

## **Warwick Local Plan: Publication Draft, 2014 – Representations on behalf of AC Lloyd Homes Ltd.**

### **Paragraph 1.29**

#### **Representation:**

A C Lloyd Homes object to the Plan period of 2011- 2029. It is considered that the plan period should be extended from 2029 to 2031. The current approach is considered 'unsound' as it does not conform with the provisions of NPPF which requires Plans to cover an appropriate time period, preferably a 15 year time horizon, but which takes account of longer term requirements. Since the plan is unlikely to be adopted before 2015 this period appears too short. Extending the period to 2031 would ensure a 15 year period is provided for and also bring the plan into line with the housing evidence base i.e. the Joint Coventry and Warwickshire SHMA that has been used to consider housing allocations. This document makes provision for housing between 2011 and 2031.

Stratford on Avon District Council, a neighbouring Authority which has also just published its Proposed Submission Core Strategy, has extended its plan period to 2031 in recognition of this position and has noted that its plan could run the risk of being found 'unsound' at examination unless a period to 2031 was provided for.

### **Policy DS6 - Level of Housing Growth**

#### **Representation:**

A C Lloyd Homes object to the proposed level of housing growth of 12,860 new homes between 2011 and 2029. As stated in our objection to Paragraph 1.29, it is considered that the plan period used should be 2011 to 2031. The current approach is considered 'unsound' as it does not conform with the provisions of NPPF which requires Plans to cover an appropriate time period, preferably a 15 year time horizon, but which takes account of longer term requirements. Since the plan is unlikely to be adopted before 2015 this period appears too short. This would bring it into line with the evidence base in the Coventry and Warwickshire Joint SHMA. Accordingly, it is considered that the appropriate level of housing should be increased by at least 1,428 dwellings to provide for the additional 2 years and the plan period should extend to 2031.

A further concern is that the current approach to meeting the housing requirement for the District does not take into consideration any shortfall of housing within the sub-regional housing market area (in particular in Coventry) or within adjoining housing market areas (in particular Birmingham).

It is acknowledged that this issue is already recognised at paragraph 1.24 of the Plan albeit it states that Warwick is unlikely to have to directly accommodate any shortfall from Birmingham. Objection is raised to this statement on the basis it is premature and considered unlikely given the scale of the anticipated shortfall in Birmingham and the good transport links between the two areas. Furthermore since the interim findings of the Greater Birmingham and Solihull LEP (GBSLEP) Strategic Housing Needs Study is due for publication in July 2014, it is clear that the implications from that Plan may well start to become apparent within a sufficiently near timescale as to be considered as

part of the evidence base against which to establish the overall objectively assessed need for Warwick District.

### **Policy DS7: Meeting the Housing Requirement**

#### **Representation:**

A C Lloyd Homes objects to Policy DS7 and the associated table for the reasons set out in its objections to Policy DS6, i.e. that the period used for housing provision should extend to 2031. In accordance with that objection the overall housing target should be increased by at least 1,428 dwellings.

Furthermore A C Lloyd Homes objects to the Table in Policy DS7 as it is considered that it makes an over estimate of the likely delivery from windfalls during the plan period. Given that there is already separate provision allowed for from small urban sites (which are by definition also windfalls as they are not allocated), and given insufficient evidence base to justify the levels proposed, it is considered that the windfall allowance is not robust.

Accordingly, the amount of housing to be allocated on new sites within the plan should be increased from 6,238 to at least 8,000 both in order to meet the shortfall from the missing 2 year period to 2031 and also to allow for a lower delivery from windfalls.

### **Policy DS10: Broad Location of Allocated Housing Sites**

#### **Representation:**

In line with objections raised to Policies DS6 and DS7, A C Lloyd Homes object to Policy DS10 as the overall housing numbers being provided for are too low, and specifically, the allocation of numbers to the Growth Villages is too low. It is considered that the shortfall in numbers should be met (at least in part) through an increase in the number of homes being provided for within the Growth Villages and the rural area, and should be more in line with the numbers proposed in the earlier versions of the Local Plan which were double that now proposed. This can be achieved both through additional allocations but also through a more flexible approach to development within the Growth Villages that allows for both windfalls and other suitable sites to come forward.

In order to meet the higher housing provision advocated in its objection to Policy DS6 and DS7, A C Lloyd Homes advocates that a higher number of housing (at least 1,500) is allocated towards the Growth Villages and Rural Area.

### **Policy DS11: Allocated Housing Sites**

#### **Representation:**

In line with objections raised to Policies DS6, DS7 and DS10, A C Lloyd Homes object to Policy DS11 as the overall housing numbers being provided for are too low. It is considered that additional sites should be included to make up the shortfall, and greater flexibility should be built into development within the Growth Villages.

Previous iterations of the Plan have provided for a range of dwellings to be provided within the Growth Villages, for example the 2013 version of the Plan required a range of dwellings to be provided for within each settlement. This approach was supported. The current approach of allocating a small number of sites is inflexible and there is a very real danger that limited choice is being provided. This is not positive planning and contrary to NPPF. It makes little sense to exclude other suitable sites that may come forward in the plan period in sustainable locations. On this basis the current approach is considered to be 'unsound'.

It is considered that the Council should alter Policy DS11 to provide an overall figure for the Growth Villages, allocate known suitable sites, incorporate flexibility in the settlement boundaries and then provide a criteria based policy for additional sites to come forward in the plan period. The current structure of the plan allows for such an approach and this is discussed further in A C Lloyd Homes' objection to Policy HS10.

In terms of additional sites to be included within Policy DS11, A C Lloyd Homes in particular seek the inclusion of 2 sites:

1. Land at Spring Lane, Radford Semele.
2. Land off Severn Acre Close, Bishops Tachbrook

These are considered further below.

A C Lloyd Homes also make comment in relation to the allocated land at Hatton Park which is also considered below.

### ***Spring Lane, Radford Semele***

Radford Semele, is one of the largest and most sustainable villages in the District but the draft plan only allocates one site for 50 dwellings within the village. In preparing the plan the Council has failed to include an additional highly suitable site off Spring Lane, on the south west edge of the village. This site extends to 3.37 hectares and is identified on the site location plan accompanying these representations. It is considered suitable for up to 65 units.

The site at Spring Lane is in a highly accessible location within the village, more so even than the allocated site. The site is subject to a planning application (ref: W/14/0433) that was validated on 26th March 2014. This application is in outline form and relates to the proposed development of up to 65 houses including a mix of open market dwellings and affordable dwellings. The application was submitted with an illustrative layout and a number of technical reports including a Landscape and Visual Impact Assessment, Transport Statement, Ecology Report, Flood Risk Assessment and Planning Statement. These key documents are attached to these representations to help inform the considerations for the site.

The site is by far the best placed site within the village in terms of proximity to community facilities and services. It lies immediately next to the sports ground/play ground and associated community hall and club. It is extremely well linked to the public footpath network and is also within very easy walking distance of the primary school on School Lane and the local shops and church on Spring Lane. It is also in walking distance of bus stops. It is therefore clear that in principle the site offers a sustainable location to provide additional development.

In respect of technical issues relating to the delivery of the site, these have all been considered as part of the recent planning application and all matters have been satisfactorily resolved such that the site is clearly deliverable.

The only aspect of the site that is in dispute with The District Council is the Landscape and Visual Impacts of the development. The assessment that accompanies the application submission concludes that, at present, the character of the countryside to the south and west of Radford Semele is currently adversely affected by the hard edge of the village caused by the unscreened rear elevation of the last line of houses developed on the ridge line. Should the development at Spring Lane come forward this hard edge can be softened by a flexible form of development layout and associated generous landscape proposals as put forward in the current planning application. Furthermore, the development of the site would form a natural 'rounding-off' of the village boundaries and would not compromise the open nature of the area or reduce the minimum width of the green wedge between the settlements of Radford Semele and Sydenham. The County Council has recently revised its Landscape evidence base for the District and has made amendments to the Sensitivity Study for Radford. In doing so the Spring Lane site has been downgraded from 'High sensitivity' to residential development to 'High/Medium' and the amendments specifically recognise that some development could be accommodated on the Spring Lane site to address the current hard edge of the settlement in this location.

In respect of Transport issues, the Transport Statement identifies that the site is situated in a sustainable location and well connected to existing pedestrian, cycle and public transport networks. It also demonstrates that traffic generation associated with the development of the site would be modest and would not have a material adverse impact on the operation of the adjacent highway network. The County Highways Authority has raised no objection to the current planning application.

The Ecological Assessment has shown that the habitat is very poor for wildlife and that the development of the site would have minimal direct impact on any habitat apart from arable land. There are also opportunities for habitat enhancement within and around the perimeters of the site.

The Flood Risk Assessment and Drainage Report show that the site is at no risk of flooding and the surface water drainage can be managed to ensure that any development will not increase the risk of flooding elsewhere. Foul water disposal will be via the existing adopted Severn Trent sewers.

There are no objections to the current application from statutory consultees and there are no technical or environmental issues to prevent development of the site for residential purposes.

To summarise the site is in a sustainable location, adjacent to the built up area of the village of Radford Semele. Future residents of the site would have the opportunity to access every day facilities and key destinations by a choice of transport modes. The site is available and achievable and offers a sustainable solution to assist in meeting the housing requirement for the District.

### **Seven Acre Close, Bishop's Tachbrook**

Bishop's Tachbrook is a sustainable settlement and one of the largest Growth Villages in the District. In preparing the plan, the Council has failed to include an additional highly suitable site in the village off Seven Acre Close on the north west edge of the village. This site extends to 2.39 hectares and is identified on the site location plan accompanying these representations. It is considered suitable for up to 60 units.

The southern part of the site (extending to 0.85 hectares) is currently subject to a planning application ref: W/14/0763 that was validated on 20th May 2014. This proposes a limited first phase of development to meet short term housing needs whilst the wider site is considered suitable for longer term needs over the Local Plan period. The current application is in outline form and relates to the proposed development of up to 25 houses, including a mix of 15 open market dwellings and 10 affordable dwellings. The application was submitted with an illustrative layout and a number of technical reports including a Landscape and Visual Impact Assessment, Transport Statement, Ecology Report, Flood Risk Assessment and Planning Statement. These key documents are attached to these representations to help inform the considerations for the site.

The site immediately adjoins the main part of the settlement and is located between existing houses off Seven Acre Close and an individual farm house and small holding known as Knob Hill. All local facilities within the village are within easy walking distance of the site. These facilities include a village store, primary school, sports and social club, recreation ground and play area, church, medical centre and public house.

The Landscape and Visual Assessment for the current application shows that the site benefits from a good level of existing boundary treatment and is well contained. In respect of visual impact the sensitivity of visual receptors to the proposals are not significant.

The Transport Statement for the current application identifies that the site is situated in an accessible location and is well connected to existing pedestrian, cycle and public transport networks. It also demonstrates that the traffic generation associated with the current proposals will be modest and will not have a material impact upon the operation of the adjacent highway network. It also demonstrates that a satisfactory access can be achieved. It is considered that this access also has capacity for the wider site should it be required.

The Ecology Report demonstrates that ecological considerations do not pose a material constraint to the development of the site and adequate mitigation measures can be provided.

The Drainage Report shows that the site is at no risk of flooding and is located in Flood Zone 1. Surface water drainage can be managed to ensure that the development will not increase the risk of flooding elsewhere. Foul and surface water disposal will be via the existing adopted Severn Trent Sewers.

There are no objections to the current application from statutory consultees and there are no technical or environmental issues to prevent development of the site for residential purposes.

To summarise the site is in a sustainable location, adjacent to the built up area of the village of Bishop's Tachbrook. Future residents of the site would have the opportunity to access every day facilities and key destinations by a choice of transport modes. The site is available and achievable and offers a sustainable solution to assist in meeting the housing requirement for the District.

### ***Birmingham Road, Hatton Park***

A C Lloyd Homes support the allocation of Land north of Birmingham Road, Hatton Park. When bringing forward this site it will be critical to ensure any new community can integrate with the existing community at Hatton Park, which can be secured by bringing access through from Ebrington Drive. This will ensure connectivity to the village, existing bus stops and local facilities, whilst also avoiding an unnecessary new access onto the Warwick Road. As owner of the land at the end of Ebrington Drive, A C Lloyd Homes is willing to work with the site owners to ensure this more preferable access solution is delivered.

### **Policy H1: Directing New Housing**

#### **Representation:**

A C Lloyd is in general support of the approach set out in Policy H1 to directing new housing on the basis of the settlement hierarchy.

It is however considered that the subsequent explanation and linked policies to this do not allow this policy to be fully delivered. Specifically the policy states that it will direct new development to Growth Villages, but the later approach to this is limited solely to allocated sites. It is considered that new housing should not only be allowed on the sites shown on the Policies Map for the Growth Villages, but also on other suitable sites that can assist in meeting the District's housing requirements.

As set out in objections to Policy DS10, it is considered that there is a shortfall in housing provision proposed in this Plan and it is proposed that this shortfall can be accommodated via the Growth Villages. This is detailed further in the response to Policy H10.

### **Policy H2: Affordable Housing**

#### **Representation:**

A C Lloyd Homes object to part (b) of policy H2 regarding Affordable Housing. It is considered that the threshold of sites of 5 or more dwellings or 0.17 hectares is too low and disregards the costs of developing small sites over larger one's. This policy will have an adverse effect on the ability of developers to bring forward small sites which can provide a valuable contribution to housing provision across the district. If a higher threshold is introduced this will encourage more sites to come forward.

## **Policy H10: Bringing forward Allocated Sites in the Growth Villages**

### **Representation:**

A C Lloyd Homes object to Policy H10 as it does not provide a sound basis for future development for the Growth Villages.

The policy is too narrow and inflexible, provides no choice and adopts an unsustainable approach to the provision of housing for the Growth Villages. In particular, it is considered that new housing should not only be provided on the sites shown on the Policies Map for the Growth Villages, as there are clearly other suitable sites that can assist in meeting the District's housing requirements.

The Policy provides a clear opportunity to bring some flexibility to the plan and allow additional growth in appropriate locations, through a criteria based approach. As set out in objections to Policy DS10, it is considered that there is a shortfall in housing provision proposed in this Plan and a logical way to help accommodate this shortfall is from other suitable sites that may come forward within or adjacent to the Growth Villages. Whilst not all sites will be suitable, and in some cases there will be Green Belt limitations, Policy H10 as currently drafted is 'unsound' and should be more flexible in allowing other sustainable sites to come forward in the plan period within the Growth Villages.

Accordingly it is suggested that the policy be re-named as "*Policy H10: Growth Villages*", and be reworded as follows:

*Housing development for Growth Villages will be permitted on sites allocated in the plan and on other suitable sites where the proposals are in accordance with the following criteria:*

- a) the site is within or adjacent to the settlement boundary, is outside of the Green Belt, and would have no significant adverse harm to the landscape setting of the Village or on any ecological and heritage interests;*
- b) the site can provide suitable vehicular access and good connectivity with existing village facilities and the public footpath network;*
- c) the design, layout and scale of development is established through a collaborative approach to design and development, involving District and Parish Councils, Neighbourhood Plan Teams, local residents and other stakeholders;*
- d) the housing mix of schemes reflects any up to date evidence of local housing need through a parish or village Housing Needs Assessment, including those of neighbouring parishes. Beyond meeting this need, or in the absence of a local Housing Needs Assessment, the scheme reflects the needs of the District as set out in the latest Strategic Housing Market Assessment; and*
- e) on sites allocated for 50 or more dwellings, the proposals include a phasing strategy whereby the homes are delivered across the plan period in phases of no more than 50 dwellings at a time over a period of 5 years, starting from the date the development commences on site.*

### **Policies Map 15: Radford Semele**

#### **Representation:**

A C Lloyd Homes object to the Policy Map for Radford Semele. As set out in the objection to Policy DS11, the Map should include the A C Lloyd site at Spring Lane and the settlement boundary should be adjusted accordingly.

### **Policies Map 16: Bishop's Tachbrook**

#### **Representation:**

A C Lloyd Homes object to the Policy Map for Bishop's Tachbrook. As set out in the objection to Policy DS11, the Map should include the A C Lloyd site at Seven Acre Close and the settlement boundary should be adjusted accordingly.