

Preferred Options Response Form 2012

For Official Use Only

Ref:

Rep. ref:

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B 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 for members of the public. You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agents Details
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Would you like to be made aware of further consultation stages of the new Local Plan? Yes

Part B – Commenting on the Preferred Options

Sheet 1 of 6

Which document are you responding to? Preferred Options (Full Version)

Which part of the document are you responding to? PO1: Preferred level of growth.

Paragraph number / Heading / Subheading (if relevant)

Map

What is the nature of your representation? Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Options consultation document states the March 2011 'Helping Shape the District' consultation, which provided three scenarios for growth; 250 dwellings/year, 500 dwellings a year, 800 dwellings/year.

The report indicates that following this consultation, two options for growth have been considered; Option 1 providing 600 dwellings/year, Option 2 providing 700 dwellings a year. The Council has decided to work towards the delivery of 600 dwellings/year providing a total of 10,800 new homes between 2011 and 2029, considering this to be the more sustainable option.

RPS on behalf of the Trustees disagrees with this figure growth option as it does not provide appropriate levels of growth in line with the evidence base for the Local Plan.

Evidence advanced by the West Midlands regional assembly for the West Midlands RSS Examination in July 2009 from the Cambridge Centre for Housing and Planning Research, based on 2006 ONS Household Projections and allowing for the economic downturn, concluded that Warwick District's housing requirement between 2006 and 2026 was 18,200 dwellings at a rate of 910 dwellings/year.

The 2008 ONS Household Projections estimates an increase of 17,000 households between 2008 and 2028, at a rate of 850 dwellings/year. The 2012 Strategic Housing Market Assessment indicates a requirement of 698 dwellings/year to meet affordable housing needs of the District, in addition to market housing needs. Therefore it is evident that the Council's proposed 10,800 dwellings for the Local Plan period is insufficient and below the predicted number of new homes required.

The 2012 Strategic Housing Land Availability Assessment indicates a supply of housing between 2014 and 2029 of 13,385 on deliverable sites, excluding windfall sites. Therefore, a greater number of dwellings can be delivered within the District to contribute towards the housing needs of Warwick than the 10,800 target proposed in the Local Plan. However, even with the deliverable SHLAA sites taken into account it is evident that further housing is required to meet predicted levels of growth.

Therefore, RPS is of the opinion that the Council should recognise that the development of Green Belt land in sustainable locations is required to ensure that housing needs of the District are appropriately met, and in particular that growth within the rural areas is supported. The Council's housing targets should therefore be increased to reflect the evidence base.

Part B – Commenting on the Preferred Options

Sheet 2 of 6

Which document are you responding to? Preferred Options (Full Version)

Which part of the document are you responding to? PO3: Broad Location of Growth

Paragraph number / Heading / Subheading (if relevant)

Map

What is the nature of your representation? Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Option to concentrate growth within or on the edge of existing urban areas, including some growth adjacent to villages, is supported by RPS. It is also agreed that development should be in sustainable locations avoiding the coalescence of settlements, and development within the rural areas should be higher in the larger villages (Categories 1 and 2) where services are available and more accessible.

RPS supports the Council's preference for distributing development across the District, and the recognition of the importance of the presumption in favour of sustainable development, particularly the acknowledgement of a need for housing in rural areas to support local communities.

The Council recognises that there is a shortage of suitable urban brownfield sites, and RPS recommends that rural Green Belt sites adjacent to settlement boundaries are considered to ensure that housing can be delivered to meet the proposed increase in households for the plan period and provide additional support for villages.

Hatton is a Category 2 village with a range of services and community facilities, such as a day nursery, Primary School, church and village hall, alongside significant development nearby at Hatton Park. RPS considers that the Council should allow small-scale growth on Green Belt land adjacent to the existing settlement of Hatton to support the existing local facilities and contribute towards rural housing needs.

Part B – Commenting on the Preferred Options

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Which document are you responding to? Preferred Options (Full Version)
Which part of the document are you responding to? PO4: Distribution of Sites for Housing
Paragraph number / Heading / Subheading (if relevant)

Map

What is the nature of your representation? Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

RPS supports the Preferred Option and the distribution of new housing within the District, prioritising the large urban settlements for the majority of the housing and community facilities, but also enabling development within the rural areas.

RPS also supports the identification of Hatton as a Category 2 village within Policy PO4, and that some development in these larger villages will be allowed.

In the case of Category 1 and 2 villages which are currently “washed over” within the Green Belt, the Preferred Option advises that it will be necessary to identify areas with potential for limited development for inclusion within a village envelope. Specifically, in the case of villages within the Green Belt such as Hatton, land within the village envelope will be removed from the Green Belt to enable development to take place.

In the rural areas, a limited amount of development is directed to those villages with a good range of services and public transport to the towns. The Category 2 villages such as Hatton have fewer services than Category 1 villages, but it is recognized that a limited amount of development may help to support existing services and could encourage new services, as well as provide a greater choice of housing.

The Preferred Option Policy proposes that between 30 to 80 dwellings are to be developed at Hatton. Whilst it is agreed that housing is required at Hatton, as the Council’s targets of 10,800 new dwellings up to 2029 is far below the evidence base projections for growth and number of housing required, it is recommended that the Council promotes the higher figure of 80 dwellings to be delivered at Hatton. RPS considers that due to the sustainable location of Hatton village with good links to Warwick Town Centre and M6 Motorway, and existing facilities within the village, a larger number of houses can be supported.

There is no specific boundary for Hatton on the current Local Plan Proposals Map. Whilst the policy states that land within the village envelope may be removed from the Green Belt to enable development to take place, RPS recommends that this should also apply to sustainable sites adjacent to the settlement boundaries which could be easily integrated within the existing settlement. The Trustees site lies outside of the settlement of Hatton, but adjacent to it with existing properties on either side, as the enclosed Location Plan shows, and could provide a proportion of the required housing for the village

Therefore, RPS recommends that the village boundary of Hatton is revised to include the Trustees’ site, and that the site is excluded from the Green Belt to allow for residential development which would contribute to meeting rural housing needs and support the village.

Part B – Commenting on the Preferred Options

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Which document are you responding to?

Preferred Options (Full Version)

Which part of the document are you responding to?

PO5: Affordable Housing

Paragraph number / Heading / Subheading (if relevant)

Map

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Policy PO5 is considered to be acceptable, requiring 40% affordable housing on developments of 5 or more houses in rural areas. However, it is hoped that this target will meet the affordable housing needs identified in the Council's latest SHMA or Local Housing Needs Assessment.

The inclusion within the policy that the Council will be flexible in respect of the viability of developments to be able to provide this 40% affordable housing is supported.

RPS considers that this is important as some small sites, particularly in the rural areas, may not be able to viably contribute towards this affordable housing requirement. This should not stop smaller sites from coming forward to meeting the market housing needs of the District, especially in the larger villages where development would provide greater support to local services and facilities within these villages.

Part B – Commenting on the Preferred Options

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Which document are you responding to? Preferred Options (Full Version)

Which part of the document are you responding to? PO10: Built Environment

Paragraph number / Heading / Subheading (if relevant)

Map

What is the nature of your representation? Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

RPS accepts Policy PO10 and the Council's priorities of delivering sustainable development in terms of protection of the environment, high quality design, and incorporation of sustainability and renewable energy measures.

However, it is important that these measures are only incorporated into developments where it is viable to do so, and this should be included within the policy. RPS considers that although sustainability is key to the NPPF, it is important for the Council not to reject housing proposals that do not meet all of the aims of this policy as this could compromise rural housing delivery. Furthermore, the Council proposes 10,800 dwellings to be delivered up to 2029, which is far below the anticipated increase in population and future needs identified in the SHMA and ONS 2008 Household Projections.

RPS therefore considers that the Council should be flexible when assessing locations for development and planning applications, to enable developments such as rural housing schemes, to be delivered where it is not viable to include these sustainable measures but which would support growth within the rural areas.

RPS seeks for a higher level of housing to be proposed for the District in line with the 2008 ONS Household Projections, and that consideration should be given by the Council for development on potentially less sustainable sites to meet these housing targets and provide for local needs.

Part B – Commenting on the Preferred Options

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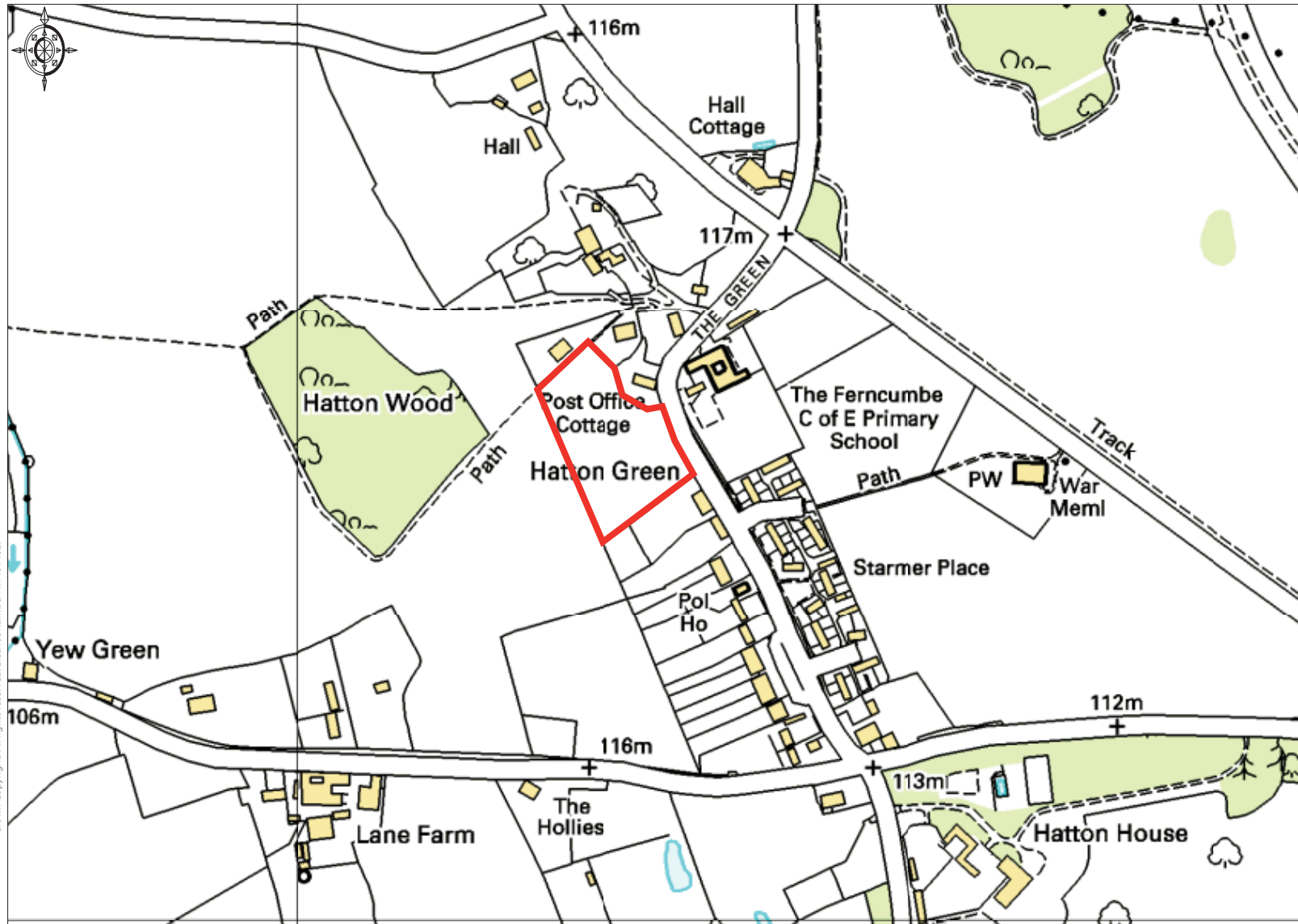
Which document are you responding to? Preferred Options (Full Version)
Which part of the document are you responding to? PO16: Green Belt
Paragraph number / Heading / Subheading (if relevant)
Map (e.g. Preferred Development Sites – Whole District)
What is the nature of your representation? Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Option's strategy in relation to Green Belt development and the recognition of the requirement for housing within the rural area to support local services and enable growth of villages, particularly at larger villages which can sustain some level of growth, is supported by RPS. RPS agrees with the removal of the larger villages from the Green Belt and the alteration of settlement boundaries with development sites identified, to enable future development to occur which cannot be delivered on brownfield sites.

The Preferred Option to remove Hatton from the Green Belt and draw a new Green Belt boundary around the village to allow for development is supported by RPS. Such a boundary must include potential development sites.

The Local Plan has identified an additional 30 to 80 dwellings to be delivered for Hatton. RPS considers that the site promoted by the Trustees of the Haseley Settlement, located off 'The Green' at Hatton as shown on the attached Location Plan, is an appropriate location to deliver a proportion of this housing. The site is adjacent to the existing settlement with houses on either side, and is located just off the main road through the village. RPS therefore considers that the Council should recognise the potential of this site in bringing forward sustainable development at Hatton, and that the new village boundary includes the site within the settlement.



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SCALE: 1:5000 @ A4

REF: JBB8053
 CLIENT: Bruton Knowles
 DATE: July 2012
 STATUS: Final

CHECKED BY: AB
 DATE CHECKED: 23/07/12
 REVISION: 00
 PREPARED BY: JP



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