



Gladman Developments Ltd

Phase 1

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

Qu4.4 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]?

- 1 Gladman have expressed concerns in our submission representations about the timing of the SA process, whether it has been iterative and whether the Local Plan and its various options have genuinely been informed by the process. We will respond further upon the Councils clarifications of these points.

Qu4.6 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?

(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?

(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?

- 2 Gladman do not disagree with the categorisation of settlements within policy LP2 in Categories 1-4, however we do not believe that Category 5 which in effect rules out all development outside of settlements boundaries is justified, effective or consistent with national policy.
- 3 Category 5 is in effect a blanket restriction policy on the delivery of the vast majority of development, with the exception of small number of uses. The problem with the Council in

pursuing such a policy is that it leads to a plan which is not able to adopt to rapid change as required by the NPPF and one in which has no flexibility built in. There are already problems with the Local Plan not allocating sufficient sites to provide either a 5 year housing land supply or to meet its overall plan needs. With a policy such as this there is no mechanism for the plan to respond to any of its allocations either failing totally to deliver or being delayed and pushing additional development out of the plan period. In effect with this policy in place anything coming forward would be contrary to the development plan.

- 4 Therefore we believe that the Category 5 section of the policy needs to be deleted in order to make LP2 sound. It could be replaced with an additional policy which gives the plan a flexible approach to development adjacent to settlement boundaries in specific circumstances. The scale of development could be proportionate to the settlement it adjoins. Similar policies have been proposed in a number of Local Plans to respond to the issue of flexibility, including policy H1 of the Warwick Local Plan¹.

Qu4.9 Is the approach to site allocations overly reliant on the allocation of larger sites to the detriment of supporting thriving rural communities?

- 5 Larger sites will have an important role to play in North Warwickshire meeting its housing needs, however as has been made clear in both the Housing White Paper and the revised NPPF, Local Plans in order to ensure they are deliverable must open themselves up to the allocation of a range of sites. Sites should be small, medium and large in scale and located in as wide a range of locations as possible in order to engage small, medium and large size housebuilders.
- 6 In the case of North Warwickshire 4,552 of the housing numbers allocated in the Local Plan are within just 3 strategic allocations. Gladman consider in Matter 8 how it is likely that these strategic allocations will take time to come forward and that their delivery rates may not be at the rate the Council is currently expecting. In that regard there will be a need to fill the gap provided with these sites and a realisation will need to be accepted that many of the larger scale strategic sites may spill their delivery into the next plan period. The way in which this can be remedied is to provide a range of additional small to medium sites in sustainable locations.
- 7 As Gladman referenced in our submission representations there are locations on the edge of Tamworth (medium scale) and in Mancetter (small-medium scale) which could be allocated. In the case of Mancetter whilst correctly considered part of Atherstone in terms of the settlement hierarchy that location has not been considered for growth in the Local Plan and could support the services of Mancetter as well as meeting the overall plan needs.

¹ https://www.warwickdc.gov.uk/downloads/file/4623/new_local_plan (retrieved 29/08/18)