

**Warwick District Council**  
**Local Plan Examination**

**Response to Inspector's Matters and Issues**

**Matter 12**

**Housing policies**

Policies H0 – H14

**Issue**

Whether the housing policies are justified, effective and consistent with national policy.

**October 2016**

## Policies H0 – H14

### Policy H0 – Overarching policy

**1. Should it be amended to reflect the Council’s position in terms of accommodating unmet needs from other authorities? How could this be done?**

- a) Policy H0 provides the overarching framework for the more specific and focused policies that follow. It links with Policies DS2, DS6 and DS7. The amendments proposed by the Council to accompany the submission of the Plan in January 2015 (see LP21 and LP23) suggest that clause a) of the Policy should be modified to read:-

*“provide in full for the District’s Housing Requirement;”*

- b) The Council considers that by referring to the District’s Housing “requirement”, this revision to the wording of Policy H0 links directly to the modified Policies DS6 and DS7 which refer more specifically to the overall housing requirement and the way that the Council intends to meet this requirement. As set out in the modified Policy DS6, the overall housing requirement clearly refers to both local housing need and unmet need from elsewhere

### Policy H1 – Directing new housing

**2. Is the policy itself sufficiently clear in terms of the definition of urban areas/villages and the open countryside i.e. the role of settlement boundaries?**

- a) Following the Matter 4 hearings on 28<sup>th</sup> September 2016, the Council proposed some amendments to Policy H1 (See EXAM71) as follows:

#### ***H1 DIRECTING NEW HOUSING***

1. *Housing development will be permitted in the following circumstances:*
  - a) *Within the Urban Areas, as identified below and on the Policies Map;*
  - b) *Within the allocated housing sites at Kings Hill Lane (H43) and Westwood Heath (H42);*
  - c) *within the boundaries of Growth Villages and Limited Infill Villages, as identified below and as shown on the Policies Map;*
  - d) *in the open countryside; where:*
    - I. *the development is for rural affordable housing, in accordance with Policy H3;*
    - II. *the development is for a rural worker in accordance with Policy H12;*
    - III. *the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
    - IV. *the development would re-use redundant or disused buildings in accordance with Policy BE4 and lead to an enhancement to the immediate setting; or*
    - V. *the design of the dwelling is of very exceptional quality or innovative nature*
2. *Housing development on garden land, in urban and rural areas, will not be permitted unless the development reinforces, or harmonises with, the established character of the street and/ or locality and respects surrounding buildings in terms of scale, height, form and massing.*

- b) Alongside this, amendments to the Explanatory text were also proposed to explain that the development strategy seeks to direct housing towards urban areas, allocated sites on the southern edge of Coventry and growth villages.
- c) The policy (in conjunction with the Policies Map) clearly defines urban areas; growth village envelopes and infill village boundaries. The proposed amendment in EXAM71 clarifies that allocated sites on the southern edge of Coventry are also suitable for development. By default, the remainder of the District (i.e all areas falling outside the defined areas) is open countryside.
- d) The policy is also clear that housing development is acceptable within the defined areas, but that outside these areas it will only be permitted in line with the criteria set out in clause c).
- e) The Council contends this is sufficiently clear. However, we would suggest a definition of “open countryside” as set out above, is added to the glossary for the avoidance of doubt.

**3. Is the approach to development beyond settlement boundaries appropriate and justified? Is it sufficiently flexible?**

- a) The approach to development beyond the settlement boundaries (in open countryside) is set out in clause c) of Policy H1. The explanation for the clause is set out in paragraph 4.9.
- b) In supporting growth in infill villages, the Policy is consistent with para 55 of the NPPF as it seeks to promote sustainable development and enhance or maintain the vitality of rural communities. To achieve this, paragraph 55 states that isolated new homes should be avoided except in specific circumstances. The Council contends that new homes beyond the boundaries of growth villages and infill villages in rural areas can be considered to be isolated due to poor access to services.
- c) The settlement hierarchy (V01) examines the capacity of all settlements in the District with a population of over 50. As a result, the Infill Villages include settlements with relatively small populations such as Eathorpe (35 dwellings; pop 78); Rowington (40 dwellings, pop 82); Hill Wootton (40 dwellings, pop 102). It excludes Turners Green and Pinley Green due to the scattered nature of development in the settlements. Locations beyond the Growth and Infill villages (in the open countryside) can reasonably be considered to be isolated and do not therefore generally provide for sustainable development in line with the aims of para 55 (and supported by in paras 17 and para 30). The Council therefore considers that its approach is justified (by the analysis of settlements) and appropriate in that it is consistent with the NPPF.
- d) Policy H1 does allow development in the open countryside in line with clause cI to cV. The clauses are consistent with the four bullet points set out in paragraph 55 of the NPPF with the addition of allowing for the development of affordable rural housing in line with Policy H3. This clause (cI) seeks to provide for identified affordable housing needs as set out in Policy H3 and aligns with paragraph 54 of the NPPF.
- e) In terms of flexibility in the approach beyond the settlement boundary, the Council contends that a balance needs to be struck in line with the NPPF between encouraging sustainable development patterns and supporting housing in rural areas. The clauses within the Policy seek to strike this balance by ensuring development in open countryside is limited to proposals that are consistent with the NPPF.

**4. Are the boundaries themselves appropriate and justified? Are any modifications required?**

- a) The settlement boundaries were established through a rigorous process involving:
- i. Reviewing boundaries established in the extant Local Plan
  - ii. Desk-top and on-the-ground analysis of settlement edges
  - iii. Liaison with parish councils
  - iv. Consultation (Village Housing Options and Settlement Boundaries Consultation 2013)
- The preparation of Neighbourhood Plans (such as at Barford) and emerging Neighbourhood Plans (such as at Hampton Magna, Bishops Tachbrook and Leek Wootton) has supported the proposed settlement boundaries.
- b) The proposed settlement boundaries take account of:
- i. The existing built form of settlements including the full extent of the curtilage of properties that are residential in nature (such as gardens)
  - ii. Areas proposed for development allocations in the Local Plan
  - iii. Physical and landscape features such as roads, woodlands, watercourses, hedgerows, other field boundaries
- c) Following the Publication Draft consultation (2014), the Council proposed a number of modifications to the settlement boundaries as set out in the Modification Table January 2015, - modification PM6, PM7, PM8, PM9, PM11, PM12 and PM14. The modifications are shown on the policies map that accompanied the submission draft, specifically LP21 Map extract 6, LP21 Map Extract 11, LP21 Map Extract 12, LP21 Map Extract 15, LP21 Map Extract 19, LP21 Map Extract 29. These modifications were approved by the Council prior to submission, but have not been the subject of further consultation.
- d) One further modification is still required as a result of a cartographical error. This relates to land at Oakfield, Kingswood as raised in rep 68883. The revised boundary shown in LP21 Map Extract 29 does not correctly follow the boundary of the garden and as a result a further modification is proposed in map extract in appendix 1 of this statement.

**5. Is the approach to housing development in the open countryside and on garden land appropriate and justified, is it consistent with national policy, in particular paragraph 55 of the NPPF?**

**Open Countryside**

- a) 1c) of Policy H1 sets out the circumstances in which development in the open countryside will be permitted.
- b) With exception of C(I) (Affordable Housing), the criteria set out in this policy are consistent with Para 55 of the NPPF.
- c) In the case of reuse of redundant or disused buildings, the Policy is supported by policy BE4 which sets out what could constitute a disused or redundant building and how the Council will assess whether a building will lead to an enhancement to the immediate surroundings.
- d) In the context of the Council's interpretation of "isolated dwellings" as set out in answer to question 3 above, the Council contends that the approach to development in the open countryside is appropriate and is consistent with paragraph 55 of the NPPF

### Garden Land

- NPPF Para 53 says: “LPAs should consider the case for setting out policies to resist inappropriate development of residential gardens for example where it would cause harm to the local area.”
- The second paragraph of H1 seeks to clarify paragraph 53 by explaining the circumstances whereby “harm to the local area” caused by garden land development can be avoided. This approach supports the Local Plan objective set out in paragraph 1.51 of ensuring new “developments are designed and located to maintain and improve the quality of the built and natural environments...and should respect the integrity of existing settlements”. In this context, gardens are an important element in the built and natural environments. They help define local character and loss of garden land therefore has the potential to undermine the integrity of settlements. The Council’s approach to Garden Land development therefore indicates that it will be resisted unless it harmonises or reinforces the established character in line with para 53 and in line with the Local Plan’s objectives.

### Policy H2 – Affordable Housing

#### 6. What is the evidence in relation to the need for affordable housing? What does this show?

- a) The principal evidence source in relation to the need for affordable housing is the Coventry & Warwickshire Joint Strategic Housing Market Assessment (November 2013) (HO04) and the associated update from September 2015.
- b) The 2013 study showed a net affordable housing need of 268 dwellings per annum from 2013 to 2031 out of an overall assessed need range from 660 (minimum provision) to 720 (assessed need) per annum from 2011 to 2031. This represented a range of 37% of “assessed need” to 41% of “minimum provision”.
- c) The 2015 update found an annual affordable housing need of 280 dwellings per annum out of a total housing need of 600 per annum (from both demographic-led and economic-led projections). This equates to 47% of total housing need on either measure.
- d) The Local Plan modifications makes provision to accommodate 332 dwellings per annum of unmet housing need from Coventry as set out in the Housing Memorandum of Understanding (HO21PM). The corresponding figures for Coventry are:
  - The 2013 study showed a net affordable housing need of 477 dwellings per annum from 2013 to 2031 out of an overall assessed need range from 1,040 (minimum provision) to 1,180 (assessed need) per annum from 2011 to 2031.
  - This represented a range of 40% of “assessed need” to 46% of “minimum provision”.
  - The 2015 update found an annual affordable housing need of 600 dwellings per annum out of a total housing need of 2,120 per annum (based on demographic-led projections)
  - This equates to 28.3% of total housing need.
- e) The Coventry City Local Plan, supported by the Housing Memorandum of Understanding plans for a total of 2120 dwellings per annum.
- f) Appendix C of the Council’s Matter 2 Statement shows the Affordable Housing Statement of Common Ground between Coventry City Council and Warwick District Council. This shows that taking account of Coventry’s housing need, the total affordable housing need for

Warwick District is 374 dwellings per annum and the total housing requirement is 932 dwellings per annum.

- g) The Statement of Common Ground recognises that this approach is a simplification of a complex set of relationships. However both parties consider it provides an initial indication of how affordable housing could be redistributed alongside the overall unmet need and as such it is a useful guide.
- h) The Statement of Common Ground indicates that in total across the District, Affordable Housing is 374 dwellings per annum and that this is 40% of the total housing need.

**7. What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show?**

- a) The Council undertook an Affordable Housing Viability Assessment in November 2011 (HO15) and an addendum in May 2012 (HO16). The 2011 report considered affordable housing viability across 5 distinct sub-markets. The percentage of affordable housing that was viable across these ranged from 0% to 50%. The table at paragraph 10.7 shows that only the sub-market defined as “*deprived areas is unlikely to sustain viability for 40% affordable housing assuming a “mid-market position”*” (NB this table excludes sites of 5 dwellings or less). The 2012 addendum reviewed the 2011 study in light of the “Affordable Rent” tenure which was launched in 2010 and clarified during 2011. Broadly, this showed similar results to the 2011 and the table 9.10 shows that only the sub-market defined as “*deprived areas is unlikely to sustain viability for 40% affordable housing assuming a “mid-market position”*”.
- b) Given that sites in “deprived areas” are unlikely to make up more than a very small percentage of applications for housing over 10 dwellings, the Council has used this evidence to justify a uniform 40% affordable housing policy, whilst recognising that where viability can be demonstrated to be compromised by that level of affordable housing a flexible approach will be taken.
- c) This evidence has been supported by more recent studies regarding CIL Viability – specifically the 2013 CIL Viability Assessment (IN06) and Addendum (November 2014) (EXAM3) which factored in 40% affordable housing in to the viability assessment of sites and concluded that all proposed housing allocations across the District are likely to be viable in the context of a requirement for 40% affordable housing. This evidence is further supported by recent planning approvals which have accommodated 40% affordable housing, many of which are currently being implemented.
- d) This evidence demonstrates that in general 40% affordable is viable across all parts of the District and that viability is likely to be an issue in a small number of specific circumstances or locations.

**8. What is the basis for the requirement for a minimum of 40% affordable housing? Is this figure justified? Does it reflect evidence on viability? Is a single figure for the whole District appropriate and justified? Is there evidence to take a different approach?**

- a) As set out in the answer to question 6 and 7, the affordable housing need is 374 dwellings per annum. This is 40% of the total housing requirement of 932 dwellings per annum. Given that the viability assessments indicate that this level of affordable housing is viable for the vast majority of sites over 10 dwellings it is reasonable to require 40% affordable housing as set out in Policy H2.

- b) The answers to questions 6 and 7 and particularly the documents referred to in those answers provide the justification for Policy H2.
- c) It has been suggested in representations that a variable approach should be taken to affordable housing. In particular, suggestions have been made that where a site is allocated to meet Coventry's unmet housing need, the policy should apply an affordable housing percentage to align with the evidence in SHMA relating to Coventry's affordable housing need (e.g approximately 28 or 29%).
- d) Whilst this alternative approach is understood, it is based on the false premise that certain sites have been allocated to meet Coventry's need and certain sites to meet Warwick District's need. This is not the case. In reality all sites have been allocated to ensure the District's housing requirement of 16,776 dwellings is met in full and all sites contribute to ensuring housing need is met in the District. The Council has been consistent and clear that even though the plan may be addressing different needs, the Local Plan is addressing a single housing requirement.
- e) For this reason, the Council does not propose to monitor provision for Coventry separately from provision for Warwick District and the Plan does not therefore distinguish which sites are contributing to which need. To attempt to do so would be complex, fraught with ongoing difficulties and is entirely unnecessary in light of Paragraph 47 of the NPPF which requires the Local Plan to meet "*the full and objectively assessed needs for market and affordable housing in the housing market area*".
- f) In relation to affordable housing, this approach is also supported by the Bilateral Statement of Common Ground (Appendix C of the Council's Matter 2 Statement) which clearly shows how a redistribution of Coventry's overall housing need should be supplemented by a redistribution of affordable housing need. The SOCG provides a clear and pragmatic way of ensuring both authorities are playing their part in meeting the requirements of paragraph 47.
- g) Policy H2 is important in achieving this and by applying a uniform approach across the District is clear, simple, consistent with national policy and is justified by the evidence.

**9. Should the policy be worded to reflect the fact that provision of affordable housing is achieved through agreement or unilateral undertaking? i.e. should it refer to affordable housing being sought?**

- a) The Council considers that the provision of affordable housing is a requirement that should be placed on all relevant proposals unless it can be demonstrated that the requirement will compromise viability. Given the evidence of affordable housing need for the District set out in the answers above, it is the Council's view that affordable housing provision should be required to make residential development acceptable. Without that requirement, residential schemes would fail to meet the District's housing need.
- b) this approach is supported by the PPG (23b-001-20150326) which sets out that Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms." and PPG (23b-006-20140306) which sets out that "*where local planning authorities are requiring affordable housing obligations or tariff style contributions to infrastructure, they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances.*"
- c) The Council contends that Policy H2 as worded complies with this guidance and in particular

notes that obligations are needed to make development acceptable in planning terms.

**10. In light of current national policy (following the Court of Appeal judgement in May 2016) are the thresholds of 10 and 5 dwellings appropriate and consistent with national policy?**

- a) In light of National Policy, the Council has proposed a modification that was submitted alongside the Submission Draft Local Plan (LP21). This amends the first paragraph of H2 to read:
- “Residential development on sites of 11 or more dwellings, where the combined gross floorspace is more than 1,000 sq.m., will not be permitted unless provision is made for a minimum of 40% affordable housing to meet local needs.”*
- b) The Council considers that this is consistent with the Court of Appeal judgement in May 2016

**11. Is the policy sufficiently flexible, particularly in terms of the effect on viability and the potential for off-site contributions?**

- a) The policy states that “The form of provision, its location on the site and the means of delivery of the affordable element of the proposal will be subject to negotiation at the time of a planning application. The viability of the development will be a consideration in such negotiations”.
- b) The policy is flexible in allowing any developer to bring forward evidence as to the impact of the affordable housing requirement upon the viability of the development and for this to be considered on a case-by-case basis.
- c) The policy as drafted does not suggest that the 40% requirement itself could be subject negotiation in the event of viability issues. This is an oversight and the Council would support a modification to the of the second paragraph of the policy to read **“The level of affordable housing, the form of provision, its location on the site and the means of delivery of the affordable element of the proposal will be subject to negotiation at the time of a planning application.”**
- d) The policy allows for accepting alternatives to onsite provision in the following terms: “The Council will, in exceptional circumstances, accept contributions of equivalent value in lieu of on-site delivery. This should include financial contributions, land or off-site provision of affordable homes. In such cases, the developer will be required to demonstrate why on-site delivery is not practical.”
- e) The policy is flexible in that it enables any developer to make a case for contributions in lieu of on-site delivery and these will be considered on a case-by-case basis. The Council acknowledges that there may be circumstances where an off-site contribution is necessary but seeks to ensure that this is the exception rather than the norm. There are three reasons for this:
- The Council aims to create sustainable, inclusive and mixed communities in accordance with paragraph 50 of the NPPF and reducing onsite affordable housing while providing a higher proportion of affordable housing elsewhere mitigates against this objective;
  - Paragraph 50 makes it clear that alternatives to onsite provision should only be accepted where this “can be robustly justified”;
  - The Council does not have significant land-holdings of its own on which it could use



financial contributions to build affordable housing and the high land values in the area make it very difficult for the Council to compete for land.

**12. Is the policy consistent with national policy in relation to the definition of affordable housing and the type of provider?**

- a) The policy itself does not define “affordable housing”. However explanatory note 4.19 states that “The definition of affordable housing which is applied in this policy will be the definition as set out in national planning policy”.
- b) This approach allows the Council to update the definition as and when national guidance changes without the need for a change of policy. The definition used is that set out in annex 2 to the NPPF.
- c) The type of provider is set out in principle V of the policy: “the affordable housing will normally be provided through the involvement of a Registered Provider (of social housing) who is either a Preferred Partner of the Council or who has otherwise been approved in writing by the Council”.
- d) The Council’s view is that it is essential for the development of long-term sustainable and robust communities, that providers have a commitment to the area and the ability and resources to manage the properties effectively once let. The “preferred partner” approach ensures that this is the case but also allows flexibility to use another provider if necessary, as long as the Council has the opportunity to approve it first. It is also open for any registered provider to approach the Council with a request to join the preferred partner list. Further, the policy is flexible enough to allow for affordable housing to be owned in accordance with national policy. In particular the inclusion of the word “normally” enables other providers to be included.

**Policy H3 – Affordable housing on rural exception sites**

**13. Is the approach to outline planning applications justified? Would it have any practical effect? What is the justification for a two year limit on detailed permissions**

- a) In accordance with paragraph 54 and annex two of the NPPF, it is important the rural exception sites are brought forward in response to an identified housing need. The surveys of local housing need are considered to have a “shelf-life” of five years. These needs and opportunities to meet them will change over time. It is therefore important that the policy strongly encourages a responsive approach. The Council therefore applies two mechanisms to ensure that rural exception sites are brought forward in a responsive manner:
  - i. First, the Policy requires full applications only (no outline applications). This ensures that speculative proposals are not made and ensures that schemes are able to respond quickly to the specific needs identified.
  - ii. Second, the time limit imposed (2 years) is intended to ensure as far as possible that schemes are not built so long after the need survey was carried out that the data underpinning the scheme is out of date and the need has changed .
- b) The effect of this approach is to ensure the rural exceptions are only developed in response to a specific need and to ensure that identified needs are met quickly.

**14. What is the basis for the specific figure of 40% market houses? Should a more flexible approach be taken i.e. a simple reference to the minimum necessary?**

- a) The intention of policy H3 is to allow development on sites that would not normally be released for housing provided that the provision is of affordable housing to meet a local need.
- b) Any scheme mix that included 60% market housing or more would to all intents and purposes be a market housing scheme to be considered under policy H2 and not an exception. The Council's view is therefore that there should be a cut-off point for market housing at a level below 60%.
- c) Paragraph 54 of the NPPF states, in relation to rural exception sites, that "*Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs*".
- d) The definition of a "rural exception site" in annex 2 of the NPPF states that "*Small numbers of market homes may be allowed at the local authority's discretion*".
- e) The Council believes that taken together the interplay between the words "some" and "small numbers" in connection with market housing, in comparison with "significant additional" in relation to affordable housing indicates that for a site to qualify as a rural exception there should be less market housing than there is affordable housing.
- f) Within that constraint, for the policy to be effective, it requires some flexibility and, given that these are small sites and total numbers will be small, "up to 40%" was felt to provide the appropriate degree of discretion.

**15. Is the policy in other respects justified, effective and consistent with national policy?**

- a) The basis for Policy H3 is paragraph 89 of the National Planning Policy Framework, which indicates that the "*limited infilling in villages and limited affordable housing for local community needs under policies set out in the Local Plan*" may be appropriate development in the Green Belt.
- b) Policy H3 provides the framework to enable this national policy to be applied in Warwick District. It supports evidence from the Updated Assessment of Housing Need (HO20PM) that there is a need for affordable housing in the District and from local housing needs surveys which frequently identify small scale affordable housing needs in villages.
- c) The Policy clarifies that the development of such sites is dependent on demonstrating that there is a local need as shown by a village/parish housing need assessment. In recognition of the relatively low level of need in rural areas, the need to encourage sustainable development patterns and the importance of maintaining the openness of the Green Belt, the policy requires that such developments+ are small scale and located within or adjoining an existing settlement.
- d) Given that developments such as these are exceptions under paragraph 89, it is important that the accommodation provided does directly address the identified need. For this reason clause c)I, c)II and c)III are justified and necessary.
- e) Taking all these factors in to account alongside the answers set out in questions 13 and 14 above, the Council considers that Policy H3 is justified, effective and consistent with national

policy.

#### **Policy H4 – Securing a mix of housing**

##### **16. Is part 2 of the policy appropriate in light of the new National Technical Standards and Building Regulations? Is the approach justified?**

- a) Part 2 of the Policy relates directly to paragraph 50 of the NPPF which seeks to ensure the Council’s plan for a mix of housing including “the needs of different group in the community” including older people and people with disabilities.
- b) In recognition of the national approach to applying technical standards through Building Regulations, the Policy does not seek to apply any specific standards. Instead it seeks to ensure that the overall housing mix provides accommodation which can be considered to be age-friendly. It is not prescriptive about this but in the explanation at paragraph 4.51 it offers a number of examples including bungalows, houses built to Lifetime Homes Standards and other adaptable homes.
- c) This approach is justified by the data set out in the 2012 SHMA (HO03) which identifies that the population of people over 65 is expected to grow substantially over the plan period. Within the population the number of people with mobility problems is also expected to increase substantially. In this context (and in the context of paragraph 50 of the NPPF) the Council considers that it is justified in including a policy which enables those with growing mobility problems to remain or relocate in to market housing that can meet their specific needs.
- d) In summary, the Council is clear that the Policy is prescriptive in terms of specific standards but that it does require developments to specifically address the needs of a specific group in the community in line with paragraph 50 of the NPPF. In this respect the Council considers the Policy to be justified, and consistent with national policy.

#### **Policy H5 – Specialist housing for older people**

##### **17. Are the criteria for the location of such developments appropriate? Should there be more flexibility to allow for schemes in rural villages with fewer services?**

- a) Policy H5 seeks to ensure that new specialist accommodation for older people is located in close proximity to shops, amenities and public transport. These criteria are important as people over 70 are less likely to have access to private vehicles and are more likely to have mobility issues. Therefore it is important that they have good access to essential services such as shops and to public transport. The policy allows for the potential for this kind of accommodation to be located in appropriate growth villages within rural areas. However, the Council contends that locating this kind of accommodation in locations that are not in close proximity to shops, amenities and public transport is likely to lead to social isolation, practical difficulties for residents and unsustainable patterns of development.
- b) The Policy also seeks to ensure that Primary Health Care is available within reasonable proximity. This reflects the fact that older people often experience greater health issues and therefore require more frequent access to primary health care. These issues can be exacerbated by transport and mobility problems. It is therefore important to take account of primary health care when considering appropriate locations for specialist accommodation for

older people.

- c) Whilst there may be a case for a limited amount of accommodation for older people in other locations (such as rural villages with fewer services) this accommodation is best suited to people with private transport. In these cases, the Council contends that the policies set out in Policies H1 and H4 are sufficiently flexible to allow specific local development of accommodation that is suitable for older people within Limited Infill Villages

### **Policies H7-H9 – Accommodation for Gypsies and Travellers**

#### **18. What is the evidence in terms of the need for accommodation for Gypsies and Travellers?**

- a) In November 2012 the Council published its Gypsy and Traveller Accommodation Assessment (GTAA) document (HO19). In this document, the research carried out by the Salford Housing & Urban Studies Unit (SHUSU) at the University of Salford, found that there is a need in Warwick District for 31 permanent pitches and a transit site to accommodate 6-8 over a 15 year period.
- b) This figure has been further considered in the light of the changes to household formation rates in the Gypsy and Traveller community. In March 2016, an update was published (Doc HO30PM) which took this into account and extended the time-frame to coincide with the dates of the Local Plan i.e. 2011 – 2029. This had no effect on the overall requirement except that it indicated the requirement was through to 2029 (instead of 2026).
- c) With regard to Travelling Showpeople, the evidence demonstrates that the yard providing five plots already located within the district, is sufficient to fulfil the needs of this community and therefore no further plots are required within the Plan period.

#### **19. How is it intended to meet these needs? How will the Gypsy and Traveller Site Allocation Plan address needs and over what timescale? What about needs in the shorter term?**

- a) The Council is committed to meeting its obligations with regard to meeting the needs of Gypsies and Travellers. It is intended to do so through a Development Plan Document (DPD) which will be produced after the adoption of the Local Plan. The Local Plan provides the criteria by which potential sites will be assessed. The DPD will allocate specific sites. It is expected that there will be a minimum of two sites of up to 15-16 permanent pitches and a site for transit (6-8 pitches). Considerable work has already been undertaken in this regard and a number of public consultations have been held. This has resulted in a narrowing down of the number of sites which are likely to be suitable and therefore likely to be pursued further.
- b) The Council intends to meet the need in full. The evidence indicates a need for 25 of the permanent pitches to be allocated within the first five years with the remainder and the transit site being provided over the remainder of the Plan period.
- c) Currently, there are no sites for the use of Gypsies and Travellers in the district. In the short term, the district experiences some illegal encampments which are moved on where they are causing a problem, otherwise, they are tolerated for short periods of time. It is therefore important that the Council addresses the shortfall as soon as possible. There are two potentially suitable sites currently which the Council is pursuing. Land at

Leamington Football Club on Harbury Lane is due to become available when the club moves to new premises within the Europa Way stadium complex which is proposed as part of this Local Plan. Negotiations are underway for the purchase of the land required for the stadium from Warwickshire County Council (the landowners) to achieve this. If the football club vacate their present site, there would be the potential for a fifteen pitch permanent site, utilising the current modern brick built buildings for an amenity block of day rooms to serve the site. There is also the possibility utilising some highway land in the ownership of Warwickshire County Council, on the eastern side of Europa Way, for a transit site. Aside from access, the land has been assessed as suitable. However until the Europa Way highway improvements have been designed in detail it is not possible to establish whether the site can be safely accessed.

- d) The Local Plan modifications also makes provision for future need by including possible allocations within the identified strategic sites for residential use (see the Appendix at the end of this statement)

**20. Are the criteria in Policy H8 appropriate and justified?**

- a) The policy lists criteria which are nationally recognised. Originally outlined in the now superseded Government guidance ‘Designing Gypsy and Traveller Sites’, May 2008, the criteria have been repeated in ‘Planning Policy for Traveller sites’, published in August 2015. They are listed in ‘Plan Making, Policy B: Planning for Traveller sites, 13 a) – h)’.
- b) The criteria are expected to provide sites that are sustainable and provide suitable environmental conditions for Travellers whilst taking into account the amenity of the settled community.

**21. Overall, do Policies H7-H9 set out a clear and effective approach to the provision of sufficient accommodation for Gypsies and Travellers? Are they consistent with national policy?**

- a) The policies set out the Council’s commitment to providing sites to meet the identified need through a DPD, the criteria which will be used to assess potential sites and the possible use of CPO powers as a last resort if sites cannot be identified in any other way. In addition, the modifications approved by the Council’s Executive on 24 February 2016 and appended to this statement (Appendix 1) make provision for future need by including possible allocations within the identified strategic sites for residential use. These proposed modifications have not be subject to consultation.
- b) This has been added to the policy in order to assure future provision which has proven difficult to achieve with the co-operation of private landowners. It is considered that, with this criterion added to the policy, developers will be made aware that if there is an unmet need in the future for Gypsy and Traveller sites, the new strategic sites could be required to provide land for this use and will be alerted to this possibility.
- c) This is consistent with national policy as outlined in ‘Planning Policy for Traveller Sites’, August 2015.

**Policy H10 – Bringing forward allocated sites in the Growth Villages**

**22. Is criterion a) reasonable and realistic?**

- a) During the consultation on the Publication Draft Plan in 2014 the Council received representations suggesting that criterion a) is not reasonable or realistic. The Council therefore proposed modifications in LP21 to take on board points made in representations. The proposed modifications to criterion a) read as follows:
- a) *the design, layout and scale of development is established through a consultative approach to design and development, involving District and Parish Councils, local residents, other stakeholders and where appropriate Neighbourhood Plan Teams.*
- b) This softer approach which still places an emphasis on pre-application engagement recognises that collaboration with all stakeholders may not always be possible or appropriate. Instead it places an emphasis on a consultative approach which is more in tune with the PPG (20-001-20150326 ): *“working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development”* and PPG (20-002-20140306) *“Pre-application engagement is a collaborative process between a prospective applicant and other parties which may include:*
- *the local planning authority*
  - *statutory and non-statutory consultees*
  - *elected members*
  - *local people*
- It is recognised that the parties involved at the pre-application stage will vary on a case by case basis, and the level of engagement needs to be proportionate to the nature and scale of a proposed development. Each party involved has an important role to play in ensuring the efficiency and effectiveness of pre-application engagement.”*
- c) The Council contends that where a Neighbourhood Plan has been designated it is important that they are consulted on the proposals so that the application can take account of emerging local evidence, priorities and policies.
- d) Taking account of the proposed modifications, the Council contends that the policy is realistic and reasonable and is supported by national guidance. Further, the Policy is important in ensuring developments that will have a significant impact on local communities, take account of local knowledge and priorities.

**23. Is the approach to housing mix in criterion b) sufficiently clear and justified?**

- a) The purpose of this criterion is to seek to address identified needs at the local level in rural areas in accordance with paragraph 54 of the NPPF which states that *“local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”*.
- b) The Council has appointed a contractor to work with parish councils to carry out parish-level housing needs surveys around the district. These surveys provide information on localised housing needs at a geographic scale below that of the district as a whole and therefore provide data that supplements the Strategic Housing Market Assessment (SHMA).
- c) In a parish where such a survey has been carried out in the recent past (the surveys are considered to have a “shelf life” of five years) the mix of housing on a site coming forward should firstly be targeted towards the identified local needs of the parish. If the identified local need is smaller in number than the capacity of the site then the mix for the remaining units is

to be directed towards the district needs identified by the SHMA.

- d) Where no up-to-date local survey has been carried out, the mix for the scheme should be directed towards the district-level needs identified by the SHMA as this is the only available needs information.
- e) The Policy also indicates that account should be taken of housing need in neighbouring parishes. This enables the allocated sites to not only meet the needs of the village within which it is located, but also needs of neighbouring parishes in line with paragraph 55 of the NPPF. Clearly this can only be applied where there is an up to date housing needs survey in the neighbouring parishes.
- f) The Council therefore contends that this criterion is consistent with national policy and provides a clear and justified approach to securing an appropriate housing mix within growth village allocations.

**24. What is the basis for the phasing approach set out in criterion c)? Is it justified and consistent with national policy?**

- a) During the consultation on the Publication Draft Plan in 2014 the Council received representations suggesting that criterion c) is not justified and consistent with national policy. Particularly in view of the importance of boosting significantly the supply of housing and achieving a 5 year supply of housing land, the Council accepted that this clause should be deleted. This deletion was included in the modifications that accompanied the Local Plan submission (LP21). Alongside this, the second part of paragraph 4.76 should also be deleted.

**Policy H11 – Limited infill village housing development in the Green Belt**

**25. What is the basis for criteria a) and b)? Are they justified or should a more flexible approach be taken?**

- a) Criteria a) and b) seeks to clarify the definition of what the Council considers to be limited village infill housing. The policy applies to those villages which are to be retained within the Green Belt. In this context Paragraph 89 of the NPPF applies. This indicates that “*limited infilling in villages and limited affordable housing for local community needs under policies set out in the Local Plan*” are not inappropriate in the Green Belt.
- b) Given that the Limited Infill Villages have been retained within the Green Belt due to the contribution they make to the openness of the Green Belt in line with paragraph 86 of the NPPF, the Council considers it is important that limited infilling is clearly defined and does not compromise the character of the villages or the openness of the Green Belt. The retention of the villages in the Green Belt reflects local character which involves, in many cases, settlements that include substantial areas of open land within the settlements (for example Eathorpe, Weston-under-Wetherley, Rowington, Sherbourne and Beausale).
- c) The Policy therefore seeks to encourage some small scale infill development in specific circumstances whilst ensuring significant open areas within villages are retained and avoiding “back-land” development which erodes the character and integrity of the villages.
- d) As a result criterion a) has been put forward to be clear about what is meant by “limited”. Given the nature of many of the Limited Infill Villages, it is considered that developments of three or more dwellings are likely to compromise the openness of the Green Belt. Alongside this, criterion b) seeks to ensure the development supports and strengthens the intrinsic street patterns and integrity of the settlements by focusing development within established

built-up frontages rather than to the rear of existing development.

- e) For these reasons the Council contends that (in the context of the character of local villages) the policy strikes an appropriate balance between encouraging some limited infilling to support the incremental growth of villages, at the same time as protecting the character of the villages and the Green Belt.

**26. Is the policy consistent with national policy?**

- a) As set out above (in answer to question 25) the Policy is consistent with paragraph 86 and 89 of the NPPF. In line with paragraph 89, it recognises that Limited Infill development in Green Belt villages is not inappropriate and provides clarification as to how paragraph 89 should be applied locally taking account of the character of the District's villages and their role in the Green Belt in line with paragraph 86.

**Policy H12 – Housing for Rural Workers**

**27. Is the approach to rural workers housing justified and consistent with national policy? What is the basis for the specific size limit in paragraph 4.83, is this justified or should a more flexible approach be taken?**

- a) Policy H12 is consistent with paragraph 55 of the NPPF which indicates that new isolated homes in the countryside should be avoided unless they are special circumstances. Amongst the special circumstances identified is the following: "*the essential need for a rural worker to live permanently at or near their place of work in the countryside...*".
- b) Policy H12 seeks to clarify how this element of Paragraph 55 should be applied within Warwick District by setting out a number of criteria that the Council will take in to account when assessing whether an "essential need" has been demonstrated.
- c) The Policy seeks to be sufficiently robust to ensure that only bona fide rural workers' dwellings are constructed in the open countryside under this policy. The criteria require evidence of a functional need for a dwelling, evidence that the business is on a sound financial footing, and evidence that the intended occupier is fully or primarily employed on the land to which the proposal relates. In essence the Policy is carried forward from the 1996-2011 Local Plan and therefore has an established track record of being appropriate and robust. However, issues have arisen with regard to the ability of certain business to demonstrate financial viability in line with clause c). The new policy has therefore added additional flexibility with regard to the criterion on the financial status of the business to enable a temporary permission to be granted where financial viability is difficult to demonstrate.
- d) The Council accepts that the specific size limit set out in the final sentence of paragraph 4.83 is unnecessary because the appropriate size of any dwelling would be addressed through criterion d) and would support the deletion of that sentence.

**Policy H13 – Replacement dwellings in the open countryside**

**28. Why are criteria a) and b) necessary, particularly in light of paragraph 89 of the NPPF in relation to replacement buildings in the Green Belt?**



- a) This policy is a continuation of Policy RAP3 in the extant adopted Local Plan. The final Inspector's report for the 1996 – 2011 Local Plan found this policy to be sound and considered that it was a reasonable interpretation of Government advice at the time (PPG2) which indicated that replacement dwellings need not be inappropriate, providing the new dwelling is not materially larger than the dwelling it replaces. This advice is strongly echoed in paragraph 89 of the NPPF.
- b) The Council has given consideration as to whether the criteria set out in a) and b) are still relevant in light of the NPPF and the lighter-touch guidance set out in the PPG (50-001-20160519). Whilst the PPG does not provide any direct guidance, the Council contends that the criteria set out in a) and b) are still relevant locally in that they ensure the existing rural quality is maintained without recourse to demolition and replacement and that where replacements are appropriate the new buildings are positively contributing to the rural environment.
- c) The Council therefore considers the findings of the Inspector's report and the reasons behind the criteria are as relevant locally today as they were in 2007, particularly in the context of a high quality rural environment and significant local pressure for new dwellings in the countryside.

#### **NOTE ON CUSTOM AND SELF-BUILD HOUSING**

The Council has proposed an additional policy (HNew1) to provide a policy framework for Custom and Self-Build Housing. This was approved by the Council on 24th February 2016 (Appendix 3 of report to Council). The Policy and Explanation are included in the Appendix 1 to this Matter Statement. This proposed Policy has not been the subject of consultation

## Appendix 1 of WDC Matter 12 Statement

### Table of Proposed Modifications to the Publication Draft Local Plan (part 2)

February 2016

#### Introduction

The proposed modifications to the Publication Draft shown in the table below were prepared in February 2016 to address emerging issues such as new government policy or updated evidence. The modifications do not seek to directly address the issues of soundness identified by the Inspector in his letter of 1<sup>st</sup> June. Instead they are proposed for completeness in anticipation of these areas being examined.

The proposed modifications are based on the text of the Publication Draft Local Plan published in April 2014 as amended by the Focused Consultation published in October 2014.

Subject to the agreement of the Local Plan Inspector to these modifications, any that are substantive in nature will form part of a future consultation following Examination hearings and prior to finalising and adopting the Local Plan.

**Note: In the table below,**

**new text** is shown as follows: [where this has been](#)

**existing text to be retained** is shown as follows: which are assessed as being

existing text to be deleted is shown as follows: ▼

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**Deleted:** needs to identify sites for

Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
<b>Development Strategy</b>				
<b>Policy H7 Providing the Homes the District Needs</b>				
Mod 28	96	Policy H7	<p>Amend Policy H7 to add an additional paragraph to read</p> <p><b>H7 Meeting the Accommodation Needs of Gypsies and Travellers</b></p> <p>The Council will produce a Development Plan Document (DPD) that will allocate sufficient land on sustainable sites to meet the permanent accommodation needs of its Gypsy and Traveller community, satisfying an identified need for 31 pitches over <a href="#">the Plan Period</a> (25 of which should be within the first 5 years). <a href="#">In preparing the DPD, the Council may require the proposed strategic housing allocations, set out in Policy DS15, to provide land for gypsy and traveller accommodation.</a> Monitoring of such sites will inform future requirements.</p> <p>The Council will support Warwickshire County Council in its proposal to provide emergency stopping places in the County, to assist in meeting the transit needs of the whole of Warwickshire. <a href="#">However the DPD will ensure that the District's transit need of 6 – 8 pitches will be met by providing a transit site. This will be addressed by considering planning applications against the criteria in Policy H8 and/or by bringing further sites forward in line with this Policy.</a></p> <p><a href="#">The Council may require the proposed strategic housing allocations, set out in Policy DS15, to provide land for gypsy and traveller accommodation, in the event that monitoring shows a shortfall in pitches available to meet need during the plan period.</a></p>	To ensure the long term needs of Gypsies and Travellers are met
Mod 29	96	4.67 to 4.70	<p>Amend paras 4.67 to 4.70 to read as follows:</p> <p><a href="#">4.67</a> The Gypsy &amp; Traveller Accommodation Assessment (GTAA), (November 2013)</p>	To reflect proposed changes to Policy H7

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**Deleted:** But will ensure meeting its own transit need of 6-8 pitches by providing a transit site. Monitoring may show that there are insufficient pitches available to meet need during the plan period. Planning applications will therefore be assessed against the criteria in Policy H8.

Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
			<p>defined this Council's permanent need as 31 pitches over a 15 year period. <u>The figure has since been updated (October 2015) to coincide with the Local Plan period and although the required number of pitches is unchanged, it is now required over the Local Plan period rather than 15 years as previously published.</u> Because the Council has no current provision and therefore a historic under-provision, 25 of those pitches must be found within the first five years,▼</p> <p><u>4.68</u> In addition, the GTAA found a need for <u>6-8</u> transit pitches over the same time period. The Council has been closely involved with Warwickshire County Council (WCC) with regard to the provision of such pitches <u>and the County Council has committed to the provision of emergency stopping places to help serve the transit need, however as these are likely to be too few to serve the whole of the County need, this Council will allocate land for a transit site to meet its own need.</u>▼</p> <p><u>4.69</u> Government advice suggests that a site size of between 5 and 15 pitches is the most appropriate in order to ensure successful management of the site. <u>The Council will need to allocate sites at the upper end of this limit to reflect the lack of suitable, sustainable, available and deliverable land. Moreover, having exhausted all possible potential sites outside the green belt, the Council considers that exceptional circumstances now exist that demonstrate the need to consider releasing land currently in the green belt for this use.</u>▼</p> <p><u>4.70</u> <u>In order to ensure that any unfulfilled current need and future need is met, it may become necessary to include new Gypsy and Traveller provision within the larger strategic housing sites allocated in the Local Plan. Monitoring and updating the need assessment will provide the evidence for this requirement.</u></p> <p>The Council has already made considerable progress towards the production of the Development Plan Document and this will be submitted to the Secretary of</p>	

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**Deleted:** and the County Council has committed to the provision of emergency stopping places (to serve the transit need) for the whole of Warwickshire. To do this, the County Council is looking for a site in the north of the county and one in the south which will satisfy the requirements for all local authorities in the county. To this end, WCC has already identified and gained permission to use a site in Stratford District as the site in the south. This site will satisfy Warwick District's need for a transit site. This Council is therefore only looking to provide permanent sites i.e. 31 pitches over a 15 year period; 25 in the first 5 years. These pitches will be accommodated on a number of sites, each having a relatively small number of pitches.

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**Deleted:** The Council prefers sites of a maximum of 10 pitches. In view of this, the Council intends to meet its need on a greater number of smaller sites.

Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
			State soon after the Examination into this Plan	
<b>New Policy: <a href="#">Custom and Self-build Housing Provision</a></b>				
Mod 30	New	Policy H New1	<p>Insert new policy H New1</p> <p><b><a href="#">Custom and Self-build Housing Provision</a></b></p> <p><a href="#">To support the delivery of self- and custom build housing in Warwick District that meets the needs of local communities, sites providing more than 100 dwellings will allocate at least 5% of the dwellings for sale as self- build, custom-build or self-finish opportunities, through the provision of serviced and accessible plots of land. Unless otherwise specified, the self- and custom build plots in these circumstances will form part of the market housing allocation.</a></p> <p><a href="#">In exceptional circumstances, the Council may accept contributions of equivalent value in lieu of on-site delivery. This may include serviced land for an equivalent number of custom and self-build plots in another suitable, sustainable location. In such cases, the developer will be required to demonstrate why on-site delivery is not practical.</a></p> <p><a href="#">Where it can be robustly demonstrated that the provision of on-site plots is unviable or cannot be achieved for some other reason and the developer is unable to make off-site provision, the Council will waive the requirement and will accept a financial contribution in lieu.</a></p> <p><a href="#">Where clear and robust evidence can be provided to demonstrate that plots have been made available and marketed appropriately for at least 2 years and have not sold, they may either remain on the open market as self- / custom build / self-finish opportunities or be built out by the developer.</a></p> <p><a href="#">Proposals for custom and self-build housing in other parts of the district will be approved in suitable, sustainable locations (such as brownfield sites, growth villages and appropriate locations within infill villages) subject to compliance with all other</a></p>	To address the emphasis put on custom and self-build in the emerging Housing and Planning Bill

Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
			<p><a href="#">relevant policies of this plan.</a></p> <p><a href="#">Where appropriate, sites within certain settlements may be identified for self- and / or custom build in a neighbourhood plan; the neighbourhood plan may also provide necessary guidance through a locally derived design code. Such sites should accord with all other relevant policy requirements in the Local Plan and national policy, including green belt and historic and environmental designations.</a></p>	
Mod 31	New	Para 4.New1	<p><b>Explanation for Policy H New1</b></p> <p><a href="#">4.New1 National policy identifies that local authorities should plan for a mix of housing, including for people who wish to build their own home. In March 2015, the government enacted legislation (Self-build and Custom Housebuilding Act 2015) that places a requirement on local councils to maintain a register of people seeking to acquire land to build a home themselves. The government is keen to promote the self- and custom build housing sector as a means of increasing the general housing supply and encouraging the construction of sustainable, environmentally sensitive and more affordable properties.</a></p> <p><a href="#">4.New2 In the case of Warwick District, the Council is keen to support increased delivery to promote greater diversity in the local housing stock, the use of innovative design and the provision of more affordable and sustainable construction. It has set up a register of people interested in building their own homes; preliminary information indicates that most people are looking for individual plots for detached houses or bungalows with three to four bedrooms. Most people currently on the list are applying broad locational criteria, with sites within a 10 – 20 mile radius of Warwick, Leamington and Kenilworth as the preferred target. Some of the reasons people cite for wanting to build their own homes are: -</a></p>	To support policy H New1

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Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
			<ul style="list-style-type: none"> <li>• <a href="#">closer to family / personal links to area</a></li> <li>• <a href="#">ability to stipulate higher build quality and specification</a></li> <li>• <a href="#">higher environmental performance / lower running costs</a></li> <li>• <a href="#">eco-friendly design and materials</a></li> <li>• <a href="#">sense of community</a></li> <li>• <a href="#">individual / bespoke home to meet personal needs</a></li> <li>• <a href="#">ability to specify locations</a></li> </ul> <p><a href="#">4.New3</a> To help sustain this process <a href="#">this policy encourages landowners and developers to offer a range of plots and development opportunities to the custom and self-build market. This will assist both in the provision of a range of opportunities on larger development sites and in the identification of suitable smaller scale opportunities. In some cases, neighbourhood plans may be a suitable vehicle to help identify and promote suitable and sustainable small-scale self / custom build, especially where people want to maintain personal and social links to a particular local area. Registered Providers and other social housing promoters can also help to deliver group self-build schemes in appropriate areas, whereby people who cannot currently afford to enter the housing market can contribute “sweat equity”, in the form of physical labour on site, towards the purchase of a more affordable dwelling.</a></p> <p><a href="#">4.New4</a> It may be that an element of commuted funding could be used to purchase and service plots in suitable areas as a means of offering opportunities to local people. The Council will generally control access to custom / self-build housing schemes by establishing and maintaining a Register of Interest of those who wish to become custom builders and meet the relevant legislative criteria.</p> <p><a href="#">4.New5</a> Plots on larger development sites that have been made available and marketed appropriately for at least two years, but which have not sold, may</p>	

Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
			<a href="#">either remain on the open market as self-build or be built out by the developer. Self- or custom build development subject to planning permission will need to be built out within three years of the sale of the plot.</a>	
Mod 32	159	Policy NE4	<p><b>Amend policy NE4 Landscape to add an additional clause j</b></p> <p>New development will be permitted which positively contributes to landscape character. Development proposals will be required to demonstrate that they:-</p> <p>...j) <u>minimise the loss of the best and most versatile agricultural land.</u></p>	To address increasing pressures on the best and most versatile agricultural land as a result of increasing development allocations
Mod 33	160	Policy NE5	<p><b>Amend Policy NE5 Protection of Natural Resources (Clause d) as follows</b></p> <p>...</p> <p>d) <u>minimise loss of the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes;</u></p>	To address increasing pressures on the best and most versatile agricultural land as a result of increasing development allocations
Mod 34	161	5.198	<p>5.198 ...This need is increasing due to the anticipated reduction in the ability of countries continuing to export food to the UK due to increased flooding, erosion or drought. <a href="#">A number of housing allocations have been identified on agricultural land, with the result that the remaining resource is considered to be of increasing importance and vulnerability.</a> Development affecting the best and most versatile agricultural land will not be permitted unless <del>there is an overriding demonstrable need for the development and</del> it can be shown that development of lower grade land would have <u>overriding</u> adverse sustainability impacts, such as on biodiversity, natural resources, landscape character or conservation of heritage assets <u>or in an unsustainable location.</u></p>	To address increasing pressures on the best and most versatile agricultural land as a result of increasing development allocations
Mod	Policies	Policies Map	Amend the Kingswood Growth Villages Envelope (see Policy H10) to the South of Old	To address drafting error that was

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Ref	Publication Draft Local Plan Page number	Paragraph Number	Proposed Modification	Reason
xx	Map 29	29	Warwick Road as shown on revised Policies Map 29	overlooked following representations received in 2014

