

Warwick Local Plan Examination

Matter 4: The Spatial Strategy

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Introduction

1. Lenco Investments (Lenco) does not consider that the Local Plan is founded upon a robust spatial strategy which should be informed by realistic options for growth, supported by a comprehensive Sustainability Appraisal.
2. The deficiencies in the Sustainability Appraisal reflects the attempts to retrofit the strategy to account for the significant changes to the Local Plan as a consequence of including Coventry's unmet housing need. Though Lenco considers that accounting for Coventry's need is the correct thing to do, the spatial strategy needs to be more fully unpicked so that it could consider all potential options for creating an appropriate strategy to balance the need for the District alongside Coventry's unmet need. This has not been done and Lenco's concerns remain.

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?

3. The Council's spatial strategy appears to be driven by allocations, rather than outlining a strategy for the distribution of growth. The strategy is focussed around the protection of the Green Belt, as evidenced in Table 3.4 of the latest Sustainability Appraisal [SA11PM]. This decision has subsequently led the Council to consider five options for the distribution of growth (Table 3.5 of [SA11PM]). The Sustainability Appraisal confirms an acceptance for Option 5 as the preferred distribution strategy (paragraph 3.24 refers), which would deliver significantly more growth on the edge of Coventry, more in Kenilworth and the villages/rural. On page 17 of SA11PM, significant growth to south Coventry is qualified as 2,455 dwellings. Options 1 and 3 also proposed growth to the South of Coventry, however both of these options tested 3,025 dwellings to the south of Coventry.
4. Lenco considers that the strategies presented here are unclear and Option 5 does not present a realistic high growth scenario for development on the edge of Coventry. Lenco would recommend the testing of an option focussed on delivering significant growth to the South of Coventry, rather than presenting Option 5, which is actually a lower growth figure than other options tested.

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

5. As indicated below in response to Question 3, the strategy appears largely unchanged. Sites have been added into the Proposed Modifications [LP25PM] to respond to the need for additional sites adjacent to Coventry, however Lenco does not consider the

Matter 4: The Spatial Strategy

Council has fully explored all reasonable options for the distribution of growth around the south of Coventry.

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

6. Lenco has previously made representations in this regard, indicating that the modifications proposed by the Council do very little to create a supportive framework for growth around Coventry.
7. The Council's strategy is pursuant on delivering growth arising from the 2015 Coventry and Warwickshire Strategic Housing Market Assessment [**H020PM**]. The growth figures within this document have been taken forward as part of a Memorandum of Understanding (MoU) [**H021PM**] in 2015 between all authorities in the Coventry and Warwickshire Housing Market Area.
8. The purpose of the MoU is to redistribute unmet need from Coventry City. Though reservations on the exact quantum of housing to be delivered is still subject to debate, Lenco agrees that Warwick District should take a significant apportion of Coventry's need (as indicated in point 3 of **H021PM**).
9. With the exception of Nuneaton and Bedworth, the Coventry and Warwickshire Authorities agreed this distribution, which presents significant implications for Warwick District.
10. To account for the need to allocate sites on the edge of Coventry to address unmet need arising from the City, the Council has amended the number and range of sites to be included in the Local Plan. Lenco supports the approach to delivering growth to the south of Coventry, however the strategy for overall development remains largely unchanged with the sequential focus remaining on delivering growth on brownfield sites. This strategy approach does not reflect the fact that all potential deliverable land to meet unmet need arising from Coventry would be on greenfield/Green Belt land. Though the Proposed Modifications [**LP25PM**] has introduced a new policy for the delivery of sites on the edge of Coventry (MOD20), this is at odds with the overall spatial strategy, which remains focussed on a brownfield first approach.
11. This is potentially damaging to the strategy, as it suggests that the preference for brownfield sites first, which does not reflect the immediate need to contribute towards need arising from Coventry. Lenco propose that DS4 (a) be amended to also include sites on the edge of Coventry, to be included with equal weight in the spatial strategy.
12. It is therefore correct that the Council should be looking towards meeting development arising from Coventry within locations that can serve Coventry directly, rather than

Matter 4: The Spatial Strategy

locations elsewhere in the District that will lead to increases in commuting and travel to leisure/recreational facilities.

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

13. The Council has opted for a strategy which is considering locations on the edge of Coventry in order to meet the unmet need arising from the City. Lenco agree with this approach, however disagree with the proportion to be delivered to this location and the Council's methodology for selecting the preferred locations. A number of sites have been inappropriately discounted from the site selection process and the Council has not provided an opportunity for all suitable sites to be considered against the proposed strategy for growth – including unmet need arising from Coventry.
14. The Council's February 2016 Sustainability Appraisal [**SA10**] notes that the Council has considered a range of different site options as part of the development of the Local Plan (paragraph 3.26 refers), a chronology of which is included within Appendix VII of the February 2016 Sustainability Appraisal [**SA10**]. It is important to note that at the time when this strategy was proposed prior to submission, the Council was planning for growth of 12,860 dwellings, none of which was associated with unmet need from Coventry. Therefore the sites submitted to the Council around the edge of Coventry would have been appraised differently as part of the Council's strategy.
15. The position has now notably changed. The Council has increased the housing target significantly to 17,577, including a strategy to deliver sites on the edge of Coventry. What the Council has not done however, is to consider all those sites around the edge of Coventry in light of how they respond to the unmet need from the City and contribute towards the wider objectives for growth in Warwick and Coventry.
16. A number of alternative sites exist in this regard, including land at Baginton, which has been promoted to the Council on a number of occasions as part of the Warwick Local Plan, included as reference "C10".
17. Lenco Investments considers Land at Baginton (62.3ha) to be a reasonable and justified site which is well located to meet need arising from Coventry and also complements the Council's strategic plans for economic growth, given its proximity to the proposed Coventry Gateway site.
18. The chronology of Land at Baginton is included within Appendix IV of the Proposed Modifications Addendum Sustainability Appraisal (June 2016) [**SA11PM**], which indicates that the site has been considered since the 2012 Preferred Options (page 37 of Appendix VII refers), though discounted due to unresolved constraints highlighted through the SHLAA process. The Council held this position throughout the evolution of

Matter 4: The Spatial Strategy

the Local Plan until the Submission Report (February 2015), where the Council contend that a report had been submitted to deal with the highlighted concerns, however the site was still rejected as “*there was insufficient evidence that odour, noise and landscape constraints could be mitigated*” (Table 4.19, [SA10]). Lenco Investments contests this on the following grounds:

- I. Lenco Investments has submitted a range of evidence to the Council addressing specifically the impact of Noise and Odour as part of technical submissions to the Council. A Noise Assessment and Odour Assessment has been prepared and have been submitted to the Council. These have both been prepared in liaison with the Council’s EHO, Environment Agency, Coventry Airport and Severn Trent, and substantiate the responses submitted to the Council by RPS in 2009, 2010, 2011 and 2013 that noise and odour are not constraining factors to development. The Council has not reflected on this evidence or updated their assessments accordingly and the site selection process is unsoundly based.
 - II. The Council’s records indicate that new information was only presented as part of the Submission Document, however technical evidence relating to the delivery of the site was submitted to the Council in time for the Publication Local Plan in April 2014. Though this information was submitted to the Council in 2014, the SHLAA and Sustainability Appraisals have not been updated to reflect this evidence base.
19. The same chronology on page 37 of the latest Sustainability Appraisal [SA11PM] contends that a refreshed appraisal has been undertaken of the site presented in Appendix III. This is not the case.
20. Turning to Appendix III of the same document, an assessment has been taken for a smaller allocation for approximately 80 dwellings, despite being ruled out as a strategic site on the grounds of physical constraints. This points to clear issues of objectivity relating to how the Council decides which sites to test and which to disregard. This assessment has been undertaken on the basis of development in Baginton as a growth village, rather than assessing the merits of the site as a strategic extension to meet Coventry’s need. This is therefore not a full and robust assessment for the purposes of evidencing the Local Plan.
21. The Council has provided no legitimate reasons why Land at Baginton should have been discounted for consideration as site to assist in meeting Coventry’s unmet need. The site should have been considered, in whole, as part of an urban extension to the south of Coventry, to be appraised alongside the other urban options for growth. This assessment has not been undertaken and the objection to the plan making process remains.

Matter 4: The Spatial Strategy

22. Lenco consider Land at Baginton to be a realistic alternative to the sites currently presented by the Council on the south of Coventry. In particular, the site can fulfil a number of functions:

- Capacity to support a comprehensive strategic urban extension including necessary social and environmental infrastructure;
- Excellent transport links to Coventry and proposed Gateway employment site to the south east of Coventry;
- Creation of defensible landscape buffer between site and Baginton;
- Enable the potential expansion of Coventry Airport;
- Delivery of significant affordable housing; and
- Flexibility for additional housing to assist in maintaining a deliverable supply of housing;

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

23. The Council's approach to the removal of Green Belt has been informed by the Stage 1 Joint Green Belt Study, prepared for the C&W authorities in June 2015 [LA07PM]. This document includes a summary position of the Green Belt review across the C&W authorities, however the Council's examination library does not include the detailed information which reports how the scores for each parcel of land has been determined.

24. The Green Belt Review [LA07PM] has considered a number of parcels of land to the south of Coventry identifying the Council's two preferred sites at King's Hill (reference C14) and Westwood Heath (references C19 and C20) on page 22 of the report. Additionally, Land at Baginton is also included within this assessment on the same page (reference BT1).

25. The Council has assessed these sites using a methodology derived from the National Planning Policy Framework which (as paragraph 80 refers) identifies five Green Belt purposes. The results of which are included within the supporting appendices to LA07PM.

26. In terms of the overall score Land at Kings Hill (C14) is presented with an overall score of 15/20. Similarly, Lenco Investments Land at Baginton (BT1) has also been attributed the same score of 15/20, though a comparative exercise has not been possible as the site was omitted from the process for the reasons outlined in earlier in this matter statement.

27. Given the Council's emphasis for the protection of the Green Belt, it is unclear from the evidence how the Green Belt Review has been used to inform options for development

Matter 4: The Spatial Strategy

around the south of Coventry. The Council has not justified why it considers Land at King's Hill to be suitable for release, when other sites of a similar Green Belt score (Land at Baginton) have not been assessed. Lenco considers the Council's assessment to be deficient in this regard.

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

28. Lenco do not consider that the Council's approach to meeting unmet need arising from Coventry is justified or appropriate. Warwick's role in delivering unmet housing need from Coventry is significant. As outlined in the MoU [HO21PM], Warwick is tasked with delivering the most significant component of growth out of all the authorities in the Coventry and Warwickshire Housing Market Area.
29. As indicated in the Council's Proposed Modifications [LP25PM], MOD5 indicates that of the proposed housing requirement for Warwick (16,776), 35.6% of the total is associated with unmet need from Coventry. Clearly, this is an influential part of Warwick's total housing requirement. The Council's strategy for distribution (proposed under MOD8) indicates land for 2,245 dwellings on greenfield sites around Coventry's urban edge, which represents only 13.4% of the proposed supply to meet Coventry's need. This points towards a potential imbalance between the location of the Council's supply and location of the unmet need. The Council's latest Sustainability Appraisal [SA11LP] outlined a potential distribution strategy for higher levels of growth to the south of Coventry (Table 3.5 refers), however this was not progressed due to concerns over highways and infrastructure constraints. Lenco considers that this is an unreasonable assumption to make, as the Council has not considered all appropriate extensions to the south of Coventry and this decision has been made on the limited sites that the Council is seeking to progress. The Sustainability Appraisal has therefore only partially appraised this issue and is flawed from the outset.