

WARWICK DISTRICT COUNCIL LOCAL PLAN EXAMINATION**MATTER 4: THE SPATIAL STRATEGY****Issue**

Whether the spatial strategy is justified, effective and consistent with national policy.

Policies DS4, DS10, DS19 and H1 and list of Growth Villages and Limited Infill Villages

This statement has been prepared in response to Matter 4: The spatial strategy prepared by Barton Willmore on behalf of Mr Johnnie Arkwright in relation to the land at Hatton Station.

Questions

- 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?**
 - 1.1 While the broad strategy is logical in terms of its approach to focusing development around the towns and in the more sustainable villages, we do have concerns with the approach to development around sustainably located sites such as the land at Hatton Station.
 - 1.2 The Spatial Strategy does not recognise the importance of new housing sites in proximity to sustainable transport links, in particular rail. The Sustainability Appraisal does make reference to the desire to promote more sustainable transport choices, with Objective 2 using the number of train passenger journeys as an indicator [SA10 – January 2015, page 7]. However the sites at Hatton Village were withdrawn and are not assessed in the January 2015 SA [page 78] and as such our Client's site at Hatton Station, of entirely different character and therefore impact, has not been assessed. It also does not assess the potential for a strategic housing site such as this to become more sustainable over time.
 - 1.3 In our view, Policy DS4 needs to be more explicit in reference to development in potentially sustainable locations to allow for development to come forward and deliver the objectively assessed housing need. Without addressing the identified shortfall of the District and those surrounding it, it is difficult to argue that the Plan will be effective and consistent with national policy. This lack of flexibility for future growth in potentially sustainable locations is contrary to the presumption in favour of sustainable development set out in paragraph 14 of the Framework, and in not making full use of existing public transport corridors, the Plan also fails to reflect Sustainability Appraisal Objectives 2 and 3 (first formulated in SA01 [March 2011])

and most recently used in SA10 [January 2015]) and bullet point 11 of paragraph 17 of the Framework which states:

'Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'

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

2.1 The amended Policy DS4(b) substitutes the word 'urban' for 'built up'. Without a definition of 'built up' it is not clear that this policy will be fully effective. Of more concern is the complete lack of reference to a potential development's proximity to sustainable transport links. This could be rectified with a further amendment to (b) to include '.....areas in sustainable locations close to areas of employment, public transport corridors or where community facilities such as shops, medical facilities and schools are available or can be made available.'

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

3.1 The Spatial Strategy as modified allocates 2,245 dwellings on greenfield sites on the edge of Coventry, including some release of Green Belt land. Given the relatively broad nature of the policy's wording, this is in line with the Strategy in the sense it is directing development close to the edge of built up areas close to sustainable locations, including some benefits for regeneration. However as above, we contend that the definition of sustainable location is not fully justified given its lack of reference to accessibility to sustainable modes of transport. A development on the land at Hatton Station could help to take the pressure off other areas of high growth while providing well-located housing that is easily commutable by train to places such as Warwick, Leamington Spa, Solihull and Birmingham.

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

4.1 As set out from paragraph 2.41 of the Plan, the SHLAA and Site Selection Methodology/Matrix has informed the suitability of each site using several indicators. Within the Modifications there is no explicit mention of proximity in relation to transport corridors informing the Methodology [page 35]. However it does include the Sustainability Appraisal and Strategic Transport Assessment, the former of which does make some reference to train stations and bus stops. All of these documents predate the submission of our Client's site at Hatton Station and as

such the appropriateness of the site has not been assessed. The last time any sites in Hatton Village were assessed [S04 – November 2013, page 51], despite the positive score for accessibility, the three potential allocations were discounted on the basis of constraints which would not necessarily be as limiting on a site of our Client's size. We are concerned that the collection of small sites that may have been justifiably dismissed in November 2013 have therefore precluded any later assessment of more appropriate sites, such as Mr Arkwright's at Hatton Station.

- 4.2 Given its suitability and availability, by discounting sites near to rail stations it is difficult to see how the Plan is consistent with the Framework, for instance paragraph 35:

'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:

- **give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;'**

- 4.3 When looking at the options for distributing the additional housing need for Coventry as part of the Proposed Modifications [HO25PM], the review of the Council's Strategy set out in paragraph 17 notes that one of the options is to focus development around key transport corridors. Paragraph 18 and Appendix 1 acknowledge that the assessment shows this option, and the eventually chosen option of edge of urban areas and sustainable growth villages, as the most sustainable. Despite this there is no relevant mention of 'transport corridor(s)' in the Plan in its previous and modified forms. It is clear that a site such as Hatton Station could potentially deliver dwellings on a strategic level in a sustainable manner and the Plan and evidence base should be updated to reflect this. In the absence of this it is not clear that all potential options have been explored and as such the Plan is not fully justified.

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

- 5.1 As with the evidence base noted in (4) above, assessments of Green Belt quality were undertaken before our Client's site had been promoted to the Council, notably [V13] and [V14] (November 2013), [V15] (April 2014) and most recently the Coventry and Warwickshire Joint Green Belt Study (April 2016).

5.2 [V12 – April 2014] is an Appraisal Matrix which when scoring the sites surrounding Hatton Station, notes under the Green Belt section that 'Village housing development focused in the district's top 10 growth villages - Hatton Station does not fall within this grouping'. Additionally it notes that all sites around the Village are 'not suitable as an allocated housing site as Hatton Station is not considered a sustainable location for further large scale housing growth' [page 5]. The land at Hatton Station is substantial in size and can accommodate significant levels of mitigation to address ecological, landscape, flooding and amenity issues as well as benefits to the public such as open space. As this site has not been assessed as part of the evidence noted above, the alternative options have not been fully explored.

5.3 As noted in (7) below, we disagree with the manner in which the land at Hatton Station has been classified, particularly as its sustainable location and development potential have been entirely overlooked. This undermines its potential for a well-planned scheme which could make a significant contribution to the identified housing shortfall. We consider similar exceptional circumstances can be demonstrated to justify strong support for development here and given the release of Green Belt land at Hatton Park, we feel assessment of the well-connected Hatton Station site is necessary to ensure all options have been explored

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

6.1 We do not consider that the approach to the location and broad distribution of development is entirely appropriate and justified. There is a clear identified housing shortfall both within the District and neighbouring authorities and although the Plan allows for a review, the Spatial Strategy does not recognise the importance of new housing sites in proximity to sustainable transport links, especially rail, and as such fails to reflect the Council's own Sustainability Appraisal Objective 2. It also fails to enable a range of sustainable transport options and does not align with the Framework's encouragement of promoting sustainable transport.

6.2 One of the Framework's Core Planning Principles at bullet point 11 of paragraph 17, which should underpin plan making, is to

'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.'

6.3 There is an absence of recognition around the potential of siting housing around existing rail stations, and as such, the opportunity on the land at Hatton Station has not been considered.

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

- 7.1 We do not consider that the list of villages in each category is justified and appropriate. For example, the site at Hatton Station could be of strategic importance in meeting the identified housing need.
- 7.2 The Village Settlement Report [V01] attempts to conduct a comprehensive approach to analysing settlements in terms of services and facilities and there is an acknowledgement that 'where services and facilities are not available within villages an assessment is made to support development in settlements with better and quicker public transport connections and less travel distance to services and facilities' [page 2]. The weighting given to a regular train service, such as is the case with Hatton Station, is relatively low compared to some of the local services which by comparison could be provided fairly easily by, or as a result of, additional development which would serve to improve the local facilities. With regards to Hatton Station, in [V02] the indicator for access to a main town on public transport is scored 0 as it only accounts for bus routes, completely discounting the regular and direct train to Warwick, Leamington Spa, Solihull and Birmingham [page 55].
- 7.3 The study acknowledges that this is a snapshot in time, with significant weighting given to services such as primary schools – something which is easily deliverable on the land at Hatton Station. Identifying the land at Hatton Station within the 'very small Villages and Hamlets' category [page 10] severely underplays its potential to deliver sustainably located growth in a way that similarly classified settlements cannot. This overly cautious approach is not a justified way of distributing development sustainably.