

Warwick Local Plan: Publication Draft, 2014- Representations on behalf of Deeley Group Ltd

Paragraph 1.29

Representation:

Deeley Group 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 a 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:

Deeley Group 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 of 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 on 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:

Deeley Group 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, Deeley Group 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 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, Deeley Group 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 the objection to Policy DS6 and DS7, Deeley Group advocates 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, Deeley Group 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 within each settlement. This approach was supported. The current approach of allocating a small number of sites with very tightly drawn settlement envelopes 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 Deeley Group's objection to Policy HS10.

In terms of additional sites to be included within Policy DS11, Deeley Group in particular seek the inclusion of 2 sites:

1. Land off Home Farm, Leek Wooton
2. Land off Friends Close, Baginton

These are considered further below.

Home Farm, Leek Wootton

The site comprises 2.5 hectares of land, it is broadly rectangular in shape and is located on the western edge of the village. The site is accessed off Home Farm a cul-de-sac leading from Warwick Road which currently serves a number of residential properties.

The site immediately adjoins the existing built up part of Leek Wootton and is in a sustainable location. The local facilities within the village are within walking distance of the site. These facilities include a primary school, village hall, place of worship and a public house. The village is serviced by public transport, with an hourly bus service to Warwick.

The site is generally flat with mature trees along the boundaries and a few within the centre of the site. The Warwickshire Golf course lies along the western boundary of the site, farmland is located to the south and existing residential properties lie to the north and east. The residential character of the surrounding area is mixed with varying house types and designs including a mix of detached, semi-detached and terraced houses and cottages.

The site is considered suitable for a mix of open market and affordable dwellings. The illustrative layout plan shows one option of how the site could be developed and indicates a scheme of low density residential development incorporating 10 units including a mix of 6 open market bungalows and 4 social houses to the northern part of the site which aims to provide a sustainable and inclusive mixed community.

The landscape proposals for the scheme are a key consideration, with opportunities for the inclusion of significant areas of open space incorporated into the scheme along with retained and improved landscape boundary treatment. One of the key features is to retain views into the open views into the countryside.

As with any development site, there are a range of environmental and technical considerations that need to be considered as part of any development allocation. These are addressed in the accompanying Statement in Support of the Representations which illustrate that there are no known technical reasons why this site could not come forward for development.

Friends Close, Baginton

The site comprises 0.9 hectares of land, and is located to the rear of houses on Mill Hill, in the north western part of the village. The site is accessed from Friends Close, an adopted cul-de-sac leading from Mill Hill that currently serves a church community hall to the east. A plan of the site is attached with these representations.

The site is sloping north to south and comprises of scrubland and an area of trees. The surrounding area to the north is residential in character whilst to the south it is open countryside. The site was originally part of a wider area that was the local quarry and used for sand and gravel extraction. The quarry was filled over 50 years ago and although some of the former quarry area is not suited for development, the land off Friends Close as identified in this submission has been assessed as suitable for development subject to normal mitigation.

The site is considered suitable for up to 20 units. As part of the development, land to the south as identified in blue on the site location plan would be offered to the Parish Council as for public access. This would provide a valuable local amenity.

Policy H1: Directing New Housing

Representation:

Deeley Group 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:

Deeley Group 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 ones. 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 and more affordable housing provision to be provided in the District.

Policy H10: Bringing forward Allocated Sites in the Growth Villages

Representation:

Deeley Group 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 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 immediately adjacent to the village envelope 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 8: Baginton

Representation:

Deeley Group object to Policies Map 8, as the settlement envelope boundary does not accurately reflect the extent of the village and ignores recent planning permissions and existing buildings. Specifically, it should be redrawn to include the recently approved Free School located off Bosworth Close, as well as the neighbouring church hall.

Deeley Group also object to Policies Map 8 on the grounds that it should include the Deeley Group site at Friends Close (as referenced in the objection to Policy DS11). The site should be identified for housing and included within the settlement envelope boundary. The combination of the southern boundary of this site, the church meeting hall and the school would form a new logical and defensible long term boundary for the Green Belt.

Deeley Group consider that the settlement boundary is currently too tightly drawn and does not provide for a long term clear and defensible boundary to the Green Belt around the village. As such the Map is not positively prepared and does not take into account NPPF requirements that new Green Belt boundaries should be drawn having regard to their intended permanence in the long term, to ensure that they are capable of enduring beyond the plan period.

Paragraph 85 of NPPF requires that:

When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

In circumstances where the plan already acknowledges that Green Belt boundaries need to be reviewed, and furthermore that it is already known the plan may need an early review to provide for some of the housing needs of neighbouring authorities, it is clear that the circumstances require proper consideration of the permanence of the proposed new Green Belt boundaries.

Policies Map 12: Leek Wootton, Hill Wootton, Old Milverton and Blackdown

Representation:

Deeley Group object to Policies Map 12 on the grounds that it should include the Deeley Group site off Home Farm (as referenced in the objection to Policy DS11). The site should be identified for housing and included within the settlement envelope boundary.

In general, Deeley Group consider that the settlement boundary is too tightly drawn and does not provide for a long term clear and defensible boundary to the Green Belt around the village. As such the Map is not positively prepared and does not take into account NPPF requirements that new Green Belt boundaries should be drawn having regard to their intended permanence in the long term, to ensure that they are capable of enduring beyond the plan period.

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- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

In circumstances where the plan already acknowledges that Green Belt boundaries need to be reviewed, and furthermore that it is already known the plan may need an early review to provide for some of the housing needs of neighbouring authorities, it is clear that the circumstances require proper consideration of the permanence of the proposed new Green Belt boundaries.