

**Response by NWBC on the Matters, Issues and Questions
Phase 1, Strategic Matters**

**Matter 4, Strategic approach, distribution of development
and justification (including Sustainability Appraisal, 'SA')**

4.1 Is the LP founded upon a spatial vision and strategic objectives which are effective and justified?

4.1.1 Yes. The spatial vision and strategic objectives build on those established through the 2014 adopted Core Strategy and Community Strategy Vision (Para 1.2 and 4.1 of the Local Plan). The Core Strategy was adopted in 2014 looking to 2029, locating quality sustainable development in the right place at the right time.

4.1.2 The North Warwickshire Community Partnership is responsible for the delivery of the North Warwickshire Sustainable Community Strategy (AD17) and action plans. The Community Strategy notes that 'the Local Development Framework has an important role in supporting the delivery of the physical infrastructure required by the Sustainable Community Strategy, ensuring the Strategy is genuinely sustainable' (Section 2, 1st paragraph). The Strategy priorities have been developed in consultation with local people and stakeholders and are supported by evidence, which was collated by the North Warwickshire Community Partnership. The North Warwickshire Community Partnership is responsible for the delivery of the North Warwickshire Sustainable Community Strategy. The Partnership comprises of representatives of the public, private and voluntary sector including the Borough and County Councils, NHS Warwickshire, Warwickshire Police and a range of other organisations from the voluntary, business, community and public sectors, ensuring the vision and objectives were both justified and effective as well as evidenced. (See:- https://www.northwarks.gov.uk/download/downloads/id/5953/north_warwickshire_sustainable_community_strategy_2009-2026.pdf (AD17))

4.2 Has appropriate consideration been given to commuting patterns and redeveloping previously developed land in establishing the overarching spatial approach to development?

4.2.1 The Coventry & Warwickshire Joint Strategic Housing Market Assessment, Final Report, November 2013 (CD8/9a) dealt with Commuting Flows, Dynamics and Migration levels in section 3 (3.29 to 3.30)(noting in 6.44 and 7.31 that stronger growth in jobs than population over the last decade in NWBC is likely to support notable net in-commuting) and commuting patterns were considered and addressed in the Addendum to the main Joint SHMA Report of November 2013, titled the '2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire', September 2014 (CD8/9, see Section 3, para 3.14 to 3.24), and patterns ratios and dynamics in the 'Updated Assessment of Housing Need: Coventry-Warwickshire HMA, September 2015' (CD8/10, See sections 2 and 4, 4.29 – 4.66). This information highlighted where the strongest functional links in migration and commuting links between Local authorities were, which fed in to the relevant Local Authorities Local Plan strategy and work. For North Warwickshire the overall commuting pattern to adjoining urban centres and metropolitan areas is significant (North Warwickshire has the highest proportion of its workforce who are in-commuters at 64% with around half of the 10,500 commuters who travel from Birmingham into Warwickshire work in North Warwickshire. The highest out-commuting rates are also experienced by North Warwickshire at 54% of the resident population in work who out-commute. Source 2011 Census – "Who goes where.....Commuting patterns into and out of Warwickshire" – Warwickshire Observatory 2015 <http://www.warwickshireobservatory.org/who-goes-where-commuting-patterns-into-and-out-of-warwickshire-2/> (AD24A) and the borough effectively falls wholly within the Coventry /Warwickshire HMA and the Birmingham HMA. The Growth Options (CD6/6) addressed this issue through including a spatial option of locating development closest to the urban/metropolitan areas with greatest commuting/TTWA (Travel to Work Areas) relationships with North Warwickshire and with significant levels of shortfall, such as Birmingham and Tamworth. In the latter authority, agreement had already been made to accommodate a significant element of their shortfall through the Duty to Co-Operate, with the delivery and location of this housing to be determined through the Local plan.

4.2.2 In relation to previously developed land (pdl) the Strategic Housing Land Availability Assessments (CD8/17) addressed the availability of pdl land, which highlighted the limited supply availability of such sites and also, where reasonably large sites existed, their unsustainable, isolated countryside and Green Belt locations, with little or no relationship to existing settlements, services and infrastructure, with poor

transport infrastructure links. Where opportunities exist (or have come forward) these have either already been accommodated through current Local Plan and Green Belt exception policies or constrained through physical (e.g. flood zones), natural or ecological designations that restrict development potential. The lack of significant sustainable pdl sites to address the housing needs was reflected in the Plan strategy and primarily green field site allocation. Nevertheless, the allocations at Polesworth and Dordon and Ansley Common and Hartshill are within and include significant areas of former mined land which has regenerated, but still reflects and includes elements of pdl land, in addition to being in sustainable locations well related to existing settlements, services and facilities.

- 4.2.3 In addition, the Sustainability Appraisal of the Growth Options (CD6/7) included an appraisal of the Growth Options against SA objective 10 (efficient use of land and infrastructure), which considered the extent to which each option might allow for higher or lower amounts of development on brownfield sites. The Sustainability Appraisal of the Growth Options (CD6/7) also appraised each option against SA objective 15 (sustainable transport) which considered the extent to which each option might facilitate higher levels of sustainable transport use. The Sustainability Appraisal of the Growth Options (CD6/7) made reference to the likely effects of each option, particularly those relating to accommodating growth generated from outside of the Borough, in terms of commuting distances and modes of transport.

4.3 Would any areas of conflict arise between the spatial vision and strategic objectives of the LP relative to its policies arise? How could any be resolved?

- 4.3.1 It is considered that the Spatial Vision, the Strategic Objectives and the Policies within the Plan guide development, both speculative and expected/allocated. The Plan should, however, be read as a whole as the Local Plan seeks to address any adverse impacts, managing and minimising these impacts. The Plan is seeking to balance between competing needs while taking account of statutory and non-statutory constraints.

- 4.3.2 For example: Objective 7 seeks to “To protect and enhance the quality of the natural environment and conserve and enhance the historic environment across the Borough”. This needs to be balanced with Objective 2, “To provide for the housing needs of the Borough” and 3, “To develop and grow the local economy for the benefit

of local residents". Local Plan policies on LP14 Landscape, LP15 Historic Environment and LP16 Natural Environment will then address in detail where the housing and employment allocations may impact on the landscape, and any natural or historic assets within or adjoining these sites. These plan policies through appropriate design, mitigation and compensation (e.g. biodiversity offsetting) requirements, take account of and require development to address these potential impacts in order to resolve any conflict. Specific site policies will also address this need for balance and where specific needs or issues arise on site will, for example through specific criteria on Landscape sensitivity (see H1) or proximity to historic and natural assets (see H13), require any development on that site to address the issue and strategic objectives .

4.4 Including in respect of its timing, and the consideration of growth options [CD6/6, CD6/7], was the sustainability appraisal process legally compliant [CD1/2]?

- 4.4.1 The Growth options were identified by the Council and were then subject to SA by consultants LUC. The preferred growth option subsequently agreed was a hybrid, as described in paragraph 4.46 of the December 2017 SA Report (CD1/2). This hybrid option was taken forward into the Draft Submission Local Plan, and was appraised through the appraisal of policies in that version of the Local Plan. All appraisal work for the preferred growth option and the reasonable alternatives was therefore presented in the December 2017 SA report.
- 4.4.2 It is common practice to use the results of the SA of alternative growth options to develop a preferred strategy, and the preferred growth strategy is frequently a hybrid of the alternatives considered. This is to be expected, as the definition of growth option alternatives needs to be sufficiently distinct for meaningful comparison to be made and subject to SA. From this appraisal work, better performing components of the alternatives can be taken to develop a preferred option which is then worked up in detail and subject to on-going refinement through the SA, other evidence base, and consultation processes.
- 4.4.3 In terms of the timing of consultation on the Local Plan and the accompanying SA report, the key stage in terms of legal compliance is the Regulation 19 stage. A timeline of the production of both documents is attached as Appendix A to this paper

and is a document in the examination library. It should be noted that due to issues beyond the Council's control the SA document wasn't finalised in time for release at the start of the Local Plan consultation in November 2017. As a result the consultation period was extended (to 31st March 2018) to ensure opportunity to examine and comment on the SA. The representations subsequently received following the consultation were taken into account and changes made as a result. This ensured legal compliance with the Regulation 19 stage. It should also be recognised that the SA was not produced in isolation at this stage and is developed from earlier iterations and other SA's produced for both the Core Strategy, Development Management Plan and Site Allocations Plan consultations.

- 4.4.4 It can be clearly seen from paras 6.205 to 6.209 of the SA Report, including Tables 6.15 and 6.16, how the Council has responded to recommendations arising from the SA in preparing the Regulation 19 Submission Draft Local Plan. The SA process is therefore considered to be legally compliant.
- 4.4.5 The Sustainability Appraisal process is described in detail in the submitted Sustainability Appraisal Report (CD1/2). Table 1.1 in that report lists the requirements of the SEA Regulations and signposts where each one has been met within the report and accompanying appendices.
- 4.4.6 The Sustainability Appraisal was undertaken iteratively throughout the preparation of the Local Plan, and therefore the findings of the Sustainability Appraisal were taken into account by the Council as the Local Plan was developed. Prior to the preparation of the submitted Sustainability Appraisal Report (CD1/2) which related to the Draft Submission Local Plan, an earlier iteration of the Sustainability Appraisal Report was prepared and published in February 2017 to accompany the Regulation 18 consultation on the Draft Local Plan. Prior to that, options and draft policies in the emerging Site Allocations Plan and Development Management Plan (which were later incorporated into the new Local Plan) were subject to Sustainability Appraisal.
- 4.4.7 In terms of the timing of the Sustainability Appraisal, although there was a delay in publication of the Sustainability Appraisal Report at the Regulation 18 stage, at Regulation 19 stage the SA Report was published alongside the Local Plan from the start of the consultation period. At the Regulation 18 stage, the Sustainability Appraisal Report was indeed published after the start of the consultation on the Local

Plan itself to allow time for the Sustainability Appraisal Report to reflect the content of the Draft Local Plan published for consultation. However, the Council had the benefit of the Sustainability Appraisal for the Regulation 18 Local Plan (as well as the consultation responses received) when preparing the Regulation 19 Local Plan. It can be seen from paragraphs 6.205 to 6.209 of the final Sustainability Appraisal Report, including Tables 6.15 and 6.16, how the Council responded to recommendations arising from the Sustainability Appraisal in preparing the Regulation 19 Submission Draft Local Plan.

4.4.8 In relation to the timing of the growth options work, the growth options paper was presented to the LDF sub-committee in April 2016 and the SA work was presented in August 2016. The purpose of the April 2016 meeting was to gain agreement of the Council as to which options should be consulted upon and subject to SA. No decisions were made by the Council at this time on which of the options were preferred options. The Growth Options Consultation Paper (CD6/6) makes it clear that the options would be subject to SA, which was duly carried out. The results of the SA and the consultation exercise then informed the decision of the preferred option to be included in the Regulation 18 draft Local Plan. The options had been identified and appraised well before the Draft Local Plan was published later in 2016; therefore there was an opportunity for the SA work in relation to the growth options to feed into the Council's decision making.

4.5 What reasonable alternatives to the plan strategy have been assessed via the SA, including to the housing requirement and aspiration in respect of GBHMA?

(a) Have reasonable alternatives to the plan strategy been defined distinctly?

4.5.1 Yes – The Growth Options looked at reasonable alternatives for the Plan strategy and, although diagrammatical, clearly identified broad areas of possible alternatives, showing these areas relationships to the settlement hierarchy applying to the Core Strategy and the relationship (where relevant) with adjoining authorities and areas of development pressure and shortfall.

4.5.2 In addition the SA (Sustainability Appraisal Report: Appendices December 2017, CD1/2 Table 1.1, Section 5, Appendix 7 and tables 5.1 to 5.39) includes detailed assessment of the sites comprising reasonable alternatives to the Plan, including

sites outside and within the Green Belt, specifically with reference to their relationship with the relevant settlement from the settlement hierarchy and sustainability in relation to available services and infrastructure (See SA Appendix 7, as identified and defined in section 5, Figures 5.1 to 5.39).

4.5.3 Five alternative options were identified for meeting the development needs generated within the Borough (IN1-5) and a further five were identified for meeting the development needs generated outside of the Borough (OUT1-5). These options are set out in detail in the Growth Options Paper (CD6/6).

4.5.4 These options were subject to Sustainability Appraisal and the findings were presented to the Council officers preparing the Local Plan in June 2016 so that they could inform the preparation of the Draft Local Plan (Regulation 18 consultation).

(b) Has that assessment been in a comparable level of detail to the approach now advanced by the LP?

4.5.5 Yes. The alternatives identified in the Growth Options Paper (April 2016) CD6/6 were all assessed against 20 SA Objectives, which were also used to assess the Growth Options in the Sustainability Appraisal of the North Warwickshire Growth Options Paper and Scoping Update (June 2016) CD6/7. The same range of objectives were also used to assess the Submission Version of the Local plan and ensured consistency of assessment/appraisal. The range of the SA 20 objectives is reflected in the objectives also used in assessing the site allocations and reasonable alternative site assessments (CD1/2). This provided a comparable level of assessment as that for the Local Plan, although the assessment was more strategic in approach and did not drill down/focus down to the level of detail used for individual site assessments in the Local Plan, whether reasonable alternatives or site allocations. This reflected the fact that the Growth Options document was a more strategic, broad assessment of options, indicating broad areas/sites, not a site specific option assessment. This element of assessment was addressed in the Reasonable Alternative site assessments in the SA to the Local Plan, once the strategic approach/direction had been agreed.

4.5.6 Paragraphs 4.6-4.50 in the submitted Sustainability Appraisal Report explain the process that was undertaken in terms of appraising alternative growth options for the

Local Plan. Each option was appraised against the same 20 objectives in North Warwickshire's Sustainability Appraisal framework. Comments arising from Members consideration of the Growth Options Report at the 25th April 2016 Local Development Framework (LDF) Committee and from Parish Councils and Area Forum consultations were fed into the Local Plan and subsequent Report presented to Members on 3rd August 2016 LDF Committee. The SA findings for the growth options were also considered by Members in the North Warwickshire Local Plan Report on 3rd August LDF Committee 2016 (AD20A) (For the SA, see Appendix B to the Local Plan Report to the LDF Committee) and a new pattern of growth was identified based on a mixture of growth options IN1 and IN2 and OUT1, OUT2 and OUT3. Table 4.4 expands on the Council's reasons for decision making. The approach that was taken forward in the Local Plan was set out in the Spatial Strategy policies in Section 7 of the Local Plan. These policies were subject to Sustainability Appraisal in the same level of detail as the growth options, with each policy being appraised against each of the 20 Sustainability Appraisal objectives and a score assigned to each in order to identify where there are likely significant positive or negative sustainability effects.

(c) Is it clear how assessments of the likely significant effects of the plan strategy in environmental, social and economic terms have influenced the LP?

- 4.5.7 The SA of the North Warwickshire Growth Options Paper and Scoping Update (June 2016) CD6/7 was clear in showing the effects of the five growth options on the SA environmental, social and economic objectives were broadly very mixed, reflecting the range of advantages and disadvantages associated with focusing development at the larger towns or dispersing it more widely throughout the Borough. This mixed effect informed and influenced the eventual hybrid strategy option chosen. The Growth Option SA Summaries for the "IN" Options (IN1, IN2 & IN4) noted in section 1, para 1.35 – 1.51, that the status of Coleshill, in terms of its sustainable services, transport hub, which encouraged its inclusion in the Main Market Town category. But without proposing allocations outside its current boundary, to reflect its circumstances surrounded by Green Belt, So the initial conclusion was to include Coleshill within the main settlement hierarchy but then to balance any allocations at the Policy stage to reflect its Green Belt situation.

- 4.5.8 Similarly, the new settlement options in both the “IN” and “OUT” options appear reasonable. But in the absence of a clear available site or location this was difficult to support or achieve. As a result the Local Plan text in paragraph 6.20 included wording that , although not explicitly stating a “New Settlement”, does enable the opportunity to be considered, if future options/sites come forward.
- 4.5.9 The Sustainability Appraisal was undertaken iteratively throughout the preparation of the Local Plan, and therefore the findings of the Sustainability Appraisal were taken into account by Council officers as the Local Plan was developed. Prior to the preparation of the submitted Sustainability Appraisal Report (CD1/2) which related to the Draft Submission Local Plan, an earlier iteration of the Sustainability Appraisal Report was prepared and published in February 2017 to accompany the consultation on the Draft Local Plan. Prior to that, options and draft policies in the emerging Site Allocations Plan and Development Management Plan (which were later incorporated into the new Local Plan) were subject to Sustainability Appraisal.
- 4.5.10 Paragraphs 6.205 to 6.209 of the final Sustainability Appraisal Report (including Tables 6.15 and 6.16) explain how the Council responded to recommendations arising from the Sustainability Appraisal in preparing the Regulation 19 Submission Draft Local Plan.

4.6 Policy LP2 sets out the settlement hierarchy for the Borough, which seeks to broadly define where development should be located relative to the scale and role of settlements. It appears that the primary changes to the settlement hierarchy since the CS are the inclusion of Coleshill within the Green Belt as a market town, and allowing the expansion of towns abutting the boundary of NWBC’s administrative areas. Is the settlement hierarchy justified and consistent with national policy?

- 4.6.1 Yes. The amendment to the Adopted Core Strategy settlement hierarchy, with the inclusion of Category 2 in the Submission version of the Local Plan allowing the expansion of towns adjoining the boundary of NWBC, reflected the need to address any shortfalls of development needs (identified through the Duty to Co-Operate and through examination of adjoining authorities Local Plan, e.g. Tamworth, Coventry and Birmingham’s EIP’s) in adjoining authorities in the most sustainable locations (within

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North Warwickshire) to those authorities main settlements and development areas, where these can comply with National Policy constraints such as Green Belt.

4.6.2 The inclusion of Coleshill in category 1 (previously within its own category, Category 2 - Green Belt Market Town, in the Core Strategy) as “the Green Belt Market Town”, along with other Market Towns outside of the Green Belt was to reflect the sustainability of Coleshill, in terms of services, facilities, and infrastructure, transport and employment opportunities, irrespective of its constrained location within the Green Belt and the settlements status as a Market Town. Coleshill has always been recognised and identified as a Market Town and is reflected as such in the settlement hierarchies of the adopted Core Strategy (CD6/2B), the Site Allocations Plan June 2014 (CD3/1) and the 2006 Local Plan. However, due to its location wholly within the Green Belt and the difficulty of enabling further expansion without conflicting with National Policy the majority of the development and housing growth has been distributed to the main Market Towns outside of the Green Belt. Nevertheless, it is accepted that this category could be clearer in reflecting the settlements constrained circumstances within the Green Belt. It is considered the Category 1 could be split into 1a and 1b with Coleshill in the latter Category, still reflecting the settlements Market Town status and the range of services and facilities available but reflecting the constraints placed upon development due to its location wholly within the Green Belt. This is considered to be consistent with National policy in terms of reflecting the sustainability and functionality of a settlement while reflecting the constraints applying by National Green Belt policy.

<i>Chapter</i>	<i>Para</i>	<i>Proposed Modification</i>	<i>Main Mod or Additional Mod</i>	<i>Reason</i>
7	7.11 Policy LP2	Policy LP2 - Subdivide Policy LP2 Category 1 into categories 1a and 1b as follows; <i>Category 1a: Market Towns of Atherstone with Mancetter and Polesworth with Dordon, and;</i> <i>1b: the Green Belt Market Town of Coleshill</i> <i>Development for employment, housing</i>	<i>Main Mod</i>	<i>Amend settlement Hierarchy Category 1 to reflect constraint on development at Coleshill - Green Belt Market</i>

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		<i>(including affordable housing), services and other facilities will be permitted within the development boundaries of the Market Towns.</i>		<i>Town compared to other category 1 settlements</i>
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(a) I note examination document CD0/2A states that the hierarchy was effectively ‘established through previous Local Plans and the adopted Core Strategy’. Is that accurate?

4.6.3 Yes. The hierarchy established through the 2014 adopted Core Strategy (CD6/2B) and the Site Allocations Plan June 2014 (CD3/1) that underwent consultation prior to the development of the current Submission Local Plan. The Core Strategy was adopted in 2014 looking to 2029 and built on the previous Local Plan settlement hierarchy adopted in 2006. The Growth Options paper (CD6/6) and then the emerging Local Plan looked at the hierarchy to see if development could be delivered within this adopted strategy. As it could not it lead to a change to the hierarchy and meant the relevant Core Strategy policy needed to be updated.

(b) NWBC set out in examination document CD0/2A that alternatives to the scale of housing growth proposed via the LPSP have been considered. Where has such consideration been undertaken? Have other options for levels of employment space also been assessed?

4.6.4 The Growth Options looked at alternative strategies and locations to accommodate the housing growth, but did not specifically look at alternative ‘scales’ of growth. The assessment undertaken in addressing the Birmingham shortfall did look at a range of levels based on the Commuting patterns and Census data and came to a pragmatic decision on accommodating a mid-level figure between the lowest and highest expectations of pressure (See Note 3).

4.6.5 In relation to alternative levels of housing growth, the Sustainability Appraisal for the now adopted Core Strategy appraised a growth figure of 3,650. During the production of the Local Plan the Sustainability Appraisal appraised a growth figure of 5,280 in relation to the OAN plus economic and affordability uplift (2015 SHMA Table 53 page 128), plus the redistribution from Coventry and Warwickshire HMA (up to

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2031 in the Regulation 18 version) and then 5,808 (up to 2033 in the Regulation 19 version). These figures were appraised along with an additional 3,790 which related to the additional requirement from GB HMA.

4.6.6 The SA also looked at the following range of levels of employment land growth including;

- Core Strategy Growth level – 60 ha - 2011 and 2029 at least 3,650 dwellings to be developed.
- Local Plan growth - 58ha - 5,280 dwellings over the period 2011-2031
- Local Plan plus inclusion of GBHMA shortfall of 3790 – 90ha - 9070 dwellings over the Plan Period between 2011 and 2031.

In addition the Addendum to 2013 Employment Land Review Final Report 2016 assessed a number of scenarios based on housing need and a range of percentage shortfalls arising from across the Birmingham HMA. These 4 Scenarios are summarised below and in detail in the above Report. This shows consideration of a range of levels of employment land growth, based on balancing the employment land requirements generated by additional housing growth scenarios as sought in the NPPF 2012, paragraph 37, where “*Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities*”, and also reflect the requirements expressed in paragraph 81 of the new NPPF for a flexible approach to accommodating employment land and economic growth needs, also paragraph 8(a) to ensure “*that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity*” and paragraph 11 (b) “*strategic policies should, as a minimum, provide for objectively assessed needs for housing **and other uses**, as well as any needs that cannot be met within neighbouring areas*”.

Table 13: Housing Delivery Scenarios

Scenario	Scale of Housing Provision, 2011-31	Basis/ Rationale	Total - Employment Land Requirement, 2011-31 (ha)
A	5,280 Homes	Meeting the Borough’s own needs, together with its share of unmet needs from Coventry and Tamworth as agreed to date.	35

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B	6,540 Homes	Meeting housing needs identified in A above, together with 3.3% of the 37,900 unmet needs identified across the Birmingham HMA.	57
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C	7,800 Homes	Meeting housing needs identified in A above, together with 6.6% of the 37,900 unmet needs identified across the Birmingham HMA.	75
D	9,070 Homes	Meeting housing needs identified in A above, together with 10% of the 37,900 unmet needs identified across the Birmingham HMA.	91

- 4.6.7 Paragraphs 4.3-4.5 in the submitted Sustainability Appraisal Report (CD1/2) explain the justification for the scale of housing and employment growth proposed in the Local Plan. The amount of housing and employment development proposed is based on the most up-to-date evidence and this part of the Sustainability Appraisal Report explains why the Council does not therefore consider there to be reasonable alternatives options.
- 4.6.8 The scale and space of employment growth, particularly in relation to additional housing growth is considered in the Employment land Review and Updates, (CD8/6, 8/7 and 8/8). Para 8.19 of the ELR noted *“Taking account of completions and extant supply, the projections indicate the need to allocate at least 24 hectares of additional employment land over the plan period.”* that fed in to the Local plan allocations.
- 4.6.9 Irrespective of the ELR findings there was a lack of sites identified and promoted through the SHLAA for employment development **outside** of the Green Belt. Many of the sites that were submitted were the eventual allocations. Further alternative sites have since come forward and obtained permission through appeal and the Borough Council have acted proactively and positively in encouraging the provision of land at MIRA south of the A5 specifically for B1 and B2 uses to diversify the employment choice, opportunity and maximise benefits from the MIRA enterprise zone.
- 4.7 **LP paragraph 1.7 explains that the settlement hierarchy is based on ‘an assessment of the services, facilities and sustainability of the various assessments’.**

(a) Where is that assessment set out specifically?

4.7.1 Each of the Borough's settlements were assessed against a range of available services, facilities and infrastructure to assess their sustainability in 2010 (CD6/3B Settlement Sustainability Assessment). The settlements sustainability was "scored" in terms of available services and facilities. A cut off score of approximately 14 or less was used as the point below which a settlement was not considered sustainable enough to warrant a Development Boundary and to accommodate development/growth. This assessment was reviewed internally in 2016 (which is an ongoing, internal document, available if required) and the service and facility situation indicated little change apart from a loss of some facilities in the smaller settlements. Some settlements previously placed within the lowest settlement category in the 2006 Local Plan, but that had lost facilities and fell below the 14 score, were retained in their position within the hierarchy to enable development that would help support the remaining services and encourage replacement of lost facilities.

(b) Is each settlement correctly categorised?

4.7.2 The settlements are considered to be correctly categorised in the hierarchy, particularly those within categories 1 to 3. For these settlements there would need to be a significant reduction in their available services and facilities to consider reducing their status and position in the hierarchy. The smaller settlements and villages in Category 4 include a few that have lost some services and facilities recently but have been retained in their position within the hierarchy to both support and maintain remaining services/facilities and enable the opportunity for new development to support and encourage replacement services and facilities. This was indicated in the Settlement Sustainability Assessment, Issues Arising on page 98 (CD6/3B) regarding settlements Shuttington and Shustoke.

4.7.3 The alternative scenario may also occur where additional services and facilities arise or are replaced following closure, such as Birchmoor, where the re-opening of a shop and establishment of a new pub at the mini-brewery over recent years has supported the settlements re-categorising as a category 4 settlement with a Development Boundary (previously the settlement was treated as if it was "open countryside" for the purposes of development opportunities). Where other settlements have scored close to the "cut-off" they have not been considered as

appropriate locations or opportunities for accommodating development due to the sporadic, unfocussed nature of both the built form of the settlement, the distance between existing services and facilities, and the settlements location within the Green Belt reflecting a significant level of constraint.

(c) Should Polesworth and Dordon be identified as separate settlements?

4.7.4 Polesworth and Dordon have been identified for many years as a co-joined urban area. The Warwickshire Structure Plan (WASP) in 2003 (AD18) identified 9 main towns in Warwickshire one of which was “*Polesworth / Dordon*” along with Atherstone. The WASP stated:

“Warwickshire has no preeminent centre and is essentially made up of a small number of main towns - Nuneaton, Rugby, Leamington, Bedworth, Warwick, Kenilworth, Stratford-upon-Avon, Atherstone and the settlements of Polesworth and Dordon - and then a far larger number of relatively small market towns and villages which are predominantly rural in character.” (page 9 of WASP)

4.7.5 The 2006 Local Plan Inspector accepted that Polesworth and Dordon should be considered as one urban area as did the Core Strategy Inspector in 2013. The 2006 Inspector’s report noted that “... *two settlements in North Warwickshire that qualify as “Main Towns” in terms of WASP policy GD.3 are Polesworth/Dordon and Atherstone*” (para 2.26) and “*I do not dispute that Polesworth and Dordon may indeed function as two distinct settlements, and there is plainly a very real difference in urban form between the two. Nonetheless, they are contiguous with each other and WASP specifically identifies them as a single settlement (or network of settlements) for planning purposes..... Importantly, regarding these two settlements as a single entity for ‘planning purposes’ does not imply that the separate character of each cannot be protected or enhanced*” (para 2.27), “*Atherstone/Mancetter and Polesworth/Dordon have been identified in WASP as the Borough’s two most sustainable development locations*” (para 2.28) and “*These towns (including Atherstone/Mancetter) should also represent the two main foci where employment, housing and facilities that are intended to be accessible to the whole of the Borough’s population are to be provided together*” (para 2.30).

4.7.6 There is no physical separation between the two settlements, other than a sign saying Dordon and Polesworth. The two places interact as one settlement for

planning purposes. However, it is recognised that locally, just as with some settlements that share a development boundary that communities may want to keep and retain their unique heritage and relationships.

Other co-joined settlements

4.7.7 Similar circumstances exist for the settlements of Atherstone and Mancetter, Baddesley Ensor and Grendon, and Hartshill and Ansley Common. In built form these settlements are contiguous and also share/benefit from the range of services and facilities, such as shops, schools and public transport services that exist or operate within them. For the purposes of planning these joint settlements are treated as one settlement as noted above.

(d) Should Lea Marston be within category 4?

4.7.8 The Borough Council does not consider or agree that Lea Marston should be a Category 4 Settlement. This is because;

- The settlement was not identified as warranting a Development Boundary in the 2006 Local Plan due to insufficient services and facilities (Sustainability Appraisal of the Local Plan 2002) and was not included in the Local Plan settlement hierarchy. The settlement hierarchy specifically aimed to steer most development to the Main Towns, where public services and other facilities can be provided close together, in locations most easily accessible to the whole of the Borough's population. It also sought to avoid stimulating pressure on the Green Belt around Coleshill... with only limited development provision in other smaller settlements identified with a development boundary.
- The settlement is "washed" over by, and lies within, the current Warwickshire Green Belt.
- The settlement did not perform well in the 2010 Settlement Sustainability Assessment (SSA 2010) study reflecting the lack of services and facilities available in the settlement (see notes below).
- The Adopted Core Strategy October 2014 Settlement hierarchy, Policy NW2 confirmed the settlement hierarchy, excluding Lea Marston from having a development boundary.
- The Draft Site Allocations Plan June 2014 maintained the situation relating to Lea Marston, except for the proposal for a "Green Belt Infill Boundary" around

the settlement to facilitate the identification and opportunity for Green Belt infill development in the settlement while constraining Green Belt infill opportunities throughout the Borough. The Green Belt Infill Boundaries were produced to address criteria 3 of Green Belt Policy NW3 in the adopted Core Strategy and consulted through the Borough Council Area Forums (Parish Council and community forums) in 2012 and as part of the Draft Site Allocations Plan consultation in 2014. Further information is available on the Local Development Framework Sub-Committee Report of 18 December 2012 if required.

- In the 2016 review of the SSA 2010, the settlement circumstances had not changed. The settlement subsequently remained part of Category 5 in the hierarchy.
- There are not considered to be sufficient “very special circumstances” to warrant taking the settlement out of the Green Belt.

4.7.9 Lea Marston does not have sufficient services and infrastructure to enable the settlement to be considered as a Category 4 settlement. The services and facilities available in settlements within North Warwickshire have been assessed and reviewed on a number of occasions in order to help establish a sound basis for the settlement hierarchy, focussing on the number of available services and facilities within each settlement or within reasonable walking distance (500 to 600m used for the Local Plan SA assessments). A threshold was applied based on the number and availability of services, facilities and infrastructure within the villages/settlements that helped determine their position within the hierarchy. The Category 4 settlements all have a minimum level of services, including one or more facilities such as village hall/meeting room, shop, pub, primary school etc. and Lea Marston has no services or facilities located within the village or within reasonable safe, sustainable walking distance. (Settlement Sustainability Assessment, Jan 2010 CD6/3B). The availability of services and facilities, including public transport services, were an integral element of the site assessments in the Local Plan SA, through analysis of the social, environmental and economic SA objectives (Sustainability Appraisal Report: Appendices December 2017, CD1/2 Table 1.1, Section 5, Appendix 7 and tables 5.1 to 5.39). These confirmed the lack of available, accessible services and facilities in the village or available for sites within the Parish, which scored only 8 in the assessment, against a “cut-off” score of 15 to warrant inclusion in the lowest category for settlements identified as suitable and sustainable for a development boundary.

4.7.10 In the Borough council's opinion nothing has altered to change or significantly improve Lea Marston's position in the hierarchy or its level of sustainability in terms of available services, facilities and infrastructure that would promote, encourage and justify increased development proposals beyond that accommodated by the Para 89 exceptions in the National Planning Policy framework (now para 145 of the New NPPF) through limited infill, rural exception or redevelopment opportunities

4.8 **Is policy LP2 sufficient clear to guide decision-taking as to the quantity of development that each settlement is apportioned?**

4.8.1 As previously noted in 4.7d, the Policy LP2 was informed and evidenced by the early Settlement Sustainability Assessments and subsequent Local Plan and Adopted Core Strategy Sustainability Assessments, which have confirmed the current settlement hierarchy as a sound basis for decision making. The settlement hierarchy is considered to provide a clear, evidenced justification for the quantity of development apportioned to settlement. It is nevertheless accepted that land and site availability will also factor significantly on the quantity of development, but will be focussed where this adjoins the main categories including Market Towns, adjoining authorities main settlements and North Warwickshire's service settlements. This hierarchy has previously been supported and Adopted through previous Local Plan Inquiries in 2006 and the current Adopted Core Strategy.

4.9 **Is the approach to site allocations overly reliant on the allocation of larger sites to the detriment of supporting thriving rural communities?**

4.9.1 The Borough Council do not consider the site allocations are overly reliant on the allocation of larger sites. The Adopted Core Strategy noted in Chapter 6, paragraphs 6.2 to 6.7 the strategy *seeks to allow development to take place in a dispersed, but controlled pattern throughout the Borough, and future development will take place in accordance to the size of the settlement taken, with its range of services and facilities and dependant on whether it is in or outside of the Green Belt.* The Submission Plan continues this approach with the amended Category 2 in the hierarchy. It was noted that, following the Matthew Taylor Report, which advocated more development in the rural areas, to assist in maintaining the vitality of the rural settlements that historically, settlements can grow incrementally and this can help to maintain the balance

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between restraint and the continuing vitality of the settlements. In this Core Strategy this approach has been widened to consider the holistic development of services and facilities to help maintain and enhance thriving communities.

4.9.2 It is noted that the new NPPF Guidance (2018) in Chapter 5 is seeking a variety of land and sites for development, noting in paragraph 68 that “*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area*”, and local planning authorities should promote the development of a good mix of sites. However, since the adoption of the Core Strategy the incremental impact of development in the smaller communities and service settlements has perhaps been insufficient to enable or achieve a threshold that triggers further infrastructure provision. By allocating some larger strategic sites the Council is seeking to ensure the “big ticket” infrastructure needs and issues are being addressed, which also provides the infrastructure to support thriving rural communities that currently suffer from a lack of infrastructure and services. This reflects the current NPPF Guidance in Paragraph 72, which notes that “*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities*”. It should also be noted that the Plan only includes a few sites above 150 dwellings. Most of the range of sites available is less than 100 (19 in total out of 27 allocated sites), with only a few between 100 and 500 (4), one just over 500 and three from 1000 to 2000. This range of sites of differing scales is not considered to make the Plan “over-reliant” on a “few” strategic large sites. It is considered that the spread of development and sites reflects the settlement hierarchy, providing growth for the service settlements as well as a number of small to medium sized sites in smaller settlements with some capacity to grow. Details of the range of sites allocated and with planning permission are included in the table below.

Breakdown of sites with Planning Permission at 31/3/18

Sites of:	1-4 dwellings	5-9 dwellings	10-100 dwellings	100-500 dwellings	500-1000 dwellings	Over 1000 dwellings	TOTAL
Number of units	183	95	702	264	0	0	1244
Number of sites	153	17	33	2	0	0	205

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Breakdown of allocated sites LP39

Sites of:	1-4 dwellings	5-9 dwellings	10-100 dwellings	100-500 dwellings	500-1000 dwellings	Over 1000 dwellings	TOTAL
Number of units	0	32	595	1111	531	4552	6821
Number of sites	0	4	15	4	1	3	27

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APPENDIX A

Timeline of SA and Local Plan production

			<i>Document reference on examination page of website</i>
Core Strategy			
	SA for Core Strategy	Draft SA Scoping Report (October 2006) Core Strategy Issues and Options SA Commentary (June 2009) Draft Sustainability Appraisal (August 2011) Proposed Submission October 2012	CD6/3
		Assessment of Main Modifications SA Addendum Report July 2014	CD6/3a
	Adopted	9 October 2014	
Site Allocations Plan			
	Draft Pre-Submission version	26 th June – 21 st August 2014	
	SA	SA Report for Draft Site Allocations Plan (March 2013) SA Report for Pre-Submission Site Allocations Plan (June 2014)	
Development Management Plan			
	Issues and options	31 st May - 23 rd August 2012	
	SA	<i>No SA work undertaken for the 2012 consultation as it did not include alternative options.</i>	
	Development Management Plan Draft policies	1 st October – 12 th November 2015	
	SA	SA Report (September 2015)	
	Board consideration of Draft policies and changes to be incorporated into emerging Local Plan	May / June 2016	

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Local Plan			
<i>Growth Options</i>	Board	April 2016	
	Presentations to Area Fora		
	SA of Options	SA of Growth Options paper (June 2016)	
<i>Regulation 18</i>	Board approved Plan for consultation	August 2016	
	SA	SA Report for Draft Local Plan (Feb 2017)	CD2/2
	Formal consultation	10 November 2016 to 31 March 2017	
<i>Regulation 19</i>	Consultation	14th December 2017 to the 16th March 2018	
	SA	SA Report for Draft Submission Local Plan (Dec 2017)	CD1/2
	Extended consultation allowing for consideration of additional information which became available: <ul style="list-style-type: none"> • Leisure Facilities Strategy • Leisure Facilities Operational Review and Future Delivery Options • Green Space Strategy • Playing Pitch Strategy • Supplementary Planning Document (SPD) on Planning Obligations for Open Space, Sport and Recreation • Assessment of the Value of the Meaningful Gap and potential Green Belt Alterations • Archaeology Assessment to inform the North Warwickshire Local Plan 	Executive Board (12th February 2018) agreed to a further extended period of consultation to the 16 th March 2018	
Submission (Regulation 20)	Agreed by Executive and Full Council	22 March 2018	
	Submission	27 March 2018	