

Village Housing Options Response Form 2013

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Village Housing Options and Settlement Boundaries.

If you are commenting on multiple sections of the document you will need to complete a separate copy of either Part B and/or Part C of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		
First Name	Nicole	
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Would you like to be made aware of future consultations on the new Local Plan?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16	<input type="checkbox"/> 16 - 24
	<input type="checkbox"/> 45 - 54	<input type="checkbox"/> 55 - 64
		<input type="checkbox"/> 25 - 34
		<input type="checkbox"/> 35 - 44
		<input type="checkbox"/> 65+
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, parish council?		

Part B - Commenting on the Village Housing Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Page Chapter Comments on the consultation document in general Paragraph
 Table or Figure Village Plan

What is the nature of your representation? Support Object

Please set out full details of your representation of support or objection. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary)

Please see attached representations submitted by Gladman Developments.

This submission provides comments on the overall housing need for Warwick and the need for the Council to ensure their housing target is based on an objective assessment of housing need. This submission supports the identification of Radford Semele as a Primary Service Village and land to the east of Church Lane as the Preferred Option for development within this settlement.

These representations should be read in conjunction with those prepared on Gladman's behalf by Stansgate Planning, which provide detailed comments in relation to Radford Semele and land to the east of Church Lane.

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Gladman Developments Ltd

Representations on

Warwick District Council

**Local Plan: Village Housing Options and Settlement
Boundaries Consultation**



January 2014

1 INTRODUCTION

- 1.1.1 Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. These representations provide Gladman's comments on the Local Plan: Village Housing Options and Settlement Boundaries consultation and build on previous submissions made to the Local Plan Revised Development Strategy (July 2013). These representations have been prepared jointly by Gladman Development and Stansgate Planning (the later providing comments specifically on Radford Semele).
- 1.1.2 Gladman note that this is only a partial consultation, focused on the village housing options and settlement boundaries. Whilst Gladman welcome the opportunity to comment on these aspects of the Local Plan we look forward to the opportunity of reviewing a more complete draft Local Plan in the future.
- 1.1.3 Gladman note that the Coventry and Warwickshire Joint Strategic Housing Market Assessment (SHMA) was finalised in November 2013. This is a key evidence base document that should inform the scale of development proposed through the Local Plan.
- 1.1.4 Gladman support the Council's decision to direct development to the main urban areas and the sustainable Primary Service Villages. However we remind the Council that this should not preclude development coming forward in lower order, but still sustainable settlements. It may also be preferable to focus more growth in villages that are unconstrained by Green Belt designations.
- 1.1.5 We support the identification of Radford Semele as sustainable location for further development, and welcome the identification of the site to the north of the settlement (land to the east of Church Lane) as the preferred option for development. Gladman are working with the land owners of this site to bring this land forward for residential development. Further information regarding this site is submitted by Stansgate Planning and should be read in conjunction with this submission.

2 MEETING WARWICKS HOUSING NEEDS

- 2.1.1 Councils are required to identify their **full, objectively assessed housing needs** (paragraph 47 of the NPPF) which should then form the starting point for determining their housing requirements for the Local Plan.

- 2.1.2 At the Revised Development Strategy consultation stage (July 2013) Policy RDS1 outlined how the Council is adopting an interim level of growth of 12,300 homes between 2011-2029 (equating to 683 dwellings per annum). This interim figure is being pursued to enable a joint SHMA covering Coventry, Warwick and Nuneaton and Bedworth to be prepared. Gladman note that the Coventry and Warwickshire Joint SHMA was finalised in November 2013.
- 2.1.3 Gladman note that paragraph 2.13 of the current consultation makes reference to this interim level of growth and the fact that this figure may be revised pending the findings of the SHMA. Gladman submit that the overall scale of growth needs reviewing in light of this updated evidence. The Council should undertake this review and subsequently consult on the revised scale of growth for the District.

2.2 Coventry and Warwickshire Joint SHMA

- 2.2.1 The Coventry and Warwickshire Joint SHMA has now been finalised and should be used to inform the scale of housing growth within the Warwick Local Plan.
- 2.2.2 Gladman note that the Joint SHMA undertakes the assessment of housing need across the sub region for a 20 year period (2011-2031), as opposed to the Warwick Local Plan Revised Development Strategy which covers the period 2011-2029. The SHMA does however provide an annualised need figure by District as well as for the HMA as a whole.
- 2.2.3 The Table below (extracted from the Joint SHMA, page 195) sets out the claimed minimum provision (bottom end of the objectively assessed need (OAN) figure) for the HMA and each district individually and the 'assessed need' (mid-point of the OAN). This table does not however set out the top end of the identified range, which is previously outlined in the document. The top end of the OAN range for the HMA area as a whole is 4,100 dwellings per annum, compared to a mid-range of 3,800 and minimum figure of 3,335.

Table 97: Overall Assessed Need for Housing (per annum 2011-2031)

Housing Need per Annum	HMA	Coventry	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick
Minimum Provision	3,335	1,040	150	430	575	480	660
Assessed Need	3800	1,180	175	495	660	570	720
Assessed Need as % Growth in Stock PA	1.0%	0.9%	0.6%	0.9%	1.5%	1.1%	1.2%

2.3 National Planning Practice Guidance

2.3.1 The draft National Planning Practice Guidance (NPPG) specifically the 'Assessment of Housing and Economic Development Needs' provides further clarity on the elements that should be considered as part of the objective assessment of housing need. Key points to note from this document include the following:

- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints
- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under delivery of a plan.
- Plan makers should take account of concealed households.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Appropriate comparisons of indicators (land prices, house prices etc.) should be made – with longer term trends in the HMA, similar demographic and economic areas, and nationally. Divergence under any of these circumstances will require upward adjustment to planned housing numbers.
- The more significant the affordability constraints (as reflected in rising prices, rents and affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and the larger the additional supply response should be.
- Market signals are affected by a number of economic factors. Plan makers should increase planned supply by an amount that, on reasonable assumptions and

consistent with principles of sustainable development, could be expected to improve affordability.

- 2.3.2 The final NPPG is expected to be published shortly. This guidance is a material consideration, and whilst limited weight can be attached to it at this stage (prior to final publication) it is a clear indication of the Government's direction of travel to which the Council should pay due regard through the preparation of its Plan.

2.4 Warwick District's housing requirement

- 2.4.1 The Council need to ensure that they consider the full OAN when determining their housing requirement and therefore should at least consider the top end of the OAN range. This should be the starting point from which the Council then assess constraints in their area. Following a review of the proposed Development Strategy and specifically the proposed level of growth set within this, the Council will need to undertake an additional stage of public consultation. Gladman reserve the right to comment on the revised scale of growth proposed for the District and the Coventry and Warwickshire SHMA in further detail.
- 2.4.2 The interim proposals which set an annual delivery rate of 683 for the Warwick District may not meet the housing needs in full, could result in a range of adverse consequences for the District and may not meet the requirements set out in the NPPF and draft NPPG. If this is the case, then it is likely that the Plan would be found unsound at Examination.

3 VILLAGE DEVELOPMENT

- 3.1.1 Gladman welcome the approach taken by the Council to undertake detailed site assessments across the villages to inform the proposals within this document.
- 3.1.2 As submitted previously to the Revised Development Strategy consultation (July 2013), Gladman support the inclusion of Radford Semele as one of the five Primary Service Villages.

3.2 Radford Semele

- 3.2.1 Radford Semele is one of the larger villages in the District with a population of nearly 2000, and just over 800 dwellings. It lies close to Leamington Spa but is physically separate from it, having its own identity and its own community. As a settlement it is largely self-sufficient for day to day things, having a Post Office, local shop, newsagent, hairdresser, primary school and nursery. There are some employment opportunities within the village, but also good public transport links to both Leamington Spa and Southam where a wider range of employment is available, together with further shopping facilities.

- 3.2.2 There is a good variety of social activities available within the village which encourages community spirit and limits the need or desire to travel elsewhere for entertainment. These include:
- the White Lion public house which serves meals all day every day
 - the Radford Semele Community Hall which supports a range of children and adult groups, including the Sports and Social Club
 - Two long established churches with associated activity groups
 - Recreation ground with children's play equipment
 - The ability to hire the school hall where further community activities are held (e.g. a dance school)
 - The mobile library also visits once every three weeks.
- 3.2.3 The Draft Settlement Hierarchy Report 2013 forms the evidence base for identification of the settlement as a Primary Service Village. This is set out in Section 12 of the consultation document. It reflects the credentials of the settlement as above and provides an accurate assessment of the village. The assessment clearly takes into account the importance of various local services and facilities, and the distance people will travel to them by means of transport other than the private car. We therefore support the approach taken and the conclusions drawn within it, particularly in relation to the designation of Radford Semele as a Primary Service Village.

3.3 New housing for Radford Semele

- 3.3.1 National planning guidance recognises that housing should be directed towards the most sustainable settlements, to ensure that sufficient housing is available to meet a growing population and a fall in household size. It also acknowledges that all settlements should be able to meet their own needs, and provide support for existing services and facilities. The thrust of the emerging Local Plan recognises this, and through the identified settlement hierarchy requires Radford Semele, as one of the most sustainable villages, to accommodate additional development in the coming years.
- 3.3.2 Furthermore, in the consultation document Table 1: Resident Population 2001 and 2011 it is evident that the trend for the majority of rural areas in the district is for low or no growth and declining populations in some cases. In Radford Semele the statistical data shows a decline in percentage change of population of some -0.6% and it therefore follows that a decline in services and facilities will ultimately result as there is less resident population to support their continued existence. In order for the settlement to remain sustainable additional development is needed to bring benefits such as new disposable income to spend

in local shops; children to attend the school and hence keep it running; residents to support community groups; and residents to support public transport services. Additional development encourages a thriving settlement with a mixed population.

- 3.3.3 The Revised Development Strategy identified Radford Semele for allocation of between 100 and 150 dwellings. Radford Semele is not washed over by Green Belt or any other landscape designations. It is constrained by Area of Restraint that aims to protect parts of the settlement against coalescence with the larger urban areas but it is less constrained than many other villages within the District. This makes it all the more suitable for accommodating towards the higher end of the range of 100 to 150 dwellings identified in the Revised Development Strategy.

4 RADFORD SEMELE

- 4.1.1 Gladman Developments support the identification of Land to the east of Church Lane as the preferred option for housing development in Radford Semele. Further detailed representations regarding this site have been prepared on Gladman's behalf by Stansgate Planning and should be read in conjunction with this submission. This builds on previous submission made regarding the site to the Revised Development Strategy consultation in July 2013.

5 CONCLUSIONS

- 5.1.1 Gladman welcome the opportunity to comment on this document and look forward to commenting on an updated version of the Development Strategy in due course.
- 5.1.2 What is clear from the Framework and the draft NPPG is that the premise of the whole process is the **assessment and delivery of the full, objectively assessed needs for housing** in an area unless there are adverse impacts that would **significantly and demonstrably** outweigh the benefits. If the process for identifying the objectively assessed needs is not followed and used to inform the policies within the Local Plan then the Council run the real risk of being found unsound at Examination.
- 5.1.3 Gladman urge the Council to undertake a detailed review of the recently published Coventry and Warwickshire SHMA and reconsider the scale of growth proposed through the Revised Development Strategy. Following this review and amendments to the Plan, the Council should undertake an additional stage of public consultation. Gladman reserve the right to comment on the revised scale of growth proposed for the District and the Coventry and Warwickshire SHMA in further detail.

- 5.1.4 Gladman agree with the proposals that growth should be directed to sustainable settlements with established sustainability credentials. However this should not preclude development in lower order, sustainable settlements which could also help sustain existing facilities and services.
- 5.1.5 The identification of Radford Semele as a Primary Service Village and consequently a location for further development is supported.
- 5.1.6 The identification of land to the east of Church Lane as the preferred option for housing development in Radford Semele is supported.