

## MATTER 4

### The spatial strategy

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for CEG

**Nexus Planning reference  
[14104 and 9156]**

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## Matter 4: The spatial strategy

**Question 1) What is the basis for the spatial strategy in terms of the location and broad distribution of development set out in Policies DS4, DS10 and H1 i.e. between different parts of the District, between the urban areas and villages and between brownfield, greenfield and Green Belt sites?**

- 1) The MoU (LP31PM and LP32PM) identifies a significant level of housing that Warwick District must accommodate to ensure Coventry's unmet needs are met in full. In fact, the MoU identifies that Warwick District has the strongest functional relationship with Coventry City of any authority with the HMA. Paragraph 34 of the NPPF details that Plans should ensure developments that generate significant movements are located where the need to travel will be minimised i.e. locating homes close to where people work. The NPPF also details states that planning policies should aim for a balance of land uses within their area, so that people can be encouraged to minimise journey lengths for employment (paragraph 37). Locating development of the edge of Coventry would accord with these requirements.
- 2) The Council has prepared a Distribution of Development Topic Paper which, at paragraph 16, states the following in respect of located housing to meet Coventry's need:

*“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.”*

This is supported by the Sustainability Appraisal (SA) (ref. SA11PM), which identifies that locating housing on the edge of Coventry, to meet unmet needs from Coventry, would be the most sustainable option.

- 3) However, and as detailed in our Regulation 19 representations, while the Local Plan is proposing to accommodate 5,976 dwellings relating to Coventry's unmet needs, it only proposes to allocate 2,225 dwellings on the edge of Coventry (1,800 dwellings at King's Hill and 425 dwellings at Westwood Heath) i.e. less than 50%, which we consider is fundamentally too low. This figure is not however due to a shortage of available land, with the Council's Distribution of Development Topic Paper (HO25PM) highlighting that a *“number of substantial sites on the southern edge of Coventry have been submitted through the SHLAA”* (para. 23). Site S1, for example, has a capacity of 900 dwellings but is only safeguarded and proposed to be considered for release 5 years post adoption of the Local Plan. Therefore, whilst CEG broadly support the general distribution of development and welcome the Council's acknowledgement of significant development pressures in the area south of Coventry, it is considered that the policy should be amended to allocate a greater proportion of housing in sustainable locations on the edge of Coventry in recognition of the significant unmet housing needs arising from the City. This should be achieved through the identification of site S1 and H42 as a single allocation for 1,500 dwellings, or S1 as a single allocation of 900 dwellings to be delivered in the Plan period (425 dwellings being deliverable and 475 dwelling being developable following strategic highway improvements which will be facilitated by the allocation).
- 4) Furthermore, and as highlighted in our Matter 2 statements, the 2014-based household projections indicate a significant uplift in housing pressures arising from Coventry relative to the 2012-based projections, upon which the current OAN calculations are based. This further

supports the reinforces the approach of allocating a greater proportion of housing on the edge of Coventry.

**Question 2) How has this been affected by the Council's suggested modifications?**

- 1) The modifications to the Local Plan include the allocation of 2,225 dwellings on the edge of Coventry. Whilst this is the largest allocation of new growth for any location in the District (in the context of new allocations made by the Modifications), it is only marginally higher than the cumulative total allocated at Warwick, Leamington and Whitnash (1,855 dwellings) and still falls well short of the overall (and potentially increasing) unmet housing needs arising from Coventry.
- 2) Allocating significant growth on the edge of Coventry is entirely consistent with the Council's spatial strategy (Policy DS4) and this is demonstrated below. Commentary is also provided regarding the specific appropriateness of allocating development at site S1 in the context of Policy DS4 (further details are provided in the Technical Annex to our Regulation 19 representations):

<b>Policy DS4 Requirements</b>	<b>Assessment of compliance</b>
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;	The evidence is clear that the Council's (and Coventry's) housing needs cannot be accommodated on previously developed land.
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.	The edge of Coventry is a highly sustainable location with excellent access to employment opportunities, public transport, schools and other complementary services and facilities.  Site S1 is located on the edge of the urban area, in a highly sustainable location, close to employment and other facilities. The Council agree with this, as evidenced by the safeguarded land status it affords.
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;	Not applicable.
d) limiting development on sites which would lead to coalescence of settlements to ensure settlement identity is retained;	The Council has commissioned a Green Belt study to assess how well sites perform against the purposes of including land in the Green Belt. One of the tests relates to preventing

Policy DS4 Requirements	Assessment of compliance
	<p>coalescence and it has been shown that certain development south of Coventry would not result in such a scenario.</p> <p>The development of site S1 would not lead to the coalescence of settlements and would in particular retain a significant countryside gap between the City and Kenilworth, as supported by the Council's Green Belt Study and our own Green Belt Assessment appended to our Regulation 19 representations.</p>
<p>e) sites which have a detrimental impact on the significance of heritage asset will be avoided unless the public benefits of development outweigh the harm;</p>	<p>No designated heritage assets are located within site S1. A Built Heritage Statement has been prepared and concludes that any impact to the setting of designated heritage assets would range from negligible to minor. It is considered that any such impacts would be mitigated to some degree through design and overall, would be outweighed by the significant benefits that would arise from the development, principally the delivery of market and affordable housing.</p>
<p>f) areas assessed as high landscape value or other highly sensitive features in the natural environment will be avoided; and</p>	<p>Site S1 is not designated as being of high landscape value, nor does it contain highly sensitive features which could not normally be accommodated within strategic developments.</p>
<p>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:</p> <ul style="list-style-type: none"> <li>i. the availability of alternative suitable sites outside the Green Belt;</li> <li>ii. the potential of the site to meet specific housing or employment needs that cannot be met elsewhere;</li> <li>iii. the potential of the site to support regeneration within deprived areas; and</li> <li>iv. the potential of the site to provide support to facilities and services in rural areas.</li> </ul>	<p>The Council has accepted that the release of Green Belt land is required to accommodate additional housing needs.</p> <p>The allocation of site S1 for housing would meet specific housing needs in the most sustainable location and exceptional circumstances exists to release it from the Green Belt, as detailed in our Matter 7c statement and Regulation 19 representations.</p>

**Question 3) Specifically how would the approach to development on the edge of Coventry affect the spatial strategy?**

- 1) Please refer to our response to question 2 of Matter 4. Overall, we consider that development on the edge of Coventry can accord with the Council's spatial strategy.

**Question 4) What alternative options have been considered in terms of the location and broad distribution of development and why were these discounted?**

- 1) The SA (ref. SA11PM) identifies that SHLAA sites C02, C03, C05 and C13 were considered in the SA Report (February 2015). C02, C05 and C13 all relate to site H42, controlled by Crest Nicholson. C03 relates in part (circa 50%) to site S1. Site S1 and further land to the south was however submitted to the Council in October 2015, in response to a call for sites exercise the Council commissioned to inform the recent modifications to the Local Plan. This site was identified as site C31 in the SHLAA Update 2016.
- 2) However, despite the site being identified as safeguarded land and paragraph 29 of the Distribution of Development Topic Paper (HO25PM) confirming that site S1 is suitable for housing (the only reason it cannot come forward at this stage is due to highway capacity issues), the SA (ref. SA11PM) fails to consider site S1 as a reasonable alternative. It appears that site H42 was not assessed again in the latest SA as the proposed allocation at Westwood Heath (site H42) represented a slightly reduced area than previously assessed. The fact that site S1 had been actively promoted and was available for development appears to have been ignored in error.
- 3) Given the above, it is clear that the SA (ref. SA11PM) will need to be revised to include a detailed assessment of site S1 and a comparison against H42 as without this, insufficient evidence exists to demonstrate why site S1 was safeguarded, rather than site H42, or indeed whether a single allocation for both sites would score more positively. The Technical Annex appended to our Regulation 19 representations provide what we consider to be a favourable SA scoring for site S1, adopting the same methodology as used by the Council.

**Question 5) How were different areas of Green Belt assessed and how has this informed the strategy?**

- 1) No comment

**Question 6) Is the approach to the location and broad distribution of development appropriate and justified?**

- 1) The MoU identifies a significant level of housing that Warwick District must accommodate to ensure Coventry's unmet needs are met in full. In fact, the MoU identifies that Warwick District has the strongest functional relationship with Coventry City of any authority with the HMA. Paragraph 34 of the NPPF details that Plans should ensure developments that generate significant movements are located where the need to travel will be minimised i.e. locating homes close to where people work. The NPPF also details states that planning policies should aim for a balance of land uses within their area, so that people can be encouraged to minimise journey lengths for employment (paragraph 37). Locating development of the edge of Coventry would accord with these requirements.

- 2) The Council has prepared a Distribution of Development Topic Paper which, at paragraph 16, states the following in respect of located housing to meet Coventry's need:

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- 3) However, and as detailed in our Regulation 19 representations, while the Local Plan is proposing to accommodate 5,976 dwellings relating to Coventry's unmet needs, it only proposes to allocate 2,225 dwellings on the edge of Coventry (1,800 dwellings at King's Hill at 425 dwellings at Westwood Heath) i.e. less than 50%, which we consider is fundamentally too low. This is not however due to a shortage of available land with the Council's Distribution of Development Topic Paper (HO25PM) highlighting that a *"number of substantial sites on the southern edge of Coventry have been submitted through the SHLAA"* (para. 23). Site S1, for example, has a capacity of 900 dwellings but is only safeguarded and proposed to be considered for release 5 years post adoption of the Local Plan. Therefore, whilst CEG broadly support the general distribution of development and welcome the Council's acknowledgement of significant development pressures in the area south of Coventry, it is considered that the policy should be amended to allocate a greater proportion of housing in sustainable locations on the edge of Coventry, in recognition of the significant unmet housing needs from the City. This could be achieved through the allocation of site S1 and H42 as a single allocation of 1,500 dwellings and as referenced in our Matter 7c statement, allocating more development at Westwood Heath would improve the prospect of delivering the A46 link road. Alternatively, S1 should be identified instead of H42 as a single allocation of 900 dwellings to be delivered in the Plan period (425 dwellings being deliverable and 475 dwellings being developable).
- 4) As highlighted in our Matter 2 statements, the 2014-based household projections have become available and indicate a significant uplift in housing pressures arising from Coventry. This further supports the approach we have advocated of allocating a greater proportion of housing on the edge of Coventry and without this change the approach to location and broad distribution of development is not considered to be justified.

**Question 7) What is the basis for identifying Growth Villages and Limited Infill Villages? Is the list of villages in each category justified and appropriate?**

- 1) No comment