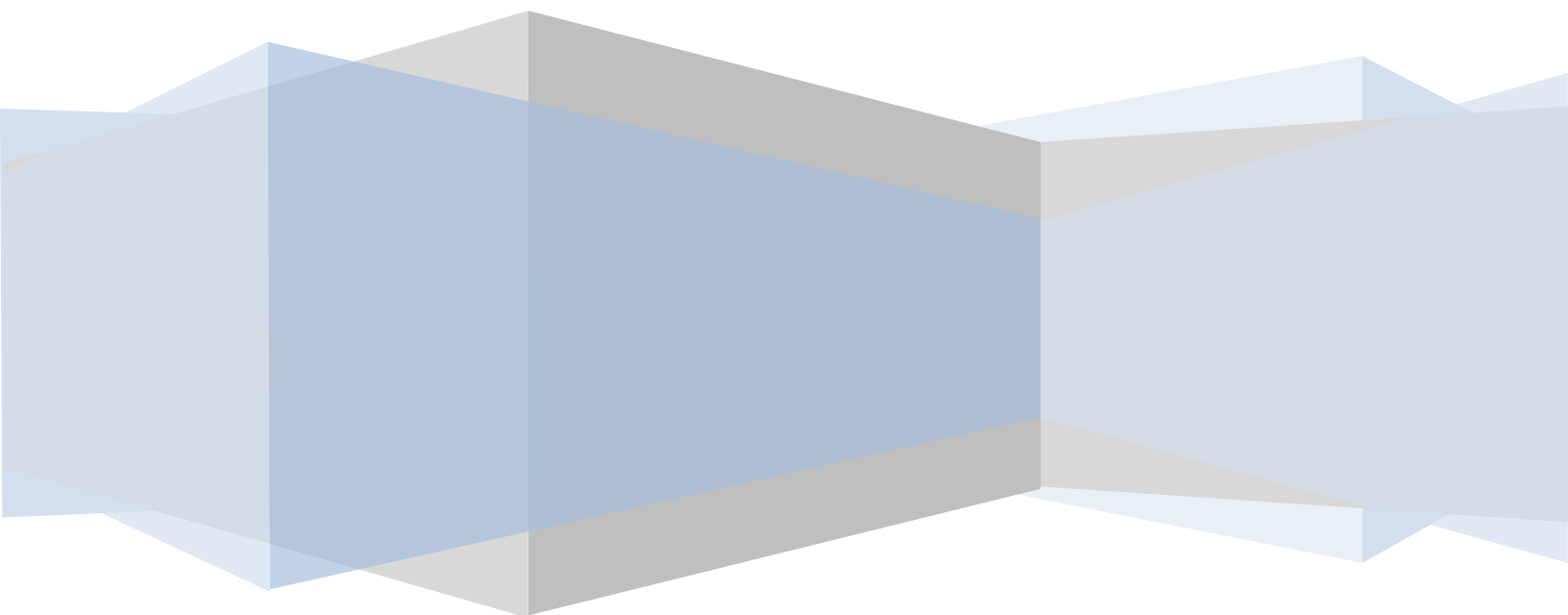


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Warwick District Council Village Housing Options and Settlement Boundaries Consultation

**Objection to Preferred Housing Option for
Radford Semele**

MBA 13057



Housing Options and Settlement Boundaries Consultation

Objection to Preferred Housing Option for Radford Semele

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SUMMARY OF KEY POINTS

The purpose of this report is to two-fold

- To object to Site (1) as the preferred site
- Secondly to put forward our views on what amendments could be made to the policy to deal with our objection.

Site1. Key objections.

Heritage and Setting. The two significant listed buildings (St. Nicholas Church and the White Lion Pub) adjacent to it and, as such, these are heritage assets.

Planning Policy Statement 5 (PPS 5) makes it clear that the setting of a heritage asset must be protected and that alternative locations must be considered if harm would be done to a heritage asset by site development. Additionally Warwick Museum has confirmed that historic artefacts have been discovered in Site (1).

The 1994 Inspectors Report. Site (1) was considered for development and this led to a planning inspector's report being prepared. That report rejected the site for development and Warwick District Council put forward a strong rejection of the site as well. The principal objections raised at that time are still valid today. New housing demands should not be used to change the attitude towards Site (1) as other sites within Radford Semele could accommodate houses closer to the natural heart of the community. The report is consistent with the approach

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taken by Warwick District Council is dismissing an application for development on site 1 in 1984.

Flooding. The Environment Agency flooding map for the area shows that parts of the preferred site have medium to high risk of surface water flooding.

Highways Issues. A Transportation Statement has been prepared by Woods Ferrer Ltd. The report is provided as an appendix to the objection.

The statement confirms that the preferred site (site 1) is on the wrong side of Southam Road being on the opposite side of the road to the village services forcing pedestrians to cross the busy main road. There is a pedestrian crossing, however, pedestrians are likely to cross the road at other locations and this is not desirable in highway safety terms.

Access to the site off Offchurch Lane would result in poor junction spacing and queues would worsen.

It would be undesirable for all traffic likely to be generated by the development of site 1 to pass through the Offchurch Lane junction.

It would be equally undesirable for the other access option at Church Lane to have all site traffic passing through the crossroads junction with School Lane and Southam Road.

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Site 2 is easily accessed. The site has adequate vehicular visibility in both directions. Street lighting is also available and traffic generated would be easily accommodated. Eastbound traffic would not have to pass through the village.

Site 2 is a sustainable and accessible location that links in with the main village.

Amendments to policy to deal with objections.

Site 2. Warwick District Council has discounted Site (2) as a preferred option. It is believed that the reasons for rejection are not valid. The rejection was made on two grounds:-

Site Access. WDC said that access to the site could not be achieved however, a report from a traffic specialist is attached in an appendix and it shows that safe vehicular access can be achieved.

High Visual Impact. Building on Site (2) was said to be undesirable because of high visual impact. However, the assessment of visual impact was made by WDC by reference to a very large area of land extending from the village boundary all the way down to the Fosse Way. In reality, Site (2), comprises a small part of the field adjoining the village. Therefore, the visual impact on Site (2) would be small compared to the permanent damage to a heritage site (Site 1) which has important listed buildings adjacent to it.

We can report that Site (2) has a **national house building company** involved with it and they will be pursuing development of the site through the SHLAA process.

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Village Boundary recommendation. We would therefore suggest that the village boundary for Radford Semele as proposed in Section 7, part 12 of the Village Housing Options and Settlement Boundaries Consultation is amended to

- **Delete the preferred option Site (1)**
- **Replace site 1 with Site (2).**

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Introduction

Martyn Bramich Associates have been appointed by residents of Radford Semele to make representations concerning the current consultation that is taking place concerning the Local Plan Village Housing Options and Settlement Boundaries.

Residents are aware of the current presumption in favour of providing new housing sites across the nation due to the changing demographic of house type and house hold size.

Government legislation has lead to Local Authorities having to reassess the amount and location and housing that will be provided over the next 20 or so years.

The principle of providing new housing in Radford Semele is something that our clients albeit reluctantly accept as part of the changing face of planning.

The issue raised by our objection relates to the location of the proposed housing sites within the area.

The Council has published guidance that shows a site fronting Southam Road/Church Lane (Site 1) as the preferred location for new housing.

We feel that the site has been selected without due care and consideration into the impact on the area and merits of the other sites that have been dismissed by the Council.

Moreover, information that has been used by the Council to assess the highways issues associated with the preferred site has been withheld from the public domain.

A total of four sites have been included in the final consultation document.

It would seem that the preferred site has been selected purely on the basis that in the opinion of the Council, the other sites are unsuitable in highway terms and on landscape quality grounds.

The information used by the Council to accept the access arrangements for the preferred site has been requested by our client but has not been forthcoming from the Council.

The reasons for dismissing sites 2 and 3 have been highways grounds and landscape impact. Site 4 has been dismissed on the grounds of the impact on the main village centre and potential coalescence of settlements.

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This statement along with supplementary information prepared by Woods Ferrer Transport Consultants will demonstrate that there is a real choice in where development can be provided within the area without raising access issues or impacting unacceptably on the landscape features in the area.

The statement will show that development could be distributed better in the area without the need to develop the preferred site.

The preferred site is itself a valuable area of open space away from the actual centre of the village.

Previous attempts to allocate the land for housing have failed.

The 1994 Local Plan Inquiry rejected the site and the Council vociferously argued against its development.

In real terms there has been no change in the contribution that the land makes to the area between 1994 and now making the Council's change in opinion somewhat contradictory.

The representations that refer to the development of the site submitted by Stansgate Planning on behalf of Gladman only refer to a small part of the 1994 Inspectors report.

The representation does not include the detailed preamble up to the quoted comments that include a detailed assessment and rebuttal of the site.

This representation will consider the following matters,

- ***The history and constraints of the preferred site that make it undesirable for development purposes.***
- ***The practicalities of providing suitable and safe vehicular access to the other sites.***
- ***The impact of the development of the other sites on landscape quality and their relationship to the village and adjoining settlements.***

The information that will be put forward in this representation will demonstrate that further consideration must be given to the location and distribution of housing in the area with the site that is preferred by the Council being the least desirable location for development.

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Site 1-The Preferred Option

The consultation document and supporting appendices promote the site as the preferred site for development.

1994 Planning Inspectors Local Plan Report

The representation made by Stansgate Planning on behalf of Gladman in support of the development of the site refers to one paragraph of the 1994 Planning Inspectors Local Plan report while ignoring the comments in paragraphs prior to it. This includes a comprehensive rebuttal of the development of the site by the Council due to its contribution to the landscape heritage of the area and detachment from the centre of the village.

It is true that circumstances have changed regarding the need to provide housing in the area. However, we simply cannot agree that the pressure to provide housing makes a site that was so comprehensively rejected by the Council in 1994 now suitable to provide such a large residential development.

It should also be noted that the site has not been pursued again until now.

The full commentary of the Inspector's 1994 comments is attached as an appendix to the statement.

The issues raised by the 1994 report in terms of the impact of the development on the landscape quality and heritage of the area are significant.

We feel that the reference made to the 1994 Inspectors Report in the representation put forward by Stansgate Planning is somewhat selective and totally fails to acknowledge the sheer extent of the impact that the development of the site will have in terms of the impact on the heritage and landscape quality of the area.

Appendix 6 to the consultation papers provides an assessment of each site.

The preferred site is shown as having a medium to high Greenfield Overall Value Assessment (OVA).

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The summary states that,

“Green Field parcel plays a significant role in maintaining the separation of Leamington Spa and Radford Semele. Also maintains open views to the north of the village.”

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The summary goes on to state that the site could accommodate a “*limited village extension*”.

The OVA confirms that the situation in terms of the landscape quality of the area and the contribution it makes to the environment is unchanged from the 1994 Inspector’s report.

Moreover, the only reference to development is as a *limited village extension*.

No definition of a limited extension is provided. However consideration must be given to how the development of 100 possibly 130 houses will have on the context and character of the area and whether that can realistically be considered as limited village extension.

The site has not previously been considered by the Council as a suitable location for development. On the contrary, the site has been viewed as not being part of the main village being severed from it by Southam Road. This was demonstrated by WDC’s refusal to approve a planning application to develop this site in 1984, following considerable opposition by the residents of Radford Semele and the Parish Council. The application initially went to Appeal by the developer who later withdrew the Appeal in the face of significant opposition by MAFF.

There is some development around the site. This includes a small residential development that adjoins the Grade II Listed Church and good size houses set in large plots of land that front Offchurch Lane.

The character of the area is totally different from what is considered to be the main area of the village to the south of Southam Road.

The provision of an intensive residential development on land between the existing limited development fronting Offchurch Lane, limited development around the church and the church would be totally at odds with the character and setting of the area and in our view cannot be described as a limited village extension.

It would totally change the character of the area from an open area of land outside of the main part of the village to a high density residential area.

The need for new housing should not preempt all other material considerations.

We feel that the impact of the development of the site will be totally at odds with heritage and landscape quality of the area.

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Moreover, the OVA assessments for discounted sites 2 and 3 are the same as the preferred site with only site 4 having a high rating.

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We will explore the discounted sites later in the report. However it seems apparent that the visual impact of the development of sites 2 and 3 is comparable to the preferred site and as a consequence it would also be possible to develop at those sites without affecting the historic landscape or adjacent listed building.

Indeed, we feel that the preferred site is of a higher landscape quality than the other sites due to its detachment from the acknowledged main area of the village and its historic context.

Sites 2 and 4 in particular are close to more built up locations and in both cases about development attached to what has been acknowledged historically as being the main built up part of the village.

The Council now contends that the site is the preferred option simply on the grounds that they feel that the site is accessible and mitigation over landscape issues can be provided.

The other discounted sites in the village that have been rejected by the Council have failed on matters of access whereas impact on landscape quality is comparative to the preferred site.

We feel that proper consideration has not been given to means of accessing the other sites and have commissioned Woods Ferrer to prepare an impartial report into the methods by which other sites in the village could be accessed.

It should also be noted that the Council has refused to allow information it has been supplied with concerning the access to the preferred site into the public domain. This is despite requests made by residents.

We would draw the Inspector's attention to the issues raised in the 1994 Inspector's report (attached as an appendix) and the conclusions therein concerning the contribution made by the site to the area and would suggest that the passage of time and changing planning policy has done nothing to diminish the significant detrimental impact that the development of the site was found to have.

The Council put forward vociferous objections to the development of the site that can be summarised as follows,

➤ ***The site is an attractive area of land separated clearly and distinctly from the main area of the village south of Southam Road.***

➤ ***Site and its setting is one of the last connections with the areas rural past.***

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- *Site is not properly in the village being wholly peripheral*
- *Village Green proposal would not replace the rural setting*
- *Site would not relate well in scale or location to the village*
- *Site is detached from the village severed by the main road.*
- *Development of the site would close the open outlook of the land and affect the impression of separation of Leamington and Radford Semele*
- *The site was considered not to be of a nature that could be included in a village envelope.*

The issues that were raised in 1994 are of equal weight and relevance in 2014.

The site has not changed in terms of character, use and landscaping.

There has been no development within or around the site that has eroded its contribution to the landscape quality of the area.

The Council was quite clear in arguing that the site was outside of the main part of the village being “**clearly**” and “**distinctly**” separated from what is considered the main part of the village south of Southam Road.

The site remains separated and detached from the main part of the village and as a consequence we cannot agree that issues that were raised and defended by the Council in 1994 are now set aside simply because there is a need for housing in the area.

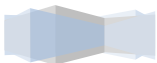
Indeed, the preferred site is by no means the only serviceable and (in planning terms acceptable) location within the village to provide housing that will meet the projected demand without having to extend the boundaries of the village across Southam Road and in so doing cause irrevocable damage to the rural landscape heritage of the area.

The field included in the preferred option can not be looked at in isolation.

Heritage and Setting

The field adjoins St Nicholas Grade II Listed Church.

The List description for the church and the church yard are attached for reference.



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The English Heritage web site confirms that Grade II listed buildings are nationally important and of special interest.

English Heritage publishes guidance which confirms that any development that will be harmful to the view, character and setting of a Listed Building is unacceptable.

This principle is brought forward into national planning policy in the National Planning Policy Framework (NPPF).

Paragraph 132 of the NPPF gives clear guidance on how development that affects a Listed Building should be dealt with. It States

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional

The guidance is clear in stating that any development within the setting of a Listed Building can harm that Listed Building.

The Council also provides supplementary planning guidance (SPG) on Listed Buildings and Conservation Areas.

The guidance includes the following information concerning Listed Buildings,

The setting of listed buildings are important, in terms of visual appearance and historical context.

The setting of a listed building should always be respected, retained and enhanced, wherever possible. This includes the subdivision of grounds and the careful siting of any new development.

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The Council's SPG predates the NPPF. However the general thrust of the SPG is carried forward into current national planning policy included in paragraph 132 of the NPPF.

The whole ethos of the justification in dismissing the development of the site in the past has been the contribution that the site makes to preserve a link with the rural past of the area.

A Grade II Listed Church set within a rural landscape provides a perfect reference point to the evolution and heritage of the area and, it is outside of the acknowledged main area of the village.

The site has clear boundaries. This does not however mean that it should be developed. On the contrary, the boundaries to the site give a clear definition to land that forms the valuable setting for the listed church.

Moreover, the site is open with clear views from Southam Road through to the rear of the site and the church. Residential properties in OffChurch Lane also benefit from views across to the church. The site is also visible from the Grand Union Canal and areas within the public space of Newbold Common and beyond to Cubbington

The development of the site would totally obliterate views across the land and towards the church.

The character and setting of the church would change from being of a rural character with connections to the agricultural heritage of the area to a church that is surrounded by modern housing. All context and legibility of the heritage asset will be lost.

The provision of a relatively small area of open space close to the church as suggested in the preferred option does not mitigate against the wholesale loss of the historic context of the area.

Gladman are currently promoting the site and have forwarded a consultation document to residents that will no doubt result in a planning application for 130 houses on the site.

The consultation document gives an indicative layout of roads and access details.

The consultation document gives no specific detail on the design of the development. However, it is clear that development will be intensive and will in our view destroy the character and setting of the church. This is contrary to national planning guidance in the NPPF.

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The consultation document sent to residents by Gladman does not properly address how the development of the site will affect the character and setting of a nationally important heritage asset.

We do not accept that this issue should be left for consideration under the planning application process.

The 1994 Inspector's report is clear regarding the contribution that the site makes to the area. The loss of the field to development would harm the character of the area and would detrimentally affect the setting of a Grade II Listed Building. This in itself is an argument of sufficient weight to preclude the development of the site.

Consideration should also be given to the wider context of the area.

St Nicholas Church is not the only listed building close to the site.

The White Lion Public House that lies opposite the site is also Grade II listed.

The list description for the White Lion is also attached to this document. The building also forms part of the heritage of the area and would have traditionally looked out over the preferred option site.

The total change in character of the preferred site will also affect the setting of the White Lion.

It therefore follows that the development of the site will have a detrimental impact on the character and setting of a number of acknowledged heritage assets that are close to the site.

The total change in character of the preferred options site if it was to be developed would be harmful to the historic heritage of the area and would harm the character and setting of a number of listed buildings and structures.

The harm that will be brought forward to the historic context of the area is significant and any need for housing should not outweigh the harm that will be brought forward by the development of the site.

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Flooding

We also feel that proper consideration has not been given to environmental factors that are connected to the site.

The Environment Agency flooding map for the area shows that parts of the preferred site have medium to high risk of flooding.

Development in high risk flood areas should be avoided. The problems caused by flooding have been evident across December 2013 and January 2014. Any development that will add to flooding problems should be avoided.

Flood water will run down towards the rear of the site. This has been demonstrated by localised flooding of property on Offchurch Lane in periods of intense rainfall

The consultation document from Gladman shows a balancing pond in the open space that is proposed as part of the development. The developer will need to provide a Flood Risk assessment plan to Warwickshire County Council Sustainable Urban Drainage System Approval Board to show that they comply with the Environment Agency requirements for limiting urban flooding. Mitigation work will be required such as avoiding development on areas prone to flooding and raising ground levels of houses on the periphery of such areas.

It is impossible at this stage to know if that balancing pond will be sufficient given the high risk of flooding.

Moreover, the development of 130 properties and associated infrastructure will result in large area of a currently undeveloped field that is currently used as a soakaway area for water coming down the hill, being covered with a hard surface. As such, a vast area of natural drainage will be lost and this must add to any potential flooding issue.

Ecology

We also feel that the environmental quality of the land has not been considered. The site is undeveloped with only farming activities taking place. As such, there is the potential for the natural habitat of the site to be of importance. This issue has not been addressed by Gladman.

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Green Belt Assessment

The documents accompanying the consultation include a Green Belt Assessment. The site was assessed as Parcel Code RS1.

The assessment of Parcel RS1 found the following issues,

- ***Site has a distinctive character due to church positioning and adjacent open field landscapes***
- ***Very open landscape with wide ranging views across to West Leamington and Cubbington***
- ***Development of site would have potential impact on the character, identity and setting of Radford Semele.***
- ***Green Field parcel plays a significant role in maintaining the separation of Leamington Spa and Radford Semele. Also maintains open views from the north of the village.***

These extracts and findings from the Green Belt Assessment give added weight to our view that the situation regarding the contribution that the site makes to the area and to the need to protect it from development still hold true following on from the 1994 Inspector's Report.

Highways

An independent highways report has been commissioned and is appended to the report.

The Council has taken the view that Site 1 is the only site that can be safely accessed and serviced.

The full commentary on the access arrangements to Site 1 and the impact that we feel it will have on the area is contained within the highways report and we would draw the Inspector's attention to that document.

The salient points brought forward in the conclusion to the report are as follows,

- ***Any development to the north of the A425 in the vicinity of the preferred site would be on the wrong side of the main road, and on the opposite side of the main road to the services and facilities in the village. Given that village facilities are located to the south of the main road, the development of the preferred site would force pedestrians to have to***

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cross the busy A425. Although there is an existing pedestrian crossing on the A425, near to Church Lane, pedestrians are likely to cross Southam Road elsewhere too. This is undesirable in highway safety terms.

- *If a vehicular access were provided to the preferred site from Offchurch Lane, poor junction spacing would result, and queues would worsen. An access on Offchurch Lane would also have to cope with traffic travelling at speed when turning left into Offchurch Lane from the A425.*
- *It would be undesirable for all of the traffic likely to be generated by the development of the preferred site to pass through the Offchurch Lane junction. It would be equally undesirable for the other access option at Church Lane to have all site traffic passing through the crossroads junction with School Lane and the A425.*

The highways report concurs with our view that site 1 is detached from the main area of the village and will have a detrimental impact on pedestrian and vehicular traffic movements.

It should also be noted that residents can provide further information on traffic issues in the area. A serious collision took place close to the site on 06 January 2013 and data confirms that over the last 2 years traffic travelling through the village has increased by a substantial amount.

The information attached as an appendix to the report. It shows a 47% increase in traffic movements between 2010 and 2012.

The preferred option site is located directly to the front of Southam Road with (as shown on the Council's plan) primary access to the site being onto Southam Road.

This can only exacerbate the existing problems within the area that have resulted in accidents such as that on 06 January 2014 which involved a van and motorcycle resulting in the road being closed for over half an hour while the injured were treated and vehicles recovered.

In summary, we feel that the loss of the site as an open feature that defines the heritage and agricultural history of the area is misguided and that the land should be protected from development.

Site 2 – Discounted Option

The Council has chosen to discount site 2 on the grounds of high landscape impact and insufficient vehicle access.

We have demonstrated in our comments regarding the preferred option that landscape impact issues that have been highlighted in the Council's own evidence confirms that the OVA impact of site 2 is the same as the preferred site.

We have put forward our comments as to why we feel that the landscape impact of the preferred site is of higher value than any of the other sites. Moreover, the preferred site has been protected from development by the Council until now.

We feel that site 2 offers a logical and sensible area where a limited village expansion could take place without having to compromise the quality of the environment included in the preferred site.

The 1994 Inspectors report is quite specific in identifying that the main part of the village is on the southern side of Southam Road where site 2 is located.

It is also important to note that the proposed development site will link into the existing built up area of the village.

As such, even without considering landscape matters it is clear that the site will link into the existing village settlement rather than placing development on the opposite side of Southam Road and beyond the historic and acknowledged extent of the main built up part of the village.

It is also necessary to identify that the full extent of the land included in site 2 is significantly smaller than the site that was assessed as Parcel RS3 in the Green Belt Assessment included with the Council's consultation documents.

The discounted option covers only a fraction of the land that was assessed as Parcel RS3. The land in site 2 adjoins existing development infilling land between properties in Overtons Close, Lythall Close and Thornely Close. The site extends along the Southam Road but falls some way short of The Grange.

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The Green Belt Assessment by contrast assesses a much larger area of land including Southam Road to the north, Fosse Way to the east, Lewis Road and unclassified rural link to the west and south.

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The parcel of land included in RS3 is described as being a

“very open landscape with wide ranging views.”

This assessment does not however corroborate with the area of land that forms Site 2.

Site 2 includes only a fraction of the land that was assessed by the Green Belt assessment.

The proposed development site fronts Southam Road to the north and adjoins existing development to the west.

A gap will be retained to the east of the site between the extent of the development site and the Grange.

The site will also be away from the gas main services referred to by the Council in appendix 6 of the consultation documents.

The land to the south of the site will remain undeveloped and is outside of the suggested development area.

In reality the landscape attributes that are identified in the Green Belt Assessment will be protected with the majority of land remaining undeveloped.

There is a clear disparity between the parcel of land that has been assessed by the Green Belt Assessment and the parcel of land that is actually proposed to be brought forward for development.

It is impossible to develop a green field site without there being some impact on the visual amenity of the area. However, a balance needs to be struck between the need for development and finding a location for that development that is least obtrusive.

Site 2 can provide a suitable solution by developing land that relates closely to the acknowledged heart of the village and that will border the main road through the village. Site 2 also links directly with existing development that can be of a comparative size and scale to what could be provided on the site.

The vast majority of land that was assessed under RS3 of the Green Belt Assessment will remain open and undeveloped.

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The quality of the landscape would in the main be preserved and open views will be protected. This is in stark contrast to the preferred site where the majority of the land associated with the parcel land assessed under RS1 of the Green Belt Assessment will be lost to development.

The advantages of developing site 2 are therefore clear.

The development of the site will act as a natural extension of the existing village boundary and development of only a small area of the site that was assessed under the Green Belt Assessment will ensure that the attributes of the land will remain in tact.

Moreover, the land included in Site 2 is closely related to existing permanent physical boundary treatments such as Southam Road, the rear gardens of existing properties and The Grange. As such, the development of Site 2 could be properly and securely constrained in order to prevent any further development.

It is also important to note that Site 2 has safe and easy pedestrian access into to the village. The development of Site 1 would result in occupiers of dwellings having to cross the busy Southam Road to access village facilities due to Site 1 being detached from the main part of the village. Site 2 is on the southern side of Southam Road. There will therefore be no need to cross the road in order for pedestrians associated with Site 2 to access the village and services available within it. This is a clear advantage in developing Site 2 in preference to Site 1.

The site can, as we understand from appendix 6 of the Council's consultation papers can take a total of 125 dwellings.

This results in the housing requirement for the area being able to be provided on a single site as an extension to the existing main area of the village.

We understand that developers are promoting the site through the SHLAA process and that representations will also be received regarding this consultation process.

We support the principle of developing site 2 as a viable and logical extension to the village.

Clearly, the importance of the site and its capacity to take development within the acknowledged heart of the village is a valid consideration.

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The Council also state that the site fails on vehicle access grounds.

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This is not the case. The findings of our highways report are set out below,

- *In contrast, there appear to be no traffic reasons why the discounted site further east, and favoured by the residents, should not be developed. Not only does the site abut the main part of the village, but it also links well to the village and is in a very sustainably accessible location. Village facilities are very close, as are bus stops and a very good public transport service. In addition, school children could walk from site to the primary school without having to cross Southam Road, and without having to even travel on Southam Road. Pedestrian routes could be improved and upgraded.*
- *The site favoured by the residents could be easily accessed. Adequate vehicular visibility would be provided in both directions at a simple priority junction on the A425. Existing street lighting is also available. Traffic likely to be generated would be easily accommodated. Generated traffic that would be going eastbound would not have to pass through the village.*

The full report is provided as an appendix to the statement. However it should be noted that mitigation measures that could quite reasonably be provided via a planning condition, unilateral undertaking or Section 106 Agreement will address any access issues the Council has with the site.

We also understand through discussions with the developer who is interested in site 2 that work has been carried out to establish whether the site can be accessed. The results of the developer's research show that safe access and egress can be achieved at site 2 onto Southam Road within the current speed limits.

The Council will as we understand receive a separate response that advocates the development of site 2 that will give further details of the site and its ability to meet the housing need for the area.

Our findings show that the objections raised by the Council on landscape and highways matters can not be substantiated as the area subject of the site allocation is considerably smaller than that assessed under the Green Belt Assessment and physical features exist within the site that will constrain the extent of the development site leaving the majority of the land assessed as RS3 in the Green Belt Assessment open and in its current form. The extent of any harm to the landscape is of a significantly lesser impact than that that is asserted by the Council.

The highways matters can be resolved and access can be achieved to the site.

Site 3 – Discounted Option

Our comments relating to site 3 are consistent with those concerning site 2 in most respects.

As with site 2, site 3 covers only a small part of the area that was assessed under parcel of land RS2 in the Green Belt Assessment.

Site 3 covers a relatively small area of land adjoining the boundaries of existing development.

However, Site 3 is on the northern side of Southam Road and in our view raises issues that can also be attributed to the preferred site in terms that it is detached and outside of the main part of the village albeit that the impact of the development on the historic environment and heritage of the village would not be as severe as taking the preferred site forward for development.

There is a current consultation to local residents by Pegasus regarding the development of the site.

Site 4 – Discounted Option

Site 4 occupies an area of land at the south of the village.

The site would link areas of existing development within the village with the recreation ground acting as an open space within the built up area of the village.

The Council has rejected the site on the grounds that it would,

“...impact on the main village centre and have the potential to encourage coalescence of settlements...”

The comments made by the Council confirm that site 4 is part of the main village centre. Therefore rather than being a location to resist development it should surely be a location where development of suitable design and density should be encouraged rather than favouring a site away from the village centre that is separated from the centre by a busy main road.

The Council simply says that the development of the site will impact on the main village centre.

There is no reason why the impact on the village centre should be negative. Indeed, the comments put forward in Appendix 6 of the Council’s documents confirm that the allocation of the site would,

“...lead to major positive long term effects on housing need.”

The Council indicates that the site could accommodate up to 60 dwellings. This would provide a good proportion of the dwellings that are identified by the Council as being required in the area, but would lead to the pressure to release additional land for development.

The negative impacts raised by the Council relate to the impact on the landscape. However as with the other sites that have been discounted there is no correlation between the land that has been assessed under the Green Belt Assessment (Parcel RS4) and the extent of the land included in discounted site option 4.

Site 4 is considerably smaller than the parcel of land assessed under RS4.

The proposed site will create a limited village extension that can easily and logically link into the existing village boundaries.

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In fact, Site 4 “rounds off” the irregular shape of that part of the village and does not therefore amount to an extension of the village at all.

The swathe of land included in parcel RS4 extends from the existing village boundary up to the limits of Leamington Spa.

The allocation of site 4 would provide a clear and defensible development boundary outside of which development will be prevented.

There will be a significant buffer zone that will be retained between the built up area of Leamington Spa and Radford Semele.

The assertion by the Council that the development of the site would encourage the coalescence of settlements is unfounded.

It should be noted that Appendix 6 of the Council’s consultation confirms that traffic impact research is ongoing. As such, there is no assurance that traffic issues concerning site 4 are acceptable.

We feel that while site 4 will not lead to the coalescence of settlements there are unresolved matters relating to traffic matters and the impact that directing more traffic into the village off Southam Road will have on amenity and safety within the village.

It should also be noted that the site is not able to provide required amount of housing for the village with only 60 properties being achievable.

We therefore feel that site 4 is not the most suitable location for housing in the village.

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Summary and Conclusion

The purpose of this report is not simply to object to the allocation of site 1 as the preferred option but to also put forward our views on what amendments could be made to the policy to deal with our objection.

The comments we have put forward regarding the unsuitability of Site 1 (preferred option) are based on proper and unbiased assessment of the contribution that the site makes to the local area and how the development of the site would impact on the area as a whole.

We have put forward evidence that confirms the importance of the site in landscape and heritage terms together with information that shows that the site is beyond what is reasonably considered to be the established village centre, that being on the south side of Southam Road.

The Council has in the past vociferously rejected any allocation of the site for residential purposes.

There has been absolutely no change in the site conditions or the contribution it makes to the area since it was last considered and assessed in the 1994 Local Plan report.

The demand for new housing should not in itself bring forward a total change in attitude towards the development of the site particularly when other sites which have been discounted by the Council could take development in a location that is aligned to and conceivably part of the established and accepted main village area.

The Council has stated that Site 2 could take up to 125 dwellings.

Site 2 is on the southern side of Southam Road and is linked to the existing village with safe pedestrian access available

It is therefore entirely practical that the development needs of Radford Semele could be accommodated at site 2 adjoining the accepted main part of the village.

The impact of the development of Site 2 on the landscape is in our view acceptable and will avoid development that will affect the setting and character of a Grade II listed building which is a heritage asset of national importance.

We also have shown that access to site 2 is achievable.

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Our comments regarding site 2 are further endorsed by the fact that a developer is pursuing the development of site 2 through the SHLAA process and will also be supporting the site through this consultation process.

We would therefore suggest that the village boundary for Radford Semele as proposed in Section 7 part 12, Village Plans and Housing Options, of the Village Housing Options and Settlement Boundaries Consultation is amended to delete the preferred option site 1 and to include discounted site 2.

We feel that this will bring forward the flexibility to provide the required amount of dwellings within a location that is directly adjacent to accepted main area of the village.