

Policy P01 Preferred Limit of Growth

Objections are lodged in respect of this policy on the basis that the overall housing provision does not meet the identified housing requirements set out in the evidence base.

The NPPF requires Local Planning Authorities to have a clear understanding of housing needs in their area. Accordingly the SHMA is the mechanism by which the housing needs of the District are assessed within the plan period (i.e. up to 2029).

The evidence base sets out 3 possible scenarios for assessing the future housing requirement. These are as follows: -

- i. Option 1 provides for 600 dwellings per annum;
- ii. Option 2 provides for 700 dwellings per annum;
- iii. Option 3 was dismissed on the basis that the increase in jobs would not be matched by an increase in houses.

We agree with the general premis, that there is a direct relationship between new jobs in the District and the demand for new houses. It is however necessary to adopt an as realistic approach as possible. Given the location of the District i.e. close to the large employment centres of Solihull, Coventry and Birmingham, there inevitably will be a demand for housing in the District from people who work outside the District.

Policy P01 sets out a preferred level of housing growth of 10,800 dwellings between 2011 and 2029. This level of growth is insufficient as it is lower than the evidence in the SHMA as well as recent household projections. It also fails to take account of the decisions of adjacent local authorities. These issues will be outlined in more detail below.

Strategic Housing Market Assessment (SHMA)

Turning to the evidence which underpins the core strategy housing provision, the SHMA at paragraph 7.30 indicates that the annual need for affordable housing will be 698 dwellings per annum. This exceeds the preferred option for housing growth and more importantly only addresses the affordable housing need, not the need for open market housing which will largely provide the affordable housing. The SHMA does not address what the market need will be in the District in addition to the affordable need. Accordingly the SHMA does not satisfy the requirements of paragraphs 159 of the NPPF.

It is unclear why the 3 modelled scenarios relate to the requirement of the NPPF for the SHMA to identify the scale of housing needed or the range of tenures including housing

demand. It is not known how (if at all) the figure of 698 affordable houses per annum relates to the 3 scenarios, since it exceeds 2 of them and is almost comparable to the third. The SHMA needs to set out what the quantity of need is for both market housing and affordable housing for the plan period.

The preferred option does not explain why it is disputing the evidence of need in the SHMA. It would appear that the Council is relying on the fact that the SHLAA can only identify 11,410 dwellings (Paragraphs 5.18). This however would be to pursue a capacity based approach to determine the future housing requirement of the District rather than using the Local Plan to review existing policies and constraints e.g. green belt and consider the possibility of removing these constraints in order to meet the required level of housing need in the SHMA.

A capacity based approach would be contrary to the NPPF, as the explanation is that the Council should do all it can to meet the identified housing needs for all tenures of housing as set out in the SHMA.

Household Projections

The 2008 based household projections indicate an increase of 13,000 households in the period from 64,000 in 2013 to 77,000 in 2028. This period is roughly comparable to the proposed plan period. This is a figure which is approximately similar to Option 2 – the projected employment rate scenarios of 12,888 houses. The Council indicate that the employment projection is likely to be optimistic (Paragraph 3.22) owing to the most recent ONS GDP forecasts. Nevertheless the Council may find that economic growth and housing demand are stronger than expected. If this is the case, the plan will need to have the flexibility to respond to rising demand – something at present it does not have. This would be in accordance with the NPPF which expects local plans to meet objectively assessed needs and have sufficient flexibility to adopt to change.

Whilst we share the Council's pessimistic economic outlook, at least in the short term, housing demand is not solely related to employment prospects. The District will experience continued inward migration from affluent households who work elsewhere e.g. Birmingham, Coventry etc. The Council will need to cater for these requirements but also increase the overall level of supply in order to deal with those on low to medium incomes so that they are not priced out of the market by affluent incomers. Relying on the recession which we all hope will be short term over a small part of the plan period would be contrary to the

Government's 'Policy for Growth Agenda' which requires the planning process to deliver increased levels of growth.

Duty to Cooperate

There is also the duty to cooperate to consider and how this plan will provide for its own unmet needs that cannot be addressed through the plan as well as potentially unmet needs of adjoining Councils. If the Council is unable to meet its objectively assessed housing need through its plan, it will need to plan to ensure that these needs can be met elsewhere within the District. To do so, it will need to plan, in tandem, with other Councils.

The draft Local Plan makes no reference to this issue. Other adjoining Authorities are progressing plans which do not meet all of their own objectively assessed housing needs e.g. Solihull and Stratford. In addition Coventry are at the early stages of preparing their Local Plans. Providing part of Coventry's housing requirement has previously been proposed in Warwick District. The RSS preferred option identified 3,500 dwellings adjacent to Coventry but located within Warwick District, and necessitating a green belt review. The land which the objectors own is ideally placed to meet these requirements.

Clearly if some adjoining Authorities are not proposing to meet all of their own identified requirement then it is unlikely that they will accommodate any of Warwick's unmet need. This is an issue that needs to be resolved before the Examination.

Recommendations

The level of housing provision should be increased

Policy P02 Community Infrastructure Levy

We have no objections to the approach taken in Policy P02 and consider that it is sensible to develop the CIL scheme alongside the Local Plan. It is however essential that the emerging CIL adopts realistic rates of charging so as not to impede the delivery of strategic sites where the initial investment in infrastructure etc is extremely high.

Recommendations

Ensure that realistic rates of charging for CIL are adopted.

The Location of New Housing (Phasing)

It is unclear why the Local Plan requires phasing of identified sites. The Local Plan recognises the length of time it takes to implement and deliver strategic sites. However, if all of the sites have been identified as suitable, available and deliverable within the SHLAA then it is unclear why phasing should be required. Given that the SHHA identifies an annual need for affordable housing of 698 dwellings which exceeds the preferred option for housing growth, this is a further indication that there is no justification to phase the release of housing sites.

Recommendation

Delete the proposed phasing policy for residential development.

Policy P04 Distribution of Sites for Housing

Recommendation

As stated in our objection to the level of proposed development (Policy P01) there is a recognised and identified need for additional housing within the District not just to meet the District's housing needs but probably also those of adjoining Districts such as Coventry. The Core Strategy should and must provide the necessary certainty that those needs will be met. This can only be achieved if additional land is identified for housing development.

It is considered that in meeting the actual housing needs for the District (and perhaps those of adjoining Districts) that land currently within the green belt needs to be released. As part of the preparation of this Local Plan, the Planning Authority has undertaken a green belt review. The details of which are set out in the Coventry Joint Green Belt Review (January 2009). The land under consideration was identified as site C14C (see attached). It was reviewed in relation to the 5 green belt functions identified in PPG2 'Green Belts', now carried forward into the NPPF (paragraphs 80). The assessment concluded that the land is one of the least constrained parcels to the south of Coventry and potentially suitable to be released from the green belt.

Furthermore, the suitability of the site for development was identified within the SHLAA (May 2012). The site was assessed on Site Reference C13 Lodge Farm, Westward Heath Road, Coventry. In terms of site overall suitability, the site was assessed as (see attached): -

“Potentially suitable in part only (18.5 hectares) excluding southern extensions to site which could impact upon potential SINCS. Any development would be suggested for satisfactory measures to mitigate against impacts on areas of high landscape value.”

Accordingly in terms of the advice in the NPPF, the site is considered available, suitable and achievable. Indeed the potential of releasing land at Westward Heath Road was also assessed by the County Council in their Traffic Flow Model System. That work concluded that there would be no problems in terms of traffic impact from a residential development of 880 dwellings. In addition the emerging Local Plan confirms that there would be no issues with regards the capacity of existing schools in the area.

Comment

In view of the above, there are no constraints to the delivery of the site in respect of highways, landscape and visual impact, biodiversity, heritage assessment, drainage or ground conditions. Whilst the site is currently located within the green belt, the joint green belt review concluded that the site was relatively free from constraints and should be taken forward for further consideration. The release of the site has the potential to be developed in accordance with the principles of sustainable garden towns as set in the Council's Garden Towns, Village & Suburbs Prospectus. The promoters would want to engage in early discussions with the Planning Authority to discuss these principles of development and how they would be taken forward in joint working.

Recommendations

The site should be released from the green belt and allocated for a housing land development of up to 880 dwellings within the Local Plan. That development should adhere to the principles of sustainable garden towns as set out in the Council's Garden Towns, Village & Suburbs Prospectus (see attached plan).

P05 Affordable Housing

Objections are lodged to the proposed 40% affordable housing provision. This is contrary to the evidence which concludes that 35% affordable housing is a viable level. The purpose of the Plan led system is to provide certainty to developers, landowners etc. If the Council ignore their own evidence and adopt a higher threshold for affordable housing, there will be no guarantee that they would adopt a flexible approach once the 40% threshold was adopted. This approach is totally contrary to the guidance in the NPPF which requires that viability of affordable housing and other policy requirements of the plan are deliverable and to ensure that these do not render development unsuitable and thus that plans undeliverable.

The onus should not be placed on the developer to prove viability but for the Council to ensure that viability has been assessed when arriving at the initial figure for affordable housing within policy. This is in line with the NPPF but also the decision in Blyth Valley DC v Persimmon Homes (North East) Limited (2008).

Concerns are also expressed at the content of the viability assessment which underpins the affordable housing policy. It considered that either a number of costs have not been taken into account e.g. biodiversity offsetting, flood mitigation etc or that the figures included within the viability assessment are too low e.g. planning contributions.

Recommendation

In view of the above, it is recommended that the policy be amended to reflect the level of affordable housing based on the evidence base i.e. 35%. In addition the Council should also undertake a further viability assessment to ensure that it is compliant with NPPF and the Blyth Valley judgement.

Policy P016 Green Belt

We object to this policy which does not remove land at Lodge Farm, Westward Heath Road from the green belt and allocate that site for a housing led development in accordance with the Garden Towns principles. These objections should be read in conjunction with those made in respect of Policy P01 The Location of Development and P04 Distribution of Sites for Housing.

As part of the preparation of the Local Plan, the Planning Authority has undertaken a green belt review. The details of this are set out in the Coventry Joint Green Belt Review (January 2009). The land in question was identified as site C14C (see attached). It was reviewed in relation to the 5 green belt functions identified in PPG2 'Green Belts' (now paragraph 80 of the NPPF). This assessment concluded that the land is one of the least constrained parcels south of Coventry and potentially suitable to be released from the green belt.

Our representations in respect of Policy P01 have concluded that the housing provision for the District needs to be substantially increased. The Local Plan accepts in Policy P016 that land currently located within the green belt needs to be released to assist in meeting the housing requirement. We are firmly of the view that as the housing provision needs to be substantially increased and accordingly land within the green belt needs to be released as it is accepted within the Local Plan that there are insufficient brown field sites or unconstrained green field sites to meet the housing requirement. Accordingly this site is ideally placed to be released for green belt, in accordance with our objections to Policy P04 that the site is available, suitable and deliverable in line with the SHLAA.

Recommendation

Release land at Lodge Farm, Westward Heath Road from the green belt and include within Policy P016 to include reference to the site and its identification for housing.