

North Warwickshire Local Plan Examination

Position Statement to the Inspector's Matters, Issues and Questions (Phase 2 Matters)

Matter 9 – Allocations and Supply of Land For development Requirements

9.3 With reference to CD8/13B and PS.M8.01 are allocation yields and delivery trajectories justified and robust, including over the next five years? (noting some inevitable overlap with strategic matters 7 and 8)

We refer to the Council's allocations and delivery trajectories and consider that with minor amendments, the allocation yields and delivery trajectory for site H7: Land east of Polesworth & Dordon are considered to be justified and robust. We consider that allocation H7 will be able to deliver 2,000 dwellings within the Plan period.

As slippage has occurred in the progression of the Local Plan we consider that the first completions on site are now expected to come forward in 2022/23. With the delivery of improvements to the A5 expected to come forward by 2024 it is anticipated that the Polesworth and Dordon site will be able to continue with a good rate of delivery of at least 200 dwellings per annum on at least 4 housing outlets. The site is approximately 1.2 miles from north to south and approximately 0.7 miles at its widest which provides the opportunity for multiple sales outlets to be provided across a wide area during the course of bringing the site forward across a period of approximately 11 years.

This revised position is still broadly consistent with the Council's assumptions set out at paragraph 8.4.6 of their Matter 8 Statement (PS.M8.01) which refers to a similar rate of housing delivery (200 units per annum) across 4 outlets to be opened up via multiple access points (A5 and B5000. As stated in PS.M8.01, this rate of delivery is evidenced locally by the delivery found on the adjacent Taylor Wimpey scheme that was delivered at a rate of 66 units per annum.

9.4 Has the comparative assessment of sites resulting in those included for allocation in the plan been undertaken in a proportionate and consistent manner? (with particular regard to the SHLAA [CD8/17] and SA for site allocations, section 2 in particular [CD3/1]).

An assessment of sites for allocation has been undertaken in a proportionate and consistent manner. H7: Land east of Polesworth and Dordon has been included in the policy section of the SHLAA document, with a range of individual site submissions that make up parts of the allocation were assessed in the SHLAA document.

CD3/1 sets out the: "Reasons for Choosing the Plan as Drafted". The report states that the majority of development will take place in larger settlements, with more limited development in the smaller rural settlements and in particular those not in the Green Belt. Polesworth and Dordon is defined as a tier one settlement ("Main / Market Town"). Land east of Polesworth and Dordon (H7), is a sustainable extension to a Category One settlement outside of the Green Belt. It will not lead to a narrowing of the strategic gap between Tamworth and Polesworth and Dordon, thereby retaining the rural character at major gateways in to the Borough.

The H7 allocation will provide a significant number of strategic benefits in comparison with other potential development sites, including avoiding to release land in the strategic gap or the Green Belt, as well as a new strategic link road.

(a) If any allocations have been brought forward from former plans, have they been assessed afresh?

9.5 Local Plan paragraph 8.4 and policy LP7 indicates that the residential density of development should be at least 30 dwellings per hectare ('dph'). The average density for site allocations, excluding H23 Austrey, based on policy LP39 appears to be around 20.5 dph. The lowest densities at allocations H7, H18 and H19 are between 12 and 14 dph. Is the plan's approach to density appropriate?

Paragraph 8.4 states that the Council will seek development at a density of at least 30 dwellings per hectare. However, it notes that this should not compromise the quality of proposals and it attaches considerable importance to improving the quality of the local environment. It is appropriate in these circumstances to consider density on a site by site basis. A blanket approach to density does not ensure that the quality of the environment is not compromised. This is supported by paragraph 47 of the NPPF (2012) which states that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances, which is what NWBC appear to be doing in policy LP7. In most cases aiming for at least 30 dwellings per hectare will provide support towards making the best use of available land. Where site specific circumstances permit (e.g. town centre or high frequency public transport locations) then higher densities may be achievable.

9.8 Are the categorisations of settlements in policy LP2 appropriate with regard to the updated Settlement Sustainability Appraisal ('SSA')[CD6/3C]?

(c) Proportionately, are allocations aligned with the scale and function of settlements? If not, is there compelling justification for that? NB. This question will also fall to discussions on individual sites as necessary.

As set out in our response to Matter 9, Questions 9.3 and 9.4 above, it is considered that the Council's strategy of focusing strategic housing development (allocation H7) in one of the most sustainable settlements in the District to be appropriate. Whilst reference is made to the delivery of 67% of all housing within three allocations, including H7, we are specifically interested in the justification for site H7. As set out above the site can be delivered within the plan period.

Alternative housing locations to Polesworth and Dordon may exist but would require the release of land constrained by Green Belt land in the strategic gap. A comprehensive development to the east of Polesworth and Dordon avoids these constraints, whilst enabling development which is in line with the scale and function of the settlement and will provide substantial community benefits which are required, including a new strategic link road to serve the site and relieve congestion on existing local roads such as Long Street.

9.10 Is there a rationale for referencing certain Local Plan requirements inconsistently, such as provision of Sustainable Urban Drainage Systems in certain allocations but not others? Is there a rationale for setting only certain allocations as a minimum number? Should a consistent size threshold be set for terming a site 'strategic' or requiring that masterplans are prepared?

We consider that the housing targets referred to in each of the housing allocations should be set as a minimum because it is important for the Council in preparing its plan to have certainty that the sites they have proposed for allocation will be able to contribute to meeting their identified housing need. We have undertaken joint technical assessments with The Church Commissioners for England and have provided a concept plan to demonstrate that the site can deliver between 2,230 and 2,602 dwellings subject to more detailed technical assessments being undertaken at the planning application stage. We consider that this provides sufficient flexibility to address site constraints and provide the necessary infrastructure required to support the proposed allocation.

Polesworth with Dordon

9.19 Allocation H7, land to the east of Polesworth and Dordon

(a) Reflecting 9.11 (b) are the masterplanning requirements for allocation H7 consistent with the approach set out in paragraph 14.14 (and 14.23)?

In terms of the land uses referred to in the allocation, whilst housing is the primary use identified, there is a list of other uses including education, retail and health which are deemed to be the key supporting uses needed to support this allocation. It is not considered that other uses such as employment should be identified given the major existing employment opportunities provided in nearby locations such as Birch Coppice.



Work has commenced on the preparation of a draft concept plan and a version of this has been shared with the District and County Councils as well as Dordon Parish Council. Further engagement with these Councils and Polesworth Parish Council are expected to take place in the coming months as part of the planning application preparation.

(b) Is it appropriate to allocate the site as for 'a minimum' of 2000 homes?

As set out in our response to Question 9.10, we consider that sufficient and proportionate evidence has been prepared and provided to the Council to demonstrate that an allocation of a minimum of 2,000 dwellings and associated supporting infrastructure can be delivered on the H7 allocation site.

(c) Would any infrastructure provision undermine viability with reference to NPPF2012 paragraph 173?

The Council's viability evidence (NWBC 13) demonstrates that the site is viable with 40% affordable housing and other s106 obligations. The detailed infrastructure package will be reviewed in full detail at the planning application stage in accordance with paragraph 173 of the NPPF (2012).

(d) Would the effect of the scheme on ecology, the environment, and heritage assets, including ancient woodland and local wildlife sites, be appropriate?

A range of initial baseline technical reports has been undertaken to feed into the preparation of a site wide concept plan which demonstrates that a minimum of 2,000 dwellings can be accommodated whilst retaining key features such as the Hollies ancient woodland and Local Wildlife Sites, whilst preserving the setting of key heritage assets. We have significant concerns regarding the findings of the LUC report and a response to this is contained in the attached heritage responses prepared by BSA Heritage.