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Dear Sir/Madam,

WARWICK LOCAL PLAN: VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATION, NOVEMBER 2013

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 consultation on the Village Housing Options and Settlement Boundaries published in November 2013. These representations sit alongside our submissions made in July 2013 to the Council's Local Plan Revised Development Strategy Consultation.

Having reviewed the consultation paper, the following observations are made.

Housing Requirement

The Revised Development Strategy is acknowledged at paragraph 2.13 of the Village Housing Options paper. It is noted that the current development strategy projecting an interim level of growth of 12,300 homes may need to be revised pending the findings of ongoing work on a joint Strategic Housing Market Assessment. Indeed the conclusions of the joint SHMA are that additional housing over and above the 12,300 should be identified.

As noted in our representations in July 2013, we consider that the overall housing target figure does not meet the Council's objectively assessed need, and there will be a requirement to find additional sites during the plan period. In this regard, the strategy adopted of identifying primary and secondary service villages whilst in terms of its overall principles is considered appropriate, within the detail of those villages identified as secondary service villages, is objected to.

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 now brought forward, the categorisation of Norton Lindsey and its role in delivering new housing growth has been reduced to that of a tertiary village.

Para 2.16 of the Village Housing Options acknowledges that development within these smaller settlements may still be appropriate, and failure to invest development within them may put at

further risk the continued viable provision of local services and facilities, making the areas more unsustainable over the course of the plan period.

It is noted that for development to be supported in these locations there should be a requirement for, inter alia, Parish Council support, as well as the identification of sites within a “defined village boundary”. However, given that the Village Housing Options paper omits to identify village boundaries for the smaller villages it is difficult to understand how such a policy requirement could be complied with?

Norton Lindsey, alongside Bubbenhall, scored highly in terms of the Council’s Settlement Hierarchy Report in comparison to the other small and feeder villages. Whilst it is acknowledged that inevitably there will be a determinative cut-off point between the definition of villages, sizes and functions, the assessment of Norton Lindsey and the criterion weighting used, along with the determinate transition point between “small and feeder villages” and “secondary service villages” are questioned. The consequence of having determined that Norton Lindsey with a score of 32 points is a ‘small and feeder village’, as opposed, for example, to Hatton Park which scored 37 points as a ‘secondary service village’ (with other villages scoring in a range of between 9 points and 57 points) has resulted in no assessment having been given of the potential for Norton Lindsey to accommodate any of the Council’s objectively assessed housing need through the current consultation process. Given that the plan is already building in a shortfall of provision, (Section 7 Preferred allocations total only 847 units against a statutory requiring delivery of 1,000 units), then these settlement definitions should be reviewed. This is all the more so given the findings of the SHMA.

It is considered that given the Council’s own acknowledgement that the housing target is likely to be altered as a result of ongoing work in the conjoined SHMA that this consultation is both i) premature in advance of the conclusions of both the SHMA being established and tested through examination and housing need being defined, and ii) it is also premature in the context of dismissing villages such as Norton Lindsey as providing any potential for development growth during the plan period.

Moreover, within the context of para 2.16 of the Village Housing Options paper, the primary driver for the identification of villages to meet the housing needs of the District, must be to accommodate the objectively assessed need. In that context, it cannot be an appropriate strategy to effectively create a policy which allows Parish Council to veto any growth that they do not wish on an ad hoc basis. There are neither now numerous statements of government intent and High Court judgements, which confirm that this is neither the intention nor the desired outcome of “localism”. Rather, localism is about a collaborative arrangement of local communities, Local Authorities, and the development industry, in agreeing how, where and when, necessary growth should be provided. Localism is not a tool by which communities can simply refuse to accept such growth.

Paragraphs 3.11 and 3.12 of the Village Housing Options paper identifies specific issue with regard to rural Green Belt villages such as Norton Lindsey, and that relates to the problems in sustaining community facilities and the vitality of rural communities where there is an ageing population and a marked decline in the percentage of younger people within those communities.

Norton Lindsey has indications of an ageing demographic and it is considered that this is a trend likely to continue without new growth with the ability to bring in new families and provide the potential for a greater range of population with a consequential benefit for services and facilities.

Summary

In summary, it is considered that the approach to the identification of villages for rural growth has not been sufficiently robust, and premature ahead of a clear identification of an objectively assessed housing need, which in turn will have implications for the appropriate strategy for the provision of rural housing.

The methodology used for identifying the different scale and "sustainability" of villages is questioned, as is the nominal "cut-off" point between second-tier villages and "small and feeder villages".

It is concluded that Norton Lindsey is a rural village of sufficient size and with sufficient facilities to accommodate some growth, the provision of new development would assist in a rebalance of the demographic to the benefit of the range of services and facilities and balance within the local community.

We reserve the right to make additional comment at such time as the revised local plan strategy has been updated and subject of examination.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Keith Fenwick', written in a cursive style.

Keith Fenwick
Director