



Site Allocations Plan

Topic Paper 1:

Reserve Sites Preferred Option

September 2020

1. Purpose

- 1.1 The purpose of this Topic Paper is to explain in more detail how the Council has arrived at its preferred option in respect of identifying the specific reserve housing sites listed in Annex 1 of the Site Allocations Plan. This document should be read in conjunction with the explanatory text set out in the Site Allocations Plan itself.
- 1.2 Although a Development Plan Document in its own right, the Site Allocations Plan is a tier 2 plan and subservient to the Core Strategy. As such, the Core Strategy sets the context for the identification of reserve sites.
- 1.3 It is important to note that reserve sites differ from allocated sites in that they will only be released for development if required; they are in addition to allocated sites and sites with planning consent that comprise the Council's trajectory of sites to deliver its housing requirements. Allocated sites are relied on and expected to deliver at a point in time.
- 1.4 As such, for practical reasons, if a site can come forward for development in any event (because it is permitted to do so under the Core Strategy) then it cannot be identified as a reserve site, as the restrictions preventing its development could not reasonably be applied.

2. Strategy

- 2.1 Core Strategy Policy CS.15 identifies seven general 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
 - D. Local Service Villages (LSV) – 4 categories
 - E. Large Rural Brownfield Sites
 - F. All Other Settlements
 - G. Local Needs Schemes
- 2.2 This pattern of dispersal has formed the basis of the strategy for identifying reserve housing sites. However, there are a number of differences. Firstly, reserve sites would not be consistent with the forms of development proposed under either (F) or (G). As such, reserve sites have not been identified in these locations. Secondly, the Core Strategy is supportive of development on Large Rural Brownfield Sites (E) under Policy AS.11. As set out in paragraph 1.3 above it would not be appropriate to identify brownfield sites as reserve housing sites given they could come forward in any event.

- 2.3 In respect of (C), the Planning Inspector who examined the Core Strategy concluded 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 LMA¹.” Although the Inspector 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 within the next five years or so 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 quickly to specific purposes that arise.
- 2.4 For the reasons set out above, the location of reserve sites is therefore limited to locations (A), (B) and (D).
- 2.5 Policy CS.16 apportions a quantum of development to each of the various locations identified in Policy CS.15 in order to deliver the objectively assessed housing requirement of 14,600 dwellings. These numbers exclude any provision for reserve sites. This is because reserve sites are in addition to the housing requirement of 14,600. Also, given that the Core Strategy Inspector was satisfied that it was entirely appropriate for the Site Allocations Plan to identify reserve sites (as opposed to the Core Strategy), apportioning a quantum of reserve to specific locations in the Core Strategy would have prejudged this process.
- 2.6 It has been suggested that the quantum of reserve sites in any particular location should correspond to the quantum for each location set out in Policy CS.16. It is the view of the Council that the identification of reserve sites should not be a mathematical exercise but should be informed by the most up-to-date information regarding the suitability and availability of individual sites for potential development. The Council is therefore taking the same bottom-up approach that it took in specifying the quantum of development in the Core Strategy; the numbers set out in Policy CS.16 and Figure 1: Housing Trajectory are simply the sum of housing allocations and consents in each location.
- 2.7 In respect of the Local Service Villages in particular, whilst on the one hand the Core Strategy Inspector concluded that the approximate figure for 2,000 homes for the plan period reasonable, as set out above, the same Inspector also concluded that the Local Service Villages were appropriate locations in which to identify reserve sites. Although set out in the explanation to Policies SAP.1 and SAP.2 in the Site Allocations Plan itself, it is worth repeating the Inspector’s conclusions in respect of the suitability of the Local Service Villages for development²:

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

¹Paragraph 276, Core Strategy Inspector’s Final Report (June 2016) available at www.stratford.gov.uk/corestrategy.

² Paragraphs 197-199, Core Strategy Inspector’s Interim Conclusions (March 2015) available at www.stratford.gov.uk/corestrategy

sustain their long-term future. I have no 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.*

- 2.8 The Inspector's conclusions in this respect support the Council's bottom-up approach to basing the identification of reserve sites on a range of site-specific factors. However, before looking at these factors, there are a number of policy principles that have been applied to inform the Council's approach to the identification of reserve sites.

3. Policy Principles

Green Belt

- 3.1 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 inappropriate 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 village would also have to be removed from the Green Belt.
- 3.2 The Council's approach to excluding Green Belt locations is also consistent with the approach to Green Belt set out in the NPPF.
- 3.3 On that basis, the following sites identified as being suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) 2020 have not been identified as reserve sites in the Site Allocations Plan:
- ALC.6 North of Captain's Hill, Alcester
 - HEN.06 West of Stratford Road (north), Henley-in-Arden
 - HEN.08 West of Bear Lane, Henley-in-Arden
 - STUD.22 East of Green Lane, Studley

Cotswolds AONB

- 3.4 The NPPF makes it clear that housing development in this designated area should be restricted to meeting local needs only. Reserve sites are to meet District-wide housing needs. In light of the revised approach set out in the Preferred Options version, and the removal of Southam College as a constraint to significant development, there is now sufficient suitable and available land to provide the required number of dwellings on reserve sites outside the AONB. As such, it is not appropriate to locate reserve sites within the AONB area.
- 3.5 On that basis, the following sites identified as being suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) 2020 have not been identified as reserve sites in the Site Allocations Plan:
- BRA.11 South of Orchard Close, Brailes
 - ILM.09 North of Back Street (west), Ilmington
 - ILM.10 North of Back Street (middle), Ilmington
 - ILM.11 North of Back Street (east), Ilmington
 - LC.04 East of Back Lane, Long Compton
 - LC.11 West of Oxford Road (south), Long Compton

Neighbourhood Plans

- 3.6 The Council fully supports parishes preparing Neighbourhood Plans. Reflecting the status of made Neighbourhood Plans as part of the statutory Development Plan as well as the effort of communities in preparing them, the Council has taken the view not to identify reserve sites in the settlements that have a Neighbourhood Plan that is either 'made' or is significantly advanced and that already identifies a reserve site/sites.
- 3.7 Significantly advanced is defined as having reached the stage where the Council has made a formal decision to submit the NDP for referendum. This is considered appropriate because this is the first point at which the content of a Neighbourhood Plan is fixed and not subject to change. The Council is confident that because Neighbourhood Plans represent the wishes of the community, they will pass referendum.
- 3.8 On that basis, the following sites identified as being suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) 2020 have not been identified as reserve sites in the Site Allocations Plan:
- ETT.02 West of Old Warwick Road, Ettington
 - ETT.08B South of Banbury Road (rear), Ettington
 - ETT.11 South of Rogers Lane, Ettington
 - ILM.01 South of Armscote Road, Ilmington
 - ILM.03 North of Ballards Lane, Ilmington
 - ILM.09 North of Back Street (west), Ilmington
 - ILM.10 North of Back Street (middle), Ilmington [NB. Reserve site in NDP]
 - ILM.11 North of Back Street (east), Ilmington [NB. Housing allocation in NDP]
 - KIN.07 North of Banbury Road (west), Kineton
 - KIN.08 North of Banbury Road (east), Kineton
 - SHIP.01 South of Darlingscote Road, Shipston-on-Stour
 - SHIP.07A East of Stratford Road, Shipston-on-Stour
 - SHIP.08B South of Oldbutt Road (rear), Shipston-on-Stour
 - SHIP.11 West of Shoulderway Lane, Shipston-on-Stour
 - WELL.06 West of Kineton Road, Wellesbourne
 - WELL.07A North of Walton Road, Wellesbourne
 - WELL.10 South of Loxley Road (south), Wellesbourne

Scale of housing development

- 3.9 Policy CS.16 in the Core Strategy establishes the number of dwellings to be provided in various settlements in the District. In relation to Local Service Villages (LSVs), there is a specific distribution and scale of housing established for each category. However, unlike the LSVs, the Core Strategy does not specify an indicative quantum of development considered appropriate for each MRC; the numbers quoted (Core Strategy Figure 1) simply refer to the expected likely scale of growth envisaged at the time of adoption of the Core Strategy.
- 3.10 In certain villages, the level of housing provision to date (i.e. completions and commitments to 2031) already significantly exceeds the dwelling numbers specified. The latest available monitoring is at 31st March 2019. A summary of provision in each Local Service Village is set out at **Appendix 1** to this Topic Paper. Given the concerns raised during the 2019 consultation regarding the level of development proposed in the Local Service Villages, the Council considers it appropriate that the approach to identifying reserve sites in the Preferred Options version should take account of scale of existing provision.
- 3.11 The Council has defined significant provision as being in excess of 20% of the figures set out in Policy CS.16. This figure is considered appropriate given the use of 20% as an appropriate quantum for the reserve and use of a 20% figure in 5 Year Housing Land Supply calculations.
- 3.12 In those Local Service Villages that have significantly exceeded the indicative numbers in the Core Strategy, whilst this has not precluded the identification of reserve sites, sites exceeding 30 dwellings have not been identified. Doing so would further undermine the intended balance of distribution set out in the Core Strategy.
- 3.13 On that basis, the following sites identified as being suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) 2020 have not been identified as reserve sites in the Site Allocations Plan:
- BISH.07 West of Gaydon Road, Bishops Itchington
 - ETT.09B South of Banbury Road, Ettington
 - ETT.11 South of Rogers Lane, Ettington
 - FEN.09 South of Station Road, Fenny Compton
 - LONG.07 South of Stockton Road, Long Itchington
 - LONG.15 North of Leamington Road, Long Itchington
 - SALF.11 South of School Road, Salford Priors
 - STOC.12 West of Sycamore Close, Stockton
- 3.14 In addition to these, a further site has not been identified as a reserve housing site due to its size: QUIN.19 South of The Fordway. This site has a capacity of 90 dwellings and its location is deemed to be too large to be identified in the SAP. This is further justified by the fact that four smaller reserve sites are identified in Quinton and because the village has already provided 100 dwellings during the plan period.

Self-build and Custom-housebuilding Sites

- 3.15 A number of sites have been promoted for self-build housing and are allocated in the Site Allocations Plan specifically for this purpose. It would be inappropriate to also identify them as reserve sites.
- 3.16 On that basis, the following sites identified as being suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) 2020 have not been identified as reserve sites in the Site Allocations Plan:
- ALC.14 North of Allimore Lane, Alcester
 - ALD.05 East of Skylark Road, Alderminster
 - HALF.03 North of Idlicote Road, Halford

- HAR.16 West of Bush Heath Lane (north), Harbury
- LONG.04 North of Collingham Lane (west), Long Itchington
- NAP.07 North of Dog Lane (west), Napton-on-the-Hill
- SALF.08 West of Evesham Road (south), Salford Priors
- SOU.12A Greenacres, West of Coventry Road, Southam
- STOC.10 West of Jubilee Fields, Stockton
- WELF.04 North of Millers Close (east), Welford-on-Avon
- WELL.07A North of Walton Road, Wellesbourne

4. Identification of Reserve Sites

- 4.1 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) has assessed a wide range of scenarios based on the 126 amber sites identified in the April 2020 version of the SHLAA. In total, these sites have a capacity of approximately 5,100 dwellings.
- 4.2 A number of the scenarios tested do not reach the required 2,920 dwellings that need to be deliverable on reserve sites. Conversely, certain scenarios would achieve this figure. However, it is not sufficient to rely solely on the SHLAA as a technical basis for identifying which sites are appropriate as reserve sites in the SAP because it is a relatively high-level assessment of land parcels.
- 4.3 In addition to the SHLAA, there is a range of specific factors (see below) that contribute to the overall evidence base regarding the suitability of sites. Each of these has the potential to reduce the number of amber sites in the SHLAA that are appropriate to be identified as reserve sites in the Site Allocations Plan.
- 4.4 Taking into account all these considerations means that the number of amber sites in the SHLAA that are appropriate to be identified as reserve sites is reduced significantly. As a result, a revised set of reserve sites is set out in the Preferred Option Site Allocations Plan and which has been assessed specifically in the SA.

Heritage Impact

- 4.5 Heritage impact – a detailed assessment has been undertaken which has resulted in a number of amber sites in the SHLAA being shown to have a major negative effect on heritage assets. These are as follows:
- ETT.11 South of Rogers Lane (middle), Ettington
 - FEN.02 North of Northend Road (east), Fenny Compton
 - FEN.04 West of High Street (front), Fenny Compton
 - HALF.08 East of Fosse Way (middle), Halford
 - HAMP.03 East of Snitterfield Road, Hampton Lucy
 - HAMP.04 South of Church Street, Hampton Lucy
 - HEN.06 West of Stratford Road (north), Henley-in-Arden
 - ILM.09 North of Back Lane, Ilmington
 - LIG.06 North of Church Lane, Lighthorne
 - LC.04 East of Back Lane, Long Compton
 - LMAR.08 East of Long Marston Road (north), Long Marston
 - NAP.13 North of Folly Lane (middle), Napton-on-the-Hill
 - QUIN.03 North of Main Street (east), Quinton
 - QUIN.07 South of Main Road (middle), Quinton
 - TYS.12 South of Oxhill Road, Tysoe
 - TYS.17 West of Church Farm Court, Tysoe

Flood Risk

- 4.6 An updated Level 1 SFRA has been produced that identifies which of the amber sites in the SHLAA are affected by Flood Zones 2 and 3 and surface water flooding. None of the amber sites in the SHLAA are so significantly affected by flood risk to

the extent that they should not be identified as reserve sites. However, a number of them are partly affected and this has a bearing on the extent of suitable development and their dwelling capacity.

Access

- 4.7 The County Highway Authority has assessed all the SHLAA amber sites and advised on which ones would involve major constraints to providing a suitable access. The following site has not been identified as a reserve site due to what appears to be an overriding factor:

- HAR.06 North of Mill Street (east), Harbury

Highway Capacity

- 4.8 There is a major constraint in relation to the network south of the River Avon at Stratford-upon-Avon specifically. An assessment has been produced which establishes the amount of further housing development that can be accommodated on the southern side of the town in advance of the proposed South-Western Relief Road being constructed. As a result, two amber sites in the SHLAA on the southern edge of Stratford-upon-Avon have not been identified as reserve sites:

- STR.11 East of Banbury Road, Stratford-upon-Avon
- STR.12 West of Banbury Road, Stratford-upon-Avon

Noise Impact

- 4.9 An unacceptable level of impact has been identified by the Council's Environmental Health Officer in relation to a SHLAA amber site in Studley due to the proximity of industrial uses:

- STUD.07 East of Redditch Road (south), Studley

Previously Developed Land

- 4.10 A site in Long Itchington that is covered in the SHLAA and identified as amber is a brownfield site and is now within the Built-Up Area boundary defined for the village. As such, the principle of redevelopment is established and it would be inappropriate to identify it as a reserve site:

- LONG.20 West of Marton Road (rear), Long Itchington

5. Further Information

- 5.1 The technical studies referred to in this Topic Paper are available to view alongside the Site Allocations Plan itself at:

www.stratford.gov.uk/siteallocations

www.stratford.gov.uk/shlaa

- 5.2 The Core Strategy is available at:

www.stratford.gov.uk/corestrategy

- 5.3 Latest monitoring information available at:

www.stratford.gov.uk/housingtrajectory

Appendix 1

The Preferred Options version of the Site Allocations Plan has been finalised during the summer of 2020. The Council collates its monitoring information for the previous financial year during the same period. Owing to the COVID-19 pandemic, there has been a significant delay to the monitoring site visits. As such, the latest published information in respect of housing land supply is as at 31st March 2019. As the Site Allocations Plan progresses, the Council will amend the Plan to take into account the most up-to-date monitoring position.

Tier	Settlement	Built	Committed	Total	"Target"	Difference ¹	%
LSV4	Alderminster	28	5	33	32	-1	103.1%
LSV4	Alveston	11	6	17	32	15	53.1%
LSV4	Aston Cantlow*	0	0	0	32	32	0.0%
LSV4	Bearley*	0	0	0	32	32	0.0%
LSV1	Bishop's Itchington	135	70	205	113	-92	181.4%
LSV2	Brailes	18	31	49	84	35	58.3%
LSV3	Claverdon*	1	9	10	59	49	16.9%
LSV4	Clifford Chambers	14	5	19	32	13	59.4%
LSV3	Earlswood*	2	6	8	59	51	13.6%
LSV3	Ettington	42	33	75	59	-16	127.1%
LSV2	Fenny Compton	22	85	107	84	-23	127.4%
LSV4	Gaydon	40	9	49	32	-17	153.1%
LSV3	Great Alne*	9	10	19	59	40	32.2%
LSV4	Halford	6	3	9	32	23	28.1%
LSV4	Hampton Lucy	25	0	25	32	7	78.1%
LSV1	Harbury	134	2	136	113	-23	120.4%
LSV3	Ilmington	20	6	26	59	33	44.1%
LSV4	Lighthorne	21	7	28	32	4	87.5%
LSV2	Lighthorne Heath	11	12	23	84	61	27.4%
LSV3	Long Compton	43	5	48	59	11	81.4%
LSV1	Long Itchington	241	68	309	113	-196	273.5%
LSV4	Long Marston	75	5	80	32	-48	250.0%
LSV4	Loxley	3	6	9	32	23	28.1%

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LSV4	Mappleborough Green*	14	2	16	32	16	50.0%
LSV4	Moreton Morrell	3	1	4	32	28	12.5%
LSV2	Napton-on-the-Hill	60	5	65	84	19	77.4%
LSV3	Newbold-on-Stour	58	41	99	59	-40	167.8%
LSV4	Northend	11	1	12	32	20	37.5%
LSV4	Oxhill	20	16	36	32	-4	112.5%
LSV4	Pillerton Priors	2	14	16	32	16	50.0%
LSV4	Priors Marston	9	8	17	32	15	53.1%
LSV1	Quinton	45	55	100	113	13	88.5%
LSV2	Salford Priors	66	76	142	84	-58	169.0%
LSV3	Snitterfield*	21	10	31	59	28	52.5%
LSV2	Stockton	104	6	110	84	-26	131.0%
LSV4	Tanworth-in-Arden*	3	28	31	32	1	96.9%
LSV3	Temple Herdewycke	0	94	94	59	-35	159.3%
LSV1	Tiddington	44	69	113	113	0	100.0%
LSV3	Tredington	37	2	39	59	20	66.1%
LSV2	Tysoe (Middle & Upper)	23	8	31	84	53	36.9%
LSV2	Welford-on-Avon	99	25	124	84	-40	147.6%
LSV2	Wilmcote*	11	0	11	84	73	13.1%
LSV4	Wood End*	4	7	11	32	21	34.4%
LSV2	Wootton Wawen*	17	12	29	84	55	34.5%

* Washed over by the Green Belt

ⁱ A minus number signifies over provision