

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph Number:

Policy Number:

DS11 Allocated Housing Site

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes



No



5.2 Complies with the Duty to Co-operate?

Yes



No



5.3 Sound?

Yes



No



6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:



Justified:



Effective:



Consistent with National Policy:



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Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see below

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound the land to the east of Church Lane as shown on the attached location plan and masterplan should be allocated for housing development of up to 130 dwellings plus open space. Further in order to give greater protection to the setting of the Parish Council and bring additional benefits to local residents land to the west of Church Lane could be allocated for public open space.

The allocation of the land would increase the amount of housing to be provided in the village to circa 180 dwellings, or about 22.4% of the 2011 housing stock which is consistent with the level of provision in other

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The matters raised in these representations require the Council's assessment and appraisal work to be rigorously tested, and the strategy of the Plan to be considered in the detail which can only be achieved by debate at an examination.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed

[Redacted signature]

27/06/2014

Date :

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Rep ID:

- 7 Radford Semele is one of the larger more sustainable villages in the District and it has been correctly identified as a Growth Village but the evidence base clearly demonstrates that it is capable of accommodating more than the 50 houses allocated to it. The Revised Development Strategy July 2013 and the Village Housing Options and Settlement Boundaries Consultation (November 2013) recognised the sustainability of the settlement, noting constraints, and identified it suitable for delivering 100-150 houses. Additional allocations should be made and land to the east of Church Lane previously the preferred option, should be allocated.

The settlement has a range of services and facilities including a local shop and post office, primary school, place of worship, mobile library, community centre, public house, children's nursery, and public open space. Furthermore it is close to the centre of Leamington Spa (2.7 miles) and has a good bus service (10 minutes to the centre on the bus).

The 2011 usual resident population was recorded as 1,022 persons and there were 803 dwellings. This makes it the second largest rural settlement in the District and, in the Council's own settlement hierarchy report it achieved the equal third highest score behind Hampton Magna and Cubbington. It is relevant to note however that the population of the village fell slightly between 2001 and 2011, which is indicative of the growth of smaller households occupying existing housing stock and the lack of new housing development over the last decade or more.

Notwithstanding the high sustainability score for Radford Semele the Plan now only allocates land for 50 dwellings which only amounts to 6.23% of the number of dwellings found in 2011. This level of provision is inconsistent with earlier findings of the District Council and with the amount of housing to be directed to other Growth Villages and previously proposed, including Bishops Tachbrook (20.35%); Burton Green (22.81%); Cubbington (10.20%); and Hampton Magna (16.61%). Unlike some of these other Growth Villages, Radford Semele is not within the Green Belt, or affected by landscape or other environmental constraints. The level of housing now identified for the village is too low and does not meet the requirements of the NPPF and local objectives.

The process by which the District Council arrived at a lower figure for housing growth in Radford Semele than promoted in earlier versions of the draft Plan is unclear, and is not supported by the evidence base. The Village Housing Options and Settlement Boundaries Consultation (November 2013) recognised the sustainability of the settlement but also noted the landscape constraints in terms of potential growth to the east of the village, and potential issues of coalescence of settlements if development was to be permitted on the western/south western side of the village. Accordingly land to the east of Church Lane was allocated for 100 dwellings, and potential housing sites to the east and south west of the settlement were discounted. Land to the east of Church Lane was judged to be the preferred option for development in the village subject to a detailed phased masterplan and further detailed work in connection with landscape impact and site access.

There is no sound justification for deletion of the previous preferred option allocation in the Plan. The SHLAA 2013 found the site (R116) to have some potential for development subject to highways assessment and detailed review of landscape. This evidence base led to the site being identified as the preferred option in The Village Housing Options and Settlement Boundaries Consultation (November 2013). A new SHLAA May 2014 to support this Plan now finds the site unsuitable but without explanation as to what has changed to support this different opinion. It is noted that

the latter SHLAA postdates the publication of the Plan so the evidence base at the time of the decision making supported allocation of this site.

It is considered that land to the east of Church Lane remains suitable for housing development subject to appropriate safeguards to protect the setting of the Parish Church and other Listed Buildings, consideration of landscape impacts, access arrangements and other matters.

Considerable survey and assessment work has been undertaken by those making these representations, latterly in connection with a planning application for the land to the east of Church Lane (reference W/14/0303). In summary:

Agricultural Assessment: The site is classified as best and most versatile agricultural land. The site however is a contained area, detached from the wider area of agricultural land around the edges of the settlement and as an isolated area it is difficult and uneconomic to farm.

Archaeological Assessment: The assessment has established that no designated archaeological heritage assets are present within the study site. The study site contains two lengths of important historic hedgerow, as defined by the Hedgerow Regulations 1997. Any potential impact from the proposed scheme could be mitigated through the masterplanning process. Potential for locally important buried archaeological assets to either side of Church Lane was identified and geophysical survey work has been undertaken to consider this. No assets have been identified through this survey. As a result no archaeological assets have been identified that would be a constraint to development.

Ecological Assessment: The site itself is not subject to any statutory or non-statutory nature conservation designation. However, several ecological designations lie adjacent to and within close proximity of the site. In summary, with the implementation of appropriate mitigation measures the proposals will have no significant adverse effects on any nature conservation designations.

Flood Risk Assessment: The site lies in Flood Zone 1 (Low Risk), it would not adversely increase flood risk elsewhere as a result of the proposed development through increase in surface water run-off. A drainage strategy is set out in the Assessment.

Heritage Assessment: There are a number of Listed Buildings around the edge of the site to be taken account of in development proposals. The boundaries of the development area can be drawn to respect these and the development area determined to maintain an open frontage to Southam Road frontage and areas of open space to protect the setting of the Church and other listed buildings.

Landscape and Visual Impact Assessment: The site is not subject to landscape designations and a former Area of Restraint policy was removed in 1994 following a recommendation of a previous Local Plan Inspector. The Inspector recommended deletion specifically to allow for the possibility of future growth of the village.

The Landscape and Visual Impact Assessment concludes that the site and receiving environment have the capacity to accommodate the proposals for a development area of 5.4 hectares. The proposals would not result in significant harm to the landscape character or visual environment and a proposed development could be successfully integrated in this location.

Transport Assessment: An assessment confirms that the site can be satisfactorily accessed from Church Lane via a new traffic light junction with Church Lane/Southam Road and School Road which will consolidate the existing pelican crossing. Pedestrian / cycle / emergency access is available from Offchurch Lane. The County Highway Authority has confirmed it has no objection to the development of the land on highway grounds. All the village services and facilities are then within easy walking and cycling distance of the site.

The Development Framework Plan (Ref 5277 DF 001 H) prepared to support the planning application is enclosed. The full reports summarised are available with the planning application (W/14/0303).

Enc: Development Framework Plan (Ref 5277 DF 001 H)
 Heritage Assessment
 Landscape Assessment



Key existing vegetation structure to north eastern boundaries to be retained and enhanced

Pedestrian/ cycle / emergency access

Development focused within central and eastern site area

Enhanced landscape buffer to southern site boundary affords a degree of containment to the site, forming an appropriate setback from the existing urban edge

5.4ha (Up to 130 Units)

Grand Union Canal Walk (Recreational route)

Existing vegetation to north western and western boundary to be reinforced and enhanced.

Potential location for parking facilities

St Nicholas' Church

Belensara Pond

Public Open Space

Public Open Space

Church Lane

Southern Road

Site access onto Church Lane

Provision of public open space focussed within western site area maintaining an appropriate setting to St Nicholas Church



NOTES:
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