site to meet specific housing or employment needs that cannot be met elsewhere;

iii. the potential of the site to support regeneration within deprived areas; and the potential of the site to provide support to facilities and services in rural areas.
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- 9 A sustainability appraisal of this Policy was undertaken and concluded that it was a sustainable approach in the context of the housing need being planned for at that time.
- 10 Policy DS4 provided the framework for Policy DS10 which set out the Broad Location of Allocated Sites for Housing as follows:

<b>DS10 Broad Location of Allocated Housing Sites</b>	
Urban Brownfield sites	<b>1,330</b>
Greenfield sites on the edge of Kenilworth	<b>850</b>
Greenfield sites on the edge of Warwick, Leamington and Whitnash	<b>3,245</b>
Sites within Growth Villages and the rural area	<b>763</b>
<b>Total</b>	<b>6,188</b>

- 11 This shows that the allocated sites in the Draft Local Plan were entirely consistent with the Plan's strategy in the focus on brownfield sites; edge of urban sites and growth villages. Policy DS11 of the Draft Local Plan set out the specific Allocated Housing Sites. As would be expected given the nature of the District and the strategy set out in Policy DS4, about 88% of the houses allocated in the Plan are located within or adjacent to the District's four Towns (Warwick, Whitnash, Leamington Spa and Kenilworth).
- 12 It should also be noted that although the majority of the proposed allocations fall outside the Green Belt, there are a number of sites that fall within the Green Belt. These have been included where there are exceptional circumstances in line with the National Planning Policy Framework and with Policy DS4.
- 13 It is important to note that the Council's strategy and resulting distribution of development has never sought to exclude Green Belt development where exceptional circumstances exist.
- 14 The Council has used a three stage approach to assessing Exceptional Circumstances on any particular site:
- is there an essential need that has to be met? If yes,
  - are there any suitable sites outside the green belt that can meet this need? If no
  - is this the best site within the Green Belt to meet the need (taking account of the Green Belt study as well as other aspects of the site assessments)? If yes, then there are exceptional circumstances to release a site from the green belt and allocate it in the Local Plan
- 15 As a result the following Green Belt housing allocations have been included within the submitted Draft Local Plan

Table 2

<b>Site/Location</b>	<b>Number of Dwellings</b>	<b>Summary of Exceptional Circumstances</b>
Red House Farm	250	There is a need to regenerate Lillington. This site is located

		on the edge of Lillington and has the potential to play a significant role in its regeneration.
Castle 6 <sup>th</sup> Form College (part)	130	Kenilworth is constrained by the Green Belt and this has prevented the organic growth of the town. This site contributes to the needs of Kenilworth and to support the viability of a new secondary school (NB only part of this site falls within the Green Belt)
Thickthorn	760	Kenilworth is constrained by the Green Belt and this has prevented the organic growth of the town. There is a need to encourage the growth of the town as well as helping to support the District's housing requirement. This site offers the most sustainable location to meet the housing needs of Kenilworth
Oak Lea Farm	20	This site contributes towards the District's housing needs and given its size can contribute to 5 year supply on adoption of the Plan. It is a suitable site on the edge of Coventry which is bounded by clear defensible boundaries.
Green Belt villages	444	Release of land for housing adjacent to Green Belt growth villages is needed partly to meet the housing needs of the specific villages and rural areas and partly to provide for the District's overall housing need. The nature and scale of these sites supports market flexibility and provides sites which play an important role in contributing to the 5 year supply of housing land on adoption. These sites also play an important role in supporting local services and facilities.

### Revised Distribution of Development: Issues to consider

16 In considering the most appropriate distribution of development across the District to accommodate the additional housing requirement, the following issues provide important context:

- **Household Projections:** the number of households in the District is projected to rise from 58,700 in 2011 to 69,500 by 2029 an increase of over 18%. In addition to this the District will need to accommodate 5976 dwellings to meet Coventry's housing needs. Combined with this District's own need this represents a 29% increase in houses between 2011 and 2029.
- **The context provided by existing urban areas:** The District has four towns; Leamington Spa, Warwick, Kenilworth and Whitnash. Each of these needs to grow to provide for local needs and to support local employment and services. This is a key part of the strategy required to underpin the strategic priority of supporting prosperity and to provide for local housing needs (see Local Plan para 1.42 and Objective 1).
- **Villages:** At a smaller scale, the Council is also seeking to support the growth of the largest and best served villages in the District. The strategy therefore seeks to provide for the proportionate growth of 10 rural settlements that can best provide sustainable locations.

- **Relationship with Coventry:** In addition to seeking to support the growth of the District's towns and main rural settlements, it is recognised that the District has a close relationship with Coventry and that a thriving, vibrant city will also support a thriving District. The strategy therefore seeks to provide for part of the City's growth in line with the MOU. It is recognised that (subject to environmental and policy constraints) the most sustainable locations to achieve this are those closest to or with the best access to Coventry.
- **Relationship to Employment Areas:** to provide balanced, mixed communities and sustainable settlement patterns, the distribution of development needs to take account of the location of major centres of employment – both existing and proposed. Existing employment is focused to the south of Warwick and to the north of the District around the university, Westwood Heath and Coventry Airport. Beyond the District's boundaries Coventry and western parts of Rugby District also provide important centres of employment. The focus of employment to the south of Warwick was an important factor in proposing housing allocations to the south of the towns in the submitted Local Plan. The revised distribution, seeks to take account of the employment centres in the north of the District and in Coventry.
- **Green Belt:** Around 80% of the District currently falls within the West Midlands Green Belt. The Council recognises and supports the importance of Green Belt and the Local Plan's strategy seeks to continue to protect the Green Belt unless there are exceptional circumstances that can justify the release of land from the Green Belt. The need to provide for the growth of the District as a whole and specific settlements (including Coventry) is considered to provide exceptional circumstances unless suitable and appropriate options exist outside the Green Belt.
- **Sustainability Appraisal:** The sustainability appraisal has informed the modifications to the Local Plan. This has involved appraisals of four housing growth options; seven broad locational options and four distributions, as well as site by site appraisals of all reasonable alternatives. This sequence of appraisals has helped derive proposals that will deliver sustainable development.

## Review of Council's Strategy

- 17** Taking account of the factors set out above, the Council has considered a number of strategic options that could support the distribution of development across the District. These options are:
1. Focus development outside the Green Belt
  2. Focus development in and the around the edge of urban areas & sustainable growth villages
  3. Focus development around key transport corridors
  4. Dispersal Approach: distribute development across urban areas & urban edge, growth villages and limited infill villages
  5. New Settlement outside the Green Belt

## 6. New Settlement in the Green Belt

- 18** A high level assessment has been undertaken to compare these 6 spatial options. The outcomes from this exercise are shown in Appendix 1. This assessment shows that options 2 and 3 offer the most sustainable spatial approaches even in the context of having to provide for Coventry's needs. This is entirely consistent with the spatial strategy set out in Policy DS4 of the Draft Local Plan.
- 19** This shows that the spatial strategy set out in Policy DS4 continues to provide a sustainable and rational framework for planning for the growth of the District. This strategy is capable of addressing the issues raised in para 14 above. It is therefore proposed that the distribution of development continues to provide for growth within existing built up areas or, where this is not possible, on the edge of settlements with employment, services and infrastructure capable of supporting growth.

### **Modifications to Proposed Distribution**

- 20** This distribution in the submitted Draft Local Plan was driven by the assessment of sustainable broad locations of growth and as a result focused on sites within or on the edge of the main urban areas, growth villages and sustainable Green Belt sites where exceptional circumstances exist. At the time of the Plan's publication, the housing requirement focused on Warwick District. As a result the distribution focused on the District's main settlements and did not include major Green Belt releases on the edge of Coventry.
- 21** The modifications proposed in February 2016, have been prepared in a way that recognises assessment of spatial options (indicating that spatial options 2 and 3 are the most sustainable options), at the same time as recognising the range of issues set out in paragraph 16 above, and particularly that around a third of the District's housing requirement is to provide for the needs of Coventry. The modifications do not make significant changes to the proposed allocations that were set out in the publication Draft Plan. Instead, they seek to add to this in a way that recognises that, predominantly, the additional housing requirement derives from Coventry's shortfall. This approach is supported by the high level assessment of broad spatial options and is consistent with the Spatial Strategy as set out in appendix 1. For this reason it is proposed to carry forward all the sites that are allocated in the submitted Draft Local Plan as a starting point.
- 22** The modifications therefore focus primarily on how the housing needs of Coventry can most appropriately be accommodated in the District, at the same time as ensuring that the overall distribution continues to provide balanced and sustainable patterns of growth across the whole District. The starting point therefore is to seek to provide for the City's needs in sustainable locations including locations close to the City, at the same time as considering whether suitable alternatives exist outside the Green Belt and whether exceptional circumstances for Green Belt release can be justified.
- 23** **Opportunities to the south of Coventry:** a number of substantial sites on the southern edge of Coventry have been submitted through the SHLAA. Some of these have been assessed as suitable and these therefore provide an opportunity to meet a significant part of the needs of the City as close to the City as possible, subject to Green Belt and infrastructure considerations.

Many of these sites can make best use of existing infrastructure and are located close to existing and future employment opportunities. In general this area therefore offers a sustainable broad location.

- 24 Opportunities in the Green Belt adjacent to Leamington, Warwick and Kenilworth:** a number of substantial sites have been put forward in the SHLAA around Kenilworth and to the north of Warwick and Leamington. Some of these sites have been assessed as suitable. Whilst these locations are not adjacent to the urban edge of Coventry, they generally provide good connectivity with the City by public transport (bus and rail) and by road (particularly the A46). Whilst the transport infrastructure would need to be improved to accommodate significant levels of development in these areas, these broad locations do offer sustainable options to meet the needs of the City and to support the growth of the Towns. Subject to being able to justify exceptional circumstances these locations are consistent with the spatial strategy and are supported by the sustainability appraisal set out in Appendix 1. In general this area therefore offers a sustainable broad location.
- 25 Opportunities within or adjacent to growth villages:** A village profile and housing allocations paper has been prepared separately. This sets out the approach the Council has taken to assessing the capacity and availability of suitable sites in each of the growth villages. In particular, it recognises that connectivity with Coventry is a relevant factor in considering the extent to which these growth villages could accommodate additional growth over and above the allocations in the submitted Draft Local Plan. It also takes account of the need to boost housing supply and to deliver a 5 year supply on adoption of the Local Plan. Many of the sites adjacent to growth villages are smaller in size and provide for a different market. They are therefore needed to help deliver a 5 year supply of housing. However, the paper also recognises that sites around many of these villages are constrained by landscape, flooding, ecological and heritage assets, infrastructure and access. Some growth in these broad locations is consistent with the spatial strategy and they offer some limited potential to contribute to the additional housing requirement and the 5year supply of housing.
- 26 Suitable alternatives outside the Green Belt:** The only part of the District that falls outside Green Belt is to the south of Warwick, Whitnash and Leamington Spa. For this reason the submitted Draft Local Plan proposes substantial allocations within this area, which in combination with recent permissions total almost 4000 dwellings. In addition, in January permission was granted on appeal for two large sites in this area (the Asps and Gallows Hill) totalling 1350 dwellings. Given the scale of proposed development in this broad location there can only be limited additional suitable capacity that is consistent with the agreed Spatial Strategy, particularly when considering potential delivery rates and other constraints (such as heritage, landscape, and infrastructure). Further, in general, sites in this area have relatively poor connectivity with Coventry and are therefore less well suited to meeting the City's needs. The level of further potential growth in this broad location is therefore limited and focuses on capacity that can help ensure a strong supply of housing throughout the Plan Period.
- 27 Exceptional Circumstances within Green Belt:** The sustainability appraisal has shown that the most sustainable locations to meet Coventry's housing needs are either adjacent to the City or where good connectivity is available. As set out above (in paras 23 and 24), these locations are

predominantly within the Green Belt. The requirement to provide for Coventry’s housing needs combined with a limited supply of further appropriate sites outside the Green Belt (see para 26 above), provide the exceptional circumstances to justify the release of land from the Green Belt. Applying the three stage approach set out in paragraph 14 above, the details are provided in Table 3 below.

28 Specifically, it is therefore proposed to modify the Plan to allocate additional sites in the broad locations set out in Table 3 below.

Table 3

<b>Broad Location</b>	<b>Approximate Number of Additional Dwelling Proposed (Mods 2016)</b>	<b>Total Number of Dwellings Proposed (including Draft Local Plan proposals)</b>	<b>Green Belt - Exceptional circumstances (three stage approach):</b> a) is there an essential need that has to be met? If yes, b) are there any suitable sites outside the Green Belt that can meet this need? If no c) is this the best site within the Green Belt to meet the need?
Urban Brownfield Sites	0	1208	N/A
Edge of Coventry	2225 dwellings (plus capacity for a further 2000 dwellings beyond the Plan Period)	2245	a) HMA’s and Coventry’s housing need and lack of capacity within Coventry. b) There are no suitable sites outside the Green Belt that can meet this level of need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan’s Strategy and do not offer sustainable locations to meet the City’s housing need. c) This is a sustainable location which allows expansion on the edge of the City’s urban area in sustainable locations providing opportunities for infrastructure improvements (see para 23 above). The 2015 Green Belt considers this area: These locations lie within Parcel C14 (scores 15/20), C16 (scores 15/20), C19 (scores 8/20) and C20 (scores 13/20). To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns. The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt. Although a sustainable broad location, capacity in this area is limited by delivery rates, the availability of suitable sites and major infrastructure constraints (particularly highways). In view of ongoing housing needs and capacity constraints in the City, capacity beyond the Plan Period is provided in this location (including safeguarding land for a future Plan review). This will provide opportunities to address medium to long term infrastructure improvements before further



			development comes forward.
Edge of Kenilworth	740 dwellings	1500	<p>a) HMA's and Coventry's housing need and lack of capacity within Coventry. Supports expansion of Kenilworth which is tightly constrained by Green Belt thereby providing for local housing needs.</p> <p>b) There are no suitable sites outside the Green Belt that can meet this level of need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.</p> <p>c) Provide sustainable locations with good links to employment and services within the City. Opportunities for infrastructure improvements (see para 24 above). The 2015 Green Belt considers this area: These locations lie within Parcel KE1 (scores 11/20), KE2 (scores 10/20), KE4 (scores 13/20) and KE8 (scores 18/20). To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns. The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt.</p>
Northern edge of Leamington Spa	250 dwellings	500	<p>a) HMA's and Coventry's housing need and lack of capacity within Coventry.</p> <p>b) There are no suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet this need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.</p> <p>c) Sites in this area are consistent with the Local Plan strategy and provide sustainable locations with reasonable links to employment and services within the City and Leamington. Whilst this location is not as well located to the City as the edge of Coventry and edge of Kenilworth, there are no further suitable and deliverable sites in these locations that are not being proposed for allocation. In that context, the area to the north of Leamington offers the next most sustainable location, particularly as the area to the north of Milverton has strong defensible boundaries. There are good opportunities for infrastructure improvements to support development (see para 24 above). The 2015 Green Belt considers this area. These locations lie within Parcel RL1 (scores 16/20), RL2 (scores 15/20), and RL3 (scores 15/20). To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic</p>

			towns. The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt.
South of Warwick, Whitnash and Leamington	1910 dwellings (including the Asps and Gallows Hill)	3720 (in addition to a number of sites included as commitments)	N/A
Growth Villages	700 dwellings	1146 (in addition to a number of sites included as commitments)	<p>Of the 700 dwellings proposed for growth villages in the 2016 Modifications, 535 are within the Green Belt. This reflects that the growth villages outside the Green Belt are less well placed to meet the needs of Coventry and have already been subject to significant allocations in the submitted Draft Local Plan. Exceptional circumstances for the allocations to Green Belt growth villages are:</p> <ul style="list-style-type: none"> <li>a) HMA's and Coventry's housing need and lack of capacity within Coventry; important in achieving a 5 year housing land supply on adoption; important in meeting local housing need (constrained by current planning policy)</li> <li>b) There are insufficient suitable sites outside the Green Belt or more sustainable locations within the Green Belt that can meet both overall and 5 year supply housing need and - see para 25 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy or effective in meeting these needs.</li> <li>c) It is important to provide a variety of sites in a variety of locations to support the housing market in boosting significantly the housing supply. Growth villages across the District (including Green Belt locations) offer sustainable and unique locations to achieve this. These locations also directly provide for local housing needs and support the retention (and potentially improvement) of local rural services. Finally, these locations also support the HMA's and the District's housing need, including the City's housing need. For this reason additional locations (proposed in 2016) are focused more on those villages which have stronger access to Coventry. The Village Profile and Housing Allocations paper considers the 2015 Green Belt study</li> </ul>

27 **Alignment with areas of employment:** Currently employment within the District is predominantly focused on Leamington and Warwick and particularly in the areas to the south of the towns, with some smaller areas of employment in the rural area and Kenilworth. Gaydon and Coventry also provide significant centres for existing employment outside the District. The Draft Local Plan seeks to allocate additional employment for local needs to the south west of Warwick and the south of Kenilworth. It also includes a sub-regional allocation to the south east of Coventry. A significant focus of housing development

in the submitted Draft Local Plan was to the south of Warwick, Whitnash and Leamington. This recognised that much of the District's existing employment offer is in that area along with a significant part of the supply of employment land. However, with Coventry providing the source of much of the additional housing need, the relationship with employment land has been reconsidered. In this context, the most sustainable locations are those close to, or with good access to, the City's existing and planned employment offer including the City Centre, the Universities, Westwood Heath and the area around Whitley and Coventry Airport. The proposed distribution for the additional housing need, therefore takes account of this by focusing more development to the north of District to minimise commuting and where possible, offer alternatives to the car.

- 28 Infrastructure:** Ensuring that sites can be brought forward in locations where the infrastructure impacts can be mitigated is a key element in selecting locations. For instance where the highways network or education requirements are unable to support growth and the impacts cannot be effectively mitigated, sites have not been allocated or capacity has been capped. Conversely, some locations provide opportunities to provide viable infrastructure improvements. The Infrastructure Delivery Plan sets out the infrastructure requirements associated with the proposed level of growth and distribution of development
- 29 Safeguarded Land:** The modifications propose that two areas of land are removed from the Green Belt and are safeguarded. These sites have the potential to support future growth of the District and the sub-region. In the case of the land at Westwood Heath, this has been assessed as suitable for meeting future housing needs subject to resolving significant highways constraints in the area. It cannot come forward until significant highways investment has been made. Whilst work is being carried out to plan for this investment, there remain some uncertainties about the nature and funding of the scheme. This means the site cannot be allocated now. A further area of land is safeguarded to the north of Leamington. This recognises that there is a substantial, suitable site in this location with strong defensible boundaries. As not all this land is required to meet needs within the current Plan Period, it is proposed to safeguard the remainder of the land to minimise the risk that the Green Belt boundaries will require further change beyond the Plan Period and to provide potential for future housing need in the District.

### **Summary: Justification for revised overall distribution**

- 30** The justification for the overall revised distribution of growth has been set out above. In summary, the proposed distribution:
- Aligns with the Local Plan's Spatial Strategy, which has been shown to be a sustainable approach
  - Ensures local housing needs are met within the District's main towns and growth villages
  - Provides for the needs of Coventry adjacent to the City or in areas with good connectivity to the City
  - Ensures alignment between the location of housing and existing and proposed areas of employment
  - Ensures good mix of sites and locations across the District to support different markets

- Ensures a mix of sites which seek to enable a 5 year housing land supply on adoption of the Plan
- Recognises important environmental constraints such as heritage, landscape and ecology
- Includes Green Belt releases where exceptional circumstances exist, but otherwise seeks to protect the Green Belt
- Ensures key infrastructure requirements can be planned and delivered to support the distribution.

Appendix 1

	a) in the first instance, allocations will be directed to previously developed land within the urban areas and in particular those areas where there is greatest potential for regeneration and enhancement;	b) where greenfield sites are required for housing, they should generally be located on the edge of urban areas in sustainable locations close to areas of employment or where community facilities such as shops, bus services, medical facilities and schools are available or can be made available.	c) Where greenfield sites are required for employment, they should only be allocated in locations which are suitable for the needs of 21st century businesses, accessible via a choice of transport modes and are in close proximity to existing or proposed housing subject to ensuring there is no undue impact on residential amenity ;	d) limiting development on sites which would lead to coalescence of settlements to ensure settlement identity is retained;	e) sites which have a detrimental impact on the significance of heritage assets will be avoided unless the public benefits of development outweigh the harm;	f) areas assessed as high landscape value or other highly sensitive features in the natural environment will be avoided; and	g) taking the national Green Belt policy in to account, sites that are currently in the green belt will only be allocated where exceptional circumstances can be justified. The following will be taken into account in considering exceptional circumstances:	i. the availability of alternative suitable sites outside the Green Belt;	ii. the potential of the site to meet specific housing or employment needs that cannot be met elsewhere;	iii. the potential of the site to support regeneration within deprived areas;	iv. and the potential of the site to provide support to facilities and services in rural areas.
Broad Spatial Option	a)	b)	c)	d)	e)	f)	g):	i	ii	iii	iv
Broad Option 1 - Focus development outside the Green Belt	Yes	No	No	No	Unknown	Unknown		Yes	Yes	No	No
Broad Option 2 - Focused in and around the edge urban areas & sustainable growth villages	Yes	Yes	Yes	Yes	Yes	Possible but dependent upon further evidence and possibly requires slight alteration of criterion		Yes	Yes	Yes	Yes
Broad Option 3 - Focused around key transport corridors	Yes	Yes	Yes	Yes	Yes	Unknown		Unknown	Unknown	No	No
Broad Option 4 - Dispersal Approach: Urban Areas & Urban Edge, Growth Villages and Limited Infill Villages	Yes	No	No	Yes	Unknown	Unknown		Yes	no	Yes	Yes
Broad Option 5 - New Settlement Outside the Green Belt	No	No	No	Unknown	Unknown	Unknown		Yes	No	No	No
Broad Option 6 - New Settlement in the Green Belt	No	No	No	Unknown	Unknown	Unknown		No	No	No	No