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Warwick District Local Plan Examination

Statement of behalf of Barwood Development Securities Ltd

Matter 4: The Spatial Strategy

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HOW Planning LLP, 40 Peter Street Manchester, M2 5GP

Contact Partner: Richard Barton Telephone: 0161 835 1333

Planning and Environmental Advisers

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1 INTRODUCTION

- 1.1 HOW Planning LLP ("HOW") has been instructed by Barwood Development Securities Ltd ("Barwood") to prepare and submit a Hearing Statement in response to the Matters and Issues identified by the Inspector. This Statement should be read in conjunction with Barwood's representations to the Proposed Modifications (April 2016) and Hearing Statements previously submitted to the Inspector, including all relevant appendices. Direct reference to these previous submissions is made for ease of reference.
- 1.2 This Statement addresses a number of questions raised by the Inspector under Matter 4, specifically questions 4 and 6. It sets out a summary of Barwood's position on the issues to be expanded upon at the Hearing Sessions.

2 MATTER 4 - THE SPATIAL STRATEGY

6) IS THE APPROACH TO THE LOCATION AND BROAD DISTRIBUTION OF DEVELOPMENT APPROPRIATE AND JUSTIFIED?

- 2.1 The Council's revised strategy for Policy DS10 has been to direct a significant amount of new development to greenfield sites on the edge of Coventry. The Council's justification for the identification of growth in this location is to 'meet local and sub-regional housing needs', however as this spatial approach was not promoted previously by the Local Plan, it can be assumed that the Council's justification for the location of this growth is to meet the sub-regional housing needs. Proposed Modification Mod 21 confirms at paragraph New1.2 that to address the need generated by Coventry, an area adjacent to the boundary with the City has been identified as a suitable prospect for delivering part of the housing required.
- 2.2 The Planning Practice Guidance (PPG) defines a Housing Market Area (HMA) as:
- "A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work."*¹
- 2.3 The Coventry and Warwickshire HMA, which Warwick is part of, includes the following Local Planning Authorities: Coventry, North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon, and Warwick. It is therefore agreed by all the authorities that they form part of the same HMA. Warwick has been evidenced to have the greatest functional relationship and HOW agree with this evidence, however the Council's justification that the delivery of the housing growth redistributed from Coventry has to be physically adjacent to the City is incorrect and rather should be based upon an approach led by Warwick's previously identified spatial distribution of development.
- 2.4 As set out in Barwood's Matter 2 Hearing Statement, prepared by Peter Brett Associates, the Council should not seek to concentrate need in only a few Green Belt sites around the Coventry boundary as this does not reflect where the demand for housing is highest and most viable. Focusing housing growth too heavily on Coventry, assuming that is where the demand is coming from, is likely to result in an incorrect spatial distribution of development.
- 2.5 As discussed in relation to Policy DS19: Green Belt, the Council's justification for the release of such a quantum of Green Belt land is not justified and, furthermore, the parcels identified to be removed from the Green Belt are assessed as providing a great contribution to the role and

¹ Paragraph: 010, Reference ID: 2a-010-20140306

function of the Green Belt. The National Planning Policy Framework (NPPF) advises that new Green Belts should only be established in exceptional circumstances and, if proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

2.6 The NPPF (paragraphs 82 to 85) confirms that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation and review of a Local Plan. The Council's proposed exceptional circumstances to justify altering Green Belt boundaries is the need to allocate land to deliver the redistributed HMA development needs, however the Council has not undertaken an assessment of the spatial distribution of development should the redistributed quantum of development be apportioned as per the Warwick spatial distribution of development. HOW consider that it is practicable to fully meet the development needs of the area without amended Green Belt boundaries. The process and evidence is flawed and HOW do not consider that the exceptional circumstances exist to amend Green Belt boundaries.

2.7 The Council has not sought to address the above points at all through evidence in the preparation of the Local Plan. The newly identified sites to the south of Coventry, which have been identified to deliver the HMA's redistributed growth, in the Council's opinion, are not based upon any detailed evidence to justify their release from the Green Belt and, fundamentally, the approach to the spatial distribution of development.

2.8 The Council's approach to the release of Green Belt land is not reflective of an approach that seeks to promote sustainable patterns of development. The Council has not fully considered the allocated of a greater number of smaller sites on the fringes of the built-up area and Growth Villages, which will enable dwellings to be delivered in the early phase of the Plan period as the development will not be reliant upon largescale infrastructure. The Council's conviction that the HMA redistributed growth requirement must be allocated adjacent to Coventry is fundamentally

incorrect and has unduly influenced decisions to release larger Green Belt sites without the supporting evidence base.

- 2.9 Bishop's Tachbrook has been identified by the Council as a Growth Village, therefore being recognised as a sustainable location for new development not confined by Green Belt, which will be further enhanced by the infrastructure provided by the developments permitted to the west of Europa Way. On behalf of Barwood, HOW has promoted through the Local Plan process a site located at Mallory Road, Bishop's Tachbrook, which is considered to be a significantly more sustainable development option than releasing Green Belt land to the south of Coventry, which is not based upon a robust evidence base.
- 2.10 The sustainability of the Mallory Road, Bishop's Tachbrook site is set out in HOW's representations to the Proposed Modifications (April 2016).

Summary

- 2.11 HOW considers that the Council's approach to identifying its proposed distribution of development is fundamentally flawed. The Council has incorrectly sought to demonstrate that Green Belt sites close to Coventry are the most appropriate way to deliver the requirements of the Coventry and Warwickshire HMA.
- 2.12 National planning policy is clear that Green Belt boundaries should only be altered in exceptional circumstances; Warwick District Council have not provided any justification to explain why Green Belt land is required to be released for development. The approach taken presumes that the HMA's redistributed housing growth is required to be located adjacent to Coventry, which is fundamentally incorrect and detailed within Barwood's Matter 2 Hearing Statement. The Council should be promoting a spatial distribution of development which promotes a sustainable development strategy and the release of Green Belt land without any justification does not achieve this. The Local Plan has not been developed in accordance with paragraph 82 of the NPPF and therefore the Plan's approach to the release of Green Belt land is not justified and the Plan is unsound.
- 2.13 As such, it has not demonstrated very special circumstances for Green Belt release and the Local Plan should not be considered sound; there are more appropriate non-Green Belt sites which could meet the needs of the HMA. The approach to the location and broad distribution of development is not appropriate and is not justified.

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HOW Planning LLP

40 Peter Street
Manchester M2 5GP
0161 835 1333
howplanning.com