



## **Gladman Developments Ltd (9149)**

### **Warwick Local Plan Examination – Further Hearings**

#### **Matter 4: Spatial Strategy**

**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 part of the District, between the urban areas and villages and between, greenfield and Green Belt sites?**

- 1 The Distribution of Development paper published in 2016 contains the rationale used by the Council to justify its approach to spatial distribution with regard to the main modifications. It considers how development was spread throughout the district in the submission version of the plan and adds comparison as to how the updated housing requirement has come about, and how the proposed modifications propose to deal with the additional need.
- 2 It is clear from considering the document that there is substantial additional allocations on Green Belt sites. Whilst Gladman do not object to the allocation of Green Belt sites, if there are exceptional circumstances we do not believe that the Council has thoroughly and robustly assessed all none Green Belt options, Gladman are particularly concerned with regard to the need to assess the potential of the Growth Villages. Table 3 of the document explains that of the 700 additional dwellings proposed for the Growth Villages in the main modifications some 535 of them are contained within the Green Belt. It is claimed that insufficient suitable sites outside the Green Belt exist, or that Green Belt sites are more sustainable. This in itself may not constitute exceptional circumstances to justify Green Belt release, but in any event Gladman are now promoting allocation H47 in Barford, the small site is considered sustainable (as is the wider location) but is allocated for just 30 units. Savills in their representations to the previous round of consultation indicated why an expanded allocation should be pursued. Gladman concur with this approach and discuss these issues in detail in our Matter 7d statement. It is clear therefore that the key evidence base document relied upon by the Council is flawed and that as such there must be doubt as to how justified, effective and consistent with national policy

DS10 is. Gladman would question if all sustainable none Green Belt sites have been properly considered.

- 3 In addition to the above it is clear that the Council is preparing a major new Green Belt release on the edge of Coventry. It is claimed this is in relation to the unmet needs of Coventry, and dealing with them in a location in close proximity to where the need arises. In principle Gladman do not object to such an approach, but would note significant Green Belt release in this location has not been contained within the Local Plan prior to the main modification stage. It will be for the Inspector to consider how the current iteration and strategy of the plan relates to the version of the plan submitted for examination.

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

- 2 The spatial strategy, as outlined above, departs to some degree from the original strategy proposed, largely through the allocation of significant Green Belt release on the edge of Coventry. Substantial numbers of other allocations are also made in the Green Belt, especially in the growth villages.

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

- 3 A number of additional options are considered within the Distribution of Development paper, whilst in principle Gladman can see the benefit of the Council seeking to allocated development around principle urban areas, we do not consider that the Council has been sufficiently robust in maximising the levels of sustainably located, proportionate, housing development which can be achieved on none Green Belt sites. Such an exercise would not only identify additional land to meet the shortfalls in overall supply, and 5 year land supply identified in our Matter 3 statement, but also allow the Council to minimise the need for the release of Green Belt land.

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

- 4 See above. Whilst the strategy is reasonable a proper, and robust assessment of none Green Belt land has not been undertaken to ensure that the release of any sites within the Green Belt is justified.

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

- 5 Gladman contend that the approach to identifying growth villages is sound in terms of their overall selection, but flawed in relation to the amount of growth such settlements could

reasonably take. As identified above the plan is now proposing significant additional Green Belt development, in locations not previously identified in the submission version of the plan. The Growth Villages in particular represent sustainable locations, as evidenced by the Council in the Village Profile and Housing Allocations paper (February 2016), which could accommodate further residential development without, or with reduced, Green Belt incursion.

- 6 The document, in Table 2, considers 10 villages as being sustainable locations for housing allocation. Of these 10 villages 6 are with the Green Belt, these are Baginton, Burton Green, Hampton Magna, Hatton Park, Kingswood, and Leek Wootton. In addition Cubbington is highly constrained by Green Belt which abuts the settlement. The remaining villages of Barford, Radford Semele and Hamton Magna lay outside of the Green Belt. Whilst it is proper and correct for the Council to consider the way in which even Green Belt settlements can grow, in order to properly allow the sustainable development needed to support rural vitality, Gladman would consider that such a constraint as Green Belt ought to have been a factor in assessing the delivery potential of settlements in Table 3.
  
- 7 The table in question seems to purely address the growth of settlements on their existing size, we have mentioned above how no consideration as to the impact of Green Belt is given in this table, but nor is any other assessment made. The villages are selected due to their sustainability score, as outlined in Table 1, however no further assessment is given just a percentage growth point, and this is a poor indicator as to the suitability and sustainability of the growth potential of a settlement. Gladman would content that there are sustainable, none Green Belt sites in Barford which should be allocated to ease pressure on the Green Belt and to provide more certainty as to the delivery of plan targets and the 5 year land supply. Our Matter 7d statement considers in detail the sustainability and rationale for an expanded allocation at site H47 in Barford.