

**Representations on the Warwick
District Local Plan
Proposed Modifications February 2016**

Land at The Valley, Radford Semele

Mr & Mrs Jarrett





Contents Page

| | | |
|-----|----------------------------------|---|
| 1.0 | Introduction | 2 |
| 2.0 | Modifications 1 & 2, 4 & 5 | 3 |
| 3.0 | Modification 3 | 4 |
| 4.0 | Modifications 6 & 7 | 5 |
| 5.0 | Modifications 8 & 9 | 6 |
| 6.0 | Modifications 10 and 11 | 7 |

Additional Documents (attached separately)

- Location Plan
- Access point design
- Flood Risk Assessment

| | | |
|---------|----|---------|
| Created | NM | 19/4/16 |
| Checked | | |
| Issued | | |



1.0 Introduction

- 1.1. McLoughlin Planning are instructed by Mr & Mrs Jarrett to submit representations on the proposed modifications to the Warwick Local Plan 2011-2029. This document will take each relevant modification in turn and where necessary, refer to the Evidence Base, National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and other material considerations.
- 1.2. By way of context, Mr & Mrs Jarrett have land interest on a site at The Valley, in Radford Semele which measures circa 1.6ha for up to 40 units. The purpose of these representations is to make comment on the various modifications and promote the site for development, as a means of assisting the Council in meeting its strategic housing target.



2.0 Modifications 1 & 2, 4 & 5

- 2.1. Mr & Mrs Jarrett support the Council in meeting its Duty to Cooperate and the increase in housing need to accommodate the unmet need from outside of the District. However, this unmet need should not be separated out from the actual need for Warwick DC.
- 2.2. As acknowledged, the 2015 SHMA has a critical role to perform in helping the Council prepare a Local Plan, which is sound. However, it is noted that the SHMA covers a 20-year period, but the plan period is only 18 years. To allow for this, the Council has applied a pro-rata figure to the plan period. Mr & Mrs Jarrett's concern with this is that although the total need over the 20 year period is known, the breakdown of demand for housing during the period is not, it is not a constant perfect linear line, but dynamic.
- 2.3. Therefore, the Plan's target of 16,776 new dwellings is not justified and potentially could not be delivered in the short term. Failure to provide the required level of housing will further compound supply problems as well as hinder economic growth and fail to address affordability concerns. This is further supported by the affordability of market housing data shown in table 46 in the SHMA, which identifies that Warwick District is less affordable, than the England average.
- 2.4. If the Council insist on using a figure different to that in the full OAN identified in the SHMA, This figure needs to be justified for the shorter period. It is also considered that in accordance with the need to "boost" housing supply that the housing target should be expressed as a minimum to provide for additional flexibility to make for any under-delivery on allocated/consented site. Such a modification would also have the benefit of providing a suitably permissive policy framework, should the circumstances arise where it is necessary to review the Plan.



3.0 Modification 3

- 3.1. Mr & Mrs Jarrett support the change to Policy DS4. This clarifies that allocations can occur to a wider range of settlements across the District.



4.0 Modifications 6 & 7

- 4.1. Following on from the Inspector having found the windfall figure as previously put forward unjustified, the Council have lowered the figure.
- 4.2. However according to the letter from the Council leader, Cllr Andrew Mobbs, to the Inspectorate dated 14th October 2015, work is still on going “regarding a justifiable level of windfalls” and the figure put forward is “just an estimate” and no further evidence has been provided within the proposed modifications to support this figure, even though it is lower than the previous allowance.
- 4.3. As a result, Mr & Mrs Jarrett consider the Plan’s approach towards windfalls to still be unsound as it is clearly contrary to national guidance and the fact that the Plan is supported by a robust SHLAA. Given the detail in the SHLAA, further housing allocations can and should be made to further reduce any risk of the housing target being met. In addition, subject to other representations looking for the Plan’s target to be expressed as a minimum, it would provide the necessary flexibility for windfalls to come forward.
- 4.4. It is considered that the windfall figure can be reduced further by the allocation of Mr & Mrs Jarrett’s land at Radford Semele for housing development.



5.0 Modifications 8 & 9

- 5.1. Mr & Mrs Jarrett support the proposed changes to Paragraph 2.37 and 2.38. As now drafted, the Policy will allow for housing development on locations adjacent to more sustainable villages. In terms of the SHLAA identifying suitable and available sites, whilst there is no reference to it in the Modifications, there will be a need for routine monitoring of the SHLAA to present an up-to-date picture of site availability.



6.0 Modifications 10 and 11

6.1. Mr & Mrs Jarrett support the Plan in making additional allocations for housing land to meet the revised housing target, including the allocation of additional land at Radford Semele. However, Mr & Mrs Jarrett consider the Plan unsound in regards of the Radford Semele Plan as it does not allocate Mr & Mrs Jarrett’s land at the Valley for housing development.

6.2. In seeking the site’s allocation, Mr & Mrs Jarrett wish to make the following observations.

Consistency with the emerging Local Plan

6.3. The site is a green field housing site, situated on the southern side of the village, adjacent to The Valley. Whilst it is located outside of the settlement boundary for the village, it is bounded by development on three sides and visually reads clearly as part of the village.

6.4. Emerging Local Plan policy H1 provides clear guidance on where new housing will be located. In Radford Semele’s case, it is identified as a ‘Growth Village’ where new development will be directed to locations adjacent to it (see modifications 3 and 9 which directly support this location strategy). As Radford is identified as a Growth Village, it follows that it should be a focal point for new housing development, away from the major urban areas in the district. Given the existing commitments of H38 and the allocation of H52, the Plan clearly considers that this is a settlement which can accommodate additional housing.

6.5. Therefore, the allocation of the site would be supported by emerging planning policy.

Housing Land Supply

6.6. In conjunction with other representations, there is a clear issue about the use of windfalls in the Local Plan. As drafted, the Plan does not have any flexibility for additional sites to come forward to meet any shortfalls or under-delivery. In this case, given the presence of a windfall allowance, the proposed development of the site for up to 40 units (subject to Masterplanning) presents an opportunity to reduce the uncertainty associated with windfall delivery rates in the Plan.

Is the Site Deliverable

6.7. Subject to a detailed masterplan being prepared and site-specific matters addressed, it is considered that there are no in principle barriers to development. Using the tests in footnote 11 of page 12 of the Framework, the following should be noted:



- 6.8. *Is the site available for development?* Yes, Mr & Mrs Jarrett have acquired a controlling interest in the site, which now allows them to actively promote it for development.
- 6.9. *Is the site deliverable?* Yes, given the current position of housing land supply in the District, Mr & Mrs Jarrett are actively considering the submission of an outline planning application. Assuming either the prompt allocation of the site or positive determination of the application, outline permissions would be secured and then reserve matters applications would follow. It is entirely conceivable that the site would be delivered within 3 years.
- 6.10. *Is the site developable?* Yes, in accordance with Paragraph 55 and the emerging development strategy for the District, Radford Semele has an important role to play as a 'growth village' where new development will be focused. The suitability of the village as a location for development is further underlined by paragraph 58 of the Spring Lane Appeal Decision (W/14/0433) in which the Inspector noted
- "Even though the local plan suggested only 50 dwellings as a rough guide for the village it was always likely this would have to be increased as Radford Semele is a sustainable location and is one of the most likely candidates for extra housing outside the four main conurbations in the District."*
- 6.11. The Inspector went on to note:
- "If the preferred housing figure is found wanting in the forthcoming local plan inquiry there will be even more pressure on places such as Radford Semele to find more land for housing."*

The Evidence Base

- 6.12. Whilst the site has not been actively promoted for development by Mr & Mrs Jarrett until this point, the Plan already contains an evidence base which would support its allocation.

Landscape Evidence

- 6.13. Core Document V13 does not provide the necessary fine grain analysis to draw any meaningful conclusion about the development potential of the site. However, CDV16 (page 389 onwards) provides an analysis of the site. In landscape terms the site is considered to have a high/medium sensitivity to housing development, which compares favourably against other options around the settlement. Page 389 concludes that:



6.14. There is some scope for very small scale development in the most north eastern corner of the site, providing existing woodland block is extended along the eastern boundary of the zone.

6.15. The site is bounded by the settlement boundary on three sides and represents an infill position.

Ecology

6.16. Again, document V16 provides the necessary conclusions on the potential of the site, subject to detailed technical work. This is a site of low ecological value and not subject to any national or local environmental designations.

Highways

6.17. The site has a direct access point onto The Valley and then onto Lewis Road, along which there is a footway allowing access to local services and facilities, as well as to bus stops on the A425 to the north of the village. It is therefore, a highly accessible site by a range of modes of transport.

6.18. Access to the site can be achieved by utilising an existing field access point on The Valley and undertaking some highway widening works to provide a footway for pedestrians. This will cross over and require the culverting of a drainage ditch on the south side of The Valley.

6.19. The attached access plan shows the technical detail for such an arrangement.

Flood Risk

6.20. The site is adjacent a pond and drainage ditch, which runs along the northern boundary of the site. Currently, there is no field drainage and surface water runoff is not actively managed. Development of the site, complete with surface water attenuation measures will be able to provide an enhanced drainage system and better control run off.

6.21. The attached FRA provides further details of the issues and solutions, concluding that the site is in Flood Zone 1 and that a surface water drainage strategy can be delivered.

Housing Mix

6.22. The site can provide a mix of units, both open market and affordable, in line with planning policy.

Therefore, in conclusion

6.23. The proposed allocation would meet the tests of soundness in that:



- Its allocation would be positively prepared, assisting the Council in meeting its objectively assessed needs.
- Justified by the existing evidence base, supplemented by technical details provided with this document.
- Consistent with national policy, for the above reasons.

6.24. Therefore, Mr & Mrs Jarrett request that the site is allocated for development.



McLoughlin Planning
North Warehouse
Gloucester Docks
Gloucester
GL1 2FB
01452 835 614
www.mplanning.co.uk

