



South Warwickshire *Together*

Joint Cabinet/Executive Committee

Notice of Meeting

Thursday 1 August 2024

6.00 p.m.

Note: Joint Cabinet/Executive Committee meetings are live streamed on the [South Warwickshire Local Plan - YouTube Channel](#)

Members of the Committee are requested to attend

Chair: To be appointed at each meeting

Councillors:

Stratford-on-Avon

Warwick

L Coles

I Davison

G Cowcher

C King

S Juned

L Williams

Observers:

Chair of Stratford-on-Avon District Council Overview and Scrutiny Committee	Councillor Crump
Chair of Warwick District Council Overview and Scrutiny Committee	Councillor Milton
Leader of Stratford-on-Avon District Council Conservative Group	Councillor Whalley-Hoggins
Leader of Stratford-on-Avon District Council Green Party Group	Councillor Passingham
Leader of Warwick District Council Liberal Democrat Group	Councillor Boad
Leader of Warwick District Council Conservative Group	Councillor Day
Leader of Warwick District Council Labour Group	Councillor Harrison
Leader of Warwick District Council WRA Group	Councillor Falp

Joint Cabinet/Executive Committee

1 August 2024

Agenda

1. Appointment of Chair

To appoint a Chair for each meeting from the members of the Council that is hosting the meeting.

2. Apologies for Absence

3. Disclosures of Interest

Members are reminded of the need to:

- 1) Declare the existence of any Disclosable Pecuniary Interest (DPI), Other Registerable Interest (ORI) or Non-Registerable Interest (NRI) for any agenda item;
- 2) Confirm the nature of the interest by explaining the connection between the interest and the agenda item; and
- 3) State what action (if any) they will take in relation to the interest when the agenda item is discussed*

*In the case of a DPI the obligation is to not participate in any discussion or vote and to leave the meeting room, unless the member has a dispensation from the Monitoring Officer.

If the existence and nature of any interest only becomes apparent later in the meeting it must be disclosed immediately. If a DPI or ORI is not already registered, members must notify the Monitoring Officer of the interest within 28 days.

Members are also reminded of the need to declare predetermination on any matter.

If members are unsure about whether or not they have an interest, or about its nature, they are strongly advised to seek advice from the Monitoring Officer prior to the meeting.

4. Minutes of Previous Meeting

(Pages 1 - 4)

To confirm and sign the Minutes of the meeting held on 23 November 2023.

5. Meeting Housing Growth Needs through the South Warwickshire Local Plan

(Pages 5 - 14)

To consider the housing needs figures to be used to inform the South Warwickshire Local Plan.

6. Proposed Changes to the Housing and Economic Land Availability Assessment (HELAA) Part A Methodology for the South Warwickshire Local Plan

(Pages 15 - 30)

To consider an updated methodology for the Housing and Economic Land Availability Assessment.

7. Urgent Business

To consider any business which, in the opinion of the Chair, is urgent in accordance with the provisions of Section 100B (4) of the Local Government Act 1972.

CHIEF EXECUTIVES
Stratford-on Avon and Warwick District Councils

David Buckland
Chief Executive
(Head of Paid Service)
Stratford-on-Avon District Council
Elizabeth House, Church Street
Stratford-upon-Avon
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Chris Elliott
Chief Executive
(Head of Paid Service)
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For enquiries about specific reports, please contact the officers named in the reports

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JOINT CABINET/EXECUTIVE COMMITTEE

23 November 2023

MINUTES

*Held at Council Chamber, Elizabeth House, Church Street, Stratford-upon-Avon
Meeting commenced: 6.08 p.m. Meeting ended: 6.36 p.m.*

Present: Councillor S Juned (Chairman) Councillors I Davison, L Grocott, J Kennedy and C King

Apologies: Councillor N Rock (Councillor Grocott substitute)
Councillors L Coles and D Passingham
Councillors Falp, Milton and Wightman

Also in attendance: Councillor Boad (Liberal Democrat Group Leader Warwick District Council, Observer)
Councillor Crump (Chairman of Overview and Scrutiny Committee Stratford-on-Avon District Council, Observer)
Councillor Day (Conservative Group Leader Warwick District Council, Observer)
Councillor Whalley-Hoggins (Conservative Group Leader Stratford-on-Avon District Council, Observer)

1. Appointment of Chairman

In the absence of a Chairman, the Chief Executive (Stratford-on-Avon District Council) opened the meeting and called for nominations for Chairman.

Accordingly, it was proposed by Councillor Davison and seconded by Councillor Grocott, that Councillor Juned be appointed as Chairman for the meeting.

There being no other nominations, it was

RESOLVED:

That Councillor Juned be appointed as Chairman up to the next meeting.

2. Apologies for Absence

See above.

3. Disclosure of Interest

There were no disclosures of interest received.

4. Minutes of Previous Meeting

The Minutes of the meeting held on 7 December 2022 were confirmed and signed.

5. Revisions to the timetable for preparing the South Warwickshire Local Plan

Councillor Juned (Leader of Stratford-on-Avon District Council, in the absence of Councillor Rock)

Councillor King (Place Portfolio Warwick District Council)

Consideration was given to the work that had been undertaken during 2023 on the South Warwickshire Local Plan (SWLP), including the publication of the Consultation Statement following the Issues and Options public consultation earlier in 2023, and proposed amendments to the current published timetable for preparing the SWLP.

In presenting the report, Councillor King noted the following:

- Delay to the 2021 Census and the impact of that on the Housing and Economic Development Needs Assessment;
- Technology issues between both Councils;
- Resource issues of both Councils;
- New administrations for both Councils since May 2023; and
- Potential changes to the National Planning Policy Framework (NPPF) resulting from the Government's consultation.

In response to the NPPF, officers clarified that the two main concerns were uncertainties surrounding housing and Green Belt in relation to plan-making and the Levelling-up and Regeneration Act 2023.

The options available to the Joint Cabinet/Executive Committee were to note the work undertaken to date on the SWLP, and to approve, propose amendments and then approve, or to reject the revised timetable for the preparation of the SWLP.

Councillor Day, on behalf of Councillor Milton, provided feedback from Warwick District Council (WDC) Overview and Scrutiny Committee (OSC). The Committee noted the recommendations and thanked officers for their work. The Committee also requested that a briefing be provided early next year for all councillors, to explain the stage the Plan had reached and what future steps were planned.

Councillor Crump, Chairman of the Stratford-on-Avon District Council (SDC) OSC, provided feedback from the meeting held on 17 November 2023, which included the following:

- The process was dynamically managed, with flexibility to respond to changing circumstances factored in. The timetable was therefore thought to be realistic, yet it was acknowledged that there could be further changes;

- That Stratford-on-Avon and Warwick District Councils worked closely with the providers of infrastructure to ensure suitable set-up;
- That all endeavours be made to ensure implementation of the SWLP within the current district council election cycle (ahead of May 2027) to ensure continuity and mitigate the risk of further delays. It was acknowledged, however, that there would also be risks in adopting the Plan in the period immediately before an election;
- That resources were reviewed on an ongoing basis. There had originally been a dedicated SWLP team, but the wider planning policy team had since been brought in to contribute. This allowed for a stronger approach and drew on a wider range of skills;
- Technology and systems of working were also key resource considerations in maximising efficiency;
- Close working with parish/town councils, in particular regarding Neighbourhood Development Plans;
- It was requested that future changes to the SWLP and updates on the timetable to be reported back to the Joint Cabinet/Executive Committee and the Overview and Scrutiny Committees of Stratford-on-Avon and Warwick District Councils.

During the debate, issues regarding delays to the SWLP, further amendment to the NPPF, the requirement to proceed with the SWLP, and concern with work on an old style plan were raised. In addition, the need for residents to be assured that there were no unnecessary delays.

Officers confirmed that they hoped for clarity from Central Government the following Autumn, but that it would be unlikely to meet the deadline of June 2025 to submit under the old style of plan, as required under the Levelling Up and Regeneration Act 2023. Fundamentally, however, the SWLP would require much of the same work, regardless of any future changes.

It was agreed that a briefing would be provided for all councillors, to explain the stage the Plan had reached and what future steps were planned.

Accordingly, it was

RESOLVED:

- (1) That the work undertaken on the South Warwickshire Local Plan since the end of the public consultation on the Issues and Options paper in March 2023 be noted, in particular the publication of the Consultation Statement; and
- (2) That the revised timetable for preparing the South Warwickshire Local Plan, attached as Appendix 2 to the agenda report, be approved.

NOTE: This item is subject to call-in to the OSC as it is a key decision

6. Urgent Business

There was no urgent business.

CHAIRMAN

Joint Cabinet/Executive Committee

1 August 2024

Subject: Meeting housing growth needs through the South Warwickshire Local Plan

Lead Officers: John Careford, Head of Development – Stratford-on-Avon District Council (01789 260801), Philip Clarke, Head of Place, Arts & Economy - Warwick District Council (01926 456518)

Portfolio Holders: Councillor G Cowcher and Councillor C King

Summary

The purpose of this report is to seek endorsement of the housing needs figures to be used to inform the Preferred Options draft of the South Warwickshire Local Plan.

Recommendations:

- (1) That Members note the technical work that has been undertaken to understand housing needs for South Warwickshire to inform the work on the South Warwickshire Local Plan.**
- (2) That Members approve the housing need figures contained in the Housing & Economic Development Needs Assessment (HEDNA) set out in Table 1 below as the basis for preparing the Preferred Options document of the South Warwickshire Local Plan, noting that an element of flexibility will be included within the Preferred Options document for the reasons set out in this report.**

1 Background/Information

- 1.1 Understanding the levels of housing growth that any Local Plan needs to meet is a fundamental part of the process of preparing a Local Plan. The scale of housing growth will impact on the vision for the Plan and its spatial strategy. It will also impact on issues such as the provision of timely and appropriate levels of infrastructure.
- 1.2 Issues of meeting housing needs, providing affordable housing and determining the direction and location of this new housing present a challenge for any Local Plan, however they also present an opportunity. Housing, which is well-designed and constructed, is located in the most appropriate locations, and provides high quality infrastructure, can help to meet the vision and objectives of the Local Plan. This will include matters such as tackling climate change, providing access to shops and services, and providing improved access to public transport.

- 1.3 In calculating the housing requirement for any Local Plan there are two elements. Firstly, it is important to calculate the **housing need**. This is described in the Planning Practice Guidance (issued by Government) as follows.
- "housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this."*
- 1.4 Secondly, and once this has been done, the **housing requirement** can be calculated. This uses housing need as its starting point, and then considers matters such as:
- strategic constraints which may impact the ability of an area to sustainably accommodate its housing need in full;
 - unmet need that cannot be accommodated in neighbouring areas. (In the case of South Warwickshire, this will be from Greater Birmingham & Black Country and from Coventry); and
 - whether the Plan has growth ambitions linked to economic development or infrastructure, which, for instance, might justify planning for higher housing provision.
- 1.5 This report focusses only on the first of these elements: the housing need.
- The Housing and Economic Development Needs Assessment (HEDNA)***
- 1.6 In seeking to understand housing need it is important that local authorities work together. The Planning Practice Guidance states that assessments of housing need should be prepared to cover "housing market areas" (HMAs). Both Councils sit within the Coventry & Warwickshire HMA, although SDC is also impacted by the Greater Birmingham & Black Country HMA.
- 1.7 Accordingly, all the local authorities across the Coventry & Warwickshire HMA have collaborated to commission a Housing & Economic Development Needs Assessment (HEDNA) to cover all of Coventry & Warwickshire. The purpose of the HEDNA is to provide a joint and integrated assessment of the likely future needs for housing and employment land, taking into account the economic potential and needs of all households in South Warwickshire for the period up to 2050. The HEDNA was undertaken by a team of independent consultants led by Icen Projects.
- 1.8 The HEDNA was published in November 2022, shortly before SDC and WDC approved the "Issues & Options" draft of the SWLP for public consultation. At that time, members agreed to note the figures in the HEDNA, and were content that they provided a credible basis on which to explore the issues and options that the SWLP needs to consider.
- 1.9 It is important to understand the basis upon which the HEDNA was prepared. The Government has set out a "standard method" for assessing housing need. This takes 2014-based Household Projections (produced by the Office for National Statistics (ONS)) as its starting point. The standard method then uses a prescribed approach which applies an uplift to this

based on the relative housing affordability position of individual local authorities. For cities such as Coventry, a further 35% uplift is also applied.

- 1.10 The HEDNA recommended that for Coventry & Warwickshire, a different approach to the government’s standard method should be used to calculate housing need. Table 1 below shows the housing need figures recommended by the HEDNA for Coventry and Warwickshire alongside those which would have been produced had the government’s standard method been followed. As can be seen across the HMA, using the standard method gives a higher overall housing figure than the HEDNA is projecting, however a lower figure for Stratford and Warwick Districts.

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Housing Market Area
Standard Method	3,188	176	435	516	564	675	5,554
HEDNA	1,964	119	409	735	868	811	4,906

- 1.11 In December 2023, the government updated its advice on planning and plan-making through a revision of the National Planning Policy Framework (NPPF). One of the things included in this update was further clarification on the use of the standard method. The NPPF states:

"...The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area.... There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals." (para 61 – extract)

- 1.12 The HEDNA had the advantage of being prepared following the publication of the initial outputs from the latest (2021) census. There were several reasons why the HEDNA did not follow the standard method, and for these reasons, the 2021 census is considered a more robust and reliable basis for considering population projections. These reasons included the following:

- Outputs from the census revealed that previous household projections produced by the ONS, particularly as they relate to the population of Coventry, had overestimated the population of the city. As such, there were concerns about any projections of future population based on these old projections.
- The period on which the standard method figures were calculated included several years when both Councils were applying housing moratoria. This meant that housing needs would be artificially depressed and this would make these figures less robust when challenged.

- The HEDNA applied more up-to-date assumptions about fertility, mortality and household formation rates than used in the standard method.
- 1.13 Following the publication of the HEDNA and the public consultation on the SWLP “Issues & Options” document, SDC and WDC commissioned some further work in February 2024 from IcenI to explore further what would be an appropriate level of housing need to include in the SWLP. This updated advice has now been published as part of the evidence base for the SWLP on the dedicated SWLP website. It can be viewed [here](#).
- 1.14 This new advice from IcenI considered a number of issues. These included:
- a) The use of the Standard Method and alternative forecasting models (such as the HEDNA) to calculate housing needs.
 - b) Any implications arising from the recent revision to the NPPF in December 2023.
 - c) The use of the 10-year trend in the HEDNA.
- 1.15 In respect of (a), the report reaffirmed the conclusions of the HEDNA and stated:
- “In South Warwickshire, the HEDNA showed that the use of 2014-based [standard method] projections do not provide a robust basis for assessing housing need. They are based on historic data. The ONS data which fed into them has been shown since to substantially over-estimate Coventry’s population; which in turn will have influenced the population projections for Warwickshire authorities. In addition, they were based on a period (2008/9-2014) when housing delivery in South Warwickshire was constrained by policies implementing a housing moratorium.*
- “The HEDNA considered that an alternative approach was therefore justified. The NPPF changes provide increased support for this.”*
- 1.16 In respect of (b), the report concluded that *“[through the revisions to the NPPF] the Government appears to be recognising that the 2014-based demographic projections used in the standard method are increasingly old; and there may be cases related to the demographic characteristics of areas (and potential more recent demographic data) which justify the use of an alternative approach to calculating housing needs.”*
- 1.17 In respect of (c), and at the request of the two Councils, IcenI modelled figures based on different trend periods (5-year, 15-year and 20-year). In doing so, it drew on more recent population projections from the ONS published since the HEDNA was produced in 2022. IcenI also provided a commentary on the robustness and likely soundness of different trend periods. Some of these trend periods estimated housing need requirements that are higher, and others lower, than the current HEDNA. The report continued to support the use of 10-year trend periods as had been used in the HEDNA.
- 1.18 The Councils have carefully considered all this new evidence alongside that of the HEDNA. To enable the Councils to prepare a robust “Preferred Options” draft of the Local Plan, the following is recommended:

- a) That the Councils support the advice that the government’s standard method does not form a sound basis for preparing the SWLP.
 - b) That the approach taken by the HEDNA, which was prepared jointly by all the local authorities in the Coventry & Warwickshire HMA and published in November 2022, does provide a more robust basis to prepare the Local Plan than that within the standard method.
- 1.19 The Councils have had regard to the updated advice, including the February 2024 report referred to above. It is recognised that, as the SWLP continues to be prepared, it needs to be informed by up-to-date evidence. Both Councils will need to have regard to this in moving towards a submission SWLP. However, this most recent advice has been prepared for SDC and WDC only. This contrasts with the HEDNA which was prepared jointly by all authorities in the HMA. Moreover, the HEDNA has provided an important basis for Local Plan preparation across Coventry & Warwickshire, demonstrating how we can meet our “duty to cooperate” requirements which will be an important test of the soundness of the SWLP.
- 1.20 Therefore, it is recommended that the HEDNA figures for the two Councils shown in table 1 forms the basis on which the Preferred Options document for the SWLP is prepared.
- 1.21 It should be noted that in proposing a development strategy in the SWLP Preferred Options that delivers levels of housing growth to meet the HEDNA, an element of flexibility will need to be incorporated. At this stage in the preparation of the SWLP, there are still several areas of uncertainty, particularly around the deliverability of any sites which are allocated (particularly large sites although the Councils may be able to support higher rates of delivery on these), and uncertainties around possible future changes to the planning system to be introduced by the new government. It is important that the spatial strategy of the Plan is sufficiently flexible to accommodate likely future changes prior to the Plan being examined. For this reason, an element of “over provision” will be built into the Preferred Options draft of the SWLP for the Joint Committee to consider.

Towards a sound growth strategy

- 1.22 Understanding the level of housing need for the SWLP is an important element to preparing a “Preferred Options” version of the SWLP, but it is only one element. As noted in paragraphs 1.3 and 1.4 above, the housing need is not the same as the housing requirement, and more work and dialogue with other Councils will be needed in order to understand the total housing requirement. Furthermore, work is currently being undertaken to further explore the levels of employment growth that need to go alongside the housing growth.
- 1.23 The housing and employment land requirements will need to be brought together and set in the context of a spatial vision and strategy for the SWLP. The two Councils have set an ambitious vision and strategic objectives for the SWLP focused around five overarching principles of:
- A climate resilient and net zero carbon South Warwickshire
 - A well-designed and beautiful South Warwickshire

- A healthy, safe and inclusive South Warwickshire
 - A well-connected South Warwickshire
 - A biodiverse and environmentally resilient South Warwickshire
- 1.24 The “Preferred Options” document will be an opportunity to set out how these principles will be delivered so that the two Councils can maximise the benefits that development brings by:
- a) Exploring how appropriately increasing housing densities can support the delivery of Local Plan objectives and reduce the amount of land required for new homes and jobs without compromising living standards or environmental quality.
 - b) Utilising opportunities to maximise use of previously developed (brownfield) sites wherever possible.
 - c) Building on the work undertaken by WDC in its recently adopted Net Zero Carbon DPD to deliver development that is more environmentally friendly and low cost in operation.
 - d) Promoting development which meets the 20-minute neighbourhood/ settlement design principles and ensures convenient access to shops and services.
 - e) Coordinating the delivery of appropriate infrastructure to support new and existing developments.
 - f) Increasing delivery of affordable housing.
 - g) Protecting community identity.
- 1.25 The Preferred Options version of the SWLP will need to be underpinned by a strong narrative which demonstrates how all the above (and other) objectives can be achieved through the growth that the SWLP will be delivering.

2 Alternative Options available to the Joint Cabinet/Executive Committee

- 2.1 There are several alternative options available to the Joint Cabinet/Executive Committee.
- 2.2 The Committee could decide not to accept the advice in the HEDNA and use the government’s Standard Method as the basis for preparing the SWLP. For the reasons set out above, and in particular in paragraph 1.15, this option is not supported.
- 2.3 The Committee could decide to use one of the other migration scenarios estimated by Icenl in its report of February 2024 as the basis for deriving housing need. For the reasons set out above, and particularly in paragraph 1.19, this option is not supported.
- 2.4 The Committee could decide to use a different housing need figure from any presented in this report. For the reasons that the HEDNA figures are considered to provide a robust basis for preparing the SWLP, this option is not supported.

3 Ward Councillor and Portfolio Holder Members' Comments

- 3.1 The two portfolio holders with responsibility for the SWLP (Councillor Cowcher for SDC and Councillor King for WDC) have been fully involved throughout this process and are supportive of the recommendations. The SWLP Member Advisory Group which includes a number of Ward Councillors meets monthly and has fully considered the proposed approach.

4 Implications of the proposal

4.1 *Legal/Human Rights Implications*

- 4.1.1 The South Warwickshire Local Plan is a Development Plan Document and as such, when adopted, will form part of the statutory Development Plan for both Districts. As such, its preparation must comply with a number of statutory requirements including public consultation, regard to national policy, the achievement of sustainable development and fulfilment of the Duty to Co-operate. As a Development Plan document, it will be subject to independent scrutiny through an examination in public to ensure that it is 'sound' (fit for purpose) and satisfies all necessary legal requirements. This includes ensuring that residents and stakeholders can engage meaningfully in the process.

4.2 *Financial*

- 4.2.1 The estimated cost of producing and getting the South Warwickshire Local Plan in place is £2.2m, excluding staff costs. This cost is to be shared equally between Stratford and Warwick. Stratford has £1.3m in place within the Core Strategy Funding Reserve to fund its share. Warwick currently has £0.5m allocated, including £0.3m as part of the 2022/23 Budget. Further funding from Warwick will need to be agreed as part of future Budgets.

4.3 *Environmental/Climate Change Implications*

- 4.3.1 Tackling Climate change and responding to the Climate Emergencies that both Councils have declared is at the heart of the South Warwickshire Local Plan. In order to maximise opportunities for climate change adaptation and mitigation, and to meet net carbon zero targets, it is critical that the evolving Plan is informed by assessments on its impact on climate change. As such, consultants have been appointed to prepare these assessments and ensure that all aspects of climate change are considered as part of the SWLP. The WDC Programme Director for Climate Change and the SDC Climate Change Manager are directly involved in this work.

4.4 *Council Plan*

- 4.4.1 As a Development Plan Document, the South Warwickshire Local Plan will help Stratford-on-Avon District Council meet some of its six thematic aims. These include striving to deliver affordable well built and maintained homes; creating a larger, stronger, greener and more inclusive economy; leading the fight against climate change; and ensuring that health and wellbeing is at the heart of decisions made.

4.4.2 In respect of the Warwick District Council's Corporate Strategy, preparation of the SWLP will help the Council achieve its stated objectives of:

- prioritising housing development on brownfield sites.
- minimizing use of greenfield sites where possible.
- promoting new developments using 20-minute neighbourhood/settlement designs.
- ensuring convenient access to services and shop.
- protecting existing community identities, and
- ensuring the provision of appropriate infrastructure is available to support new and existing development.

4.4.3 Through the Local Plan, positive consideration will be given to the extent to which increasing housing densities in new developments could contribute to delivering the above.

4.5 ***Analysis of the effects on Equality***

4.5.1 An Equalities Impact Assessment is required and will be undertaken at various stages of the SWLP to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations.

4.6 ***Data Protection***

4.6.1 Both Councils will ensure that all data protection requirements are adhered to. This will particularly be the case in respect of personal or commercially sensitive information that is provided to the Council through public consultations.

5 Risk Assessment

5.1.1 There are many risks associated with undertaking a Local Plan review. These are financial, reputational and legal. All local authorities are required to prepare Local Plans and both Councils are experienced in managing these risks. All stages of the Local Plan are subject to Councillor advice, scrutiny and approval and so there is plenty of opportunity for Councillors to have proper oversight of the technical work and procedures that are being undertaken.

5.1.2 There are additional risks in undertaking a joint Local Plan review with another local authority as is being undertaken here. These are largely political and relate to the willingness of both Councils to continue to work together to approve the document.

5.1.3 Ultimately, as local planning authorities, both Stratford-on-Avon and Warwick District Councils are obliged to prepare and keep up to date a Development Plan for their area. The SDC Core Strategy was adopted in 2016 and the WDC Local Plan in 2017. Both plans are now more than five years old, and in accordance with government advice it is prudent to start to consider now planning for the period post 2031/2029 when those plans expire.

- 5.1.4 It is also recognised that there are risks associated with preparing a Local Plan, the final adoption of which will take place after the 2027 local elections. It is only this final decision which would be made by the new Councils at that time. All other decisions would be made by the current administrations of both Councils and by the current Joint Committee.
- 5.1.5 There are always risks when assessing how much weight to give to different evidence that is being used in the preparation of the Local Plan. This includes when a decision is taken not to use the most up-to-date evidence at a given point in time. The reasoning behind the recommendations in this report is set out in paragraph 1.19 above. The recommendation to use the 2022 HEDNA is considered to best satisfy the Councils' Duty to Cooperate requirements at this time in respect of how they work with neighbouring authorities. In particular, by using the HEDNA there is a shared understanding that the standard method does not provide a robust basis for estimating housing needs. Moreover, it is relevant to note that the Preferred Options document will be subject to public consultation and so there will be opportunities for the public to comment on the approach taken in the Preferred Options document and for the councils to review this, and any new evidence that emerges, before preparing a submission version of the Plan.
- 5.1.6 There are also significant risks of not preparing a Local Plan. Having an up-to-date plan in place keeps the councils in control of planning decisions and enables us to ensure we get the right homes in the right places supported by the right infrastructure. Not having a plan will not reduce the demand for new homes in South Warwickshire but would result in unsustainable homes delivered by planning by appeal.

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Joint Cabinet/Executive Committee**1 August 2024**

Subject: **Proposed changes to the Housing and Employment Land Availability Assessment (HELAA) Part A methodology for the SWLP**

Lead Officers: **John Careford, Head of Development - Stratford-on-Avon District Council (01789 260801), Philip Clarke, Head of Place, Arts & Economy - Warwick District Council (01926 456518)**

Portfolio Holders: **Councillor G Cowcher and Councillor C King**

Summary

The purpose of this report is to seek endorsement to change methodology criteria in HELAA Part A to be used to inform the Preferred Options draft of the South Warwickshire Local Plan.

Recommendations:

- (1) That Members endorse the following HELAA Part A methodology changes to inform the work on the South Warwickshire Local Plan.**
 - a) Move assessment of Agricultural Land Quality from HELAA part A to HELAA Part B**
 - b) Move assessment of Potential Wildlife Sites from HELAA Part A to HELAA Part B**
 - c) Amend Flooding criteria to state the following:**

If a site is wholly or substantially within flood zones 2 or 3; or wholly subject to surface water flooding, it will be considered as "failed" and graded in the following way:

 - If 100% of a site is subject to surface water flooding, it will be graded "Red".**
 - If 0-99% of a site is subject to surface water flooding, it will be graded "Amber".**
 - If 0% of a site is subject to surface water flooding, it will be graded "Green".**
 - (2) That members delegate decision making to the Head of Development at Stratford BC and the Head of Place, Arts & Economy in conjunction with the respective Portfolio Holders for Stratford DC and Warwick DC to agree and undertake any further minor amendments to the HELAA part A methodology to ensure risk of delay to the overall timetable for the South Warwickshire Local Plan is minimised.**
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1 Background/Information

- 1.1 This report has been prepared to obtain agreement for proposed amendments to the Housing and Economic Land Availability Assessment (HELAA) Part A Methodology for the South Warwickshire Local Plan (SWLP). The changes aim to ensure that the assessment treats site constraints in an appropriate manner, and to ensure a clear justification in ruling out those sites which do not pass the HELAA Part A methodology.
- 1.2 The Joint Cabinet and Executive Committee have previously endorsed the HELAA Part A methodology for the SWLP on 10 March 2022. The SWLP team has now completed the initial assessment of Call for Sites submissions using this methodology. A process of 'sense-checking' these assessments highlighted some potential issues. The proposed changes to the methodology, explained in Part 4 of this report, seek to address these issues.
- 1.3 The Housing and Employment Land Availability Assessment (HELAA) is a technical document which identifies a list of sites that might have potential for housing and employment development at a future stage.
- 1.4 Through the 1st and 2nd Call for Sites exercises, the SWLP Team has received over 700 potential sites in South Warwickshire across the two Councils. The Team has been assessing the sites in terms of suitability, availability and achievability since October 2023.
- 1.5 The HELAA assessments are separated into two parts: HELAA Part A and HELAA Part B. The first sift (Part A) has been focused on assessing the hard planning constraints such as flood zones, sites of high ecological value and other land constraints. The second sift (Part B) will undertake a detailed analysis of sites looking at infrastructure, education, employment constraints and other policy implications etc.

2 Housing and Employment Land Availability Assessment (HELAA)

- 2.1 HELAA Part A
- 2.2 Sites have been assessed under the following three headings:
 - Suitability – The "suitability" section has been sub-divided into two parts:
 - a) Location/ Site attributes - focused on sifting out unsuitable sites based on site size, location and the proposed use of the site.
 - b) B. Policy designation – This section used a desk-based assessment, predominantly with the use of the ArcGIS Pro Software to identify whether a site falls within or is adjacent to any policy designations.
 - Availability – Determined whether the site is likely to be available based on the information submitted through the Call for Sites by agents, landowners and/or promoters.
 - Achievability – Assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions.

- 2.3 A "Red/Amber/Green" approach (RAG) has been applied to determine the score of the sites. Sites with absolute constraints that cannot be mitigated are scored "red". Sites with constraints that have the potential to be mitigated are scored "amber". Sites with the least impact from constraints are scored "Green".
- 2.4 If a site is scored one red or more, it will be considered as "Fail" and automatically rejected from the HELAA Part A process. The details of the assessment criteria for assessing the Call for Sites have been published in the public domain and are appended to this report (See **Appendix 1**).
- 2.5 The following Table 1 shows the thresholds which have been used in our HELAA Part A methodology for assessing the sites:

Table 1: HELAA Part A Criteria definitions

Terminology	Threshold (percentage of submitted site area)
Wholly within:	100%
Substantially within:	>50%
Partially within:	>0% and <100%
Is not within:	0%

- 2.6 HELAA Part B
- 2.7 Sites which pass through the HELAA Part A assessments will then be assessed through the HELAA Part B methodology. This HELAA Part B methodology was agreed by Advisory Group on 29 February 2024 and will be further refined as further evidence becomes available. Any amendments to the HELAA B methodology will be further communicated to members accordingly.
- 2.8 The HELAA Part B takes a more comparative approach to site assessment as all constraints affecting a particular site are scored and considered in the round. Sites may score higher on some aspects than others, and this approach allows for a balance to be found to identify the most suitable sites for potential development. Therefore, when considering the RAG scoring for HELAA Part B, a site scored red is not an automatic rejection.
- 2.9 The outputs from the HELAA Part B assessment will be used as the basis for selecting sites for allocation in the SWLP.

3 Results of the HELAA Part A Initial Assessment

- 3.1 The South Warwickshire Local Plan Team has now completed the first sift of the initial HELAA Part A assessment through the 1st and 2nd Call for Sites. As shown in Table 2 below, a total of 737 sites have been assessed in the HELAA Part A process, 257 of the sites classified as "Fail". A more detailed break down of the process is provided at **Appendix 2**.

Table 2: Overall results of HELAA Part A initial assessment

Pass/Fail	Number of sites
Pass:	480
Fail:	257

Total:	737
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3.2 After producing the initial assessment results, the SWLP Team had a sense-checking meeting to discuss whether the results of the assessment were justified and logical and reflected the aims of the HELAA process. This meeting highlighted that some constraints appeared to have been treated overly harshly in the methodology, and that consequently some sites appeared to have been ruled out where the justification for doing so was weak. Officers recommend refining the methodology for assessing the following site constraints:

- Agricultural Land Quality
- Potential Local Wildlife Sites
- Surface Water Flooding

3.3 The proposed refinements aim to reflect the importance of these site constraints while being realistic about what is a genuine constraint to development.

4 Refinement of the Methodology criteria

4.1 *Agricultural Land*

4.2 Agricultural Land Quality is a measure which reflects climate, topography and soil characteristics for agricultural purposes. Land is graded 1-5, with land in grades 1, 2 and 3a being considered "Best and Most Versatile". South Warwickshire has no grade 1 agricultural land. Swathes of grade 2 land can be found, particularly in a band approximately following the Avon valley, from Bidford-on-Avon to Stratford-upon-Avon and Warwick; and between Leamington Spa, Kenilworth and the area to the South of Coventry.

4.3 The current methodology suggests that "if a site is comprised wholly or substantially of the highest quality agricultural land within Grades 1 and/or 2", it will be considered as a "Fail".

4.4 Recognising the importance of assessing Agricultural Land Quality, the team suggests it would be more appropriate to move this assessment to HELAA Part B as many sites within the higher agricultural land classification area would automatically be removed from the assessment even though they are in more sustainable locations. As previously mentioned, a red score in HELAA Part B will not automatically result in site rejection like in HELAA Part A. Instead, it needs to be weighed against other site constraints, allowing for a more balanced consideration of the site's merits.

4.5 It is officers' recommendation to move this assessment of Agricultural Land Quality from HELA Part A to HELAA Part B.

4.6 *Potential Wildlife Sites*

4.7 Potential Local Wildlife Sites are sites with nature value (as indicated through habitat/flora/fauna and or landscape connectivity evidence), that have not yet undergone a comprehensive Local Wildlife Site Survey.

- 4.8 The current methodology suggests that if “the site is wholly within an area with this designation”, it will be considered as “Fail”. As Potential Local Wildlife Sites have no formal designation or protection, it is considered that ruling a site out on this basis alone would not be justified. As such, moving assessment of Potential Local Wildlife Sites to HELAA Part B would enable a more balanced consideration of this constraint against other factors.
- 4.9 It is officers’ recommendation to move this assessment of Potential Wildlife Sites from HELAA Part A to HELAA Part B.
- 4.10 **Surface Water Flooding**
- 4.11 Flood Zones 2 and 3 relate to flooding from the sea and rivers, while Surface Water Flooding relates to rainwater that cannot adequately drain away.
- 4.12 Currently, the HELAA A methodology applies the same criteria for both Surface Water Flooding and Flood Zones 2 and 3. If “a site is wholly or substantially within flood zones 2 or 3 or subject to surface water flooding”, it will be considered as a “Failed”. In this context, “wholly” means 100% of the site area, and “substantially” means 50% or more of the site area.
- 4.13 It is considered that surface water flooding has the potential to be more easily mitigated using Sustainable Drainage Systems (SuDS) compared to flooding from rivers. As such it is considered appropriate to vary how flooding from each source is treated in the HELAA Part A assessment. No change is suggested to the assessment of flood zones 2 and 3. The following recommendation is made.
- 4.14 It is officers’ recommendation to amend the methodology to include the following:
- If a site is wholly or substantially within flood zones 2 or 3; or wholly subject to surface water flooding, it will be considered as “failed” i.e.
 - a) If 100% of a site is subject to surface water flooding, it will be graded “Red”.
 - b) If 0-99% of a site is subject to surface water flooding, it will be graded “Amber”.
 - c) If 0% of a site is subject to surface water flooding, it will be graded “Green”.
- 4.15 **Feedback from Planning Advisory Group**
- 4.16 The South Warwickshire Local Plan Advisory Group of members considered the matter at its meeting on 11 July. The group recognised the need for the evidence base to be robust, and resistant to challenge. However, some concern was expressed as part of the debate that the changes could be perceived as softening the approach to when constraints could result in sites being ruled out at the HELAA A stage. Members were particularly keen to ensure that criteria around flood risk remained strong. Officers emphasized that in relation to flood risk, the change only related to surface water. More generally in relation to the proposed changes of the 3 criteria officers emphasized that in their view, the purpose of the

proposed changes was not to devalue the criteria being changed but to reflect a more nuanced approach in ensuring the assessments are defensible.

5 Implications of the proposal

5.1 Legal/Human Rights Implications

5.1.1 The South Warwickshire Local Plan is a Development Plan Document and as such, when adopted, will form part of the statutory Development Plan for both Districts. As such, its preparation must comply with a number of statutory requirements including public consultation, regard to national policy, the achievement of sustainable development and fulfilment of the Duty to Co-operate. As a Development Plan document, it will be subject to independent scrutiny through an examination in public to ensure that it is 'sound' (fit for purpose) and satisfies all necessary legal requirements. This includes ensuring that residents and stakeholders can engage meaningfully in the process.

5.2 Financial

5.2.1 The estimated cost of producing and getting the South Warwickshire Local Plan in place is £2.2m, excluding staff costs. This cost is to be shared equally between Stratford and Warwick. Stratford has £1.3m in place within the Core Strategy Funding Reserve to fund its share. Warwick currently has £0.5m allocated, including £0.3m as part of the 2022/23 Budget. Further funding from Warwick will need to be agreed as part of future Budgets.

5.3 Environmental/Climate Change Implications

5.3.1 Tackling Climate change and responding to the Climate Emergencies that both Councils have declared is at the heart of the South Warwickshire Local Plan. In order to maximise opportunities for climate change adaptation and mitigation, and to meet net carbon zero targets, it is critical that the evolving Plan is informed by assessments on its impact on climate change. As such, consultants have been appointed to prepare these assessments and ensure that all aspects of climate change are considered as part of the SWLP. The WDC Programme Director for Climate Change and the SDC Climate Change Manager are directly involved in this work.

5.4 Council Plan

5.4.1 As a Development Plan Document, the South Warwickshire Local Plan will help Stratford-on-Avon District Council meet some of its six thematic aims. These include striving to deliver affordable well built and maintained homes; creating a larger, stronger, greener and more inclusive economy; leading the fight against climate change; and ensuring that health and wellbeing is at the heart of decisions made.

5.4.2 In respect of the Warwick District Council's Corporate Strategy, preparation of the SWLP will help the Council achieve its stated objectives of:-

- prioritising housing development on brownfield sites.
- minimising use of greenfield sites where possible.

- promoting new developments using 20-minute neighbourhood/settlement designs.
- ensuring convenient access to services and shop.
- protecting existing community identities, and
- ensuring the provision of appropriate infrastructure is available to support new and existing development.

5.4.3 Through the Local Plan, positive consideration will be given to the extent to which increasing housing densities in new developments could contribute to delivering the above.

5.5 ***Analysis of the effects on Equality***

5.5.1 An Equalities Impact Assessment is required and will be undertaken at various stages of the SWLP to ensure that strategies and policies contribute towards eliminating discrimination, promoting equality and fostering good relations.

5.6 ***Data Protection***

5.6.1 Both Councils will ensure that all data protection requirements are adhered to. This will particularly be the case in respect of personal or commercially sensitive information that is provided to the Council through public consultations.

6 Risk Assessment

6.1.1 There are many risks associated with undertaking a Local Plan review. These are financial, reputational and legal. All local authorities are required to prepare Local Plans and both Councils are experienced in managing these risks. All stages of the Local Plan are subject to Councillor advice, scrutiny and approval and so there is plenty of opportunity for Councillors to have proper oversight of the technical work and procedures that are being undertaken.

6.1.2 There are additional risks in undertaking a joint Local Plan review with another local authority as is being undertaken here. These are largely political and relate to the willingness of both Councils to continue to work together to approve the document.

6.1.3 Ultimately, as local planning authorities, both Stratford-on-Avon and Warwick District Councils are obliged to prepare and keep up to date a Development Plan for their area. The SDC Core Strategy was adopted in 2016 and the WDC Local Plan in 2017. Both plans are now more than five years old, and in accordance with government advice it is prudent to start to consider now planning for the period post 2031/2029 when those plans expire.

6.1.4 It is also recognised that there are risks associated with preparing a Local Plan, the final adoption of which will take place after the 2027 local elections. It is only this final decision which would be made by the new Councils at that time. All other decisions would be made by the current administrations of both Councils and by the current Joint Committee.

6.1.5 There are also significant risks of not preparing a Local Plan. Having an up-to-date plan in place keeps the councils in control of planning decisions

and enables us to ensure we get the right homes in the right places supported by the right infrastructure. Not having a plan will not reduce the demand for new homes in South Warwickshire but would result in unsustainable homes delivered by planning by appeal.

The existing approved HELAA A Methodology

A. Site/location attributes

This first section of the 'suitability' criteria is designed to quickly sift out locations and sites, which by reason of their size, location (in relation to existing settlements) or purpose (in the case of 'call for sites' submissions only) are considered unsuitable. Any 'red' assessments in this stage will result in the location/site being removed from the process with no further assessment.

Site size

	Site size
Red	Site less than 0.4 ha and deemed unlikely to be able to accommodate 10+ dwellings
Amber	Site less than 0.4 ha but may be capable of accommodating 10+ dwellings
Green	Site greater than 0.4 ha

Red categorisation in this case would result in the site being assessed no further.

Site purpose

	Purpose (Call for Sites submissions only)
Red	Site put forward for protection – i.e. no change from its existing state.
Amber	N/A
Green	Site put forward for development potential

Red categorisation in this case would result in the site being assessed no further. The site will be removed from the process as unsuitable, given that the purpose of the assessment process is to assess potential for development. Where the same land (either as a whole or in part) has been put forward under a separate submission for its development potential, that submission will be assessed in line with this assessment methodology.

Site Location

	Site Location
Red	The site is located in the open countryside, divorced from existing settlements (in itself and in combination with other sites), and is not of sufficient size to consider a new settlement in itself or in combination with adjacent available sites.
Amber	The site is not within or immediately adjacent to an existing settlement, but in combination with other potentially available sites could become an extension to an existing settlement or become part of a new settlement.
Green	The site is within or immediately adjacent to an existing settlement OR The site is remote from existing settlements but could be of sufficient size to create a new settlement (minimum 200ha*)

*based on other 'garden village' schemes both within and beyond South Warwickshire. The scale of any new settlement must however be linked also to 'achievability' criteria.

Red categorisation in this case would result in the site being assessed no further. The site will be removed from the process as unsuitable.

B. Policy designations and site constraints

National policy designations

	Green belt	Area of Outstanding Natural Beauty (AONB)	Registered Park and Gardens
Red	N/A	The site is wholly or substantially* within the designated AONB -	The site is wholly or substantially* within a registered park and garden.
Amber	The site is wholly or substantially within the designated green belt	The site is directly adjacent to the AONB	The site is directly adjacent to a registered park or garden
Green	The site is wholly outside of the designated green belt and not directly adjacent to it	The site is wholly outside of the designated AONB and not adjacent to it	The site is not within or adjacent to a registered park or garden.

*substantially is considered to be 50% or more of the gross area.

Sites which fully or partially fall within the green belt, will not be automatically removed from the assessment process at this stage. The green belt is a restrictive policy constraint that will need to be carefully assessed as part of the overall development strategy of the SWLP. This will further inform whether any locations or sites within the greenbelt should be developed. The purpose of the HELAA is to assess only whether sites *could* be developed, and not whether they *should*.

Areas of Outstanding Natural Beauty are also highly restrictive. Sites which are indicated as red in these criteria may not be assessed further. Any sites within a registered park or garden would also be removed from the process as unsuitable.

Ecological designations

	European Wildlife site	National Wildlife Site	SSSI	Special Protection Area (SPA)	Local Wildlife Site	Potential Wildlife Site	Ancient Woodland
Red	Site wholly within an area with this designation	Site wholly within an area with this designation	Site wholly within an area with this designation	Site wholly within an area with this designation	Site wholly within an area with this designation	Site wholly within an area with this designation	Site wholly within an area with this designation

Amber	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation	Site partially within and/or immediately adjacent to an area with this designation
Green	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.	Site does not include any land within this designation, nor is it immediately adjacent to it.

Red categorisation in one or more of the above criteria would result in the site being assessed no further. The site will be removed from the process as unsuitable.

Land constraints

	Flood risk	Brownfield/greenfield	Agricultural land quality	Minerals and waste
Red	Site is wholly or substantially within the flood zones 2 or 3 or subject to surface water flooding	N/A	The site is comprised wholly or substantially of the highest quality agricultural land within Grades 1 and/or 2	The site is wholly or substantially within a minerals and waste allocation.
Amber	Site is partially with flood zones 2 or 3 and/or partially subject to surface water flooding.	The site is wholly or substantially comprised of land that has not been previously developed (greenfield)	The site is within grade 3a or only partially grade 1 and/or 2	The site is within a minerals and waste safeguarding area
Green	The site is wholly outside of flood zones 2 and 3, and is not subject to surface water flooding.	The site is wholly or substantially comprised of previously developed (brownfield land)	The site is comprised of grade 3b, 4 or 5 agricultural land, or does not currently comprise agricultural land.	The site is not within a minerals and waste allocation or safeguarded area

Heritage constraints

	Heritage assets	Note heritage asset(s)** and whether within the site or the relative in proximity to the site
Red	The location/site is likely to have a significantly detrimental impact on a heritage asset and its setting, for which no mitigation can be envisaged.	
Amber	The location/site includes a designated heritage asset, for which further assessment is required. OR the location/site is in relatively close proximity* to a designated heritage asset, and assessment of impact on the setting of that asset would require further assessment	
Green	The location/site does not include any designated heritage assets, and it is unlikely to directly impact upon the setting of any heritage assets.	

*a degree of judgement will need to be employed in assessing the relative proximity of the asset. The actual proximity of any potential development location and its relevance to the asset is likely to vary dependent on the type of heritage asset, and the type and scale of development that may be envisaged.

**heritage assets could include the following: listed buildings, conservation areas, scheduled monuments, archaeological interest, or local heritage assets.

AVAILABILITY

	Ownership
Red	Site is in multiple ownerships, with no clear indication of willingness to work together or sell.
Amber	Site in multiple ownerships/tenancies but landowners have expressed willingness to sell. Any barriers to availability (i.e. operational requirements or tenancies) may be overcome.
Green	Site in single ownership, where the landowner has expressed intention to sell, or the land is already under the control of a developer

ACHIEVABILITY

	Viability and deliverability	List potential constraints to 'achievability' (e.g. major infrastructure within/close to the site; such as HS2, or pressurised gas pipes etc; or known contamination)
Red	Development costs, market conditions and/or constraints are likely to make delivery unviable	
Amber	Site constraints and associated additional development costs may potentially be mitigated to make development viable.	
Green	No foreseen extraordinary development costs or constraints. Market conditions appear favourable.	

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Breakdown of the initial HELAA A Results

	Pass	Fail
1. Site/location attributes		
a) Site Size	728	9
b) Site purpose	727	10
c) Site Location	638	99
2. National policy designations		
a) Green belt	737	0
b) Area of Outstanding Natural Beauty (AONB)	721	16
c) Registered Park and Gardens	734	3
3. Ecological designations		
a) SSSI	737	0
b) Local Wildlife Sites	731	6
c) Potential Wildlife Site	722	15
d) Ancient Woodland	737	0
4. Land constraints		
a) Flood Zones 2&3	712	25
b) Flood risk (Surface Water)	715	22
c) Brownfield/greenfield	737	0
d) Agricultural land quality	627	110
e) Minerals Sites and Safeguarding Areas	735	2
5. Heritage		
a) Listed Buildings	737	0
b) Conservation areas	737	0

	Pass	Fail
c) Scheduled monuments	737	0
d) Registered Battlefields	737	0
AVAILABILITY (Ownership)	737	0
ACHIEVABILITY (Viability and deliverability)	737	0

Notes: The total number of fail sites is 257, but the total number of the right-hand column will not sum to 257 as some sites could fail on multiple hard constraints.