

Land at Hatton Station
Reserve Sites Note for the Warwick Local Plan Examination Library

Following our appearance on behalf of Mr Johnnie Arkwright at the Matter 7D Hearing Session on Wednesday 16th November 2016, this note provides further clarification in relation to the ability to identify reserve housing sites in the Green Belt.

Where there is a need to increase deliverable housing sites to meet the Warwick OAN and unmet need from its neighbours, or provide greater flexibility to respond to delays in the delivery of draft allocated sites i.e. exceptional circumstances have been demonstrated as a case in this Plan period, then reserving a site or sites now would enable the Warwick Plan to meet these needs when they arise. In the case of an allocation or reserve sites (contingency sites) the land would be removed from the Green Belt and therefore be able to respond quickly and deliver ahead of safeguarded land, which is referenced in paragraph 85 of the NPPF.

We have also obtained a legal view as to whether a Local Plan Inspector could reserve land, which would involve removing it from the Green Belt now, to act as a contingency site over the Plan period, rather than safeguarding the site to meet needs beyond the Plan period. This legal view concurs with our view that there is the ability to reserve sites, which are currently in the Green Belt.

We set out below examples from the adopted Stratford Core Strategy and the emerging Cheshire East Local Plan in relation to reserve sites in the Green Belt.

Stratford-on-Avon Core Strategy – Adopted 11th July 2016

Policy CS.16 Part D. of the Stratford Core Strategy (attached) makes provision for the identification of reserve sites in the Site Allocations Plan. Policy CS16 states:

“The Site Allocations Plan (SAP) will identify Reserve Housing Sites providing flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA)”

Stratford-on-Avon Core Strategy - Final Inspector’s Report dated 20 June 2016

Paragraphs 276-279 of the Inspector’s Final Report (attached) discusses the location of reserve sites in the Site Allocations Plan.

At paragraph 278 the Inspector references a list of omission sites (attached) where the Council stated that the sites could be considered through the preparation of the Site Allocations Plan. A number of these omission sites are located in the Green Belt.

At paragraph 279 the Inspector acknowledges that the Core Strategy has identified a variety of sustainable locations for reserve sites, and he also acknowledges that it would be unlikely that the Site Allocations Plan must be informed by a Green Belt Review. However, the Inspector noted that a concurrent Green Belt Review is being undertaken and therefore this is a matter for the Council to consider.

Cheshire East Emerging Local Plan

The Cheshire East Emerging Local Plan was subject to Examination during September and October 2016. The Inspector is now considering his findings.

The Site Allocations and Development Policies Document will follow the adoption of the Local Plan. The Site Allocations and Development Policies Document will contain detailed policies to be used when considering planning applications and will also allocate the remaining sites proposed for future development.

Emerging Local Plan Policy PG3: Green Belt (attached) proposes the removal of 28 sites from the Green Belt. Furthermore at point 6. of Policy PG3 it states:

“In addition to these areas listed for removal from the Green Belt, it may also be necessary to identify additional non-strategic sites to be removed in the Site Allocations and Development Policies Document.”

Summary

The above examples of the Adopted Stratford-on-Avon Core Strategy and the emerging Cheshire East Local Plan conclude that sites in the Green Belt can be allocated as reserve sites or otherwise in Site Allocation Development Plan Documents; which follow the adoption of Local Plans.

5.2 Housing Development

Strategic Objectives

- (12) *Previously developed sites in sustainable locations will have been re-used for purposes that are of an appropriate type and scale, while retaining their important natural, historic and other features.*
- (15) *At least an additional 14,600 homes (an average of 730 per annum) will have been built across the District on brownfield and greenfield sites, reflecting the dispersed settlement pattern of the District. Where justified by the available evidence, the District Council will have worked with neighbouring councils to help meet any unmet housing needs arising outside the District. In addition, the needs of gypsies and travellers will have been met through the provision of 41 additional pitches by 2019 and an additional 30 pitches thereafter, a total of 71 pitches by 2031.*
- (16) *A mix of sizes, types and tenures of housing will have been built by a range of developers, housing associations and other providers. To improve the affordability of housing across the District, 35% of dwellings on eligible sites will have been provided as affordable homes.*

Policy CS.16

Housing Development

A. Housing Requirement

Stratford-on-Avon District will meet its objectively assessed housing needs for the period 2011 to 2031. Provision will be made for at least 14,600 additional homes, distributed as follows based on the sustainable locations identified in Policy CS.15:

- Stratford-upon-Avon: approximately 3,500 homes
- Main Rural Centres: approximately 3,800 homes
- New Settlement at Lighthorne Heath: approximately 2,300 homes
- New settlement at Long Marston Airfield: approximately 2,100 homes
- Local Service Villages: approximately 2,000 homes
- Large Rural Brownfield Sites: approximately 1,245 homes
- Other Rural Locations: approximately 750 homes

B. Strategic Allocations

To deliver the housing requirement, the Core Strategy identifies the following strategic allocations for housing and housing-led mixed-use development during the plan period. The detailed provisions for each site allocation are set out in Section 6 Area Strategies.

- 650 homes within the plan period from a total of approximately 1,010 homes on the Canal Quarter Regeneration Zone, Stratford-upon-Avon (SUA.1)
- 65 homes South of Alcester Road, Stratford-upon-Avon (SUA.2)
- 500 homes North of Bishopton Lane, Stratford-upon-Avon (SUA.3)
- 190 homes North of Allimore Lane (southern part), Alcester (ALC.1)
- 160 homes North of Allimore Lane (northern part), Alcester (ALC.2)
- 200 homes West of Banbury Road, Southam (SOU.1)

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- 165 homes West of Coventry Road, Southam (SOU.2)
- 530 homes South of Daventry Road, Southam (SOU.3)
- 2,300 homes within the plan period from a total of approximately 3,000 homes at Gaydon/Lighthorne Heath New Settlement (GLH)
- 2,100 homes within the plan period from a total of approximately 3,500 homes at Long Marston Airfield New Settlement (LMA)

A further strategic allocation of approximately 2,000 homes is identified for the Local Service Villages. Policy CS.15 identifies four categories of Local Service Village, to which the following housing requirements apply:

- Category 1 - approximately 450 homes in total, of which no more than around 25% should be provided in any individual settlement
- Category 2 - approximately 700 homes in total, of which no more than around 12% should be provided in any individual settlement
- Category 3 - approximately 450 homes in total, of which no more than around 13% should be provided in any individual settlement
- Category 4 - approximately 400 homes in total, of which no more than around 8% should be provided in any individual settlement

Within the Green Belt Local Service Villages, housing development will take place wholly in accordance with the provisions of Policy CS.10.

C. Neighbourhood Planning

The Council is committed to giving local people the opportunity to influence where homes are built in their communities and encourages Parish Councils to prepare Neighbourhood Plans that identify sites to meet or exceed the housing requirements set out above.

D. Phasing and Delivery

The accompanying Housing Trajectory Table shows how the housing requirement will be delivered. The provision of new homes will be monitored at least annually to ensure the trajectory is being met and to assess the housing land supply. The calculation of 5 year housing land supply as set out in the latest Authority Monitoring Report (AMR) will provide the mechanism for managing housing delivery and updating the Housing Trajectory to bring forward additional sites if required.

The Site Allocations Plan will identify Reserve Housing Sites providing flexibility to ensure that the District can meet in full its agreed housing requirement (the share of the housing needs arising in the Coventry and Warwickshire Housing Market Area to 2031) and/or to respond to the need to meet housing need arising outside the Coventry and Warwickshire Housing Market Area (HMA). The location of any reserve sites will take account of the settlement pattern and the overall balance of distribution of development set out in Policy CS.15. Reserve sites will have the capacity to deliver up to 20% of the total housing requirement to 2031.

Reserve sites will be released in the following circumstances:

- To rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in Stratford-on-Avon District;
- To contribute to meeting any identified additional need for housing in relation to a net growth in jobs at Jaguar Land Rover arising from development of the employment allocation at Gaydon Lighthorne Heath;

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- To contribute to meeting within the District any identified shortfall in housing across the Coventry and Warwickshire HMA as demonstrated through the agreed outcomes of ongoing joint working between the Coventry and Warwickshire local planning authorities;
- To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that it is accepted through co-operation between the relevant councils as needing to be met within the HMA and most appropriately being met within the District.

In accordance with Policy CS.17, the Council will bring forward a review of the Core Strategy if it is evident that the required scale of additional housing site provision is beyond that which can properly be addressed within the context of the Site Allocations Plan process.

Explanation

- 5.2.1 Stratford-on-Avon District Council is required to boost significantly the supply of housing. The housing requirement of 14,600 for the 20 year period 2011 to 2031 is derived from an objective assessment of housing needs based on up-to-date technical evidence as required by the National Planning Policy Framework (NPPF). The OAN for the District is 14,600 homes (or 730 homes per annum).
- 5.2.2 The starting point for objectively assessing housing need is to use trend-based demographic forecasts that make assumptions about likely household formation rates, rates of fertility and mortality, and levels of in-migration into the District from other parts of the UK. These projections then need to be tailored to local circumstances, taking account of employment forecasts, housing market signals and indicators of housing affordability.
- 5.2.3 In Stratford-on-Avon District, of the 14,600 new homes required, only some 2,258 are needed to house the increase expected from the existing population: the vast majority of new homes being to house in-migrants to the District. Based on the latest demographic assumptions as set out in the 2012 Sub-National Population Projections, the housing required to meet identified need is 9,236 (462 homes per annum), rising to 11,534 (577 homes per annum) to take account of migration rates over a 10 year period. However, once adjusted to take into account the factors outlined above, the calculation of OAN rises by 153 homes per annum to 14,600. This is the level of development required to balance the number of homes with the expected number of jobs in the District to 2031, whilst maintaining the 2011 commuting ratio of 0.96:1.
- 5.2.4 The housing requirement to be planned for in the Core Strategy is based on three different annual rates of delivery: 566 homes per annum in Phase 1 of the plan period, 894 homes per annum in Phase 2 and 730 homes per annum in Phases 3 and 4. This 'step-change' in delivery is considered appropriate firstly because of the fact that the Core Strategy period is at the end of Phase 1 and it would be perverse to retrospectively apply a significantly higher housing target to past years, and secondly because the Council recognises the importance of meeting the OAN and acknowledges the need to plan on the basis of an identified element of contingency or 'headroom' (see below).

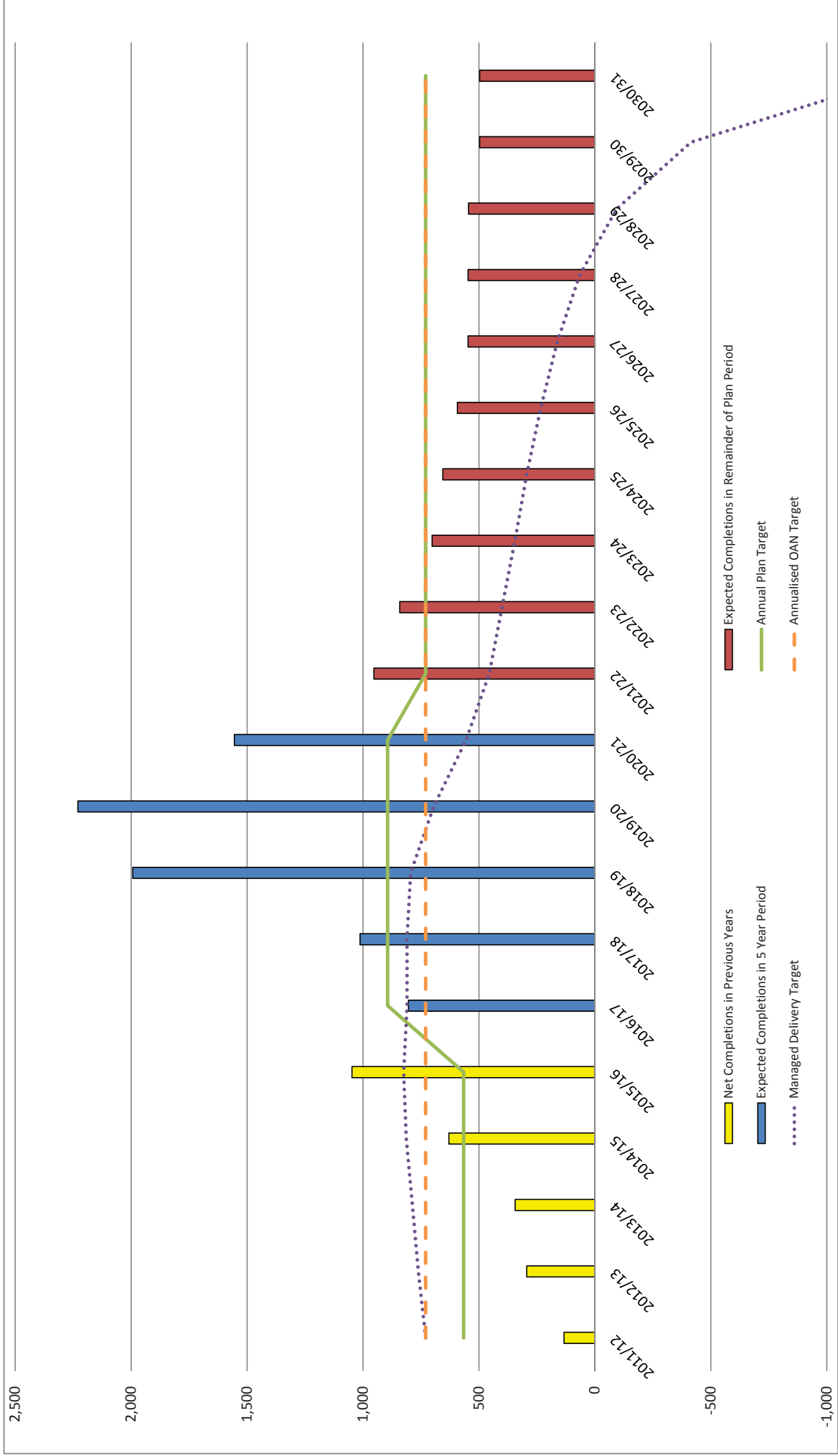
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- 5.2.5 The Fig.1 Housing Trajectory - Table and Graph show how the housing requirement is being met through expected rates of delivery across the plan period. It covers the 20 year period from 2011 to 2031 and follows on from the end of the Local Plan Review 2006 in 2011. More information on the housing trajectory can be found in the Housing Implementation Strategy that accompanies the Core Strategy.
- 5.2.6 As can be seen from the Trajectory Table, sufficient provision is made for at least 16,423 homes to be delivered by 2031, exceeding the requirement of 14,600 by approximately 12.5%. The step-change in annual supply and the Council's commitment to meeting the housing needs of the District is also evident when contrasting the delivery of 132 homes in 2011/12 with the projected delivery of (at the peak point) some 2,230 homes in 2019/20. The highest levels of delivery are expected in Phase 2 reflecting the need to remedy the undersupply in previous years.
- 5.2.7 Annual completions (actual, expected in current year and estimated in future years) are shown by the columns in the Trajectory Graph. The Council acknowledges that the anticipated high-level annual delivery between 2016/17 and 2020/21 is ambitious and exceeds by some margin the previous highest rate of annual supply of 806 homes in 2004/05. However, this reflects the need to correct the previous undersupply of housing in the short-term, as required by the NPPF. In doing so, it also requires commitment by developers and homebuilders to deliver new homes for which they have been granted planning permission. The stepped decrease in housing provision over the plan period reflects anticipated oversupply in phase 2, enabling the Council to demonstrate a continuous 5 year supply of housing as required by the NPPF. The Core Strategy will need to be reviewed prior to 2031 to identify the housing requirement post 2031, enabling a continuous supply of housing beyond the plan period.
- 5.2.8 The graph also shows the annualised OAN target of 730 (horizontal dashed line) and the annual plan target (horizontal solid line), with the step-change between 2015/16 and 2016/17. The managed delivery target (dotted line) shows the number of homes still needing to be built to achieve the housing requirement. The slight rise between 2011/12 and 2016/17 above the annualised average rate reflects the shortfall in provision during the early years of the plan period whilst the tailing off reflects the overprovision between 2016/17 and 2020/21. The 'negative' end to the target corresponds to the over-provision in overall delivery that is anticipated by 2031.
- 5.2.9 The housing trajectory comprises homes already built (known as completions), homes with planning permission and homes on allocated sites (known as commitments). Commitments include 800 homes at 'Land West of Shottery, Stratford-upon-Avon', a further 965 homes at Meon Vale (ie. The Large Rural Brownfield Site of the former Engineers Depot, Long Marston), as well as the sites identified as strategic allocations in this Core Strategy that were granted permission in 2014/15: 350 homes North of Allimore Lane, Alcester (sites ALC.1 and ALC.2); 236 homes West of Banbury Road, Southam (SOU.1); 165 homes West of Coventry Road, Southam (SOU.2); and 82 homes at Warwick House, part of the Canal Quarter Regeneration Zone, Stratford-upon-Avon.

Fig.1 Housing Trajectory - Table

For the plan period 1 April 2011 to 31 March 2031		Phase 1													Phase 2					Phase 3					Phase 4				
Location	Total (Net)	% of Total	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31							
SUA.1 - Canal Quarter	652							41	41				30	60	60	60	60	60	60	60	60	60							
SUA.2 - South of Alcester Road	68							25	40				100	75	50	50	50	50											
SUA.4 - North of Bishopston Lane	500							100	100				50	50	50	50	50	50											
West of Shortery	800					201		202	117	101	196	91	50	50	20	2	2	2											
Other Sites	1,488		52	149	164	93							5	5	5	5	5	5	5	5	5	5							
Windfall	50																												
Stratford-upon-Avon	3,558	21.7%	52	149	164	93	201	202	311	382	396	293	235	240	135	115	117	115	115	113	65	65							
ALC.1 - North of Allimore Lane (South)	190							40	40	40	40	40	30	40	40	40	40	40											
ALC.2 - North of Allimore Lane (North)	160							1	3	2	38	1	40	40	40	40	40	40											
Other Sites	176					35																							
Alcester	526	3.2%	57	39	39	35	35	1	43	42	118	81	70	40															
Bidford-on-Avon	768	4.7%	-1	97	132	132	132	51	56	157	132	92	50																
Henley-in-Arden	85	0.5%	39	10	9	6	1	4	8	9	9	40																	
Kineton	212	1.3%	11	13	10	60	38	18	18	9	39	40																	
Shipston-on-Stour	508	3.1%	43	3	20	10	14	44	58	139	124	53																	
SOU.1 - West of Banbury Road	236					2		45	48	48	48	45																	
SOU.2 - West of Coventry Road	165							30	40	40	40	15																	
SOU.3 - South of Daventry Road	535							75	100	100	100	100	100	100	60														
Other Sites	144					3		1	21	60	45	1																	
Southern	1,080	6.6%	6	2	4	1	3	1	21	60	45	1																	
Studley	100	0.6%	6	2	4	1	5	76	109	223	233	161	100	100	60														
Wellesbourne	830	5.1%	1	4	15	15	33	6	7	12	7																		
MRC Windfall	100		20	2	2	73	115	144	70	52	102	50	50	50	50	2	2	2											
Main Rural Centres	4,209	25.6%	48	79	107	244	400	361	358	637	769	484	280	200	120	60	12	10	10	10	10	10							
Category 1 LSV	848		13	17	40	103	103	22	86	213	228	126																	
Category 2 LSV	565		5	8	6	22	72	41	58	162	126	55																	
Category 3 LSV	397		4	5	10	23	22	9	6	94	108	73	40	40	40	3	3	3											
Category 4 LSV	317		2	9	6	8	35	27	33	64	111	21	1	10	10	10	10	10	10	10	10	10							
LSV Windfall	100																												
Local Service Villages	2,227	13.6%	24	22	39	93	232	99	183	533	573	275	51	10	10	10	23	10	10	10	10	10							
GLH - Gaydon Lighthorne Heath	2,300	14.0%																											
LMA - Long Marston Airfield	2,100	12.8%																											
Long Marston Depot (Meon Vale)	965				5	155	115	76	78	116	102	118	60	60	60	20	20	20											
Harbury Cement Works	280									20	40	40	40	40	40	20	20	20											
Large Rural Brownfield Sites	1,245	7.6%			5	155	115	76	78	136	142	158	100	100	100	60	20	20											
Rural Elsewhere	519		7	29	24	38	75	46	66	96	69	58	5	12	12	12	12	12	12	12	12	12							
Rural Villages	145		2	15	5	7	25	20	17	24	11	17	12	12	12	12	12	12	12	12	12	12							
Rural Windfall	120																												
Other Rural Locations	784	4.8%	9	44	29	45	100	66	83	120	80	75	17	12	12	11	21	12	12	12	12	12							
District Total	16,423	100.0%	133	294	344	630	1,048	804	1,013	1,993	2,230	1,555	953	842	702	656	593	547	547	545	497	497							

Fig.1 Housing Trajectory - Table



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- 5.2.10 The figure for the Large Rural Brownfield Sites refers to those listed in Policy AS.11 and represents the number of homes with planning permission from these sites. Whilst further homes may come forward from this source in accordance with Policy AS.11, the District Council is not relying on this supply to meet its housing requirement. Any additional homes would therefore comprise an additional source of windfall supply. The remainder of the housing requirement is being delivered through the remaining strategic allocations as set out in Policy CS.16; on identified Strategic Housing Land Availability Assessment (SHLAA) sites, and with a small allowance made for 'windfall' sites. Notwithstanding the above, it should be noted that whilst the Council considers the housing requirement to be appropriate for the District, local communities may wish to make additional provision through the auspices of Neighbourhood Planning.
- 5.2.11 The Council has also committed to preparing a Site Allocations Plan to allocate reserve sites in accordance with Policy CS.16 to meet any shortfall in housing within the District and help meet housing needs arising from outside the District. The Site Allocations Plan therefore builds additional robustness into the housing trajectory and makes doubly sure that the housing needs of the District will be met.
- 5.2.12 'Windfalls' are those homes that get permission and are built on unidentified sites such as small infill schemes and conversions or where a larger site unexpectedly comes forward for development, such as a former factory. Given the nature of the District, with its numerous settlements each comprising a mix of older and newer built areas and the past high rate of windfall development it is appropriate to continue to include an allowance for windfall development in Phases 3 and 4 of the plan period. This allowance is based on an analysis of the rate of windfalls on small sites (i.e. less than 5 homes) excluding residential garden land. In reality, the level of windfall development may be much higher, particularly since a number of larger rural exception affordable housing schemes may also come forward for development. As such, the windfall allowance should not be seen as a ceiling, although the Council will monitor the cumulative supply of windfalls to ensure that there is not a significant overprovision of housing across the District.
- 5.2.13 Policy CS.15 supports the principle of Local Needs schemes for housing. These are small-scale community-led schemes that meet a need identified by that community. The provision of Local Needs schemes applies across the District in all settlements. Further information on Local Needs Schemes will be set out in the Development Requirements Supplementary Planning Document (SPD). Prior to the preparation of the Site Allocations Plan, any Local Needs scheme coming forward in a Local Service Village (as opposed to the parish) will count towards the target for that village. Any Local Needs scheme coming forward elsewhere (i.e. Stratford-upon-Avon town, in one of the eight Main Rural Centres or in other rural locations) would be counted towards the District windfall target. Thus, once the Site Allocations Plan has been prepared, any Local Needs scheme will provide additional supply and count as further windfall.
- 5.2.14 It should also be noted that when adopted, Neighbourhood Plans will become part of the statutory Development plan for that neighbourhood area (alongside the Core Strategy and accompanying DPDs). A Neighbourhood Plan can seek to deliver more development than set out in the Core Strategy, providing it still

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complies with the strategic approach of the Core Strategy. Any additional development would be counted as windfall.

- 5.2.15 The Council will work with developers and the community to prepare 'design concepts' for sites identified in the Site Allocations Plan. These will succinctly establish the design principles for the site, providing greater certainty to both the developer and the community as to what is expected and what type of development is considered acceptable.
- 5.2.16 There are a number of mechanisms that can contribute to meeting the housing needs of the District and the Council supports the principle of schemes being delivered as self-build projects or by community land trusts. Such schemes may contribute to 'windfall' development across the District. The Council will also consider the allocation of specific sites for self-build projects and community land trusts in the Site Allocations Plan.
- 5.2.17 As identified at paragraph 1.3.9, the planned long-term expansion by Jaguar Land Rover at Gaydon involves a development that is likely to be of more than local significance. The precise nature and timing of this development is currently unknown. In the event that development creating a substantial number of new jobs is brought forward in the earlier part of the plan period, this could have implications for the scale of housing growth that should be planned for beyond 2021. The Council will keep this matter under active review, in co-operation with other authorities in the housing market area.
- 5.2.18 The Council is required to demonstrate the equivalent of 5 years' worth of housing land supply (5YHLS) on adoption and throughout the plan period. This is known as the 5YHLS calculation. It is a comparison of the anticipated supply of new homes against the number of new homes that are required to be built (the housing requirement). It is expressed as the number of years' worth of supply. So as to avoid being skewed by annual fluctuations in housing supply, it is calculated over a 5 year period. It should therefore exceed 5. Any 5YHLS is a snapshot in time. The 5 year period is a 'forward look' produced on at least an annual basis and standard practice is for the starting point to be 1 April each year.
- 5.2.19 As of 31 March 2016, based on the housing trajectory set out in Figure 1, the Council can demonstrate a 5-year supply with a 20% buffer applied, which is necessary at the date of adoption because there has been a record of persistent under delivery of housing in the District for a number of years, albeit, as a result of the moratorium, for reasons outside of the Council's control. The calculation seeks to deal with the shortfall from previous years fully within the 5 year period, applies a conservative 5% deduction for non-implementation and excludes an additional allowance for windfalls within the 5 year period above those homes already committed. The calculation should also be seen in the context of the Core Strategy including a contingency of some 12.5%.

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Fig. 2 – 5 Year Housing Land Supply Calculation

As at 31 March 2016 (for 5 Year Period 1 April 2016 to 31 March 2021)	5% Buffer	20% Buffer
(a) Requirement 2011-2016 [566dpa x 5]	2,830	2,830
(b) Completions 2011 – 2016 [i.e. number of homes built]	2,447	2,447
(c) Shortfall [(a)-(b)]	383	383
(d) 5 Year Requirement + Shortfall [(894dpa x 5) + (c)]	4,853	4,853
(e) Add % Buffer [(d)x1.05 OR (d)x1.2]	5,096	5,824
(f) Annualised Average [(e) / 5]	1,019	1,165
(g) Supply within 5 Years (with 5% deduction for non-implementation, as appropriate)	6,785	6,785
(h) Land Supply (Years) [(g) / (f)]	6.66	5.82

Development Management Considerations

- (1) The Council will refuse applications for development that would otherwise prejudice the delivery of an allocated site.
- (2) A scheme to bring forward an allocated site which is contrary to the principles set out in the Proposal relating to it will be refused. All proposals should be in accordance with the agreed Design Statement for the allocated site.
- (3) The housing requirements for each category of Local Service Village (LSV) represent what the Council considers to be appropriate in terms of strategic planning, in accordance with the Distribution of Development policy. However, these requirements do not prevent a particular community from delivering additional development if it considers that to be appropriate and it is supported either through the Neighbourhood Plan or through the development of a Local Needs scheme.
- (4) The Local Service Village housing requirements apply to development in and adjacent to the village settlement itself, not the wider parish. Housing delivered in rural locations outside settlements will count towards the rural area total.

Implementation and Monitoring

Responsible agencies	Private landowners, developers and housebuilders, registered providers
Delivery mechanism	Through the determination of planning applications
Funding	Private funding, Affordable Homes Programme (or successors), Stratford District Council's Affordable Housing Investment Programme fund and developer cross subsidies.
Timescale	Throughout the plan period
Risk	If the policy is not followed it could result in insufficient homes being built to meet the housing requirement or too many homes being built in the wrong place resulting in unsustainable development.
Monitoring indicators	<ul style="list-style-type: none"> • Number of homes granted planning permission and number of homes completed against the annual housing target.

Category 4 settlement, which also requires a consequential change to the Key Diagram [MM31, MM91 and MMO4] in order to ensure that the Plan delivers the most appropriate strategy. In reaching this view it is not necessary for a score to be attributed to the shop at the garage. Whilst it has long hours the range of goods appears to be limited such that residents would be unlikely to be able to depend upon it to meet all of their day to day top-up shopping needs. Accordingly it does not merit a point being scored for shop.

274. Turning to Snitterfield the score of 2 for shop appears to be appropriate because although the village store is open around 80 hours a week the claim that it should be classified as a large general store has not been clearly made out. Turning to public transport, bus service 229 does not run '*at least two hourly*' and on that basis it does not meet the minimum category for a good service. In these circumstances the scores for Snitterfield are appropriate and it should not be elevated from its present Category 3 status.
275. Claverdon is not within 500 m of its railway station and on that basis, even if the frequency of trains was adequate to meet the '*fair*' category, there being no evidence of this before the examination, it should not score anything for public transport. There is negligible car parking and it has not been shown that walking and cycling along the main road are realistic alternatives. On this basis this cut-off distance appears to be appropriate when applied here. It has been claimed that there is a bus service but the extent to which that connects with the train is unclear and it has not been shown that the bus service would meet the '*fair*' category. As such the scores for Claverdon are appropriate and it should not be elevated from its present Category 3 status.

Location of reserve sites in the SAP

276. Policy CS.16D says the location of any reserve sites will reflect the settlement pattern and maintain the overall balance of distribution of development set out in Policy CS.15. The Council has indicated that it is content with this despite a legitimate concern that if a new settlement fails to deliver the anticipated trajectory it would not be possible to allocate additional deliverable housing at either location. By their nature, reserve sites would comprise those that are not allocated in the CS and there is little scope to allocate such sites at GLH or LMA. Against a background of searching questions being asked about delivery rates, it is appropriate to discount the possibility of identifying housing currently scheduled beyond the Plan period in such locations as a reserve.
277. The scale of the reserve is now quantified as 20 % of 14,600, which is 2,920, and using the latest breakdown as a guide [138] it might require around 800 houses³⁸⁹ to be identified as a reserve in a new settlement. Such strategic options exist, for example at Stoneythorpe and Dallas Burston Polo Grounds, but the rigid approach implied by the current wording might rule out other strategic options of a similar scale. It might also point to a further 13.1 %, or circa 383 houses³⁹⁰, being directed to LSVs. However against the backdrop of concerns in the IC about the level of dispersal to LSVs, together with raised thresholds for affordable housing that, in contrast to a more focussed approach, might not maximise the delivery of affordable housing, this aspect

³⁸⁹ 27.8 % of 2,920 = 812.

³⁹⁰ 13.1 % of 2,920 = 383.

of the strategy might need to be revisited when selecting reserve sites in the SAP.

278. In light of the above, in order to ensure the Plan meets the test for soundness, I recommend a MM that would allow broader discretion in the context of the further SA work that is likely to be required to underpin the SAP [MM33]. This would allow the Council to exercise greater flexibility between the options for sustainable growth that are identified in Policy CS.16A. In this context it is relevant to record that during the Hearings the Council retracted from the distinction between sites that it had drawn in its earlier analysis³⁹¹. Identifying a broad range of sites that are consistent with the strategy would allow them to be released according to the different needs that might arise.

279. Whilst noting the points raised about this MM during the recent consultation it should be clear from the above that the reference to settlement pattern and Policy CS.15 is generic, e.g. to new settlements, rather than GLH and/or LMA individually. It would indeed be perverse³⁹² to direct more housing to an option that was not delivering but that is precisely why the wording has been revised. Although it has been argued³⁹³ that a key role of the reserve sites in the SAP will be related to the unmet needs of Birmingham, they should fulfil multiple roles [67] and so the view that this will be different to the current spatial strategy is not agreed. The CS has identified a variety of sustainable locations and it is improbable that it would be necessary to fundamentally revisit the significant amount of work that has already been undertaken. It follows, noting the imperative to identify reserve sites [69], that it would seem to be unlikely that the SAP *must* be informed by a Green Belt review. Although it is understood that there is a concurrent Green Belt review, it is a matter for the Council to consider rather than it being appropriate to force the Council's hand in the manner that has been suggested.

Overall conclusion on the third main issue

280. For the reasons set out above I conclude on the third main issue that the Plan's development strategy for the distribution of the housing requirement is justified by the evidence base. The allocated housing sites are sound subject to the identified main modifications, which are necessary to ensure the policies are positively prepared, justified, effective and consistent with national policy.

³⁹¹ See page 270, Document Ref. ED.2.7.

³⁹² Representation 7394, dated May 2016.

³⁹³ Representation 1151, dated May 2016.

A wide range of omission sites have been promoted at this stage. It is appropriate to consider these in the context of the overall strategy for the distribution of development as proposed in Policy CS.15 and the proposed scale and location of housing development identified in Policy CS.16, and other specific policies where relevant.

In taking this approved District Council position into account, the treatment of these sites can be broken down into various categories:

The following sites can reasonably be treated as being strategic given the scale of development proposed through the preparation of the Site Allocations in the Proposed Submission Core Strategy, although small parts of those sites adjacent to Stratford-upon-Avon or a Main Rural Centre may be appropriate for consideration through the preparation of the Site Allocations DPD.

- 2. Land at Long Marston Airfield
- 5. Land to east and west of Eittington Road, Wellesbourne
- 6 & 32. Land south of Daventry Road, Southam
- 7. Land at former Harbury Cement Works
- 8. Land at Alcester Road, Studley *
- 10. Land at Stoneythorpe (north of A435), west of Southam
- 11. Land north of New Road, Henley-in-Arden *
- 13. Land at former Long Marston Depot
- 14. Land south of A46, Stratford-upon-Avon *
- 15. Land north of Captains Hill, Alcester *
- 19. Land south-east of Stratford-upon-Avon
- 20. Land north of Bordon Hill, Stratford-upon-Avon
- 22. Land north of Bishopton Lane, Stratford-upon-Avon
- 24. Land east of Southam Bypass
- 26. Land north of Salford Road, Bidford-on-Avon
- 28. Land at Wellesbourne Airfield
- 29. Land east of Banbury Road, Southam
- 30. Land west of Waterloo Road, Bidford-on-Avon
- 34. Land north of Campden Road, Shipston-on-Stour
- 35. Land south of Trinity Way, Stratford-upon-Avon
- 36. Land at Stoneythorpe (south of A435), west of Southam
- 37. Land to west of Wellesbourne
- 40. Land east of Tiddington
- 43. Land north and south of Loxley Road, Stratford-upon-Avon
- Those shown with an asterisk are located in the Green Belt.
- 1. Land at Tailor's Lane, Upper Quinton
- 3. Land west of A435, Mappleborough Green
- 4. Land at Wood End Lane, Wood End *
- 9. Land at Alcester Road, Wootton Wawen *
- 12. Land at The Slough, Studley *
- 16. Land at Alcester Road, Stratford-upon-Avon
- 17. Land south of Alcester Road, Stratford-upon-Avon
- 23. Land east of Weston House, Welford-on-Avon
- 25. Land north of Banbury Road, Kineton
- 27. Land west of Holywell Road, Southam
- 33. Land south of Kineton Road, Gaydon
- 38. Land north of Stockton Road, Long Itchington
- 39. Land west of Tuckwell Close, Stockton
- 41. Land west of Knights Lane, Tiddington
- 42. Land north of Millers Close, Welford-on-Avon
- 44. Land east of Shipston Road, Alderminster
- Those shown with an asterisk are located in the Green Belt.

In response to the remaining sites:

- 18. Land at Atherton Airfield can be considered against the provisions of Policy CS.21 and Policy AS.10 Countryside and Villages.
- 21. Land south of Campden Road, Shipston-on-Stour now has planning permission.
- 31. Land at Juglins Lane, Forshaw Heath can be considered against the provisions of Policy AS.10 Countryside and Villages.

Omission Policies

Number of Supports: 0 Number of Objections: 2 Number of Unspecified: 0

Respondent	Agent	Legally compliant	Duty compliant	Sound	Reasons	Changes Sought	Officer Comment
Warwickshire and West Mercia Police		Yes	Yes	No	The evening and night-time economy should be the subject of a specific policy in the Core Strategy	Insert a policy on this topic.	See overall response below.
Cope's of Earlswood Ltd Nigel Gough Associates Ltd		Not Specified	Not Specified	No	Policy AS.11 does not consider the situation of small rural brownfield. There must, as a corollary, be an appropriate policy in similar form allowing for the proper development, redevelopment and change of these sites and which is consistent with the other policies of the Plan, including policy CS.10.	Insert a policy on this topic.	See overall response below.
Overall Officer Response While the concerns raised by Warwickshire and West Mercia Police are important, they are mostly of an operational nature and not appropriate for inclusion in the Core Strategy. Specific issues can be addressed through the consideration of specific planning applications or other procedures, eg. licensing. Part 7 of Policy CS.9 Design and Distinctiveness identifies the need to ensure that proposals would achieve safe forms of development. Small rural brownfield sites are already covered sufficiently and appropriately in various policies in the Core Strategy, including CS.10 Green Belt, CS.15 Distribution of Development, CS.21 Economic Development and AS.10 Countryside and Villages.							
Overall Officer Recommendation No change.							

Policy PG 3

Green Belt

Green Belt is a designation for land around large built-up areas, which aims to keep land permanently open or largely undeveloped.

1. The purposes of the Green Belt are to:
 - i. check the unrestricted sprawl of large built up areas;
 - ii. prevent neighbouring towns from merging into one another;
 - iii. safeguard the countryside from encroachment;
 - iv. preserve the setting and special character of historic towns; and
 - v. assist urban regeneration by encouraging the recycling of derelict and other urban land.
2. Within the Green Belt, planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with national policy.
3. The construction of new buildings is inappropriate in Green Belt. Exceptions to this are
 - i. buildings for agriculture and forestry;
 - ii. provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
 - iii. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - iv. the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - v. limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
 - vi. limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
4. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:
 - i. mineral extraction;
 - ii. engineering operations;
 - iii. local transport infrastructure that can demonstrate a requirement for a Green Belt location;
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction; and
 - v. development brought forward under a Community Right to Build Order.
5. The extent of the existing Green Belt³⁹ remains unchanged, apart from the removal of land from the Green Belt associated with the following sites (shown in Figure 8.1 and on town maps and site plans):
 - i. Site CS 9 'Land East of Fence Avenue, Macclesfield'
 - ii. Site CS 10 'Land at Congleton Road, Macclesfield'
 - iii. Site CS 40 'Land south of Chelford Road, Macclesfield'

³⁹As defined in the Borough of Crewe and Nantwich Local Plan, the Congleton Borough Local Plan and the Macclesfield Borough Local Plan

- iv. Site CS 11 'Gaw End Lane, Macclesfield'
 - v. Site CS 41 'Land between Chelford Road and Whirley Road, Macclesfield'
 - vi. Site CS 32 (Safeguarded) 'South West Macclesfield'
 - vii. Site CS 15 'Radway Green Extension, Alsager'
 - viii. Site CS 30 'North Cheshire Growth Village, Handforth East'
 - ix. Site CS 49 'Land between Clay Lane and Sagars Road, Handforth'
 - x. Site CS 34 (Safeguarded) 'North Cheshire Growth Village, Extension'
 - xi. Sites CS 18 (A), (B) and (C) 'North West Knutsford'
 - xii. Site CS 50 'Land south of Longridge, Knutsford'
 - xiii. Site CS 53 (Safeguarded) 'Land south of Tabley Road, Knutsford'
 - xiv. Site CS 33 (Safeguarded) 'Land north of Tabley Road, Knutsford'
 - xv. Site CS 51 (Safeguarded) 'Land south of Longridge, Knutsford'
 - xvi. Site CS 52 (Safeguarded) 'Land adjacent to Booths Hall, Knutsford'
 - xvii. Site CS 57 'Land adjacent to Hazelbadge Road, Poynton'
 - xviii. Site CS 58 'Land at Sprink Farm, Poynton'
 - xix. Site CS 59 'Land south of Chester Road, Poynton'
 - xx. Site CS 60 'Adlington Business Park Extension, Poynton'
 - xxi. Site CS 65 (Safeguarded) 'Woodford Aerodrome, Poynton'
 - xxii. Site CS 26 'Royal London including land to the west of Alderley Road, Wilmslow'
 - xxiii. Site CS 27 'Wilmslow Business Park'
 - xxiv. Site CS 61 'Land at Little Stanneylands, Wilmslow'
 - xxv. Site CS 62 'Heathfield Farm (allocation), Wilmslow'
 - xxvi. Site CS 63 (Safeguarded) 'Land at Heathfield Farm, Wilmslow'
 - xxvii. Site CS 36 (Safeguarded) 'Land at Upcast Lane / Cumber Lane, Wilmslow'
 - xxviii. Site CS 64 (Safeguarded) 'Cheshire Gateway'
6. In addition to these areas listed for removal from the Green Belt, it may also be necessary to identify additional non-strategic sites to be removed in the Site Allocations and Development Policies Document.
7. Green Belt boundaries will be identified on the Adopted Policies Map of the Local Plan.

Justification

8.43 As set out in Chapter 4 'The Case for Growth' and Policy PG 1 'Overall Development Strategy', and evidenced through the Housing Development Study (2015), the Employment Land Review (2012) and the Alignment of Economic, Employment and Housing Strategy Report (2015) there are significant identified needs for market and affordable housing, as well as for new employment land provision within Cheshire East.

8.44 The National Planning Policy Framework requires that '*Local planning authorities should positively seek opportunities to meet the development needs of their area*' and that '*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: (i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or (ii) specific policies in this Framework indicate development should be restricted*'.

8.45 The National Planning Policy Framework also states '*Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan*'.

8.46 The Green Belt Assessment Update (2015) has considered the contribution each parcel of Green Belt land adjoining settlement boundaries makes to the purposes of the Green Belt. In the north of the Borough, there is very little scope to meet these needs from towns and villages inset within the Green Belt boundary, or from urban areas inside the Green Belt boundary. As set out in the Green Belt Assessment, a proportion of the proposed development arising from development needs within areas inset within the North Cheshire Green Belt is already channelled to locations within Cheshire East beyond the outer Green Belt boundary. Directing additional development to locations beyond the outer Green Belt boundary would lead to unsustainable patterns of development and would not provide sufficient new development in the areas of need.

8.47 The Green Belt has been a very successful instrument in limiting the expansion of urban areas and encouraging the recycling of derelict and other urban land. In addition, many of the settlements do not have a significant industrial legacy and are not blighted by large areas of derelict industrial land contributing to a potential supply of appropriately re-usable land for redevelopment. Consequently, there are not sufficient sites likely to be available to deliver enough market and affordable housing to meet anywhere near the identified housing needs and not enough opportunities for key additions to the employment sites portfolio.

8.48 Without alterations to the detailed Green Belt boundaries, the amount of new development that could be planned for in the north of the Borough would be very low. It is considered that such a low level of development would have severe consequences including:

- Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to young people and key workers being unable to stay in the area.
- An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age.
- Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.
- Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area.
- A decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.

8.49 The importance of allocating land to go some way to meeting the identified development needs in the north of the Borough, combined with the consequences for sustainable development of not doing so, constitutes the exceptional circumstances required to justify alteration of the existing detailed Green Belt boundaries, whilst maintaining the overall general extent of the Green Belt.

8.50 In the south of the Borough, there is a particular need to allow an extension of the Radway Green employment area in the Green Belt. This is a particularly successful business site which has diversified from its munitions origins, is short of available space land and is well located near to the M6 Motorway.

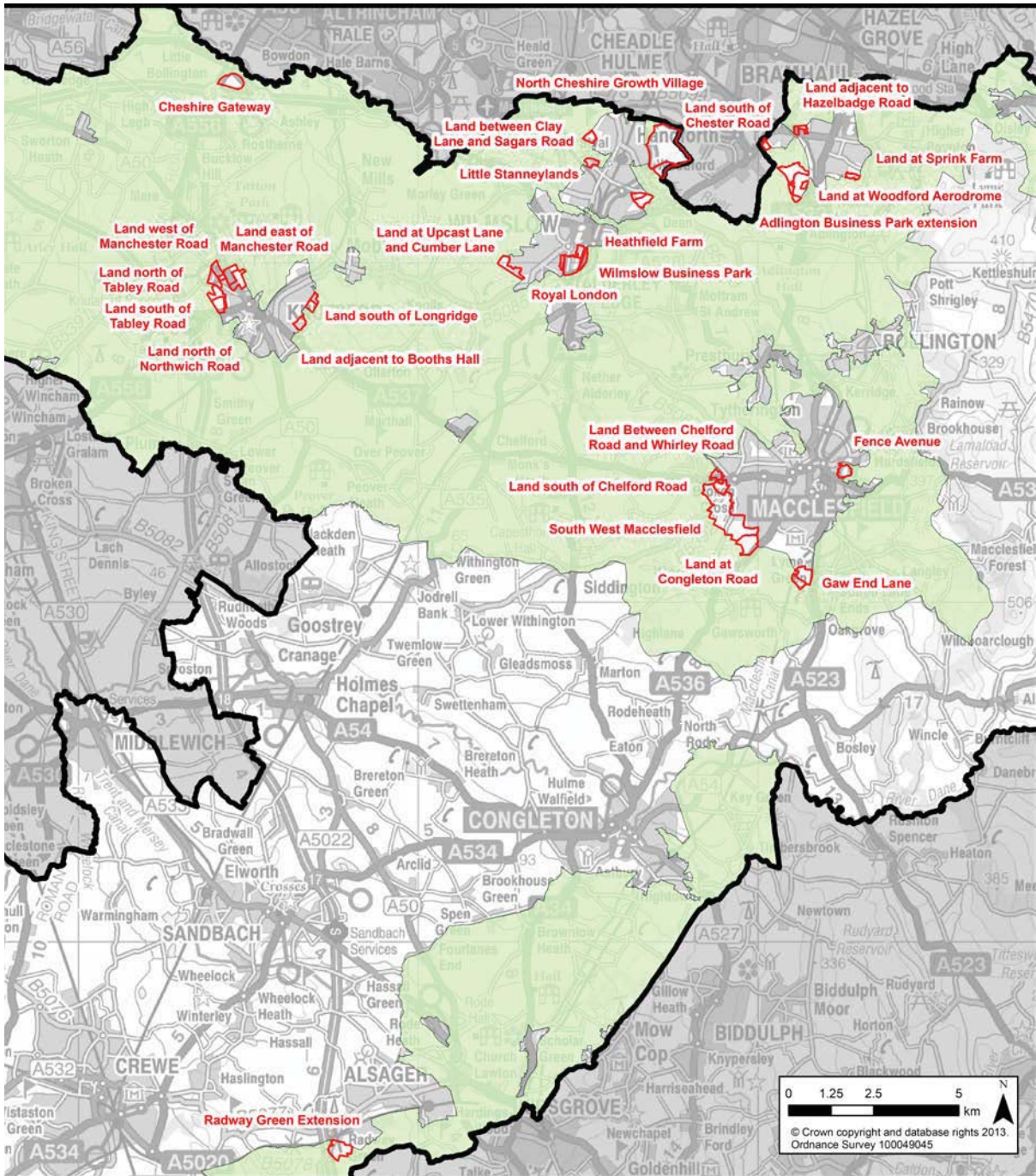


Figure 8.1 General Extent of the Existing Green Belt Showing Sites Proposed to be Removed

Key Evidence

1. Cheshire East Green Belt Assessment Update
2. New Green Belt and Strategic Open Gaps Study
3. Alignment of Economic, Employment and Housing Strategy Report
4. Housing Development Study
5. Employment Land Green Review