

Matter 32 - Monitoring

Introduction

- 1.1.1. This representation should be read in conjunction with the previous Regulation 19 representations, Stage 1 Hearing Statements and representations to the additional Local Plan Examination consultation made by the Raby Estate (ref: A0149).
- 1.1.2. The Raby Estate is promoting the Land at Shore Lane site in the village of Cressage for development.
- 1.1.3. The Estate believes that Shropshire have not identified monitoring indicators that are measurable, nor are there appropriate mechanisms in place to ensure that reserve sites can come forward to development in the case that there is a shortfall in housing delivery or supply; particularly in the context of the potential need for an immediate review if the Governments proposed standard method is taken forward in early 2025.

Question 1 – Does the monitoring framework in appendix 4 contain relevant and measurable indicators and will it be effective?

- 1.1.4. Sub-Schedule 3 within the proposed Main Modifications (GC4m SD003.02) provides a schedule of the delivery mechanisms for the proposed Strategic Policies, highlighting the particular aims of each. However, a number of these do not provide measurable indicators, and no consequences (i.e. a trigger mechanism) are given to respond to these. The proposed monitoring framework therefore lacks depth and an ability to contribute towards the effectiveness of the plan, in not providing indicators that can be measured, or lacking a measurable comparison of the indicator against the aims of the proposed policies.
- 1.1.5. As discussed within our Hearing Statement for Matter 1, Natural England acknowledge within their updated position (OD007) that should the allocations in the Local Plan prove to be undeliverable, the Local Plan would need to be reviewed.
- 1.1.6. Some form of review mechanism should therefore be proposed in the Main Modifications in to ensure there is a monitoring procedure for proposed Policy DP14, ensuring that alternative sites can come forward to deliver the objectively assessed housing needs of Shropshire in the case of the proposed mitigation measures for the Clun Catchment are unsuccessful.
- 1.1.7. Further, as outlined in our response to Matter 19 regarding Cressage; in the smaller settlements where there are individual site allocations with significant issues associated with the technical deliverability of the site (such as CES005), it would be appropriate to identify alternative sites (and monitor for delivery), particularly where the site allocation is earmarked to meet near to the whole housing requirement for the settlement.
- 1.1.8. We say this as in the instance of CES005, when the site isn't delivered in the plan period (owing to the insurmountable technical issues associated with the site access), any growth that was meant to take place in Cressage will have been stifled, and the village will have been held back from meeting its potential growth, and the benefits this brings. Also earmarking CES002 for development (even as a reserve site) would enable Cressage to continue to grow in line with its needs as a Community Hub.

1.1.9. Further, it would also be appropriate to include a review mechanism to ensure that the necessary contribution towards the unmet needs of the Black Country is delivered, which we explore further in our response to question 2 below.

Question 2 – Will they ensure that the delivery of housing and employment to meet the unmet needs of the Black Country can be effectively monitored?

- 1.1.10. ABCA clarified (EV041) that Shropshire’s proposed contribution of 1,500 dwellings and 30ha of employment land towards their unmet needs should be a “starting point”, thus a minimum contribution. Walsall Council recommended a mechanism within the Local Plan to trigger an early review to allow further housing to come forward in Shropshire if there is greater need for housing identified within the HMA (ref. A0673 within Shropshire Local Plan Regulation 19 consultation).
- 1.1.11. We agree that Shropshire Council should respond to evidence of unmet need in the Black Country when evidence arises, which a policy mechanism to bring forward reserve sites would present a positive response and flexible approach. This would be linked to evidence of an undersupply of housing (in Shropshire) during the plan period, or where dwellings are required to meet the objectively assessed needs of the Greater Birmingham and Black Country Housing Market Area.
- 1.1.12. Main Modification 259 (per Sub-Schedule 3) does not give details as to how this contribution will be monitored, nor the change in circumstances of the Black Country’s unmet need and how Shropshire’s Local Plan can contribute towards this. Rather, the monitoring approach within proposed Policy SP2 references the deliverables as dwellings completed and employment land developed on sites identified towards the unmet need, but lacks an anticipated and required (based on urgency of local need) trajectory of these, or conversely indicators of the plan not delivering its desired purpose. As such, there are no proposed means to ensure that this contribution is adequately delivered, or to increase/adapt the scale of contribution in response to a growing unmet need.
- 1.1.13. As outlined in our previous representations (ref A250) and hearing statements (ADTC.04 A0149), there would be great benefit of additional flexibility to the plan through introducing a trigger mechanism to bring forward reserve sites that are identified as suitable, or for an early review of the plan. While an early review of the plan should not be aim of its preparation, this should be explored as a potential option in order to respond to a potential change in circumstances since the plan’s preparation and examination.
- 1.1.14. This policy approach has been requested by Inspectors elsewhere (such as in Stratford-on-Avon) in order for a plan to be found sound. Policies SAP1 – SAP 5 from the Stratford-on-Avon Site Allocations Local Plan provide evidence whereby Inspectors have requested that specific trigger mechanisms be introduced into the Local Plan to ensure that the reserve sites would be released in the following circumstances:
- The Council is unable to demonstrate a 5-year housing land supply;
 - To respond to a growth in jobs within the District; and
 - To meet any shortfall in the Greater Birmingham and Black Country HMA.
- 1.1.15. Appendix A (as per ADTC.04 A0149) provides an example policy mechanism, adapted from the Stratford-on-Avon Draft Local Plan (Appendix B), which proposes the allocation of reserve sites upon the provision of evidence that indicates an undersupply of housing within the local plan period.



This would ensure that unmet need can be met across Shropshire when it arises, protecting Shropshire from speculative development, ensuring that per the NPPF (paragraph 15), development is plan-led where possible.

- 1.1.16. In the instance of Stratford-on-Avon, their Final Report (paragraphs 57-71 and 276-279, Appendix C) concludes that a failure to include such a policy and associated triggers within the plan would not be in the Council's interest. This would allow the Council to have a degree of control if housing is not delivered, as the proposed housing trajectory projects and appeals on speculative sites could be avoided. Therefore, we advise that Shropshire Council includes such a policy (per Appendices A and B) within the Main Modifications of the Plan, as it will provide certainty for the Council, communities and landowners, and can ensure that development in Shropshire is plan-led and sustainable, per paragraph 11 of the NPPF.

Word count – 1,128 (excluding questions)

Appendix A

SUGGESTED RESERVE SITES POLICY WORDING





Appendix A – Draft Policy Mechanism

Per our response to Q4, we propose the following policy mechanism. This policy has been adapted from the policies found at Appendix C in the Stratford-on-Avon Draft Local Plan.

POLICY X - IDENTIFYING RESERVE HOUSING SITES

Reserve sites will be allocated in the local plan if evidence shows that there is, or is likely to be, an undersupply of housing within the local plan period. There are two purposes for this:

- a) to rectify any identified shortfall in housing delivery to maintain a five-year supply of housing in Shropshire;
- b) to contribute to meeting objectively assessed housing needs across the Greater Birmingham and Black Country Market Area.

Reserve housing sites will be released per the mechanisms set out in Policy Y.

POLICY Y - RELEASING RESERVE HOUSING SITES

To ensure that an appropriate number of additional homes are available, the following mechanisms shall be applied:

A. To rectify an identified shortfall in housing delivery

Reserve sites will be released for this purpose when the Council calculates that either its five-year supply falls below 5.5 years (applying the appropriate buffer), or its Housing

Delivery Test trajectory shows that delivery is expected to fall below 100% in the following three years.

If a housing shortfall is identified due to the above circumstances, reserve sites identified in [an appropriate Appendix] will be released. To be released for this purpose, the site must be capable of contributing to the five-year supply of housing by being deliverable within five years of the site's release. The site delivery information provided by site promoters will be used as evidence to determine whether the site can contribute to the five-year supply of housing.

B.

To contribute to meeting the Greater Birmingham and Black Country Market Area needs.

Reserve sites [identified in an appropriate Appendix] will be released for this purpose when any Black Country authorities undertake an objectively assessed housing need that provides evidence that its needs cannot be met within the local planning authority areas.

POLICY Z – APPLICATIONS FOR RESERVE HOUSING SITES

Planning applications for reserve sites will be permitted if the criteria set out in policies X and Y apply.

A. Delivery Timescales

A valid outline or full application must have been submitted to Shropshire Council within eighteen months of the date the criteria set out in Policy Y is satisfied.

Applications on reserve sites must comply with all relevant planning policies, including Neighbourhood Plans, considering relevant supplementary guidance.



development and protect Shropshire from speculative development, ensuring that per the NPPF, development is plan-led where possible.

To ensure that sites come forward in the appropriate area, these sites are located in the A5/M54 corridor to ensure the location of new housing relates (as much as possible) to where the need has been identified (ie the Black Country). Appendix X of the Plan shows a list of reserve sites.

NOTES ON THE POLICY WORDING

This policy approach has been found sound elsewhere. Policies SAP1 – SAP 5 from the Stratford-on-Avon Site Allocations Local Plan provide evidence whereby Inspectors have requested that specific trigger mechanisms be introduced into the Local Plan to ensure that the reserve sites would be released in the following circumstances:

- The Council is unable to demonstrate a 5-year housing land supply;
- To provide housing to match job growth; and
- To meet any shortfall in the Greater Birmingham and Black Country HMA.

The Inspector requested that this mechanism be introduced to ensure no ambiguity regarding how and when the reserve sites should come forward for development. This will ensure that the Plan is justified.

In the instance of Stratford-on-Avon, in their Final Report (paragraphs 57-71 and 276-279, Appendix B), the Inspector concluded that a failure to include such a policy and associated triggers within the plan would not be in the Council's interest. This would allow the Council to have a degree of control if housing is not delivered, as the proposed housing trajectory projects and appeals on speculative sites could be avoided. Therefore, we advise that Shropshire Council includes such as policy (per Appendix A) within the Main Modification of the Plan, as it will provide certainty for the Council, communities and landowners.

The relevant extracts from the Stratford-on-Avon Local Plan can be found at Appendix C. They should be considered as evidence that demonstrates an approach that should be used in the Shropshire Local Plan, whereby the situation (in terms of cross-boundary migration and relationship) is very similar.

In light of the above, there is, therefore, justification and precedent for the proposed policy, as it will ensure that the plan remains sound (per Paragraph 35 of the NPPF) and avoids any unnecessary delay, meaning that plan-led development can take place immediately and that this will be maintained if any shortfall arises.

In relation to unmet needs from the Black Country, it is recognised that it would be favourable to encourage development in the A5/ M54 corridor. This is as development should come forward in areas that as located as logically as possible to where the housing need is. The A5/M54 corridor is the arterial route into the Black Country from Shropshire and therefore has the best relationship with the Black Country (ie the area that the houses are serving) this will make migration/ commuting in and out of both the corridor and Black Country as easy as possible for future residents.

Appendix B

STRATFORD-ON-AVON LOCAL PLAN POLICY EXTRACT



2. Reserve Housing Sites

Core Strategy Strategic Objectives

- (5) *The District will have reduced its greenhouse gas emissions, so as to contribute to the national target for reduction, through a range of measures such as the location and design of development, provision of renewable and low carbon energy schemes, and promoting opportunities for low carbon travel.*
- (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.*

2.1 Identifying Reserve Housing Sites

Policy SAP.1

Identifying Reserve Housing Sites

Reserve sites will be released if the Council's monitoring shows that there is, or is likely to be, an undersupply of housing or if the Council accepts that additional housing is required to be accommodated within the District by 2031. In accordance with Policy CS.16 Housing Development in the Core Strategy, the four purposes for identifying reserve housing sites are as follows:

- (a) To rectify any identified shortfall in housing delivery in order to maintain a 5 year supply of housing land in Stratford-on-Avon District;
- (b) 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;
- (c) 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;
- (d) To contribute to meeting any housing needs arising outside the Coventry and Warwickshire HMA that 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.

Reserve housing sites will be released in accordance with the mechanisms set out in Policy SAP.3.

Explanation

Rationale for identifying Reserve Sites

- 2.1.1 The Core Strategy meets the housing needs for the District for the plan period 2011-2031. However, there is always a risk that some sites are not built with the result that needs are not met, or that additional housing needs arise that should be met within the District. As part of the Council's ongoing proactive approach to place-shaping, the Site Allocations Plan identifies reserve housing sites that will be released for development if its monitoring shows that they are required.
- 2.1.2 The commitment to identify reserve housing sites is set out in Policy CS.16D of the Stratford-on-Avon Core Strategy (adopted July 2016). The policy requires the Council to identify reserve sites capable of accommodating up to 20% of the housing requirement to 2031, i.e. 2,920 homes. The inclusion of such a policy was stipulated by the Inspector who examined the Core Strategy in order for it be 'sound' and capable of adoption. This provision is to deal with the period of time before the Core Strategy is reviewed. It will be for the replacement Plan to provide for a new housing requirement for the period it covers based on the various sources and scale of need that are identified at that time. This is now to be the South Warwickshire Local Plan and will cover Stratford-on-Avon and Warwick Districts.
- 2.1.3 The Council acknowledges that since the Core Strategy was adopted – and the housing requirement established – the Government has introduced its Standard Methodology for identifying Local Housing Needs. The current method results in a need of 603 dwellings per annum (as opposed to 730dpa in the Core Strategy). However, it is beyond the scope of the Site Allocations Plan to revisit the housing requirement for the period to 2031. Stratford-on-Avon District Council is satisfied that the Core Strategy housing requirement remains an appropriate basis on which to plan for the District to 2031 and for this reason, considers that basing the reserve on up to 20% of the 14,600 figure is appropriate. In any event, work is progressing on the South Warwickshire Local Plan that will deal with new housing requirements expected for the period 2025 to 2050.
- 2.1.4 Given the fact that work has now commenced on the South Warwickshire Local Plan, and it is anticipated that it will be adopted by the end of 2025, the Council believes it is justified in focusing on identifying reserve sites that would be appropriate and deliverable to meet any housing needs that are identified in the short-term. Consequently, this version of the SAP identifies a first tranche of reserve sites that can be delivered within the next five years, with a total capacity of approximately 1,000 homes. A second tranche of sites for approximately 500 homes has also been identified but the delivery of these is dependent on specific infrastructure constraints being overcome. All these sites are identified in Annex 1, giving their location and indicative dwelling capacity.
- 2.1.5 The benefits of identifying and releasing reserve sites is to enable the Council, as the Local Planning Authority, to retain control of and continue to manage development in the District. Indeed, the NPPF requires plans to include flexibility to adapt to changing circumstances. If such eventualities were to occur, it could lead to an undersupply of housing and accusations that the Core Strategy is out of date and no longer valid. Not only could this lead to additional speculative sites coming forward for development but also that such decisions are made by the planning appeals system as opposed to the Council's Planning Committee. Reserve housing sites can help prevent this from happening. Reserve sites would only be brought forward for development if the Council's monitoring was to show a shortfall in

housing supply that could not be met elsewhere, or other specific circumstances arose that required the provision of more housing. Reserve sites also provide certainty to communities as to where alternative or additional development will take place rather than having to react to speculative applications or appeals.

2.1.6 It is important to remember that the Core Strategy does not restrict additional housing in any or all circumstances, and there are a number of instances where proposals for additional homes will be policy compliant and therefore granted planning consent. In summary, these include:²

- Within the built-up area of the Main Town (i.e. Stratford-upon-Avon), a Main Rural Centre, or a Local Service Village in accordance with Policy CS.16
- On a Large Rural Brownfield Site in accordance with Policy AS.11
- In other settlements in accordance with Policy AS.10
- As a local needs scheme in accordance with Policy CS.15

2.1.7 In addition to the Core Strategy, further housing will also be delivered:

- Through the permitted development / prior approvals regime
- On Allocated sites in 'made' neighbourhood plans
- As Self-Build and Custom Build housing sites, including those allocated in the Site Allocations Plan (see Section 3)
- On specific proposals in the Site Allocations Plan (see Section 7)

2.1.8 These 'windfalls' and additional provision provide a useful source of additional homes and help ensure that the supply of homes is kept 'topped-up'. Such an approach is entirely consistent with the Core Strategy housing requirement of 14,600 homes which is a *minimum* figure.

2.1.9 Information on the supply of housing is published annually in the Council's Authority Monitoring Report available at www.stratford.gov.uk/amr. The data shows that since adoption of the Core Strategy, an average of 13% of the annual supply has come from small windfall sites.³ The AMR also sets out the Council's housing trajectory. As can be seen, there has been a positive step-change in housing delivery demonstrating that the Core Strategy is effectively delivering its objectives and ensuring that the development needs of the District are being met. The trajectory also shows that, as at 31st March 2021, about 16,000 homes are expected to be delivered across the District by 2031.

2.1.10 Importantly, this overprovision provides an additional and useful buffer that potentially defers the need to release reserve sites. This is because any homes provided over and above the figure of 14,600 are contributing to meeting housing needs not specifically envisaged within the Core Strategy, including the four purposes for reserve sites. Despite the 'overprovision' against the Core Strategy requirement, it is still considered prudent to proceed with identifying a further set of sites as a reserve which can be called upon if they are required or if circumstances (e.g. housing supply) were to change in the short-term. This will allow the Council to retain control of planning and development across the District.

Identification of Reserve Sites

2.1.11 Core Strategy Policy CS.15 identifies seven sustainable locations across the District, setting out the types of development that are appropriate and where development will take place:

- (A) Main Town
- (B) Main Rural Centres (MRC)
- (C) New Settlements

² See relevant policies in the adopted Core Strategy available at www.stratford.gov.uk/corestrategy for actual policy wording

³ Table 26, Authority Monitoring Report 2020/21

- (D) Local Service Villages (LSV) – 4 categories
- (E) Large Rural Brownfield Sites
- (F) All Other Settlements
- (G) Local Needs Schemes within and adjacent to settlements

- 2.1.12 This pattern of dispersal has formed the basis of the methodology for identifying reserve housing sites. However, there are a number of differences. Firstly, reserve sites would not be consistent with the location or type of development proposed under either (F) or (G). As such, reserve sites have not been identified in these locations or to meet such needs. Secondly, the Core Strategy is supportive of development on sites covered by (E) under Policy AS.11. Consequently, it would not be appropriate to identify any brownfield land as a reserve site given that the principle of its development is acceptable in any event.
- 2.1.13 In respect of (C), although the Inspector who examined the Core Strategy did not rule out the possibility of additional new settlements being identified as reserve sites, this possibility has been considered by the Council and rejected. This is because they could not be delivered in the short-term due to the scale of development involved, the infrastructure required and the long lead-in time before any dwellings could be provided. By their nature, reserve sites need to be available to respond relatively quickly to specific circumstances that arise. It will be for the South Warwickshire Local Plan process to determine the role and location of further new settlements.
- 2.1.14 Consequently, for the reasons set out above, the location of reserve sites is limited to locations (A), (B) and (D). The exceptions to this are two sites which are suitable because they are situated adjacent to existing substantial developments in the rural part of the District. In applying this overall approach, a number of principles have been applied, as set out in the following paragraphs.
- 2.1.15 Because a Green Belt Review was not undertaken when preparing the Core Strategy, and given that the Site Allocations Plan is subsidiary to the Core Strategy, it is not appropriate to consider releasing land in the Green Belt for housing development through it being identified as a reserve site. Indeed, for those Local Service Villages 'washed over' by the Green Belt, in order to identify a site, the entire village would also have to be removed from the Green Belt.
- 2.1.16 For this reason, and in accordance with the NPPF, it is appropriate and reasonable for reserve sites not to be identified within the Green Belt given that sufficient provision can be made on sites elsewhere in the District, particularly in order to cover the short-term period until the South Warwickshire Local Plan is adopted. It is for this reason that reserve sites have not been identified on the edges of Henley-in-Arden and Studley or at various Local Service Villages that lie within the Green Belt. Reserve sites identified at Alcester and Stratford-upon-Avon are outside the Green Belt. It should be noted that a Green Belt Review is to be undertaken to inform the preparation of the SWLP.
- 2.1.17 Policy CS.15 of the Core Strategy sets out the distribution of development across the District, promoting a pattern of balanced dispersal in settlements that are considered to be sustainable locations for development: i.e. Main Town, Main Rural Centres and four categories of Local Service Villages. This distribution forms the basis of the Council's approach to identifying reserve sites in the Site Allocations Plan. The Inspector who examined the Core Strategy anticipated that the distribution of reserve sites would follow a similar pattern.
- 2.1.18 The Council has considered various ways in which to identify reserve housing sites in the SAP. However, in light of the intention for it to focus on the short-term period until the SWLP is adopted, a revised approach has been applied in this version of the Plan. This is founded on three fundamental principles:

- (i) That the sites should be available and suitable as identified in the Strategic Housing Land Availability Assessment (SHLAA) and taking into account other technical evidence that has been produced.
- (ii) That the capacity of reserve sites to deliver up to 20% of the total housing requirement should be applied to individual settlements based on the indicative dwelling figures established in Core Strategy Policy CS.16. In a number of settlements, this figure has been exceeded even when applying the 20% allowance. For those settlements, the Council believes it would be inappropriate and contrary to the sustainable distribution of housing established in the Core Strategy to identify reserve sites, give the possibility that they might need to be released. To do so would mean there would be an imbalance in the scale of housing development in individual settlements that would be contrary to the findings of the Inspector who examined the Core Strategy who found the distribution to be a sound approach given the nature of the District. This approach applies to the reserve sites identified in both tranches in Annex 1. The assessment of dwelling provision by settlement based on this principle is provided in Annex 2. In relation to certain settlements a choice had to be made as to which sites should be identified. A comparative assessment of these sites is provided in a supporting document to this Plan.
- (iii) That the reserve sites identified should be capable of delivery within the next five years or so since they need to be available to respond to circumstances that may arise. There are a number of significant infrastructure capacity constraints that apply to various parts of the District, particularly in relation to the highway network, education and water treatment, which are not readily capable of being resolved. This situation is evident from various technical documents that have been published to accompany this Plan. Given the relatively modest scale of development associated with reserve sites it would not be realistic or viable for such constraints to be overcome through their development, at least in the short-term. The sites identified in the second tranche in Annex 1 may be capable of being delivered in the longer term, subject to significant infrastructure constraints that affect them being overcome.

2.1.19 In respect of the Local Service Villages, whilst on the one hand the Core Strategy Inspector concluded that the approximate figure for 2,000 homes for the plan period reasonable, the same Inspector also concluded that the LSVs were appropriate locations in which to identify reserve sites. As such, reserve site numbers have to be in addition to the figure of 2,000 homes for the LSVs set out in the Core Strategy. The suitability of the LSVs for development is addressed in the Inspector's conclusions at paragraphs 197-199, respectively:⁴

197. There has been some criticism of the level of housing proposed for LSVs, but in the context of a large rural District some level of housing in villages would be appropriate. The housing strategy in the adopted Local Plan, and its predecessors, appears to have been successful in directing new housing to the main towns. There is evidence before the examination that this pattern has continued to be quite marked since 2015. Amongst other things the growth in the number of households in the urban part of the District is said to be nearly ten times higher in percentage terms than in the rural area and this is said to have given rise to a disproportionate ageing demographic within the rural area. In the context of a District in which 45 % of the existing population lives outside the main towns, the level of housing that is proposed to be directed to the main villages would help to address these problems and sustain their long-term future. I have no

⁴ Core Strategy Inspector's Interim Conclusions 2015 available at www.stratford.gov.uk/corestrategy

reason to doubt the Council's claim that there are another 100 villages below category 4, which underlines that the housing is being directed to the largest, most sustainable, rural settlements.

198. Inevitably such an approach is subject to the complaint that this would lead to a less sustainable pattern of development, in terms of, among other things, transport patterns and access to retail facilities. However the LSV methodology has expressly taken account of the existence of public transport and village shops, as well as settlement size and whether there is a primary school, in categorising villages. It might have been better if the methodology had taken account of employment, but I am not convinced that the end result is unfit for purpose. In my view the list of villages, as proposed to be modified, is a reasonable basis on which to direct the 2,000 dwellings currently proposed, in order to achieve a sustainable outcome. This level of housing would help to sustain the existing services and facilities in these villages, including public transport, primary schools and shops. At a minimum it would maintain the vitality of rural communities and therefore comply with the policy in paragraph 55 of the Framework, which seeks to promote sustainable development in rural areas.

199. I acknowledge that the rationale for the current figure of 2,000 dwellings appears to be rather arbitrary. The Council's explanation is that the overall quantum has been derived using a bottom-up approach taking the approximate mid-point of the ranges deemed appropriate for each category of LSV. However the chosen ranges necessarily involve a value judgment and so it is hard to escape the view they were established in order to achieve the residual number of dwellings specified in the CS. Nevertheless, for the reasons discussed, I am not convinced that the end result is inappropriate.

2.1.20 Core Strategy Policy CS.15 also sets out on which sites additional housing development will be supported in principle. This includes sites located within the Built-up Area Boundaries (BUAB) of settlements – see Section 4. Because sites located within the BUABs can come forward in any event, it is not appropriate to identify reserve sites (which will only be brought forward if they are needed) inside these boundaries. As such, reserve sites are explicitly identified outside, but closely related to the defined BUAB for a settlement. In due course, the BUABs will be redrawn to include any reserve sites that have been released for development.



Find out more about the Core Strategy and Policies CS.15 and CS.16 @ www.stratford.gov.uk/corestrategy

2.1.21 The proposed reserve housing sites identified in this version of the Site Allocations Plan are listed in Annex 1. The boundaries for most of these sites are shown in Section 8 Policies Map, Part A. However, those reserve housing sites identified in 'made' NDPs that should be available for release if needed based on the approach set out in this Plan are listed in Policy SAP.2 and shown on the maps in Section 8 Policies Map, Part B.

2.1.22 The provisions for each site, apart from those identified in 'made' NDPs, are provided in a set of Site Proformas at the end of Policy SAP.5. These identify relevant development considerations that are specific to each site.

2.1.23 In respect of the Site Allocations Plan, the Council has applied indicative densities to reserve sites as follows:

- Main Town: 35 dwellings per hectare (net site area)
- Main Rural Centres, Large Rural Sites, Category 1 Local Service Villages and Category 2 Local Service Villages: 30 dwellings per hectare (net site area)
- Category 3 and Category 4 Local Service Villages: 25 dwellings per hectare (net site area)

2.1.24 The rationale for this approach is to ensure that development on those reserve sites that do come forward reflects the character of their locality. This approach is also consistent with the NPPF which seeks to make the most effective use of land by increasing densities in more sustainable settlements. The appropriate density for individual sites will be determined on a case-by-case basis through the planning application process, taking into the local character and context.

2.1.25 The selection of the reserve housing sites identified in Annex 1 has been based on various sources of evidence. This includes information in relation to infrastructure capacity, including highways, schools and water treatment works (see 1.7 above), and on specific technical issues, such as flood risk and heritage (see 1.8 above).



Find out more about the technical evidence underpinning the Site Allocations Plan @ www.stratford.gov.uk/sap22

2.1.26 A key technical study which has informed the site selection process is the Strategic Housing Land Availability Assessment (SHLAA) that assesses the deliverability of land parcels for potential housing development. The NPPF requires the Council to prepare and keep up-to-date a SHLAA to inform plan-making. Applying a standardised methodology and consistent approach, an extensive range of land parcels across the District have been assessed to test their availability, suitability (subject to appropriate mitigation measures being undertaken), and achievability (subject to the necessary technical works being carried out). A standard density of 30 dwellings per hectare has been applied to the net developable area to calculate the potential capacity of land parcels for the purposes of the SHLAA, although this has been adjusted when applied to reserve sites as explained above.



Find out more about the Strategic Housing Land Availability Assessment @ www.stratford.gov.uk/shlaa

2.1.27 It should be noted that a number of sites are identified in the SHLAA as being potentially deliverable, but they have not been identified as reserve housing sites in this Plan due to one or more of the following reasons:

- Because they are on the edge of a settlement that has already exceeded its dwelling requirement identified in Core Strategy Policy CS.16 plus an additional 20%, as explained in more detail above.
- Within the Green Belt – as explained above, the Core Strategy does not provide for the release of land from the Green Belt for residential purposes and a detailed Green Belt review has not been undertaken to inform and justify doing so.
- Within the Cotswolds National Landscape – the purpose of reserve sites is to meet a District-wide housing need if required, whereas housing development in this area should be restricted to meeting local housing needs.

- As a result of more detailed technical assessment, for example in relation to impact on heritage assets.
- Certain sites are already allocated or identified as reserve sites in made Neighbourhood Development Plans.
- Allocated specifically for Self-Build and Custom Build housing development in this Plan.

2.1.28 The Plan has also been subject to a Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) at various stages of its preparation.

2.2 Reserve Housing Sites in Neighbourhood Plans

Policy SAP.2

Reserve Housing Sites in Neighbourhood Plans

To ensure a consistent approach to the release of reserve sites across the District, the following reserve sites, as identified in the respective made NDPs, will be released in accordance with the mechanisms set out in the Site Allocations Plan. All specific aspects of each site will be brought forward in accordance with the relevant NDP and in the Site Proformas at the end of this section of the Plan.

- Clifford Chambers – East of Campden Road
- Ilmington – Mabel’s Farm, Back Street
- Tysoe – Herbert’s Farm, Saddledon Street
- Wellesbourne – East of Warwick Road
- Wellesbourne – East of Kineton Road
- Wellesbourne – North of Moreton Morrell Road

Only those sites that are consistent with the approach to identifying reserve sites set out in Policy SAP.3 are identified in this Policy.

These sites are included in Annex 1 Schedule of Proposed Reserve Housing Sites, giving their indicative dwelling capacity.

Explanation

2.2.1 The Council is supportive of those communities that have taken the initiative to identify reserve sites in their NDP to be released if the need arises. The Council has taken the approach of not identifying reserve sites in those settlements with a reserve site identified in its NDP. The Council has applied this approach to those NDPs that are ‘made’ or at a significantly advanced stage, i.e. where the Council has made a formal decision to submit the Plan for referendum. This is because it is only at this point that the content of the NDP is not liable to change.

2.2.2 Not surprisingly, there are very slight inconsistencies in the wording of the various reserve sites policies in NDPs. To ensure a consistent approach, and for the avoidance of doubt, Policy SAP.2 seeks to standardise the release mechanisms for Neighbourhood Plan reserve sites to ensure consistency with those reserve sites identified through the SAP itself.⁵

⁵ The reserve site identified as Area 2 in the made Wellesbourne & Walton NDP has been identified although it is acknowledged that the NDP states that it is to meet housing needs post 2030. Only part of the site is required based on the methodology that has been applied in the Site Allocations Plan.

- 2.2.3 The Council acknowledges that the Site Allocations Plan is only at Preferred Options stage and that there are NDPs currently being prepared which may identify reserve housing sites. It is expected that any such NDPs will have reached an advanced stage by the time the Site Allocations Plan is ready for submission. The Submission version of the Plan will be amended accordingly to reflect the changing status of these NDPs. However, at the current time, for consistency purposes, the Council has not taken into account these emerging NDPs.
- 2.2.4 The boundaries of each site are shown on the maps in Section 8 Policies Map, Part B.



Find out more about the relevant Neighbourhood Development Plans @ www.stratford.gov.uk/neighbourhoodplans

2.3 Releasing Reserve Housing Sites

Policy SAP.3

Releasing Reserve Housing Sites

To ensure that an appropriate number of additional homes are available if required to meet the purposes of reserve sites, particularly to cover the period up until the South Warwickshire Local Plan is adopted, the following mechanism will be applied.

A. To rectify an identified shortfall in housing delivery

Reserve sites will be released for this purpose when the Council calculates that either its 5 year supply falls below 5.5 years (applying the appropriate buffer), or its Housing Delivery Test trajectory shows that delivery is expected to fall below 100% in the following three years.

If a shortfall is identified due to either of the above circumstances, the Council will consider releasing certain reserve housing sites from the first tranche in Annex 1. The release of appropriate sites to meet this purpose will be dependent on the scale of any shortfall in supply.

To be released for this purpose, the site must be capable of meaningful delivery within 5 years of the site's release. In considering whether to release a site, the Council will assess whether it can make a realistic contribution to the 5 year supply, taking into account the site delivery information provided by the site promoters.

B. To respond to the growth in jobs by Jaguar Land Rover on land at Gaydon/Lighthorne Heath

The Council does not anticipate this purpose will take effect during the period before the South Warwickshire Local Plan is adopted.

If a shortfall is identified due to this purpose, the Council will consider releasing reserve housing sites from the second tranche in Annex 1.

C. To contribute to meeting a shortfall in housing arising from within the Coventry & Warwickshire Housing Market Area

The Council does not anticipate this purpose will take effect during the period before the South Warwickshire Local Plan is adopted.

If a shortfall is identified due to this purpose, the Council will consider releasing reserve housing sites from the second tranche in Annex 1.

D. To contribute to meeting a shortfall in housing arising from outside the Coventry & Warwickshire Housing Market Area

Reserve sites will be released for this purpose in accordance with Policy SAP.4.

Explanation

- 2.3.1 As stipulated in Policy CS.16D, and in accordance with the conclusions of the Inspector who examined the Core Strategy, reserve housing sites are to be identified to meet four specific and very different purposes. To date, only the purpose relating to the Greater Birmingham & Black Country Housing Market Area (GB&BC HMA) has been confirmed as taking effect.
- 2.3.2 As explained earlier in the Plan, it is now intended that its focus should be on the period until the South Warwickshire Local Plan is adopted, as that will establish the appropriate amount and location of future housing development in the longer term. As a consequence of this, it is clear that two of the purposes, ie. with respect to housing needs from within the Coventry & Warwickshire HMA and as a result of further expansion of Jaguar Land Rover's operations at Gaydon/Lighthorne Heath, are unlikely to apply during this shorter timescale.
- 2.3.3 As a result, the mechanism for releasing reserve housing sites set out in the previous Preferred Options version of the SAP published in October 2020 has been superseded. The focus in the short-term is now on maintaining a 5 year housing land supply in the District and to provide for an appropriate level of contribution to the housing needs of the Greater Birmingham & Black Country HMA.

Purpose A - Five Year Housing Land Supply

- 2.3.4 The Council is required to demonstrate that it can deliver the equivalent of 5 years' worth of housing on an ongoing basis. Based on a standard methodology the Council calculates its supply position as at 31st March each year with the calculation and result published during the course of the following summer.⁶ The calculation includes a 5% buffer to '*ensure choice and competition in the market for land*'.⁷ As at March 2021, Stratford-on-Avon District Council can demonstrate the equivalent of 8.42 years' worth of supply.
- 2.3.5 The 5 year supply is important because it is the test that ensures that the planning policies set out in the Core Strategy remain up-to-date. In circumstances where the Council cannot demonstrate 5 years supply, the NPPF presumption in favour of sustainable development applies and applications for housing should be approved.⁸
- 2.3.6 The Council will calculate its 5 year supply position and Housing Delivery Test Projection each year as at 31st March publishing the calculation no later than 30th September. Confirmation that this purpose has been triggered will be via a formal decision of The Cabinet, alongside or following publication of the calculation by the Council of its 5 year supply position and its Housing Delivery Test projection. The Council will confirm the ending of such arrangements via a formal decision of The Cabinet once it is satisfied that supply has been re-established.
- 2.3.7 It would be tempting to wait until supply falls below 5.0 years before seeking to remedy the failure through the granting of permissions for additional homes. However, such an approach would be reactive and could, because the failure of supply is current, lead to the Council being compelled to grant applications that are inconsistent with the objectives of the Core Strategy (e.g. not adequately mitigating climate change, of poor design, lacking in affordable housing). In short, Stratford-

⁶ Available at www.stratford.gov.uk/5yearsupply

⁷ NPPF paragraph 74 (July 2021)

⁸ Subject to the caveats set out in NPPF paragraph 11 (July 2021)

on-Avon District Council would be in a very weak position in respect of managing development across the District.

- 2.3.8 As such, the Council will release reserve sites when it calculates that its 5 year supply falls below 5.5 years. This approach is both pragmatic and sensible should supply take a downward trend. Such an approach would enable the Council to effectively remedy the housing supply issue without losing control of the decision-taking process.
- 2.3.9 To be released for this purpose, the site must be capable of meaningful delivery within 5 years of its release. This is defined as being able to reasonably deliver at least two full years' worth of homes within the 5 year period.
- 2.3.10 Since the Core Strategy was adopted, the Government has introduced the Housing Delivery Test (HDT) as an additional measure of housing delivery. It is a retrospective assessment calculated over the past 3 years with the results published by the Department of Levelling Up, Housing and Communities. The presumption in favour of sustainable development applies in circumstances where authorities can only demonstrate less than 75% of supply against annual targets. The latest situation published in January 2022 showed that Stratford-on-Avon District Council can demonstrate a measurement of 240%.
- 2.3.11 Core Strategy Policy CS.16 pre-dates the creation of the HDT, hence why there is no specific reference to it in that plan. However, the wording of the Policy is "to rectify any identified shortfall in housing delivery". Continuing to satisfy the HDT would have a beneficial impact on the 5 year housing land supply and so the Council considers it prudent to use both measures as triggers for the release of reserve sites.⁹ As part of its annual monitoring the Council will endeavour to publish a HDT trajectory to assist in maintaining supply.

Purpose B - Jaguar Land Rover expansion at Gaydon/Lighthorne Heath

- 2.3.12 An area of 100ha is identified in Core Strategy Proposal GLH for Jaguar Land Rover's expansion. This is in addition to JLR's established Gaydon site to the west of the B4100. Its size and relationship to the activities of JLR make it strategically important to the West Midlands region. It should be noted that this allocation is on top of the Core Strategy requirement for 35ha (net) of employment land to 2031.
- 2.3.13 The provision of employment uses on this site will generate additional jobs. The number of jobs will be determined by the scale and mix of employment uses and until an application is submitted, is not currently known.¹⁰ However, because in a free market economy, the relationship between jobs and homes is indirect, and given the substantial increase of housing across the District (based on a migration and economic derived housing requirement), further homes do not need to be provided simultaneously. Indeed, additional homes will only be required when the buildings begin to be occupied, and often this will be on a phased based.
- 2.3.14 Since the Core Strategy was adopted in July 2016, JLR has not indicated to the District Council how and when it intends to bring forward the land identified for its use as part of Proposal GLH. On that basis, there would appear to be no likelihood that any substantive implementation of this land will take place in the short-term, to the extent that additional housing should be provided in response to any significant increase in jobs. Consequently, the Council takes the view that the release of reserve housing sites to meet this purpose is unlikely to be required in the foreseeable future. It will be for the South Warwickshire Local Plan to consider how the expansion of JLR's activities will affect the need for homes in the longer term.

⁹ Such an approach would anticipate the proposed changes to the planning system published in August 2020.

¹⁰ Different employment uses (e.g. offices, light industrial, distribution) generate different numbers of jobs per sqm / hectare. These ratios are also changing in light of structural changes to the economy.

Purpose C - Unmet Housing Needs from within Coventry and Warwickshire

- 2.3.15 Put simply, a housing market area (HMA) is the geographic area to which the majority of its current residents would look to move house, based on previous patterns of migration. However, it is worth noting that the importance of HMAs has declined in the current version of the NPPF with its shift towards meeting local housing needs. Stratford-on-Avon District falls within two housing market areas (HMAs), namely Coventry & Warwickshire and Greater Birmingham & Black Country.
- 2.3.16 In respect of Coventry and Warwickshire, Stratford-on-Avon District Council works closely with its partner authorities (including Warwickshire County Council and the Coventry & Warwickshire Local Enterprise Partnership) in matters relating to plan-making. The Core Strategy was prepared on a joint evidence base including housing and employment requirements established through agreed memorandums of understanding signed by each of the local planning authorities.¹¹
- 2.3.17 Local Plans have now been found sound and adopted in all six Council areas and all of them are starting to deliver as expected. It should be noted that additional homes provided under this reserve purpose within Stratford-on-Avon District would be in response to an identified additional need (shortfall in housing) arising from the HMA and confirmation that it is appropriate to meet the need within Stratford-on-Avon.
- 2.3.18 The wording 'to contribute to' in Core Strategy Policy CS.16 is important because this purpose relates to sub-regional scale housing needs. It is not for Stratford-on-Avon District to accommodate any growth in full but to play its part to help ensure that the housing needs of the wider housing market area are met.
- 2.3.19 Based on the situation outlined above, there is no expectation that Stratford-on-Avon District will be identified as being expected to meet any additional housing need generated within this HMA that cannot be met by each of its constituent authorities in the short-term. Again, it will be for the South Warwickshire Local Plan, based on an up-to-date Housing and Economic Development Need Assessment (HEDNA), to consider how to meet any future housing needs, including that generated from across the wider Coventry and Warwickshire area.

Purpose D - Unmet Housing Needs from outside Coventry and Warwickshire

- 2.3.20 Stratford-on-Avon District is adjoined by a number of HMAs, namely, Cheltenham, Northampton, Oxford and Worcester. The linkages between the District and these HMAs are relatively weak but the Council does liaise with relevant neighbouring authorities as appropriate. To date, none of the relevant authorities has sought to request that Stratford-on-Avon District contributes to meeting their housing needs and ongoing dialogue has confirmed that any such future request before 2031 is unlikely.
- 2.3.21 It is accepted that for statistical purposes Stratford-on-Avon District falls within the Greater Birmingham & Black Country Housing Market Area (HMA), as well as within the Coventry & Warwickshire HMA, and, as such, homes built in the District can contribute towards the housing numbers for that HMA. However, given the size of the District and its limited connectivity to the conurbation, the relationship of the District to the HMA is relatively weak.¹² Those areas of the District that are more closely related to the HMA fall within the West Midlands Green Belt, and as a tier 2 plan, it is not appropriate for the SAP to review the Green Belt. This issue will be

¹¹ Available on the Joint Committee webpages hosted by Rugby Borough Council at https://www.rugby.gov.uk/info/20086/partnerships/265/coventry_warwickshire_and_hinckley_and_bosworth_joint_committee_for_economic_growth_and_prosperity

¹² The technical work prepared by GL Hearn and Wood plc for the 14 local authorities that comprise the Greater Birmingham and Black Country HMA confirms that the western part of the District relates more to this HMA than the eastern part. Available at www.stratford.gov.uk/strategicplanning.

properly considered through the South Warwickshire Local Plan currently in preparation that will supersede both the Core Strategy and SAP in due course.

- 2.3.22 In respect of Birmingham, it is acknowledged that a housing shortfall of 37,900 was confirmed through the adoption of the Birmingham City Plan in February 2018. The GB&BC HMA has a complex geography with 14 local planning authorities each at different stages of plan preparation. However, officers from these authorities have formed an officer group to co-ordinate work to resolve the issue of the housing shortfall, including co-ordinating the monitoring of housing delivery. The group jointly commissioned consultants to undertake a Strategic Growth Study to help to address the original shortfall.¹³
- 2.3.23 The authorities also published Position Statements in 2018 and 2020 setting out progress to remedying that shortfall.¹⁴ An updated position statement addendum has since been prepared as of December 2021.¹⁵ This confirms the shortfall across the housing market area as now being 6,302 homes to 2031.
- 2.3.24 The Council accepts that there is expected to be a significant shortfall arising from Birmingham post 2031. The Site Allocations Plan does not address that shortfall as it would not be appropriate to do so given that the Core Strategy only runs to 2031. It will be for the preparation of the South Warwickshire Local Plan, which will cover the period beyond 2031 to establish a new development strategy capable of sustainably accommodating additional development to assess and respond to Birmingham's housing needs for the longer term.
- 2.3.25 As with needs arising within Coventry and Warwickshire, the wording 'to contribute to' in Core Strategy Policy CS.16 is important because this purpose relates to sub-regional scale housing needs. It is not for Stratford-on-Avon District to accommodate any growth in full but to play its part to help ensure that the housing needs of the wider housing market are met.
- 2.3.26 Reserve sites will be released for this purpose in accordance with the above approach, and, if necessary, following the endorsement of a joint monitoring statement or statement of common ground prepared by Stratford-on-Avon District Council and its partner authorities showing that a shortfall of housing exists.
- 2.3.27 Confirmation of this approach, including the scale of any provision, will be through a formal decision of The Cabinet alongside or following endorsement of the joint monitoring position by Stratford-on-Avon District Council.

Procedure for assessing the release of reserve sites

- 2.3.28 It is acknowledged that there is some cross-over between the four purposes of reserve sites. For example, releasing homes to maintain a five-year housing land supply would simultaneously contribute to the needs of the Greater Birmingham & Black Country HMA. Having said that, it is only the five-year supply purpose that relates to *replacement* provision, ie. alternative sites to deliver the existing 14,600 Core Strategy housing requirement. Housing provided under the other three purposes identified in Policy CS.16 relate to *additional* homes that might need to be accommodated within the District, ie. over and above the 14,600. It should be noted that housing delivered for purposes B, C and D could only count towards supply (as measured against the Core Strategy housing requirement) if it was first *added* to that requirement. If this were to be done, the overall net effect would be zero.

¹³ This study did not specify or agree the quantum of dwellings that it is appropriate to distribute to individual local planning authorities. It forms part of the evidence base to inform decisions about where and how any shortfall should be accommodated. Any such locations are still subject to further testing through the plan-making process as appropriate.

¹⁴ Available at www.stratford.gov.uk/strategicplanning

¹⁵ Available at www.stratford.gov.uk/strategicplanning

2.3.29 Where reserve sites are justified for release, applications will be expected to come forward in accordance with Policy SAP.5. Where this is not the case, the Council may withhold the release of a particular site. The rationale for this approach is that reserve sites are there to meet a need that exists at the point of release and should therefore be capable of being delivered in the short-term. Sites that are deemed not to be deliverable will remain as reserve sites as the constraints to delivery may just require more time to be overcome. They will then be considered again for release, should a purpose remain to be met, in accordance with Policies SAP.1 and SAP.3.

2.3.30 The Council will, on at least an annual basis, require promoters of reserve sites to submit the Site Delivery Assessment using the form provided in Annex 3 to this Plan. Completed assessments will set out expected realistic delivery timescales, as well as a summary of discussions with the relevant infrastructure and statutory service providers, to ensure that the Council has the most accurate and up-to-date information in respect of site delivery in order to inform the release of reserve sites. In accordance with the NPPF, the Council will also take into account the house builder's delivery record in Stratford-on-Avon District.

2.4 Meeting the needs of Greater Birmingham & Black Country Housing Market Area

Policy SAP.4

Meeting the needs of Greater Birmingham & Black Country Housing Market Area

The following sites will be released to provide Stratford-on-Avon District's contribution to meeting the shortfall in dwelling provision in the Greater Birmingham & Black Country Housing Market Area:

- STR.A – North of Evesham Road, Stratford-upon-Avon
- STR.B – East of Shipston Road, Stratford-upon-Avon
- STR.C – South of Alcester Road, Stratford-upon-Avon
- MAPP.A – West of Birmingham Road, Mappleborough Green

The total capacity of these sites is approximately 380 homes in accordance with the first tranche of sites as identified in Annex 1.

The following additional site totalling 150 homes as identified in the second tranche of sites in Annex 1 will also be released if specific infrastructure constraints can be overcome by 2031:

- STR.D – East of Banbury Road, Stratford-upon-Avon

All planning applications for these sites will be required to meet the provisions of Policy SAP.5.

Explanation

2.4.1 As at December 2021, the housing shortfall in the Greater Birmingham & Black Country Housing Market Area (GB&BC HMA) that cannot be met within its boundaries is identified as being 6,302 homes up to 2031.¹⁶

¹⁶ Position Statement available at www.stratford.gov.uk/strategicplanning

- 2.4.2 Although the whole of Stratford-on-Avon District notionally falls within the GB&BC HMA, both the physical and functional relationship with it is much stronger in the north-western part of the District.
- 2.4.3 Having said that, the Green Belt designation extends from the northern and north-western boundaries of the District to Alcester and the northern edge of Stratford-upon-Avon. This reflects the national purposes of Green Belt to, inter alia, restrict the sprawl of large built-up areas, prevent neighbouring towns from merging into one another and preserve the setting and special character of historic towns.
- 2.4.4 The Council has not undertaken a Green Belt Review as part of the process of producing the SAP. This is because the Plan should be consistent with the 'parent' Core Strategy which itself does not provide for development in the Green Belt, except for that identified in Policy CS.10.
- 2.4.5 The strength of the functional relationship of the District with Birmingham is relatively weak with commuting flows of just 2.1% (based on the 2011 Census). Applying this ratio, the District should accommodate just 132 homes. However, that assumes that the other authorities are capable of meeting their share. The Council is aware that the Black Country authorities also have very limited capacity to accommodate additional growth.¹⁷ Stratford-on-Avon District Council is working with its partner authorities within the housing market area to remedy the identified shortfall. A signed Statement of Common Ground confirming this approach will be prepared to accompany the submission version of the Site Allocations Plan.
- 2.4.6 The existence of the shortfall as set out in the Position Statement confirms that the trigger for the release of reserve sites under Purpose D has been met. Taking a proactive approach, it is appropriate to release the reserve sites identified in this policy.
- 2.4.7 These sites are listed in Annex 1 and a Site Proforma for each one is provided at the end of this section of the Plan. The boundaries of these sites are shown on the relevant maps in Section 8 Policies Map, Part A.
- 2.4.8 The identification of sites in Policy SAP.4 reflects the sustainability of those locations in respect of meeting housing needs arising from the GB&BC HMA. These are housing needs that, if capable of being accommodated within Birmingham and the Black Country, would be provided there. Aside from being the largest and most sustainable settlement in the District, Stratford-upon-Avon town benefits from direct rail services to and from Birmingham and the Black Country. It is therefore an appropriate location for housing to meet the needs of the conurbation. The small site at Mappleborough Green is not within the Green Belt, is located on the edge of Redditch, and proposed to come forward alongside a housing allocation in the Redditch Borough Local Plan. It has a direct functional relationship with the conurbation and it is therefore appropriate to contribute to meeting the shortfall. Both Stratford-upon-Avon and Mappleborough Green are well-related to the source of the housing need in Birmingham.

¹⁷ Available land has already been allocated and identified in these Plans to meet existing needs and is in the process of coming forward for development. On that basis, it is reasonable to assume there is limited capacity in these local authority areas for further housing development.

2.5 Applications for Reserve Housing Site

Policy SAP.5

Applications for Reserve Housing Sites

Proposals for reserve housing sites must be brought forward in accordance with Parts A and B of this policy. Applications for reserve sites will not be supported in advance of confirmation of the need for that reserve site to be released, in accordance with Policies SAP.3 to SAP.4.

A. Delivery Timescales

A valid outline application or full application must have been submitted to Stratford-on-Avon District Council within 6 months or 12 months respectively of the date of confirmation by the Council of the need to release a reserve site. A valid reserved matters application must have been submitted within 12 months of the date of decision granting outline consent. The Council will also impose a condition on full and reserved matters permissions to require that the construction of dwellings starts on site within 6 months of the date of consent, unless there are justifiable reasons why that has not been possible.

Applications on reserve sites must be fully compliant with all relevant planning policies, including Neighbourhood Plans, taking into account relevant supplementary guidance. In particular, applications must provide for the full provision of affordable housing and preferred housing mix in accordance with Core Strategy Policies CS.18 and CS.19, respectively, or any relevant Neighbourhood Plan policies, unless evidence regarding viability has been submitted and verified to demonstrate that this is not achievable.

In the event that a reserve site is not progressed in accordance with the above timescales, the Council will consider whether an alternative, replacement site should be released.

B. Zero and Low Carbon Homes

Proposals for zero carbon development on Reserve Housing Sites are strongly supported. As a minimum, new dwellings on all such sites are required to achieve a 31% reduction in carbon emissions relative to the relevant Target Emission Rate (TER) set out in the Building Regulations 2013 (as amended) (Part L1A), or until national policy establishes a different approach or procedure.

This can be achieved through a range of measures such as the installation of carbon-saving technologies such as the use of low-carbon heating systems, renewable energy sources and better fabric standards.

Applicants will be required to submit a Sustainability Statement with their planning application outlining how the development proposal meets this low-carbon standard, or any replacement standard that is introduced by the government. This requirement should be achieved as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable.

Guidance on improving energy efficiency in buildings is available in Part V (Climate Change Adaptation and Mitigation) of the Development Requirements SPD.

C. Other Requirements

All applications submitted for a Reserve Housing Site will be required to:

- (a) Meet the provisions of all relevant policies in the Core Strategy and the National Planning Policy Framework that are applicable to the site.
- (b) Deliver infrastructure and services that are necessary in order for the site to be developed satisfactorily.

- (c) Satisfy the Site Development Considerations specified in the relevant Site Proforma included in this Plan, and other matters that ensure an acceptable form of development.
- (d) Promote a comprehensive scheme for the entire site identified in the Site Proforma. For sites shown with areas of cross-hatching, housing will be restricted to the cross-hatched area only and any proposal must also assist in delivering appropriate community and/or environmental uses on the remainder of the site.
- (e) Submit a design concept for the site that has been prepared in conjunction with the District Council and the local community.

Explanation

- 2.5.1 The fundamental purpose of a reserve site is to meet an identified housing need that is not being met elsewhere. The Council will publish a regular statement to establish whether the release of any reserve site is justified in accordance with the provisions of this Plan.
- 2.5.2 It is crucial that homes on a reserve site are built expeditiously. For that reason, the Council will require a valid outline application to be submitted within 6 months of the date of confirmation of the need to release a particular reserve site, or a full application to be submitted within 12 months of such confirmation.
- 2.5.3 The Planning Act allows development to come forward as a full application or as an outline application in the first place (which confirms the development principles of the scheme) followed by a reserved matters application (setting out the detail of the scheme). Reserved matters applications are typically required within 3 years of the decision of an outline consent but this period can be less in justifiable cases. To ensure that applications come forward quickly, the Council believes it is appropriate to require such applications to be submitted within 12 months of the grant of outline planning permission to ensure the timely implementation of a reserve site to meet a specific purpose.
- 2.5.4 The Council will also impose a condition to ensure that a material commencement starts on site within 6 months of the grant of a full or reserved matters consent. The Council acknowledges that these timescales are challenging, although they are not unachievable. In order to meet identified housing needs, homes should be built in a timely manner.
- 2.5.5 The Council will engage with the applicants of individual sites that have been released so that both parties are fully aware of the situation in order to ensure that the necessary progress is being made to achieve the timescales specified.
- 2.5.6 The NPPF recognises the role of the planning system in supporting the transition to a low carbon future by helping to shape places that contribute to reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. Achieving sustainable development means that plans should secure net gains within economic, social and environmental objectives (NPPF, paragraph 8). Environmental objectives include using natural resources prudently, minimising waste, mitigating and adapting to climate change and moving to a low carbon economy.
- 2.5.7 The Council is committed to tackling climate change, and in July 2019 it declared a 'Climate Emergency' as a pledge to take local action to contribute to national carbon neutral targets through the development of practices and policies, with the aim to being carbon neutral in the District by 2030. Core Strategy Policy CS.2 (Climate Change and Sustainable Construction) requires new development to include measures that mitigate and adapt to the impacts of climate change.

- 2.5.8 Under the 2008 Planning and Energy Act, local planning authorities are able to require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.
- 2.5.9 A government consultation in 2019 set out plans for a Future Homes Standard for new build homes so that they are future proofed with low carbon heating and increased levels of energy efficiency. The consultation included options to increase energy efficiency requirements as a meaningful and achievable stepping-stone to the Future Homes Standard in 2025. The government's preferred option as an interim standard is for a 31% reduction in carbon emissions, and in order to align with the government's intention the Council believes it is appropriate to set this standard in Policy SAP.5.
- 2.5.10 It is acknowledged that the Government is intending to introduce carbon emission reduction measures through the Building Regulations. Once that takes effect, the provisions of this policy will be superseded and not be applied. For now, however, in the circumstances the Council believes it is appropriate to require applicants to provide evidence on viability if they wish to contend this provision. A Whole Plan Viability Assessment will be produced to accompany the submission version of the Plan.
- 2.5.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required standard for the type and scale of development in question would either be not feasible or not viable. In such circumstances the Council may agree to lower energy efficiency standards being achieved, having regard to other merits of the scheme.
- 2.5.12 It is essential that any proposed scheme for a reserve housing site should achieve a high quality form of development that is appropriate for the site and the character of the surrounding area. For that reason, all applications should approach the overall site in a comprehensive manner in respect to both on-site and off-site requirements, including the provision of the necessary infrastructure. This will ensure consistency with national and local planning policies and ensure effective and appropriate delivery of development.
- 2.5.13 The Site Proformas below provide a wide range of site specific information and identify the expectations of each reserve housing site, including the net development area and an indicative dwelling capacity.
- 2.5.14 In advance of a planning application being submitted, preferably as part of the pre-application process with the District Council, the Council will expect a design concept to be produced by the promoter of the site, as stated in paragraph 5.2.15 in the Core Strategy. This will help to ensure that what is proposed meets the expectations of the Council and the community, in accordance with the provisions of the Site Proforma and other considerations.
- 2.5.15 Up-front engagement with the local community about the proposed form of development is recommended. This will accord with the District Council's Statement of Community Involvement and help to ensure that what is proposed meets the community's expectations as far as is reasonable.

2.6 Reserve Sites Proformas

A Proforma has been produced for each of the reserve housing sites identified in Annex 1.

The following points should be borne in mind in relation to their content:

- Site information provided is taken from the Strategic Housing Land Availability Assessment (SHLAA) 2021 Update.
- Net area excludes those parts of the site that are unsuitable for housing development as identified in the SHLAA.
- Dwelling capacity of each site is calculated from the net area by applying the densities specified in the explanation to Policy SAP.1.
- Site development considerations are based on the findings of the SHLAA and other sources of technical evidence.
- Timescale for delivery refers to the construction of dwellings not site preparation works.

The boundaries of each site are shown on the maps in Section 8 Policies Map, Parts A & B.

NB. For those reserve housing sites identified in made Neighbourhood Development Plans, the specific provisions of those Plans should also be taken into account.

FIRST TRANCHE

SITE REF: ALC.A	SHLAA REF: ALC.12	SITE NAME: South of Allimore Lane (west), Alcester
NET SITE AREA (HA) 2.0		DWELLING CAPACITY @ 30 DPH 60
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to northern part of the site as shown by cross-hatched area on the Alcester map in Section 8, Part A • Provide a vehicular access through committed housing development to north of Allimore Lane and preclude access along Allimore Lane • Provide access for walking and cycling along Allimore Lane • Produce a Transport Assessment to consider impact on local and strategic road network • Ensure development avoids flood risk area on southern part of the site • Undertake an archaeological evaluation of the site • Provide and convey an area of public open space on southern part of the site • Incorporate public footpath which crosses the site • Provide appropriate noise mitigation from Bypass along western boundary of the site • Retain existing trees and hedgerows on the site as far as possible <p>A Flood Risk Assessment incorporating a Sequential Test and Exception Test, together with a Flood Risk Management and Drainage Strategy, will be required to be submitted with any planning application for this site.</p>		

SITE REF: ALC.B	SHLAA REF: ALC.13	SITE NAME: South of Allimore Lane (east), Alcester
NET SITE AREA (HA) 1.0		DWELLING CAPACITY @ 30 DPH 30
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to western part of the site as shown by cross-hatched area on the Alcester map in Section 8, Part A • Provide a vehicular access from ALC.A and preclude access along Allimore Lane • Provide access for walking and cycling along Allimore Lane • Produce a Transport Assessment to consider impact on local and strategic road network • Ensure development avoids flood risk area on southern part of the site • Undertake an archaeological evaluation of the site • Provide and convey an area of public open space on southern part of the site • Incorporate public footpath which crosses the site • Retain existing trees and hedgerows on the site as far as possible <p>A Flood Risk Assessment incorporating a Sequential Test and Exception Test, together with a Flood Risk Management and Drainage Strategy, will be required to be submitted with any planning application for this site.</p>		

SITE REF: BID.A	SHLAA REF: 11A	SITE NAME: East of Jacksons Meadow, Bidford-on- Avon
NET SITE AREA (HA) 1.3		DWELLING CAPACITY @ 30 DPH 40
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to southern part of the site as shown by cross-hatched area on the Bidford-on-Avon map in Section 8, Part A • Undertake hydraulic modelling to assess impact on sewerage network • Provide a vehicular access through housing development to south of the site only • Produce a Transport Assessment to consider impact on local and strategic road network • Incorporate a network of public open spaces and green infrastructure in the development in conjunction with development to south of the site <p>A Flood Risk Assessment incorporating a Sequential Test and Exception Test, together with a Flood Risk Management and Drainage Strategy, will be required to be submitted with any planning application for this site.</p>		

SITE REF: BID.B	SHLAA REF: 11B	SITE NAME: Moorland Lodge, off Victoria Road
NET SITE AREA (HA) 0.2		DWELLING CAPACITY @ 30 DPH 6
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to western part of the site as shown by cross-hatched area on the Bidford-on-Avon map in Section 8, Part A • Provide access off Victoria Road or through housing development to west of the site • Ensure character and environs of Small Brook are protected 		

SITE REF: CLIF.A [also see Policy H1 in made Clifford Chambers & Milcote NDP]	SHLAA REF: CLIF.01	SITE NAME: East of Campden Road, Clifford Chambers
NET SITE AREA (HA) 1.0		DWELLING CAPACITY @ 25 DPH 25
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to southern part of the site as shown by cross-hatched area on the Clifford Chambers map in Section 8, Part • Restrict uses on northern part of the site to those of an agricultural or outdoor recreational nature • Create a hedgerow with intermittent trees along northern boundary of proposed development area • Provide a vehicular access from Stourfield Close only <p>A Flood Risk Assessment incorporating a Sequential Test and Exception Test, together with a Flood Risk Management and Drainage Strategy, will be required to be submitted with any planning application for this site.</p>		

SITE REF: HAMP.A	SHLAA REF: HAMP.03	SITE NAME: East of Snitterfield Street, Hampton Lucy
NET SITE AREA (HA) 0.5		DWELLING CAPACITY @ 25 DPH 13
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p>		

- Restrict housing to northern part of the site as shown by cross-hatched area on the Hampton Lucy map in Section 8, Part A
- Provide a vehicular access either off Snitterfield Street or Bridge Street
- Create an access for walking and cycling onto Bridge Street
- Provide and convey an area of public open space on southern part of the site
- Preserve character of Conservation Area and setting of listed building adjacent to eastern boundary of the site and incorporate appropriate mitigation measures
- Undertake an archaeological evaluation of the site
- Create hedgerow with intermittent trees along northern boundary of the site

SITE REF: ILM.A [also see site 1a in made Ilmington NDP]	SHLAA REF: ILM.10	SITE NAME: Mabel's Farm, Back Street, Ilmington
NET SITE AREA (HA) 0.3		DWELLING CAPACITY @ 25 DPH 8
SITE DEVELOPMENT CONSIDERATIONS		
<p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development scheme for the site:</p> <ul style="list-style-type: none"> • Preserve character of Conservation Area and setting of adjacent listed buildings and incorporate appropriate mitigation measures • Assess cumulative impact of vehicle movements in association with development of allocated site in NDP to the north • Create a woodland copse on northern part of the site 		

SITE REF: MAPP.A	SHLAA REF: MAPP.01B	SITE NAME: West of Birmingham Road, Mappleborough Green
NET SITE AREA (HA) 1.0		DWELLING CAPACITY @ 25 DPH 25
SITE DEVELOPMENT CONSIDERATIONS		
<p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Promote a comprehensive form of development in conjunction with adjacent land in Redditch Borough • Restrict housing to south-western part of the site as shown by cross-hatched area on the Mappleborough Green map in Section 8, Part A • Provide a vehicular access onto Far Moor Lane, Redditch only • Identify appropriate means of managing surface water within and off site • Take a comprehensive approach to habitat enhancement and management across the site as whole • Take a comprehensive approach to the retention and suitable replacement of trees and woodland across the site as whole 		

- Replace existing plantation with appropriate native deciduous trees
- Create extensive landscaping belt on eastern part of the site alongside A435
- Provide and convey an area of public open space with landscaping on northern part of the site

SITE REF: MM.A	SHLAA REF: MM.03	SITE NAME: North of Brook Lane, Moreton Morrell
NET SITE AREA (HA) 0.2		DWELLING CAPACITY @ 25 DPH 5

SITE DEVELOPMENT CONSIDERATIONS

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Restrict housing to south-western part of the site as shown by cross-hatched area on the Moreton Morrell map in Section 8, Part A
- Provide a single point of access off Brook Lane
- Provide visibility splays of 70m to the west and 160m to the east of the vehicular access point
- Extend 30mph speed limit along Brook Lane up to the access point
- Widen Brook Lane up to access point to enable two-way vehicle movements
- Ensure a separation distance of at least 15m between access to this site and access to site opposite (MM.B)
- Extend footway along northern side of Brook Lane up to access into the site
- Produce a Flood Risk Assessment and Drainage Strategy for the site
- Undertake hydraulic modelling to establish impact on flood risk from watercourse
- Create a hedgerow with intermittent trees along northern boundary of the development area
- Create a woodland copse on eastern part of the site

SITE REF: MM.B	SHLAA REF: MM.04	SITE NAME: South of Brook Lane, Moreton Morrell
NET SITE AREA (HA) 0.3		DWELLING CAPACITY @ 25 DPH 8

SITE DEVELOPMENT CONSIDERATIONS

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Restrict housing to north-western part of the site as shown by cross-hatched area on the Moreton Morrell map in Section 8, Part A
- Provide a single point of access off Brook Lane
- Provide visibility splays of 70m to the west and 160m to the east of the vehicular access point
- Extend 30mph speed limit along Brook Lane up to the access point
- Widen Brook Lane up to access point to enable two-way vehicle movements
- Ensure a separation distance of at least 15m between access to this site and access to site opposite (MM.A)
- Extend footway along northern side of Brook Lane up to access into the site

- Produce a Flood Risk Assessment and Drainage Strategy for the site
- Undertake hydraulic modelling to establish impact on flood risk from watercourse
- Create a hedgerow with intermittent trees along southern boundary of the development area
- Create a woodland copse on eastern part of the site

SITE REF: MM.C	SHLAA REF: MM.10	SITE NAME: South of John Davis Drive, Moreton Morrell
NET SITE AREA (HA) 0.8		DWELLING CAPACITY @ 25 DPH 20

SITE DEVELOPMENT CONSIDERATIONS

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Restrict housing to eastern part of the site as shown by cross-hatched area on the Moreton Morrell map in Section 8, Part A
- Extend footway along southern side of John Taylor Way up to access into the site
- Create a hedgerow with intermittent trees along northern boundary of the site
- Create a woodland copse on western part of the site

SITE REF: NAP.A	SHLAA REF: NAP.03	SITE NAME: East of Butt Hill, Napton-on-the-Hill
NET SITE AREA (HA) 0.2		DWELLING CAPACITY @ 30 DPH 6

SITE DEVELOPMENT CONSIDERATIONS

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Preserve setting of listed building to south of the site and incorporate appropriate mitigation measures
- Undertake an archaeological evaluation of the site
- Provide a vehicular access at least 30m away from the Butt Hill/Hillside junction
- Provide visibility splays of 43m in each direction when measured 2.4m back from edge of the carriageway
- Provide an uncontrolled pedestrian crossing from vehicular access to existing footway on opposite side of the carriageway
- Create a hedgerow with intermittent trees along north-eastern boundary of the site
- Incorporate public footpath which crosses the site
- Assess impact of and on adjacent farm to south of the site

SITE REF: PILL.A	SHLAA REF: PILL.13	SITE NAME: East of Kineton Road, Pillerton Priors
NET SITE AREA (HA) 0.5		DWELLING CAPACITY @ 25 DPH 13
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to western part of the site as shown by cross-hatched area on the Pillerton Priors map in Section 8, Part A • Provide a single point of access onto Kineton Road • Provide visibility splays that are sufficient in each direction at the access dependent on the results of a speed survey • Extend footway along eastern side of Kineton Road up to access into the site • Assess and manage impact of flood risk downstream to Pillerton Hersey • Create a hedgerow with intermittent trees along eastern boundary of the development area 		

SITE REF: PM.A	SHLAA REF: PM.07	SITE NAME: South of Byfield Road, Priors Marston
NET SITE AREA (HA) 0.4		DWELLING CAPACITY @ 25 DPH 10
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to north-western part of the site as shown by cross-hatched area on the Priors Marston map in Section 8, Part A • Preserve character of Conservation Area and setting of listed buildings to north of the site and incorporate appropriate mitigation measures • Undertake an archaeological evaluation of the site • Provide visibility splays of 43m in each direction when measured 2.4m back from edge of the carriageway • Extend footway along Byfield Road up to access into the site • Create a hedgerow with intermittent trees along northern boundary of the development area • Ensure development takes into account impact of adjacent playing field and does not prejudice its use • Assess the scope to extend sports facilities on eastern part of the site 		

SITE REF: QUIN.A	SHLAA REF: QUIN.08	SITE NAME: East of Goose Lane, Quinton
NET SITE AREA (HA) 1.0		DWELLING CAPACITY @ 30 DPH 30
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Assess and manage the impact of surface water flood risk and drainage • Extend footway on eastern side of Goose Lane up to access into the site • Reinforce hedgerow along eastern and southern boundaries of the site along with intermittent trees • Assess impact of development on setting of Meon Hill Scheduled Monument to south of the site <p>A Flood Risk Assessment incorporating a Flood Risk Management and Drainage Strategy will be required to be submitted with any planning application for this site.</p>		

SITE REF: SOU.A	SHLAA REF: SOU.15	SITE NAME: West of Banbury Road, Southam
NET SITE AREA (HA) 2.5		DWELLING CAPACITY @ 30 DPH 75
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to northern part of the site as shown by cross-hatched area on the Southam map in Section 8, Part A • Provide replacement playing fields on southern part of the site equivalent or greater in quantity and quality than those that would be lost • Provide a right turn junction on Banbury Road into the site • Undertake an archaeological evaluation of the site • Assess and manage the impact of surface water flood risk and drainage • Incorporate public footpath which crosses the site and provide linkages into pedestrian/cycle routes through housing development to the north • Take into account impact of High Speed Two railway <p>A Flood Risk Assessment incorporating a Flood Risk Management and Drainage Strategy will be required to be submitted with any planning application for this site.</p>		

SITE REF: SOU.B	SHLAA REF: SOU.4	SITE NAME: East of Banbury Road, Southam
NET SITE AREA (HA) 4.0		DWELLING CAPACITY @ 30 DPH 120
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to north-western part of the site as shown by cross-hatched area on the Southam map in Section 8, Part A • Provide a primary access from roundabout at southern end of the Bypass and an emergency access off Banbury Road • Undertake an archaeological evaluation of the site • Assess and manage the impact of surface water flood risk and drainage • Provide a network of public open spaces throughout the site • Retain and reinforce hedgerows along eastern boundary of the site along with intermittent trees • Incorporate public footpath which runs through northern part of the site 		

SITE REF: STR.A	SHLAA REF: STR.16	SITE NAME: North of Evesham Road, Stratford-upon-Avon
NET SITE AREA (HA) 2.5		DWELLING CAPACITY @ 35 DPH 88
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to northern part of the site as shown by cross-hatched area on the Stratford-upon-Avon map in Section 8, Part A • Provide and convey an area of public open space on western part of the site • Produce a Transport Assessment to determine the impact of development on the highway network in Stratford-upon-Avon • Undertake an archaeological evaluation of the site • Retain and reinforce hedgerows around outer boundaries of the site along with intermittent trees • Incorporate public footpath which runs along western boundary of the site 		

SITE REF: STR.B	SHLAA REF: STR.14	SITE NAME: East of Shipston Road, Stratford-upon-Avon
NET SITE AREA (HA) 6.0		DWELLING CAPACITY @ 35 DPH 210
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to south-eastern part of the site as shown by cross-hatched area on the Stratford-upon-Avon map in Section 8, Part A • Facilitate delivery of business development on north-western part of the site • Produce a Transport Assessment to determine the impact of development on the highway network in Stratford-upon-Avon • Provide a roundabout access on Shipston Road and an additional emergency access • Retain and reinforce hedgerows within and around outer boundaries of the site along with intermittent trees • Provide walking and cycling links to public open space to north of the site <p>The disposition of uses on the site can be reconsidered through a comprehensive masterplanning exercise at the planning application stage.</p>		

SITE REF: STR.C	SHLAA REF: STR.18	SITE NAME: South of Alcester Road, Stratford-upon-Avon
NET SITE AREA (HA) 1.6		DWELLING CAPACITY @ 35 DPH 56
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to northern part of the site as shown by cross-hatched area on the Stratford-upon-Avon map in Section 8, Part A • Preserve character of Conservation Area to west of the site and incorporate appropriate mitigation measures • Undertake an archaeological evaluation of the site • Restrict uses on southern part of the site to those of an agricultural or outdoor recreational nature • Produce a Transport Statement to assess the impact of additional vehicle flows on surrounding highway network • Undertake a Stage 1 Road Safety Audit in respect of proposed access • Create an extension from the site to the existing pedestrian/cycle shared route along Alcester Road 		

SITE REF: TIDD.A	SHLAA REF: TIDD.11	SITE NAME: South of Sid Courtney Road, Tiddington
NET SITE AREA (HA) 0.8		DWELLING CAPACITY @ 30 DPH 24
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Provide a vehicular access off Main Street through Sid Courtney Road only • Replace playing field on adjacent land to a comparable size and specification in advance of existing facility being lost • Produce a Flood Risk Management and Drainage Strategy for the site 		

SITE REF: TRED.A	SHLAA REF: TRED.04	SITE NAME: South of Blackwell Road, Tredington
NET SITE AREA (HA) 0.5		DWELLING CAPACITY @ 25 DPH 13
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Undertake a Stage 1 Road Safety Audit to assess junction of Blackwell Road and Shipston Road • Provide a footway connection to the bus stop on Blackwell Road • Preserve character of Conservation Area to east of the site and incorporate appropriate mitigation measures • Undertake an archaeological evaluation of the site • Create hedgerows with intermittent trees along outer boundaries of the site • Produce a Flood Risk Management and Drainage Strategy for the site 		

SITE REF: TYS.A [also see Housing Policy 3 in made Tysoe NDP]	SHLAA REF: TYS.16	SITE NAME: Herbert's Farm, Saddledon Street, Tysoe
NET SITE AREA (HA) 0.5		DWELLING CAPACITY @ 30 DPH 15
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Assess and mitigate impact of development on heritage assets adjacent to the site 		

- Preserve character of Conservation Area and listed buildings within and adjacent to the site and incorporate appropriate mitigation measures
- Undertake an archaeological evaluation of the site
- Retain and re-use traditional farm buildings as far as possible
- Retain and improve the existing access off Saddledon Street to the satisfaction of the County Highway Authority
- Produce a Flood Risk Management and Drainage Strategy for the site
- Identify a suitable site for relocating existing farm complex if required
- Undertake comprehensive assessment of site for potential contamination

SITE REF: WELL.A [also see Policy WW7 in made Wellesbourne & Walton NDP]	SHLAA REF: WELL.01	SITE NAME: East of Warwick Road, Wellesbourne
NET SITE AREA (HA) 0.8	DWELLING CAPACITY @ 30 DPH 25	
SITE DEVELOPMENT CONSIDERATIONS		
<p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to southern part of the site as shown by cross-hatched area on the Wellesbourne map in Section 8, Part A • Provide and convey community open space on remaining parts of the site • Provide a link to existing open space and public footpath to east of the site • Retain and bolster perimeter hedgerows and trees 		

SITE REF: LRS.A	SHLAA REF: LSL.06B	SITE NAME: Adjacent former Long Marston Depot, west of Campden Road [Quinton Parish]
NET SITE AREA (HA) 3.0	DWELLING CAPACITY @ 30 DPH 90	
SITE DEVELOPMENT CONSIDERATIONS		
<p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Provide a vehicular access off Station Road and improve junction with Campden Road to the satisfaction of the County Highway Authority • Produce a Transport Assessment to determine the impact of development on the highway network in Stratford-upon-Avon • Provide a footway along Station Road to its junction with Campden Road • Provide walking and cycling access into development to south of the site • Undertake an archaeological evaluation of the site • Take into account impact of adjacent playing fields in layout and design of the development 		

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SITE REF: STR.D	SHLAA REF: STR.11	SITE NAME: East of Banbury Road, Stratford-upon-Avon
NET SITE AREA (HA) 4.3		DWELLING CAPACITY @ 35 DPH 150
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Restrict housing to south-western part of the site as shown by cross-hatched area on the Stratford-upon-Avon map in Section 8, Part A • Avoid development within the safeguarded zone of high pressure gas pipeline that crosses the site • Incorporate extensive landscaping within and around the edges of the site • Provide a network of public open spaces throughout the site • Assess impact of additional traffic movements on operation of the highway network within Stratford-upon-Avon and the scope for mitigation 		

SITE REF: WELL.B [also see Policy WW7 in made Wellesbourne & Walton NDP]	SHLAA REF: WELL.03	SITE NAME: East of Kineton Road, Wellesbourne
NET SITE AREA (HA) 2.2		DWELLING CAPACITY @ 30 DPH 67
<p>SITE DEVELOPMENT CONSIDERATIONS</p> <p>The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:</p> <ul style="list-style-type: none"> • Consider scope for retaining some of the existing allotments on the site • Relocate remainder of existing allotments to a suitable site of comparable size and specification in the village • Retain and bolster hedgerows and trees around outer edges of the site 		

SITE REF: WELL.C [also see Policy WW7 in made Wellesbourne & Walton NDP]	SHLAA REF: WELL.04	SITE NAME: North of Moreton Morrell Road, Wellesbourne
NET SITE AREA (HA) 2.5		DWELLING CAPACITY @ 30 DPH 75
<p>SITE DEVELOPMENT CONSIDERATIONS</p>		

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Restrict housing to southern part of the site as shown by cross-hatched area on the Wellesbourne map in Section 8, Part A
- Manage the impact of surface water drainage effectively
- Provide vehicular access off Moreton Morrell Road and improve junction with Kineton Road to satisfaction of the County Highway Authority
- Incorporate public right of way that crosses proposed development area within a public open space corridor
- Upgrade existing pedestrian/cycle link to Kineton Road
- Create extensive landscaping belt along outer boundary of proposed development area

SITE REF: LRS.B	SHLAA REF: LSL.04B	SITE NAME: North of former Harbury Cement Works, east of Station Road [part Harbury Parish, part Bishop's Itchington Parish
NET SITE AREA (HA) 7.0		DWELLING CAPACITY @ 30 DPH 210

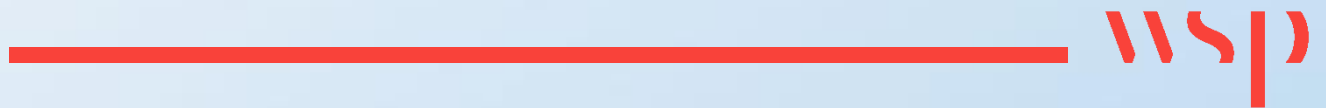
SITE DEVELOPMENT CONSIDERATIONS

The provisions of all relevant policies in the Core Strategy, Site Allocations Plan and associated planning guidance will need to be satisfied. The following specific matters should be incorporated into any development proposal for the site:

- Produce a Transport Assessment to determine the impact of development on various junction on the highway network
- Identify suitable and achievable means of providing access to Bishop's Itchington by means other than the car
- Provide internal pedestrian/cycle link to housing development to south of the site
- Incorporate extensive landscaping within and around the edges of the site including alongside the railway line

Appendix C

STRATFORD-ON-AVON LOCAL PLAN INSPECTOR'S REPORT





The Planning Inspectorate

Report to Stratford-on-Avon District Council

by Peter Drew BSc (Hons), Dip TP (Dist) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 20 June 2016

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE STRATFORD-ON-AVON

CORE STRATEGY

Document submitted for examination on 30 September 2014

Hearings held between 6 and 29 January 2015 and 12 and 21 January 2016

Accompanied site inspections made on 2 and 3 February 2015 and 21 January 2016

File Ref: 13720/429/2

Dealing with unmet housing needs from outside the District

57. There is a marked difference of opinion between i) the Council and other LPAs; and ii) the development industry, as to how this should be dealt with. In short the Council and its partner authorities argue that anything above the basic demographic need is 'surplus' to the District's requirements and available to meet the unmet needs of others, i.e. Birmingham and Coventry. The Council argues that across the Country as a whole all that is required is a level of housing that meets the demographic need and hence any additional dwellings to meet economic needs are effectively meeting the unmet needs of others. Hence anything above the basic demographic need [28] would contribute towards meeting those unmet needs, which include migrants to the wider HMAs who would otherwise live in the cities and commute into the District. Pursuant to this rationale there is a Memorandum of Understanding [MoU] between the Councils of Stratford, Birmingham, Solihull, Redditch and Bromsgrove that records Stratford will take 165 dpa of Birmingham's need [3,300 homes] on that basis¹⁰³. There is a draft MoU with all the Warwickshire LPAs in which Stratford says it will take just over 100 dpa from Coventry¹⁰⁴.
58. At the other end of the spectrum, representatives of the development industry submit that the OAN meets the needs of the District and that the unmet needs of others should be in addition to that assessment. Discussion at the resumed Hearing sought to explore whether there might be any middle ground, given the acknowledgement by one participant that: "*there is a logic to the Council's proposition, as the purpose of the uplift to align with economic growth is to provide homes for additional workers to move into the District who may well come from elsewhere in the HMA*"¹⁰⁵. There was no agreement at the Hearing.
59. Echoing the point made by PAS¹⁰⁶, there appears to be a lack of guidance as to how to deal with this issue, which is only beginning to crystallise in the West Midlands as a result of emerging plans reaching a more advanced stage. In particular Birmingham's unmet need is now quantified at 37,900 dwellings¹⁰⁷ following issue of the Inspector's report into the examination of that Plan. The only independent source of advice to which reference has been made is the updated PAS advice. Figure 4.1 thereof '*Assessing needs and setting targets*' comprises a flow diagram in which '*Cross-boundary unmet need*' is identified as a policy and supply factor that needs to be taken into account after the OAN has been quantified. Its stated rationale is: "*Cross-boundary imported need belongs below the line, for two main reasons. One reason for this is that unmet need in neighbouring authorities results from a policy change in neighbouring authorities: if those authorities supply less development land than they did in the past demand in the subject authority will rise above past trends, resulting in cross-boundary unmet need. Another reason is that how much of that need the subject authority should accommodate depends partly on its own constraints, including policy constraints*"¹⁰⁸.
60. In considering the spectrum, with the Council at one end and the development

¹⁰³ Document Ref. CD.12.

¹⁰⁴ Document Ref. ED.13.10a.

¹⁰⁵ Source of quote: Matter A Hearing Statement HS-14, December 2015.

¹⁰⁶ Paragraph 4.4, PAS, Ibid, HD.77.

¹⁰⁷ Paragraph 2.1, Document Ref. CD.12.

¹⁰⁸ Source of quote: third bullet-point, paragraph 4.5, PAS, Ibid, HD.77.

industry at the other, the PAS rationale suggests that the starting point must be that any unmet needs should be in addition to the assessment of the OAN. The economic led projection, whilst well above the basic demographic need, is required to meet the level of jobs being created and so meets the needs of the District. Nevertheless it is reasonable to say a: "*very modest*"¹⁰⁹ component of the OAN would contribute to the unmet needs of others. If it were otherwise there would be no purpose in an assessment being conducted at the HMA level: the District could simply focus on meeting its own needs. However the demand for housing transcends administrative boundaries for a number of reasons, such as those identified in the Guidance¹¹⁰. To give an example, a person who works in Birmingham might choose to live in Stratford because of family, cultural or environmental reasons. The housing need strictly arises in Birmingham but is met in Stratford and the census and travel to work data can estimate the scale of that functional relationship. Since a proportion of the existing housing stock is meeting the needs of others this could be used as a proxy for the proportion of the new stock that would be similarly used.

61. The Council says that any soundly based method for allocating unmet need should take account of the strength of the functional relationship between potential recipient LPAs and the '*deficit areas*'; I agree. To take an extreme example there is no point trying to meet the unmet needs of Birmingham in Glasgow because the socio-economic links would be lost. A co-ordinated approach under the DtC needs to agree the precise parameters for any relationship but, as the PAS guidance infers, this needs to take account of policy and practical constraints. For example some Greater Birmingham authorities might not be able to fulfil their share of the unmet need arising from an approach that simply considered the functional relationship, whether because they are substantially built-up, and hence have the same capacity constraint as Birmingham, or for policy reasons, such as Green Belt.
62. On the evidence before this examination it would appear that a comprehensive approach has yet to be agreed in the Birmingham HMA. The MoU says: "*As at the date of this statement the necessary technical work required to reach a collective agreement on the way forward is being progressed but is not complete*"¹¹¹. Accordingly there appears to be some way to go before the relevant proportion of Birmingham's unmet need can be quantified for Stratford. A holistic response is required by the DtC rather than chipping away at the total. The MoU has identified a figure but this is based on an incorrect assumption that everything over and above the demographic need is '*surplus*' and available to meet the needs of others. Given that misconception it would not be appropriate to hold the Council to the figure in the MoU. Moreover it is unclear whether the Council has agreed with other members of the CW HMA¹¹² how to address the Birmingham HMA shortfall because, as noted elsewhere [57], it is not signed by other members of the CW HMA. It is material that Fig 4.1 of the PAS advice is pitched at the HMA level and hence any: "*Cross-boundary unmet need*" feeds in at that level, not to each District, even if only certain Warwickshire Districts are within both HMAs.

¹⁰⁹ Source of quote: Matter A Hearing Statement HS-14, December 2015.

¹¹⁰ Paragraph ID 2a-012-20140306.

¹¹¹ Source of quote: paragraph 2.3, Document Ref. CD.12, dated December 2015.

¹¹² As per Policy CS.xx and its reasoned justification.

63. The position in Coventry is the opposite in the sense that the mechanism for distribution within the HMA appears to have a large measure of agreement and the basis for the split, which under the DtC is ultimately a matter for the Councils concerned, appears to be founded on sound principles¹¹³. However, whilst Table 53 of the SHMA Update¹¹⁴ identifies that roughly half of the HMA OAN is in Coventry, this figure has yet to be tested at examination. Moreover there might be policy or other constraints that restrict the capacity of the City to accommodate its housing need within its administrative boundary more severely than is currently envisaged. In short, whilst the mechanism is broadly agreed the precise scale of Coventry's unmet need that Stratford might have to accommodate is not known at the present time.
64. In light of the above it is not possible for me to identify what PAS, in Figure 4.1, describe as the housing provision target because the quantum of unmet needs arising from elsewhere is not precisely known at present. At the CW HMA level there is a good evidence base but that 'target' will be refined over time as a result of future examinations particularly because, as envisaged in Figure 4.1, a proportion of the unmet needs of Birmingham will have to be added to that total. However, applying the pragmatic approach that the Government seeks, this is not a reason to find the Plan unsound because it contains mechanisms to address the unmet need at the point that it is known. Firstly the Council has planned for a level of housing supply above the housing requirement, which is examined in Issue 5. Second there is a proposed Plan review policy and third is the reserve sites policy, which are examined in turn.
65. Policy CS.16D commits the Council to bringing forward a review of the Plan, in accordance with Policy 'CS.xx', if it is clear that the level of unmet need is beyond that which can be addressed by other mechanisms. Whilst focussed at the CW HMA part b. of Policy 'CS.xx' envisages other evidence of housing need arising from outside of the HMA, which is reinforced by the [unnumbered] last paragraph of the reasoned justification¹¹⁵. It is therefore a comprehensive approach which, following the PAS advice, is correctly focussed at the HMA level and so I reject the view that it would be ineffective. It is, however, an approach of last resort. The fact is that the CS will have taken some 9 years to get to the point at which it might be adopted. Whilst a review might be quicker, getting a strategic plan adopted is slow and expensive. So whilst I recommend Policy 'CS.xx' and the reasoned justification as a MM [MM35] to ensure that the Plan is positively prepared, in line with paragraph 182, it is a policy response of last resort because it is not the optimum mechanism to meet the identified level of unmet need at the point at which it is quantified.
66. In the May 2016 consultation responses a number of parties did however flag that the range in the first sentence of the reasoned justification is out-of-date and should be amended to align with the latest agreed position in the HMA¹¹⁶. Because the policy arose from the Hearings in January 2015 it had not been revisited and hence this had been overlooked. I recommend it be updated and whilst the Council has referred to an absolute figure of 4,277 given that the Memorandum is a draft and there is reference in the report to a higher figure

¹¹³ See Document Ref. ED.13.10 and ED.13.10a.

¹¹⁴ Document Ref. ED.14.3.2.

¹¹⁵ The last unnumbered paragraph on page 99 of Document Ref. ED.11.2a.

¹¹⁶ See ED.14.3.2 and ED.13.10a, including paragraph 1 of the draft Memorandum.

this should contain the caveat: "*at least*". This aligns it with the terminology of Policy CS.16 whilst also not excluding the higher figure in the report.

67. Policy CS.16D also commits the Council to allocate reserve sites in the SAP to fulfil 4 roles: i) to meet a shortfall in housing supply; ii) to meet the needs of JLR if the 100 ha site comes forward; iii) to meet the needs of the CW HMA; and, iv) to meet the needs of the Birmingham HMA. The Council has confirmed that it seeks to retain its figure of 10 % which, expressed as a proportion of the new housing requirement, would be 1,460 dwellings. The issue is whether 10 % is adequate, on the basis of existing information, to play all these roles?
68. The Council has sought to quantify its share of the unmet need from Coventry and Birmingham. It says, based on the current approach, the Council: "*would be expected to take 5.9 % of Coventry's unmet need of 890 dpa, or 53 dpa, and 2.1 % of Birmingham's unmet need of 1,895 dpa, or 40 dpa*"¹¹⁷. Over the 20-year life of the Plan this equals 1,860 dwellings¹¹⁸. On the basis of the Council's own calculation it is therefore evident that a 10 % reserve would be inadequate to meet the obligations that might arise from iii) and iv). Crucially this is without building in a reserve to meet: i) any shortfall in housing supply due to unforeseen circumstances; and, ii) the potentially very significant implications of bringing forward the 100 ha JLR allocation. Acknowledging that a very modest component¹¹⁹ of the OAN might contribute towards the unmet needs of others, there can be no question that it is necessary to increase the scale of the reserve to 20 % to provide a positive and effective mechanism. Ultimately there would be no jeopardy from adopting this approach. If reserve sites are not needed to fulfil these roles they do not need to come forward, but they would be available to provide a flexible response to any identified need.
69. In this context the issue is whether it is appropriate for 2,920 dwellings to be identified in this manner. The SAP was always envisaged to be a subsidiary Plan to the CS that would take a lead from it in terms of the spatial strategy. The Options Assessment¹²⁰ is evidence that the Council is not short of options to make up this scale of reserve, even without considering non-strategic scale sites. I therefore reject the view that an increase above 10 % should trigger a strategic plan review. For various reasons the role of the SAP has diminished over time, such that its main role would be to identify reserve sites. Without this role there must be doubt as to whether the need for this additional Plan is justified having regard to paragraph 153 of the Framework. The SAP would otherwise have a limited residual role identifying opportunities for small scale business, GI assets, retail development and Built-Up Area Boundaries [BUABs] for villages. The finding that the size of the reserve needs to increase does not mean that this role cannot be effectively undertaken in that Plan. It is properly something that can be delegated to the SAP, which the Local Development Scheme¹²¹ [LDS] identifies is scheduled to be adopted in spring 2017, well within the 3-year period that is set out within the Birmingham Development

¹¹⁷ Source of quote: page 11, Matter A Hearing Statement HS-33, December 2015.

¹¹⁸ The maths are $53 + 40 = 93 \times 20$ [years] = 1,860.

¹¹⁹ I suggested that it might be 8 % but the Council has, quite properly, criticised the derivation of that figure [see Document Refs. HD.74 and HD.75, respectively]. Pending further work in this area it would only be appropriate to attach this estimate very limited weight and so it does not dissuade me from the view that the 10 % reserve is inadequate.

¹²⁰ Document Ref. ED.13.4.

¹²¹ Document Ref. ED.13.8a.

Plan¹²², and on this basis would form part of the current round of Plan making activity. In the circumstances the claim that the CS needs to set a deadline for the production of the SAP is not accepted. For reasons explored elsewhere [526] it is in the Council's own interest to identify reserve sites.

70. Although the adopted Local Plan identified 3 reserve sites it is evident from paragraph 2.4.12 of that Plan that a key factor which informed that approach was that the date of adoption was much less than 10 years from the end of the Plan period, whereas the national advice at the time was that a Plan should make provision for at least 10 years potential supply of housing. That can be distinguished from the position here, where the Plan period is to 2031, 15-years ahead, reflecting paragraph 157 of the Framework. This examination is not geared up to fulfil a similar role by identifying strategic reserve sites which, at this late stage of the examination, would delay the date of adoption.
71. In passing it is material to note that 2 of the reserve sites identified in the Local Plan have been built and the third, the land west of Shottery, has planning permission. In other words, from the land owner and developer's perspective, such a mechanism has a proven track record in this District. The point is considered further, in terms of spatial distribution, in due course [276], but for the above reasons this approach is appropriate. Accordingly I recommend that the 10 % reserve be increased to 20 % [MM33] to ensure the Plan is positively prepared in line with the Framework.

Picking up on points that were raised during the consultation in May 2016

72. A number of parties have made significant submissions at this stage. The first is CPRE but the content¹²³ appears to go over ground that was discussed in the Hearing sessions. Amongst other things this report deals with the migration assumptions elsewhere [27]. However a new report entitled "*Critique of West Midlands Housing Needs Assessments*" by what appears to be a company "*Urban & Regional Policy*" has been submitted. Paragraph 1.3 says: "*I have been commissioned...*", but there is nothing in the document to explain the author's credentials. No disrespect is intended, the author is plainly familiar with the topic, but this does mean it is appropriate to attach limited weight to the document because the author's professional qualifications are not stated. The perceived tension between the household projections and the Framework might be of academic interest but the approach in the Guidance is clear.
73. My attention has particularly been drawn to page 21 of the report but the risks of under-allocation appear to have been understated. If the supply of housing is not significantly boosted to meet the full objectively assessed need for housing, as per paragraph 47 of the Framework, households, i.e. real people, are adversely affected. If there is no demand or a scheme is not viable a site will not be developed and so an allocation in a Plan is not merely a one-way process. In short this does not appear to be a balanced, independent report and it is really of general or even academic interest rather than being of assistance in helping me to discharge my duties in this examination.
74. The second¹²⁴ seeks to justify revisiting the jobs figure of 12,100, based on

¹²² See page 9 of representation 1151, dated May 2016, for wider context.

¹²³ Reference 6075, dated May 2016, the latter comprising the new report.

¹²⁴ Reference 0448, dated May 2016.

more recent data, and using: "*the latest*" Office for Budget Responsibility economic activity rates, which is said to be supported by the Government's Local Plan Experts Group and a recent appeal decision. However the submission, quite fairly, accepts that it is necessary to draw a line in the sand. Among other things the Framework talks about using a proportionate evidence base. Noting that the data set has not been provided there was no advantage in seeking the Council's comments on this submission at this stage because it potentially opens up the whole question of housing numbers and allocations. It potentially puts the whole process back 12 months and this does not appear to be in anyone's interest as even developers need the degree of certainty that flows from an allocation in an adopted plan. As is evident from the submission of CPRE even the housing requirement that has been identified, based on the evidence that has been discussed, is disputed. For these reasons it is not appropriate to solicit this new evidence at this stage of the examination, which is a pragmatic response given the imperative to get an adopted Plan in place.

75. A number of parties¹²⁵ have put forward further changes to MM02 but they are not necessary or justified. In particular the text lifted from Birmingham MM03 would be inappropriate given that the reserve sites approach is designed, as part of this round of Plan making, to avoid a revision to a Local Plan or, using the language of the CS, avoid the need for a potentially time consuming Plan review. It is self-evident the term: "*housing need arising outside the Coventry and Warwickshire*"¹²⁶ HMA includes Birmingham and so no further reference, beyond that which is evident elsewhere in the Plan, is required in MM33.

Conclusion on the first main issue

76. For these reasons, on the first main issue, I conclude that the employment led projection, and the employment rates that underpin it, appear to be a sound assessment of the housing need in the District. Whilst there is a justification for revisiting the finding in the IC with regard to the vacancy rate, this does not materially revise the District's housing need and as it was fully discussed and agreed at the resumed Hearing there is no need to further discuss this change. The need for affordable housing has also been properly assessed.
77. The OAN of 14,600 dwellings forms the base housing requirement for the Plan and to ensure it is positively prepared this should be expressed as a minimum. Whilst a small proportion of that basic requirement might contribute to needs arising elsewhere [60] the SAP, which forms part of the present round of Plan-making activity, will identify a further 20 % [2,920 dwellings] in reserve sites. This additional quantum will be available to meet the various roles set out in Policy CS.16D, including meeting any housing needs that arise outside of the Coventry and Warwickshire HMA. Should this prove to be insufficient, Policy CS.xx also commits the Council to bring forward a review of the Plan.
78. As a result I recommend MMs to the introductory text, the Vision, Strategic Objective 14, Policy CS.16 and its reasoned justification, and Policy CS.xx, which would deliver these objectives [**MM02, MM03, MM05, MM33 and MM35**]. These MMs are necessary in order to ensure the Plan is positively prepared, justified, effective and consistent with national policy.

¹²⁵ See representations 0439, 0619 and 8027, dated May 2016.

¹²⁶ See representations 1151 and 8027, dated May 2016.

Category 4 settlement, which also requires a consequential change to the Key Diagram [MM31, MM91 and MM04] 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.