

Our Ref:
Your Ref:

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Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
Warwickshire
CV32 5HQ

Tel: 0121 456 7444
Fax: 0121 456 7445

support@alliance-plan.co.uk
www.alliance-plan.co.uk

Email: kf@alliance-plan.co.uk

Dear Sir/Madam,

WARWICK LOCAL PLAN REVISED DEVELOPMENT STRATEGY - CONSULTATION

Alliance Planning act on behalf of Lone Star Land LLP in respect of their land interests at Norton Lindsey, Warwickshire.

These representations are submitted in respect of the Council's revised development strategy for the District and the potential sites they have identified for development. It is noted that the consultation document does not cover the full range of topics that will be included in the Local Plan when it is complete and indeed does not cover all of the topics that were included in the Preferred Options consultation which took place in 2012.

Having reviewed the Revised Development Strategy for Warwick District, the following observations are made.

Plan Period

Framework para 157 advises that plans should preferably run for a period of 15 years from the date of adoption. Clarification is sought from the Council with regards to the proposed plan period as there appears to be conflicting time periods stated within the Revised Development Strategy, for example para 1.2 suggests a 15 year period and para 4.1 suggests the plan commencement and end dates of 2011 – 2029 which are some 18 years apart. We would ask the Council to clarify the plan period.

Duty to Co-operate

Under paras 17, 157 and 178 of the NPPF, neighbouring authorities should work jointly together and co-operate to address planning issues which cross administrative boundaries, particularly those which relate to strategic priorities set out in Framework para 156. Moreover, in accordance with para 181 of the NPPF, local authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their local plans are submitted for examination. In this regard, I have had sight of the representations being submitted by the HBF to this Revised Development Strategy, and my client supports those comments, which are not therefore repeated at length here.

Suffice it to say that Warwick District Council has four neighbouring authorities, and the Council has not yet demonstrated evidence of collaborative working with those wider authorities (i.e. Coventry, Rugby, Stratford upon Avon and Solihull Councils). Collaboration with these authorities is considered to be critical given the current uncertainty over the level of housing provision required within neighbouring authority areas to meet their own assessed needs for both market and affordable housing.

A degree of caution should therefore be taken by the Council until the findings of the new SHMA are reported as it may be the case that neighbouring authorities will call upon Warwick District Council to assist them with the delivery of their own assessed housing needs.

Level of Housing Growth

RDS1 confirms that *“the Council is adopting an Interim Level of Growth of 12,300 homes between 2011 and 2029”*. It is noted that this figure is based upon the findings of the latest ONS projections (11,500) plus a local growth rate of 2.4%.

It is considered that the Council has placed an over reliance upon this figure which will be subject to change once the findings of the joint Strategic Housing Market Assessment have been published. Once published, the SHMA will provide a more robust profile of the Council’s objectively assessed housing needs along with any unmet needs from neighbouring authorities.

In its current form therefore it is considered that the Revised Development Strategy is not **positively prepared** or **effective** and has not taken into consideration the full objectively assessed housing needs of the District and neighbouring authorities as required by Framework para 47.

Housing Supply

At present Warwick District Council is unable to demonstrate a 5 year housing land supply which is acknowledged at para 5.1.32 of the consultation document and confirmed in the Council’s most recent Annual Monitoring Report (2012) as being 2.6 years.

Para 47 of the NPPF confirms that to boost significantly the supply of housing, local planning authorities should *“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record persistent under delivery of housing, local planning authorities should increase the buffer to 20%...”* Having reviewed the Revised Development Strategy, no reference has been made by the Council as to whether they consider themselves to be a 5% or 20% authority in order to be compliant with Framework para 47.

Furthermore, in the absence of a demonstrable 5 year land supply, the Council will be required to identify and release more land for housing development beyond those locations set out in RDS5. Whilst support is generally given to the Council’s proposed strategy for the broad location of development (RDS3) which seeks to focus development within or on the edge or existing urban areas and at primary and secondary villages, we consider that the ‘limited growth’ now proportioned to the smaller villages (i.e. Norton Lindsey) and hamlets is unjustified and does not fully recognise the importance that such settlements could play in significantly boosting housing land supply in the District.

We would question the robustness of the Council's Draft Settlement Hierarchy Report which has been used to inform the identification of Primary and Secondary Villages in RDS5. This report has only assessed villages with regards to their sustainability and has not undertaken a detailed assessment to fully consider the constraints facing each settlement (para 5.3). It is considered that this work should have been completed before any specific settlements were identified to accommodate the District's future growth.

In particular, Norton Lindsey was previously identified within the Council's Preferred Options Local Plan as a Category 2 Village which had the potential to deliver between 30-80 new dwellings. In the Revised Development Strategy the categorisation of Norton Lindsey and its role in delivering new housing growth has been reduced further although it is noted at para 4.4.6 that some growth will be acceptable where it is practical and also avoids compromising the character of the Green Belt, new village envelopes will be established to accommodate infill or small groups of dwellings, subject to detailed form, scale and character considerations.


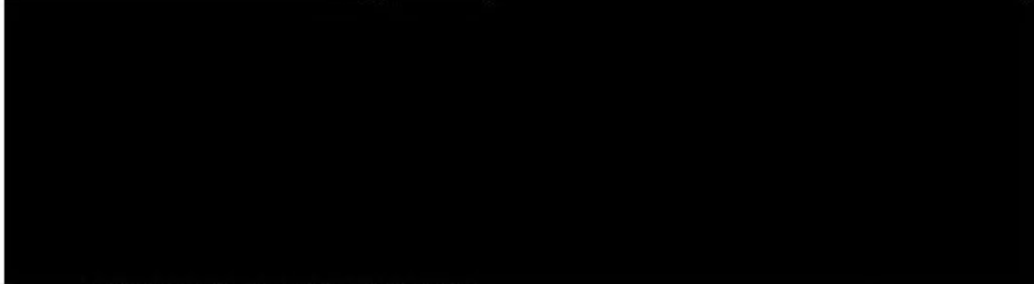
We would welcome sight of any further material with regards to the Council's intentions to introduce capped proportional growth rates at Norton Lindsey and the other smaller villages identified at Table 3. I can confirm that my client is also willing to work in partnership with the Parish Council to deliver new homes to meet the local needs of Norton Lindsey and a development which respects the existing character and setting of the Village.

As drafted we consider the policy as it relates to Settlement Hierarchy is unsound, in that it is not **positively prepared** (i.e. it will not meet the objectively assessed housing need), neither is it sufficiently **justified** nor **effective**.

Conclusion

I would be grateful if you could please confirm receipt of these representations, and confirmation that they will go forward as part of the review of the Local Plan. Could you please keep the author informed of critical timetable and committee dates for reporting of representations to Planning Committee and publication of subsequent amendments and plans.

Yours faithfully



Kerri Fenwick
Director