

Warwick District Council

Local Plan Examination

Response to Inspector's Initial Matter and Issues

Matter 4

The spatial strategy

Issue

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

August 2016

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

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?

- a) The Council is seeking to balance the need for additional housing and economic growth with the constraints represented by the Green Belt, a sensitive and attractive landscape and geographical, social, economic and commuting relationships between itself and other areas. To this end, it has addressed the issues arising out of these complex relationships by drafting strategic policies designed to facilitate both spatial growth and the delivery of environmental, social and economic benefits wherever possible.
- b) The basis for the spatial strategy is set out in the Distribution of Development Paper (HO25PM). Paragraphs 8 to 15 of this document set out the approach taken to establishing a Spatial Strategy for the Submission Draft Local (January 2015). The Spatial Strategy detailed in Policy DS4 builds on the Local Plan strategy set out in paragraphs 1.42 and 1.43 of the Publication Draft Local Plan. Policy DS4 in turn informs the Broad Location of Allocated Housing Sites set out in Policy DS10 and Policy H1 (Directing New Housing) .
- c) HO25PM explains that the approach is supported by the Sustainability Appraisal (SA10). The Sustainability Appraisal examined the impacts of a range of options and different stages of the Plan's preparation. Prior to preparing the Publication Draft Plan, it explored five options for the Location of Growth and supported Option 5 as the preferred approach. This option focused development as follows:
- “Protect the Green Belt from development, where non-Green Belt sites are suitable and available, and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District.*
- d) Further detail was then layered over this option to consider potential locations for growth through exploring the impacts of various possibilities for the distribution of housing. To inform Policy DS10, this looked at how different numbers of houses could be accommodated in different broad locations within the emerging spatial strategy by considering six distribution options. In appraising these options, the Council drew on evidence from a wide range of sources including Strategic Transport Assessments (particularly see TA11 and TA12); landscape assessments (for instance LA1 and LA3) and biodiversity (B03). Full details of the evidence base used are set out in the site by site analysis in the Site Selection Methodology matrix (SA07).
- e) From this the Council drew conclusions on the merits of the six options. Initially, options 1 to 4 were rejected as they did not offer sufficient scope to meet the District's housing needs. Option 5 was initially preferred (including focusing a significant quantum of development north of Leamington and Warwick and south of Coventry). However, following the Preferred Options consultation, it was considered that Green Belt releases to the north of the towns and south of Coventry were difficult to justify having regard to the quantum of housing need,

as it was understood at that time. This view was reinforced by evidence that emerged in response to public consultation, which demonstrated that the capacity of infrastructure (particularly the road network) in non-Green Belt locations could accommodate more development than had been assessed previously.

- f) Option 6 was therefore developed, with a greater focus on areas outside the Green Belt. Subject to certain minor amendments, the subsequent Publication and Submission Draft versions of the Plan distributed new housing as follows:

Existing Urban Area Brownfield Sites: **380**

Consolidation of existing employment sites: **450**

Sites on edge of Warwick / Leamington and Whitnash: **4,550**

Kenilworth: **700**

Village development: **1,000**

Total = 7,080

- g) Following the initial EIP hearings in May 2016, the Inspector wrote to the Council indicating that the Plan as submitted was unsound and that it needed to address a number of shortcomings. The result of this was that a significant amount of additional land needed to be allocated for housing to meet the needs of Coventry. The Distribution of Development Paper (HO25PM) explains how the Council reviewed the spatial options having regard to the particular spatial dimension of the additional need that had to be met. Paragraphs 16 to 29 summarise the approach the Council took and the justification for this. In parallel, the Council prepared an Addendum to the Sustainability Appraisal (SA11PM). This revisited the options for the broad location of growth (appraising seven options – see table 3.4) and the distribution of growth (appraising five options – see table 3.5). It also evaluated potential allocation sites. In choosing sites for development, close attention was paid to the outcomes of both the SA and the refresh of the wider evidence base.
- h) The result of the review process was that Option 5 performed best (see table 3.4 of SA11PM). It optimises the protection of the Green Belt with the imperative to make best use of previously developed land whilst directing growth to sustainable locations on the edge of settlements in a way that is calculated to minimise movement and promote sustainable travel options (see table 3.5 of SA11PM). This approach allows significantly more housing to be developed without harming the long term integrity of the Green Belt to the south of Coventry, and in Kenilworth and sustainable villages. The identification of sites in the Modifications therefore reflected this distribution of growth.
- i) The particular strength of this approach is that it “fits” the spatial strategy of the Submission Draft Plan responds to the imperative to assist Coventry by placing new development close to where need will arise and where it can be serviced efficiently and effectively. In taking this approach, the spatial strategy recognises that there are housing needs and economic benefits that need to be balanced against environmental impacts and infrastructure capacity issues for all the District’s towns and also for Coventry. For this reason, the Strategy seeks to locate growth on the edge of all of the district’s towns and on the periphery of the city rather than focus it either on any one location or through the development of a new settlement. This

allows for a balanced approach, ensuring that each of the urban areas derives benefits in terms of meeting housing needs and supporting services and facilities, at the same time as protecting the most valued environmental assets and ensuring infrastructure capacity can be addressed.

- j) The same approach has been applied to the District's most sustainable villages. This recognises the importance of supporting growth and economic wellbeing in rural areas. It also recognises the need to protect environmental assets and that there is a limit to the amount of growth the villages can sustain without fundamentally changing their character. Further detail on the approach taken to distributing development in villages is set out in answer to question 7 below.
- k) The need to protect the overall integrity of the Green Belt and promote its objectives has permeated the Council's review of the distribution of development. Only around 20% of the district lies outside the Green Belt. This area is located south of Warwick and Leamington. Some 7,000 dwellings are being built or are proposed within the Plan period in this relatively small part of the District. Although it is important to maximise growth outside the Green Belt, in reality, due to environmental constraints, site availability, infrastructure capacity and the fact that this area is not best located to meet all the district's growth needs, it can provide for only part of the district's growth. The extent to which this area can accommodate the housing requirement is a matter of judgement. This judgement needs to draw a range of factors as follows:
- i. The Phase 2 Strategic Transport Assessment (STA09) explored a "Southern Focus option". This tested the impact of accommodating 6,250 dwellings in the area outside the green belt. Whilst this showed that, with mitigation, this scale of development could be accommodated, the Local Plan proposals combined with existing completions and permissions exceeds the scale tested in this model.
 - ii. The availability of further sites in this area that are consistent with the spatial strategy is limited to areas adjacent to the three non-greenbelt growth villages (Barford, Bishops Tachbrook and Radford Semele). Each of these is already accommodating significant levels of growth and it is suggested that further growth in these locations would result in disproportionate levels of growth for each village (V18PM). Further, the sites being promoted in these locations are in sensitive landscapes or have other constraints that prevent them being suitable and consistent with Policy DS4.
 - iii. Appeal decisions in January 2016 for the Asps (application W/14/0300) and Gallows Hill (application W/14/0681) and in 2015 to the east of Bishops Tachbrook (application W/13/1688) recognise the sensitive nature of the landscape and the importance of the setting of key heritage assets. The potential for further development in this area to exacerbate negative impacts on landscape and heritage would suggest that further large scale development in this area at this time would be hard to accommodate without first allowing the changes already agreed to become established. This is supported by the landscape assessments (LA08PM, LA09PM, LA03 and LA04)
 - iv. Further concentration of development in this area would limit the choice of locations for housing across the District
 - v. Finally, the market dynamics resulting from concentrating too much development into one part of the district increase the possibility that the rate of delivery could be inhibited,

thereby preventing the district's substantive housing needs being deliverable within the plan period.

- i) For these reasons, the spatial strategy and distribution of development support Green Belt releases to enable the district's (and the City's) growth needs to be met.

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

- a) The spatial strategy as set out in Policy DS4 remains unchanged by the modifications (except for one de minimus wording change in criterion b). The application of this strategy, in the context of an additional housing requirement arising in Coventry, has resulted in changes to the distribution of growth, albeit with a continued focus on sustainable locations adjacent to built-up areas. Given the quantum of housing required and the limitations of the areas of the District outside the green belt (described in paragraph 1m) above), it has been necessary for the Council to consider additional allocations in areas currently within the Green Belt in particular, as well as sites within some of the larger growth villages. The need for Green Belt / greenfield land to be allocated in this way is discussed in more detail in the authority's Green Belt Background Paper (EXAM 45).
- b) Paragraphs h) to n) in Question 1 above, along with the Addendum to the Sustainability Appraisal (SA11PM) and the Distribution of Development paper (HO25PM) paragraphs 16 to 29, explain the approach the Council has taken to align the modifications to the Spatial Strategy. Table 3 at paragraph 28 of HO25PM shows the outcomes of this with notable numbers of additional dwellings proposed for the edge of Coventry, the edge of Kenilworth, the northern edge of Leamington, east of Whitnash and in the principal growth villages. In addition, between the submission of the Local Plan and the preparation of the modifications, permission was granted on appeal for two sites to the south of Warwick resulting in an additional 1350 dwellings in that area. To accommodate additional housing numbers, greater concentrations in areas that align with the spatial strategy are inevitable.
- c) The approach taken in reaching this distribution continued to focus on maximising the potential of sites outside the Green Belt where these are able to contribute to meeting the housing need. However, as set out in paragraph m) of question 1, it has been necessary to release land from the green belt in a range of locations to meet the housing need, to ensure environmental assets and community identity are protected and that infrastructure capacity issues can be mitigated.
- d) In summary, the modifications are consistent with the Council's spatial strategy and the sustainability appraisal addendum (SA11PM) shows that this remains the most sustainable approach to meeting the District's and the City's growth needs. Adjustments to the distribution of growth are inevitable in the context of increased housing need, but the Council has ensured that the distribution fully aligns with the Spatial Strategy and, through the Sustainability Appraisal, can be shown to be the most sustainable option.

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

- a) The proposed approach to development on the edge of Coventry is shaped by the spatial

strategy set out in Policy DS4. The approach is consistent with Policy DS4 in that it proposes development on the edge of built up areas in locations where the Council consider there to be clear exceptional circumstances for the release of Green Belt.

- b) The allocation of sites within this broad area was assessed as an option within the Sustainability Appraisal Addendum 2016 (SA11PM). This reaffirmed that the Spatial Strategy set out in DS4 was the most sustainable option (see table 3.4) and that locating a significant element of the required growth on the southern edge of the city was also a sustainable approach, given the need to provide for some of Coventry's housing need (see table 3.5). Locating growth to the immediate south of the boundary with Coventry will exploit the existing synergies between the two districts, considering current travel, employment and educational opportunities.
- c) This approach supports the Local Plan's strategy as set out in paragraphs 1.42 and 1.43 of the Publication Draft. It also supports the Plan's objectives, particularly those of ensuring "*new developments are in places that will reduce the need for people to use their cars*" (see para 1.48 of the Publication Draft) and ensuring new developments are "*located to improve the quality of the built and natural environments...*" (See paragraph 1.51 of the Publication Draft).
- d) The Distribution of Development paper (HO25PM) sets out the exceptional circumstances for this broad location in Table 3 at paragraph 28 as follows:
- i) Is there an essential need that has to be met?
HMA's and Coventry's identified housing need and the lack of capacity within Coventry.
 - ii) Are there any suitable sites outside the Green Belt that can meet this need?
There are no suitable sites outside the Green Belt that can meet this level of need - see para 26 above. Any alternatives outside the Green Belt are not consistent with the Local Plan's Strategy and do not offer sustainable locations to meet the City's housing need.
 - iii) Is this the best site within the Green Belt to meet the need?
This is a sustainable location that allows expansion on the edge of the City's urban area, providing opportunities for infrastructure improvements (see para 23 above).
The 2015 Green Belt considers this area. These locations lie within Parcel C14 (scores 15/20), C16 (scores 15/20), C19 (scores 8/20) and C20 (scores 13/20).
To varying degrees these parcels play important roles in checking unrestricted sprawl, preventing towns merging, safeguarding the countryside from encroachment and preserving the setting of historic towns. The removal of land from the Green Belt in these areas therefore needs to be undertaken with an understanding of the role that specific sites play in the Green Belt and with a view to maintaining defensible boundaries and the ongoing importance of the Green Belt. In view of ongoing housing needs and capacity constraints in the City, capacity beyond the Plan Period is provided in this location (safeguarding land for a future Plan review). This will provide opportunities to address medium to long term infrastructure improvements before further development comes forward.

- e) The consequence of applying the criteria set out in Policy DS4 to the circumstances which arose following the agreement of the Housing Memorandum of Understanding (HO21PM) is that two substantial additional allocations are proposed for the area south of Coventry at Kings Hill and Westwood Heath. For details of the Council's approach to allocating these sites and their relationship with the spatial strategy, please see answer to Matter 7c.
- f) There is a close functional relationship between Warwick District and the city of Coventry, as demonstrated by commuting and migration patterns. This relationship is reflected in the strategic housing market area covering Coventry and Warwickshire and in the Housing Memorandum of Understanding (HO21PM), which sets out how Coventry's unmet need is planned to be redistributed. This effectively means that part of the area of search for sites to accommodate this overspill, in line with the identified strategy and the assessment following the first part of the examination, was focussed on sustainable locations to the south of Coventry. The modifications sought to "plug the gap", as the Submission Local Plan had been predicated primarily on the basis of meeting local need and as a result it had not been felt necessary to consider or include land to the immediate south of Coventry currently in the green belt.
- g) The sites south of Coventry thus represent a sustainable and strategically aligned means of addressing Coventry's housing need, in a manner that reflects the need to make the most of infrastructure links, community provision, employment opportunities and deliverability, in line with the established spatial strategy.
- h) Policy H1 sets out the approach for directing new housing development. This policy is derived from the Spatial Strategy (Policy DS4) and the Broad Location of Allocated Housing Sites (Policy DS10). However Policy H1 has not been modified to reflect the revised distribution. This is an oversight. As a result of the housing allocations proposed in in the 2016 modifications to DS11, H1 needs to be updated and the urban area boundary needs to be redrawn. Therefore, to better align policy H1 with DS4, DS10 and DS11, the Council would suggest a further modification that redraws the urban area boundary around sites H42 and H43 and which identifies the southern edge of Coventry as an Urban Area in the table at paragraph 4.6. The additional modification would not change the substance of the spatial strategy as the southern edge of Coventry is clearly consistent with Paragraphs 1.42 and 1.43 and with Policy DS4. This is further supported by the fact that the Submission Draft Plan did not exclude sites on the southern edge of Coventry because they are inconsistent with the Strategy, but rather because at that time there were insufficient exceptional circumstances to justify the release of green belt in this location.

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

- a) The Sustainability Appraisals (SA10 and SA11PM)) set out how different alternatives have been appraised during the preparation process. A number of options relating to the Location of Growth (the Spatial Strategy) and the Distribution of Growth have been considered at different stages of the Local Plan process. The appraisal of these options has underpinned the Spatial Strategy set out in Policy DS4 and the Broad Location of Allocated Sites set out in Policy DS10.

b) Appendix A summarises the options assessed at each stage and the conclusions reached.

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

- a) Please also see the Green Belt Background Paper (EXAM 45) paragraphs 68 - 80.
- b) The Council was party to the publication of a Joint Green Belt Study (JGBS - LA07PM) update in 2015. Part of the importance of the joint study is in its ability to help establish the relative merit of areas, in order to assist authorities engaged in both strategic and local decision-making. The approach adopted takes a clear and impartial view of parcels of green belt across a number of authorities. It is essentially a tool for allowing authorities to confirm the characteristics of green belt in their area in terms of how it contributes to the purposes of inclusion.
- c) The JGBS adopted a scoring system that assigned a numeric total to the five purposes of green belt and rated various parcels according to their contributions to those purposes. The Council considered it appropriate to take into account the overall contribution the parcel made rather than relying on a simple score. Thus the Council has considered whether and how the parcels have made contributions to green belt and if so, at what level, rather than relying on the overall total.
- d) Other authorities within the JGBS area may choose to use the document in a slightly different way, but this is how the Council has determined its usefulness in assessing land parcels. It is also important to remember that there are other criteria that have been used to identify sites for potential allocations and that green belt, whilst important and necessary in protecting the openness of land around built-up areas, is only one of the issues to be considered.
- e) Prior to the publication of the Joint Green Belt Study in 2015, the Council relied on the 2009 Green Belt study (LA05) for the edge of the urban areas and on the 2013 Green Belt and Green Field Review (V13) for villages. Whilst the 2015 Study uses a different methodology to these other studies, the Council has undertaken a comparative exercise between them and is satisfied that there are no substantive differences in the findings of these studies that would require earlier allocations or omissions to be changed.
- f) Arising from this, the Council has considered both the local impact of removing areas of land from the green belt and the strategic and cumulative impact on the remaining green belt (and its ability to continue to meet the fundamental aims set out in paragraph 79 of the NPPF). The outcomes of this are set out in the Matter 7 statements. This has in turn informed the derivation of a strategy that acknowledges the importance of the green belt in its primary functions (maintaining openness, preventing coalescence, preventing encroachment, protecting the setting of historic towns and encouraging regeneration) while balancing them against the essential objectives of sustainability – ensuring housing and employment growth is provided in accessible and well-serviced locations within easy reach of jobs, facilities and educational resources.

- g) The presence of green belt in Warwick District is a vital component of the character of the area and the Council has not taken the decision to allocate sites within it lightly, but as an option of last resort to help meet clearly identified needs within the sub-region, in the spirit of co-operative working. The reluctance of the Council to contemplate this course can be seen in the previous iterations of the plan, where development in the Green Belt was more limited.
- h) Having had to reconsider the strategic approach to growth in light of the identified shortfall, and given the issues identified elsewhere with the remaining non-green belt land resource available to the Council, the perceived value of different parts of the green belt informed and influenced the choice of locations for additional housing. This allowed the Council to minimise the impact on the wider green belt by choosing sites with both less to contribute to the purposes of including land within the green belt and high levels of sustainability when considered against the aims and objectives of the strategy itself.
- i) In identifying sites, green belt was considered alongside the outcomes of the SA and the revised evidence base for landscape, ecology, strategic transport and other significant issues, to arrive at a holistic and rounded set of allocations.

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

- a) The sustainability appraisal (SA10 and SA11PM) shows that a range of options have been considered at each stage of the plan-making process with regard to both the location and the distribution of development. These documents clearly show how each of these options have been appraised and set out the reasons for progressing or rejecting each option. This provides a clear justification for the Spatial Strategy set out in Policy DS4 and the Location and Growth set out in Policy DS10.
- b) The Distribution of Development Paper (HO25PM) provides further explanation and justification for the proposals set it in the modifications. It explains how different opportunities were assessed and how exceptional circumstances for Green Belt releases were addressed. In conclusion it justifies the proposals for the revised distribution set out the Modifications as follows:
- “ the proposed distribution:*
- *Aligns with the Local Plan’s Spatial Strategy, which has been shown to be a sustainable approach*
 - *Ensures local housing needs are met within the District’s main towns and growth villages*
 - *Provides for the needs of Coventry adjacent to the City or in areas with good connectivity to the City*
 - *Ensures alignment between the location of housing and existing and proposed areas of employment*
 - *Ensures good mix of sites and locations across the District to support different markets*
 - *Ensures a mix of sites which seek to enable a 5 year housing land supply on adoption of the Plan*

- *Recognises important environmental constraints such as heritage, landscape and ecology*
 - *Includes Green Belt releases where exceptional circumstances exist, but otherwise seeks to protect the Green Belt*
 - *Ensures key infrastructure requirements can be planned and delivered to support the distribution.”*
- c) The Green Belt Background Paper (EXAM 45) explains how the Council has assessed the green belt in the District and how this has informed green belt releases to ensure that each release is justified and that the remaining resource continues to meet the fundamental characteristics of green belt.
- d) Drawing all this evidence together, the Council is clear that its spatial strategy and the resulting distribution of development is sustainable, appropriate and justified.

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

- a) The Settlement Hierarchy Report 2013 (V01) forms the basis of the Council's approach to identifying Growth and Limited Infill villages. It built on work that had been undertaken in 2012 as part of the Preferred Options and specifically sought to respond to comments that the village categorisation set out in the Preferred Options was not sufficiently well justified.
- b) V01 therefore applied a more objective and robust assessment to the size, character and services of each village as a way of informing the extent to which each village could accommodate growth. The approach is based on a number of principles:
- i. The need to conduct a comprehensive approach to analysing settlements in terms of services and facilities
 - ii. The model involves assessing services and facilities within a settlement; these are positively weighted, on the recognition that development may be supported in areas with direct access to a wide range of such opportunities, thus minimising the need to travel.
 - iii. Where services and facilities are not available within villages, an assessment is undertaken about supporting development in settlements with more efficient public transport connections and shorter travel distances to services and facilities.
 - iv. In general larger settlements with higher populations may be better equipped to accommodate housing growth as they are likely to contain an established range of services and facilities.
 - v. While the range of services and facilities are important considerations in helping determine the ability of settlements to accommodate growth, the distribution of development also needs to be informed by
 - strategic policy and physical constraints;
 - the availability of potential sites;
 - the broad role and function of settlements;
 - the ambition and forward strategy for settlements.

- vi. A hybrid approach is taken to the apportionment of housing growth, which starts with a forecasted baseline growth level (focused upon a percentage increase in current dwellings) and then considers how constraints and opportunities impact on these growth levels. Growth in rural areas and villages should be proportional in scale to growth forecast for the district as a whole.
- c) Based on these principles V01 sets out an objective methodology for “scoring” each village. This method is set out in paragraphs 4.1 to 4.10 of V01. The methodology considers a number of factors to arrive at a hierarchy and allocates points according to the population, facilities and services. Specifically it looks at:
- i. The size of the settlement, in terms of usual resident population;
 - ii. The availability of services and facilities within settlements, and
 - iii. The accessibility of services, facilities and employment opportunities from settlements.
- This model and the sources of information used to populate it are set out in paragraphs 4.1 to 4.10 of the Report (V01).
- d) From this each village was given a score to reach an objective view on the relative capacity of each settlement to accommodate development. Table 4.4 of the report is set out below and shows the resulting score for each village. (NB it should be noted that this score does not take into account policy and environmental constraints such as Green Belt, landscape, heritage, character and site availability – these factor were taken in to account in assessing and selecting specific sites for allocation).

Settlement	Total Score	Village Classification
Hampton Magna	57	Primary Service Village
Cubbington	56	Primary Service Village
Radford Semele	53	Primary Service Village
Kingswood (Lapworth)	53	Primary Service Village
Bishop's Tachbrook	50	Primary Service Village
Barford	48	Secondary Service Village
Baginton	43	Secondary Service Village
Burton Green	40	Secondary Service Village
Leek Wootton	38	Secondary Service Village
Hatton Park	37	Secondary Service Village
Bubbenhall	35	Small and Feeder Villages
Norton Lindsey	32	Small and Feeder Villages
Weston under Wetherley	29	Small and Feeder Villages
Offchurch	28	Small and Feeder Villages
Lowsonford	27	Small and Feeder Villages

Hampton on the Hill	26	Small and Feeder Villages
Shrewley Common	26	Small and Feeder Villages
Sherbourne	25	Small and Feeder Villages
Stoneleigh	25	Small and Feeder Villages
Hatton Green	24	Small and Feeder Villages
Hunningham	21	Small and Feeder Villages
Wasperton	21	Small and Feeder Villages
Old Milverton	20	Small and Feeder Villages
Baddesley Clinton	18	Small and Feeder Villages
Eathorpe	19	Very Small Villages and Hamlets
Ashow	16	Very Small Villages and Hamlets
Blackdown	16	Very Small Villages and Hamlets
Rowington Green	15	Very Small Villages and Hamlets
Little Shrewley	14	Very Small Villages and Hamlets
Hatton Station	14	Very Small Villages and Hamlets
Rowington	13	Very Small Villages and Hamlets
Beausale	11	Very Small Villages and Hamlets
Pinley Green	11	Very Small Villages and Hamlets
Turners Green	10	Very Small Villages and Hamlets
Hill Wootton	9	Very Small Villages and Hamlets

- e) As can be seen from the table above, initially, villages were grouped into four classifications according to their score. However, following the consultations undertaken in 2013 on the Village Options and the Revised Development Strategy, these classifications were simplified into two categories as set out in Policy H1 of the Publication Draft Local Plan as follows:

Growth Villages	Limited Infill Villages
Baginton	Ashow
Barford	Baddesley Clinton
Bishop's Tachbrook	Beausale
Burton Green	Bubbenhall
Cubbington	Chesetts Wood
Hampton Magna	Eathorpe
Hatton Park	Hampton-on-the-Hill
Kingswood	Haseley Knob
Leek Wootton	Hatton Green
Radford Semele	Hatton Station
	Hill Wootton

		<p>Lapworth Little Shrewley Lowsonford Norton Lindsey Offchurch Old Milverton Rowington Rowington Green Sherbourne Shrewley Common Stoneleigh Wasperton Weston-under-Wetherley</p>	
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- f) As the report (V01) explains, it is inevitably a matter of judgement on where the cut-off point should be between different groupings. The Council took the view that villages with scores of around 40 could reasonably be classified as Growth Villages, due to the level of services and the size of population. It was decided to include Leek Wootton and Hatton Park, due to the range of facilities available within the wider area and their location close to towns.
- g) In the case of Hatton Park specifically, it was felt that although its current status as a growth village was marginal, further growth could support and sustain facilities in the village and thereby consolidate its strengths.
- h) Section 5 of V01 considers
- i. the implications of constraints,
 - ii. the availability of sites,
 - iii. the wider function of settlements
 - iv. ambitions for the future of settlements,
- to inform the decision on the level of growth that would be appropriate for each village. From this a conclusion was drawn on the level of growth that should be apportioned to each village, which in turn was revised following consultations in 2013, as set out in the Village Housing Apportionment (Revised) – 2014 (V04). This in turn informed the classification of villages in Policy H1 of the Submission Local Plan and the allocation of village sites in the Submission Local Plan as in Policy DS11.
- i) As well as identifying Growth Villages, Policy H1 identifies 24 settlements as Limited Infill Villages (see the table at 7e above). In these locations, Policy H1 allows limited infilling within the village boundary in line with national planning policy. The village boundaries were subject to consultation in 2013 as part of the Village Housing Options and Settlement Boundary consultation. This policy recognises that, particularly where villages are “washed over” by green belt, recent planning policy has been very restrictive in these locations and has not allowed for organic growth to meet local needs. This undermines the vitality and long term viability of such settlements. Although these settlements are not of sufficient size and

/or lack the range of facilities to support substantial growth, some small scale development is appropriate in these locations to meet identified local needs.

- j) In preparing the 2016 Modifications, the principles set out in paragraph 7b) above were retained and formed the starting point for reviewing the level of development that could be accommodated in each of the growth villages, in the context of a higher housing requirement for the District. The approach is set out the Village Profile and Housing Allocations Report 2016 (V18PM). Applying the principle that *“Growth in rural areas and villages should be proportional in scale to growth forecast for the district as a whole”*, Table 3 of V18PM explores an indicative capacity for each of the ten Growth Villages, taking into account a proportionate increase intended to help meet the needs of Coventry.
- k) The report (V18PM) also applies the principle that *“a hybrid approach is taken to the apportionment of housing growth which starts with a forecasted baseline growth level (focused upon a percentage increase in current dwellings) and then considers how constraints and opportunities impact on these growth levels”* by considering each of the ten villages in turn, looking at constraints and pressures, site availability and suitability, and infrastructure in order to make appropriate adjustments to the indicative capacity.
- l) The approaches set out in the documents described above have enabled the Council to put forward appropriate and rational proposals for development in villages and rural areas which are supported by the evidence and is consistent with the overall Spatial Strategy set out in Policy DS4. This approach provides the justification for:
 - i. The apportionment of growth to villages set out in Policy DS10
 - ii. The allocation of sites in villages and rural areas set out in Policy DS11
 - iii. The amendments to the Green Belt set out in Policy DS19
 - iv. The categorisation of rural settlements set out in Policy H1

Appendix A - Summary of Spatial and Distribution Options consider in the Sustainability Appraisal

(see Docs SA10 SA11PM)

Stage: Preferred Options 2012	
<p>Broad Locations of Growth (see page 52-54 of SA)</p>	<p>This explored four options for the location of growth as follows:</p> <p>Broad Option 1 - Focus development outside the green belt: Would have a positive effect in supporting economic growth. Concentration of sites in one area, close to the urban area, has the potential to support sustainable transport options and reduce the need to travel. However focusing development in one area could have a significant impact on the landscape and the location of sites is more likely to have an impact on the historic environment. Would meet overall housing need but restricted choice in terms of location may mean this option could not meet the needs of all residents.</p> <p>Broad Option 2 - Distributed around urban fringe: Would have a positive effect in supporting economic growth, sites well related to the urban areas could reduce the need to travel and have the potential to meet all housing needs. Distribution of sites is less likely to have a significant impact on the landscape and historic environment.</p> <p>Broad Option 3 - Development dispersed in small and medium sites including villages (no large sites): Sites unlikely to be of a sufficient size to accommodate employment opportunities or support public transport improvements therefore could increase reliance on the private car. Would be more difficult to provide dedicated services, potentially impacting on existing services. Could be harder to provide a mix of housing and affordable housing. However a dispersed approach could potentially minimise impact on the historic environment</p> <p>Broad Option 4 - New Settlement Outside the Green Belt: Positive impact in terms of supporting economic growth. Critical mass to support new facilities but could still generate a need to travel to access other key services and employment. Would meet overall housing needs however there would be a lack of choice in terms of location.</p>
<p>Distribution of</p>	<p>This set out 5 options for the distribution of housing sites. Table</p>

<p>Housing Sites See Table 4.4 on page 56</p>	<p>4.5 explains why option 5 was progressed. Option 5 was as follows:</p> <ul style="list-style-type: none"> • Existing Urban Area 480 • North of Leamington/ Warwick 2, 640 • South of Leamington/ Warwick/ Whitnash 3,410 • East of Leamington 200 • East of Kenilworth 770 • Westwood Heath (South of Coventry) 0 • Rural Area 830
<p>Stage: Revised Development Strategy 2013</p>	
<p>Broad Location of Growth (see pages 59-63 of SA10)</p>	<p>Table 4.8 on pages 59-62 sets out how the following 5 options were appraised.</p> <ul style="list-style-type: none"> • Option 1: Focus development outside the Green Belt • Option 2: Distribute around the urban fringe and across the District (including within and/or on the edge of some villages). • Option 3: Disperse development in small/medium sites, including around the villages • Option 4: New settlement outside the Green Belt • Option 5: Protect the Green Belt from development, where non-Green Belt sites are suitable and available, and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District. <p>Option 1 was rejected as it would lead to the concentration of development within one part of the District and offer no scope for meeting the needs of Kenilworth or villages within the Green Belt. Option 4 was rejected for similar reasons; development would be focussed in one area and offers no scope for meeting the needs of the rest of the District.</p> <p>The Council acknowledged that Option 3 would meet some concerns expressed by the public about the impact of large development sites. However, it was rejected as the pattern for growth would make it difficult to properly plan for, and deliver, the necessary infrastructure and would be impractical in terms of the number of sites which would have to be identified. It would also make it difficult to make the fullest use of public transport, walking and cycling and make provision for a full range of community facilities with easy access to jobs, schools and other services.</p> <p>Option 2 was initially progressed as the Preferred Option in 2012 as there was a limited availability of urban Brownfield land so extensions to the urban area offered the most sustainable location for growth. However, new information has since become available that indicates that there is the potential for non-Green Belt Land south of Warwick, Leamington and Whitnash to absorb more development than was previously thought possible. Representation received on the Preferred Options also showed</p>

	<p>that there is considerable opposition to development in the Green Belt to the north of Warwick and Leamington, particularly if there were alternative non-Green Belt locations to the south of the towns. For these reasons Option 2 was rejected by the Council as it would lead to a significant amount of development on Green Belt Land.</p> <p>Option 5 was developed by the Council in response to the new evidence referred to above, which indicated that the south of the District could accommodate more development. This option was progressed as it would lead to less development on Green Belt Land, which also responds to representations objecting to development in the Green Belt to the north of Warwick and Leamington.</p>
Distribution of Housing (see table 4.10)	<p>See pages 64-68 of Doc SA10. This sets out how 6 options for the distribution of growth were appraised and explains why option 6 was progressed. Option 6 proposed a distribution as follows: Existing Urban Area Brownfield Sites: 380</p> <ul style="list-style-type: none"> • Consolidation of existing employment sites: 450 • Sites on edge of Warwick / Leamington / Whitnash: 4,550 • Kenilworth: 700 • Village development: 1,000 • Total = 7,080 •
Stage: Publication Draft Local Plan 2014	
Location of Growth (see page 70 of SA10)	The overall spatial strategy for the distribution of growth did not change. The reasons for the selection and rejection of options presented were therefore still valid.
Distribution of Housing (see tables 4.13 and 4.14 of SA10))	There were some changes to quantities and proportions of housing proposed for each of the broad locations. However the Sustainability Appraisal concludes that at paragraph 4.51 “In terms of alternatives for the broad distribution of housing, the proposed changes ... do not significantly affect the findings of the sustainability appraisal for the preferred option as set out in the Revised Development Strategy 2013 (Option 6)”.
Stage: Submission Local Plan - 2015	
Location of Growth (see page 80 of SA10)	The Sustainability Appraisal concludes “The overall spatial strategy for the distribution of growth has not changed since the Revised Development Strategy was published in June 2013. The Submission Local Plan still seeks to protect the Green Belt by focussing development on non-Green Belt sites where suitable and available and by concentrating growth within and on the edge of existing urban areas as well as distributing it across the District. The reasons for the selection and rejection of options ... are therefore still valid”.
Distribution of Housing (see Tables 4.16	There were some minor changes to quantities and proportions of housing proposed for each of the broad locations. However the Sustainability Appraisal concludes that at paragraph 4.65 “In

and 4.17 of SA10)	terms of alternatives for the broad distribution of housing, the proposed changes as set out above do not significantly affect the findings of the SA as set out in the Revised Development Strategy SA Report 2013. The reasons for the selection and rejection of options presented ... are therefore still valid”.
Stage: Local Plan Modifications 2016	
Location of Growth See pages 13 to 17 of Doc SA11PM)	This identified and considered 7 options for the location growth in the context of an increased housing requirement (part of which addresses needs arising in Coventry. The seven options are: <ul style="list-style-type: none"> • Option 1 - Focus development outside the Green Belt • Option 2 - Distribute around the urban fringe and across the District (including within and/or on the edge of some villages) • Option 3 - Disperse development in small/medium sites, including around the villages • Option 4 - New settlement outside the Green Belt • Option 5 - Protect the Green Belt from development, where non-Green Belt sites are suitable and available) and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District. • Option 6 - New settlement inside the Green Belt • Option 7 - Focused around key transport corridors <p>Table 3.3 shows how each of these options was appraised and table 3.4 sets out the reasons for the selection/rejection of the alternatives. It concludes that option 5 should be progressed. It should be noted that this is consistent with the Submission Draft Spatial Strategy which had been derived from the sustainability appraisal work set out in Doc SA10.</p>
Distribution of Growth See pages 17 to 26 of Doc SA11PM)	This identified and considered 5 options for the distribution of growth as follows: <ul style="list-style-type: none"> • Option 1 – more in Kenilworth & Coventry (Green Belt), slightly less in Leamington/Warwick (Green Belt) & rural area Urban Brownfield 1208; Greenfield on edge Kenilworth 1660; Greenfield on edge Warwick/Leamington/Whitnash 3020; Greenfield on edge Coventry 3025; Growth Villages & rural 763 – Total new homes 9,676 • Option 2 – less in Kenilworth & Growth Villages, more Green Belt growth in North Leamington Urban Brownfield 1208; Greenfield on edge Kenilworth 760; Greenfield on edge Warwick/Leamington/Whitnash 4335; Greenfield on edge Coventry 2245; Growth Villages & rural 763 – Total new homes 9,311 • Option 3 – Less on edge of Leamington & Warwick, further

	<p>growth to south of Coventry Urban Brownfield 1208; Greenfield on edge Kenilworth 1500; Greenfield on edge Warwick/Leamington/Whitnash 2455; Greenfield on edge Coventry 3025; Growth Villages & rural 1146 – Total new homes 9,334</p> <ul style="list-style-type: none">• Option 4 – Significantly less at Coventry, further growth in Kenilworth/Leamington/Warwick and rural areas Urban Brownfield 1208; Greenfield on edge Kenilworth 1660; Greenfield on edge Warwick/Leamington/Whitnash 4335; Greenfield on edge Coventry 445; Growth Villages & rural 1446 – Total new homes 9,094• Option 5 – on edge of urban areas, Proposed Modification Policy DS10 Urban Brownfield 1208; Greenfield on edge Kenilworth 1500; Greenfield on edge Warwick/Leamington/Whitnash 3270; Greenfield on edge Coventry 2455; Growth Villages & rural 1146 – Total new homes 9,369 <p>Table 3.5 sets out the reasons for progressing or rejecting these options and concludes option 5 should be progressed.</p>
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