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**our ref:** EXAM2-WDC\_Reply

**your ref:** EXAM2

27 February 2015

Dear Mr Ward,

1. Thank for your letter of 20<sup>th</sup> February. I have split the response to the points of clarification in to three broad sections. The first section relating to Duty to Cooperate addresses the points raised in your 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs. The second section relating to Green Belt boundaries addresses the points raised in your 4<sup>th</sup> and 5<sup>th</sup> paragraphs. The third section relating to the Sustainability Appraisal addresses points raised in your 6<sup>th</sup> paragraph.

## **1 Duty to Cooperate**

2. I can confirm that the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity (referred to in paragraph 5.2.8 of the Duty to Cooperate Statement) and the Coventry, Warwickshire and South West Leicestershire Economic Prosperity Board (referred to in the title of document LP20) are one and the same thing. The correct name is that given in the Duty to Cooperate Statement, although it is often referred to locally as the "Economic Prosperity Board" as it is intended that it will become such in the near future. Formally the group comprises the Coventry and Warwickshire local authorities along with Hinckley and Bosworth Borough Council (South West Leicestershire). In this context, I am able to confirm that the agreement referred to in paragraph 5.2.8 of the Duty to Cooperate Statement is that set out in document LP20.
3. With regard to the agreement about the preparation of a Joint Core Strategy, the final bullet point of 5.2.8 is misleading. This was taken from an earlier report (in October 2014) to the Joint Committee for Economic Growth and Prosperity that was agreed by a majority but not unanimously supported by all. There is not therefore unanimous agreement to proceed with a Joint Core Strategy for Coventry and



Warwickshire. However, in November 2014, there was unanimous agreement from the Joint Committee for Economic Growth and Prosperity for the process and timeline set out in section 5 of document LP20. This includes agreement (in 4.1e) to a coordinated review process, which is further explained in task 15 of Table 2 as follows: *"Agree/establish approach and governance for **coordinated review process**. This may take the form of a Joint Core Strategy or may involve a review of some or all adopted local plans (depending on the outcomes of the work on the broad spatial strategy)"*. In other words there is a commitment to work closely together according to a coordinated timetable and an agreement that this may take the form of a Joint Core Strategy if that is agreed to be the most effective mechanism.

4. With regard to the timetable set out in Table 2 of Document LP20, I can provide the following update:

	DATE	TASK	UPDATE 24/2/15
1	November to December 2014	Set up a joint <b>Monitoring Group</b> to establish consistent development monitoring processes (as a minimum this should cover housing and employment)	The group was established in November and has been active in understanding the differences in 5 year supply methodology across the HMA and in working with the LEP to provide improved housing and employment monitoring information, building on the information already provided at regional level
2	November to December 2014	Compare <b>SHLAA methodologies</b> and agree a shared methodology to be used for all SHLAA's undertaken within the HMA (SHLAA Workshop)	A draft SHLAA methodology has been agreed. This will be tested through a stakeholder engagement event scheduled to take place in Rugby on 12 <sup>th</sup> March.
3	December 2014 to January 2015	Each Local Authority to <b>formally commit</b> to the process and timetable	See separate update table below
4	December 2014 to May 2015	First Local Plan examination window	Stratford DC's Core Strategy was subject to examination hearings in January. The inspector's findings from this are awaited.
5	February 2015	Completion of <b>Joint Green Belt Study</b> (stage 1)	Work on the Joint Green Belt Study (stage 1) is progressing. However, it is expected that the stage 1 report will not be published until May or June 2015.
6	January to April 2015	Rugby, Coventry <b>undertake SHLAA reviews</b> in line with agreed methodology	These two authorities are trialling the methodology as part of the preparation of their Core Strategies. This work is underway, but will be subject to review depending on the outcomes of the SHLAA methodology stakeholder event on 12th March

5. Progress on Commitment to Process and Timetable (see task 3 above)

Authority	Date	Progress
North Warwickshire	21/1/15	Agreed by LDF Sub Committee
	10/2/15	Agreed by Executive Board
Rugby	2/2/15	Agreed by Cabinet
	10/2/15	Agreed by Full Council

Coventry	3/3/15	To be considered by Cabinet
	17/3/15	To be considered by Council
Stratford	19/1/15	Agreed by Cabinet
Warwick	28/1/15	Agreed by Council
Nuneaton and Bedworth	4/2/15	Agreed by Cabinet

6. **Joint Green Belt Study:** The nature and scope of the Joint Green Belt Study is set out in the Tender Brief, July 2014. This is attached and I would suggest this is now be added to the Examination document library.

7. **Update on Local Plan progress:**

Authority	Progress to date	Next steps
North Warwickshire	Adopted Core Strategy October 2014 Consultation on Pre-submission site allocations DPD June 2014	Preparing site allocations DPD
Rugby	Adopted Core Strategy 2010 being reviewed. Consultation on development strategy undertaken in summer 2014	Undertake SHLAA, Spring 2015 Preferred Options August 2015
Coventry	Consultation undertaken 2014. Currently preparing publication draft.	Publication Draft – July 2015 Submission – Sept/Oct 2015
Stratford	Submitted Core Strategy in September 2014. Examination hearings took place in January 2015.	The Inspector's findings from this are awaited.
Nuneaton and Bedworth	Preferred Options undertaken in 2013. Report on the development targets for the Borough Plan will be reported to Cabinet in February 2015 and	Consultation on the next version of the Plan will follow later in 2015

8. **Greater Birmingham Housing Requirements:** You ask for an update on discussions regarding housing needs arising from Greater Birmingham. The Coventry and Warwickshire Housing Market Area has engaged actively with the Greater Birmingham area and we have stayed closely in touch with developments regarding their housing requirements and a possible shortfall. The approach taken by the Coventry and Warwickshire HMA has been to require that specific and clear evidence of the shortfall should be provided prior to active discussions as to how the HMA could help address the shortfall.

9. At present, the Greater Birmingham and Solihull LEP authorities are commencing stage 3 of their requirements and capacity assessment work. This involves considering high level options as to how the housing requirement for their area could be met. Prior to this stage 3 work getting underway, the Greater Birmingham authorities have focussed their discussions with North Warwickshire and Stratford District as the two authorities most closely related to the Greater Birmingham area. It is the view of North Warwickshire Borough Council and Stratford-on-Avon District Council that the first phase of this stage 3 work should initially focus on considering options to meet the Greater Birmingham housing requirement within the Greater Birmingham area. Informally this view has been supported by the officers of all the authorities across the Coventry and Warwickshire HMA through the Duty to Cooperate meetings. Only in the event that the stage 3 work demonstrates that it is not possible or preferable to meet the requirements within the Greater Birmingham area, should options within the Coventry and Warwickshire HMA (such as North Warwickshire or Stratford District) be considered.

10. So whilst the Coventry and Warwickshire HMA authorities are fully aware that it may be necessary to help meet some of the housing requirements of the Greater Birmingham area, this remains very uncertain. The process and timeline set out in table 2 of document LP20 provides the mechanism for addressing this issue should the need arise and this is supported by Policy DS20 of the draft Local Plan.

## **2 Green Belt**

### **11. List of specific sites proposed to be removed from the Green Belt:**

- Red House Farm, Royal Leamington Spa; (DS11, Site H04)
- Castle Sixth Form, Rouncil Lane, Kenilworth; (DS11, Site H12)
- Thickthorn; (DS9, Site E2 & DS11, Site H06)
- Southcrest Farm, Kenilworth; (DS12, Site ED2)
- Land in the vicinity of Coventry Airport (sub-regional employment site) (DS16)
- University of Warwick; (MS1)
- Oak Lea, Finham; (DS11, Site H08)
- Baginton; (DS11, Site H19)
- Burton Green; (DS11, Site H24)
- Cubbington; (DS11, Sites H25 & H26)
- Hatton Park; (DS11, Site H28)
- Hampton Magna; (DS11, Site H27)
- Leek Wootton (DS11, Sites H34, H35, H36 & H37)
- Kingswood (Lapworth) (DS11, Sites H29, H30, H31, H32 & H33)

**12. Process for Reviewing Green Belt boundaries (including the basis of reviews and the geographical scope):** In preparing the Local Plan the Council has undertaken two Green Belt reviews: the Joint Green Belt Study (2009) (LA05) and the Green Belt and Green Field Review (2013) (V13, V14 and V15). The basis for these reviews was to examine Green Belt around potentially sustainable locations and settlements given the likely housing requirement, the availability of land outside the Green Belt and the spatial strategy options being considered. However, the geographical extent of each review differed.

13. The Joint Green Belt Study 2009 (LA05) was prepared by SSR Planning on behalf of Coventry City Council, Warwick District Council, Nuneaton & Bedworth and Rugby Borough Councils. It was prepared to inform the Local Development Framework process that each local planning authority was undertaking and the production of the Regional Spatial Strategy. The study has been the subject of successful Examination in the case of both Coventry's and Rugby's Core Strategy. The Housing Requirement for Coventry was such that it was unlikely that it could accommodate all of its allocation outside of both its own Green Belt designation and its administrative boundaries. Within the proposed West Midlands RSS there was provision for this 'overspill' to be met by the neighbouring authorities above. In total the figure was likely to be in the region of 7,000 dwellings. Therefore, the study examined parcels of Green Belt within Coventry and on its urban fringe in Warwick, Nuneaton & Bedworth and Rugby. In addition, the study also examined Green Belt parcels around the urban fringe of Warwick District's towns: wholly around Kenilworth and the northern half of Warwick and Leamington. This was in order to understand the purposes of Green Belt in these locations and address the District's own housing requirement. This study therefore provided a consistent basis across the local authority areas. After defining Green Belt Parcels around defensible boundaries, the study was carried out in two stages; the first stage examined each

parcel in terms of the purposes of Green Belt as expressed in PPG2. Those parcels that were considered to meet 4 or 5 of the purposes of Green Belt were then sieved out. For the second stage the remaining parcels were examined for other environmental constraints, including landscape, ecological and historical constraints. It should be noted that all parcels of land were subject to the landscape assessment, undertaken by RMA Associates on behalf of SSR, irrespective of how many purposes the parcel met. The landscape evidence provided qualitative analysis on the ability for parcels to accommodate change whilst maintaining the overall purposes of the Green Belt.

14. The Green Belt and Green Field Review was prepared to assess areas of Green Belt around growth villages proposed in the Local Plan Revised Development Strategy, including, Burton Green, Baginton, Cubbington, Leek Wootton, Hatton, Hampton Magna and Kingswood. Along with several villages not in Green Belt locations, these villages were identified as the most sustainable given the services available, locations and size. Therefore, alongside site environmental assessments for each village, Green Belt analysis was undertaken to understand how well the Green Belt was performing in relation to the purposes and function of Green Belt as identified in the NPPF.
15. The Green Belt and Green Field Review (2013) (V13, V14, V15) developed a different methodology to that prepared for the Joint Green Belt Study. It took into account the different purpose of the review as well as new guidance and policy and recent best practice from elsewhere in the country. Parcels were drawn around defensible boundaries for each village assessed, described and justified. For each parcel, a series of qualitative questions addressed the essential characteristics, functions and purposes. A conclusion and summary was provided at the end together with an outline value assessment. As the study was undertaken in house, a critical friend analysis was undertaken to verify that the approach taken was sound (Green Belt Critical Review (V14)) and undertake a sub parcel analysis of the preferred options sites set out in the Village Housing Options and Settlement Boundaries Consultation (LP09).
16. **Why the sites in question were chosen:** You ask why the sites in question were chosen ahead of others. To answer this it is important not only to understand the Green Belt Review studies described above, but also the context of the Council's spatial strategy. In this context, the selection of sites can be more clearly explained, although further information is available in the Site Selection Methodology (SA07) for urban and edge of urban areas and the Village Sites Appraisal Matrix (V12) for rural areas and the Sustainability Appraisal (SA10).
17. The Council's strategic approach to releasing land from the Green Belt for development forms part of its wider strategy for sustainable development as articulated in Policy DS4 of the Draft Local Plan. This policy seeks to retain the vast majority of the District's Green Belt and to limit releases to locations where exceptional circumstances can be justified. This means the Council's strategic approach seeks to focus development on sites outside the Green Belt unless there is a clear benefit from the development that cannot be met in sustainable locations elsewhere. Specifically, policy DS4 indicates that four factors will be taken in to account in considering whether exceptional circumstances could be justified for Green Belt releases:
  - the availability of alternative suitable sites outside the Green Belt;

- the potential of the site to meet specific housing or employment needs that cannot be met elsewhere;
- 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.

18. This strategic approach has been supplemented by an evidence base as described above. This provides a means of comparing Green Belt parcels in terms of the extent to which they fulfill the purposes of the Green Belt. The Green Belt releases set out in Policy DS19 have taken account of this strategic context and evidence base. They fall in to the following categories and the justification for these Green Belt boundary changes are explained in more detail in the paragraphs that follow:

- Kenilworth - Thickthorn, Southcrest Farm and Castle 6<sup>th</sup> Form
- Red House Farm, Leamington Spa
- Sustainable Rural Settlements
- University of Warwick
- Sub-regional employment - Land in the vicinity of Coventry Airport

**19. Thickthorn (H06), Southcrest Farm (ED2) and Castle 6<sup>th</sup> Form (H12),**

**Kenilworth:** Kenilworth is tightly surrounded by Green Belt, with limited development opportunities outside of this designation, therefore careful consideration has been given to options for amending the Green Belt in Kenilworth to enable development to come forward. The Green Belt Study 2009 identified that the Green Belt performs particularly well in the west, north west and northern sides of Kenilworth and less so in the south east and eastern side of the town. The allocations proposed will contribute to the District's identified housing needs and halt the historic housing trends of out migration and contribute to housing affordability in the town.

20. The land allocated at Thickthorn, Kenilworth and the amendments to Green Belt boundary to accommodate this location to ensure the specific housing needs of Kenilworth are met. Thickthorn represents the most sustainable Green Belt location to provide for the Town's housing and employment needs (see the Site Selection Methodology (SA07) and the Sustainability Appraisal (SA10)). Kenilworth has a shortage of employment land and some existing areas are not capable of meeting modern business needs. In addition, there are limited opportunities for business expansion within the town centre.

21. Kenilworth School currently operates from two locations with school buildings and playing fields at Leyes Lane and Rouncil Lane. The land at Rouncil Lane is currently operated by Kenilworth School as the 6<sup>th</sup> Form and its playing fields are within the existing Green Belt. The school has operational and funding issues in delivering educational needs over two sites and it is not considered to be financially viable to do so in the medium to long term. In brief, the exceptional circumstances for amending the Green Belt boundaries in this location are to help contribute to the District's and Kenilworth's identified housing needs and to halt the historic housing trends of out migration and contribute to housing affordability in the town. A landscape assessment (LA02 and LA04) of this proposal demonstrated that it is likely that visual impacts can be minimised with appropriate mitigation.

22. The housing allocations proposed in the Local Plan for Kenilworth and surrounding area, and the associated increase in pupil numbers, will result in the secondary

education sector being unable to meet educational needs effectively in its current locations in the town. As described above, Kenilworth School currently operates over two sites, which results in funding and operational issues. Furthermore both of the existing school sites are in need of significant capital investment into the ageing building stock. Neither of the existing sites have the capacity to provide an effective educational offer on a single site taking account of existing pupil numbers and projected pupil increases. Land at Southcrest Farm provides the opportunity for the School to relocate to a new combined site which can accommodate the anticipated increase in pupil numbers in modern facilities. In addition, a new school site will enable the provision of necessary additional housing in sustainable urban locations on the existing school sites. Alternative options for the delivery of the educational needs of Kenilworth have been assessed by Kenilworth School, Warwick District Council and Warwickshire County Council and are not considered to be viable, deliverable or desirable.

23. **Red House Farm, Leamington Spa:** The potential for this site to assist in delivering wider regeneration within this part of Lillington provides exceptional circumstances to justify the release of this land from the Green Belt. Lillington includes some pockets of localised but significant deprivation. These focus on the Lillington East Local Super Output Area (LSOA) which abuts the Red House Farm allocation. This LSOA has the highest levels of unemployment within Warwick District (and is within the worst 10% nationally), and is ranked lowest in the district for a range of measures including educational attainment, those not in education, employment or training (NEETS), and those with no qualification. The Council is exploring in detail a range of ways in which the Red House Farm allocation can support this regeneration effort including by widening the mix of housing opportunities, providing better access to open spaces and improving the environment. More significantly, the Council has commissioned a major study to explore options for using the allocation as a catalyst for wider regeneration including through the demolition and re-provision of some of less good quality (council-owned) housing, and by assisting in the provision of improved local community facilities. The Council has identified that there is potential to provide a wide range of environmental, social and economic benefits through such a regeneration scheme but that the Red House Farm site is fundamental to delivering this. This study is being published next week and will be able to inform the Examination.
24. All of the allocation proposed was subject of the Joint Green Belt Review in 2009 (LA05). It is considered that development of the site could be fully integrated into the landscape and in such a way to ensure a defensible barrier to future development. This could be achieved without encouraging further encroachment into the Green Belt. The development of the Red House Farm site is just one element in the regeneration of the wider Lillington area as set out in policy DS18. The intention is that the site will be removed from the Green Belt on adoption of the local plan.
25. **Sustainable Rural Settlements:** The 'exceptional circumstances' for the release of land from the Green Belt for development at Growth Villages are justified for a number of key reasons:
- there is a need for additional housing across the District and it is important that a proportion of the District's need is provided in rural areas to help provide a balanced pattern of development in line with the Council's Spatial Strategy

- some facilities and services in rural areas are becoming less viable and yet are highly valued and in some cases needed. Additional development in sustainable locations can support these services. The background to this is set out in the Village Hierarchy Report (V01)
  - Additional housing in rural settlements provides badly needed affordable homes and also provides opportunities and choice. This will enable local communities to thrive and local people to remain within their communities.
26. A detailed site selection process and methodology (V12) was developed for appraising village site options building on information gathered as part of the Council's Strategic Housing Land Availability Assessment (SHLAA) (H12), and included commissioning bespoke research on landscape impact, habitat / species impact and the function and performance of Green Belt and green fields parcels around the villages.
  27. The first stage in the site selection process involved the establishment of a 'long list' of potential sites. The next stage involved obtaining information about new site options from landowner / developer interests following local Parish Council meetings / discussions and consultation at various stages in the local plan process (Preferred Options and Revised Development Strategy).
  28. This work then progressed to establishing a revised long list of sites which were first sieved for:
    - sites of excessive size with marginal connection to village settlements;
    - negative SHLAA commentary and obvious impacts / site restrictions;
    - isolated development options with limited connectivity to village settlements, and;
    - sites connected to often smaller less sustainable villages where the Parish Council was not supportive of growth
  29. A fine-tuned list of sites then moved forward for detailed appraisal. This reduced sites from 190 to 77 sites for detailed appraisals, resulting in 28 preferred housing options covering 13 village settlements and two additional urban fringe sites, which also came through the appraisal process as potential housing options.
  30. For sites undergoing a detailed site appraisal, a partial review of the Green Belt and green field parcels surrounding the villages, was one of the criteria for assessment. A technical study (V13) of the function and role of the Green Belt was undertaken and externally appraised as part of a critical review (V14).
  31. One of the first tasks was to breakdown the overall Green Belt around the villages into defined Green Belt parcels (often defined by permanent features such as major road, rivers and canal infrastructure). A significant number of the Green Belt parcels are very large in scale and contain often different types of landscapes. While the overall function and role of the Green Belt parcel is critically important it was clear that the landscape impact and ecology research would provide a more fine-grained or detailed approach to better understanding areas within the Green Belt which may be less sensitive to change or are better suited to accommodating housing growth.
  32. Within a number of the Green Belt villages the research has indicated some substantial environmental and development restrictions which have reduced the

ability of several villages to accommodate the level of growth originally indicated at an early stage of the process.

33. The Local Plan has subsequently identified a policy framework for the identification of growth villages (identified in policy H1 and H10 of the Local Plan) where, in Green Belt locations, housing sites are allocated (identified as the most appropriate following the studies/ assessments undertaken above). It is intended that these allocations will be removed from the Green Belt in order to rationalise/ strengthen the permanence of the Green Belt boundary during and beyond the current Local Plan period. Further in line with paragraph 86 of the NPPF, the Local Plan also proposes that the built up areas of the growth villages that are currently "washed over" by Green Belt (Baginton; Burton Green; Hatton Park; Hampton Magna; Leek Wootton; and Kingswood) are removed from the Green Belt
34. **University of Warwick:** The Local Plan supports the growth of the District's higher and further education sectors given that they act as an important generator of both employment and investment in the District.
35. The Plan makes an explicit reference to the beneficial role of the University of Warwick both as an economic driver and an educational institution. It is accepted that there is a strong likelihood that further development at the University of Warwick may be necessary and therefore the long term future and success of this institution should be safeguarded.
36. The 'exceptional circumstances' for the removal of the campus from the Green Belt are focused on the fact that the level of development that has occurred (or is committed) at the Campus (particularly in the area within Warwick District which is wholly in the Green Belt) means that this areas no longer meets the essential characteristics of Green Belt policy in terms of openness and permanence. To put this in context, it is important to note that:
  - The University was originally established and located in the Green Belt at a time when HE institutions were regarded as appropriate uses in the Green Belt
  - Central Campus West (originally open fields in the Green Belt) is now largely developed and now has the character of an urban development of some scale.
  - The area has further planning approvals for some 89,000 sq.m of development that would further intensify the now urban character
37. Further, the release of the land from the Green Belt will enable the University to plan for future growth aspirations.
38. The Local Plan has responded positively by the removal of the Campus from the Green Belt and, with reference to the joint Green Belt study 2009, sets out a new Green Belt boundary that will enable the University of Warwick the flexibility to successfully manage its future growth requirements.
39. Future development proposals at Warwick University will however, be subject to Local Plan policy MS1 requiring any development to be in compliance with an approved Masterplan or Development Brief (to be agreed with the Council).

40. **Land in the vicinity of Coventry Airport:** Policy DS16 allocates land for a sub-regional employment site close to Coventry Airport. The total site area is approx. 235 hectares. However, approx. 111 hectares of this is required for the provision of landscaping and open space to minimise the impact of the developed area as well as providing for recreational space and biodiversity offsetting. It is proposed to retain this part of the site within the Green Belt and to release the 124 hectares that will be developed for employment uses.
41. The case for the release of this land from the Green Belt is based on:
- An identified need for an employment site of sub-regional significance to provide opportunities for major investments for B1, B2 and B8 uses. This need has been evidenced in the Strategic Employment Land Study (SELS)(EC01) commissioned by the Coventry and Warwickshire LEP in 2014 and aligns with the ambitions set out in the Strategic Economic Plan (SEP).
  - An assessment through the SELS and through the assessment of the Coventry and Warwickshire Gateway planning application of alternative sites to meet this need concluding that the supply of existing sites within the sub-region will dry up in the short to medium term. Therefore a site is required now to ensure there is capacity to meet future needs.
  - Evidence provided through the SELS and the assessment of the Coventry and Warwickshire Gateway planning application that there are no suitable and available sites outside the Green Belt that could meet the need and that the proposed sub regional employment site is the most beneficial location
  - The potential for the site to provide substantial numbers of jobs
  - The location of the proposed site in relation to areas with higher levels of unemployment within the sub region, particularly parts of Coventry
  - The benefits the site can bring in relation to provision of the country park and improved public transport connections
42. The justification for this release has been rehearsed to a significant degree through the Coventry and Warwickshire Gateway planning application and call-in inquiry. Whilst the Secretary of State agrees with the Inspector's conclusion that, taking all of the benefits of the proposed development into account, both on an individual basis and cumulatively, the harm to the Green Belt has not been clearly outweighed, he indicates that the matter should properly be dealt with through the Local Plan process in line with paragraph 83 of the NPPF.
43. Despite the decision on the Gateway planning application, the Coventry and Warwickshire LEP continue to strongly support a significant employment site in this location and the Council remains of the view that exceptional circumstances exist for its release from the Green Belt. The Coventry and Warwickshire Joint Committee referred to in paragraph 2 above, will consider a report on this matter at its March meeting seeking reaffirmation of support from across the sub-region for an employment site in this location. In his decision, the Secretary of State does conclude that a strong case has been made for the development but indicates that there are a number of matters that require further clarification. Working with the LEP, the Council will seek to ensure this clarification is provided

### **3 Sustainability Appraisal**

44. The Sustainability Appraisal Report of February 2015 (SA10) collectively appraised all proposals policies by theme in the submitted Publication Draft Local Plan and this is set out in Section 5 of the report. A detailed sustainability appraisal of all site options is described in appendices V and VI. Focused changes and minor

amendments to the Publication Draft Local Plan were all subject to screening as set out in Appendix IX of SA10. Any changes that were considered to be more than a minor amendment were subject to full appraisal in the sections described above. The Sustainability Appraisal also includes an assessment of broad spatial options; alternatives to the Local Plan; the chronology of appraisal for sites and responses to representations to the Sustainability Appraisal – Publication Draft, April 2014 (SA5).

I hope this helps to clarify the points raised in your letter. Please let me know if you require any further information.

Yours Sincerely

A handwritten signature in black ink, appearing to read "David Barber". The signature is written in a cursive, flowing style.

David Barber  
Planning Policy Manager