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SENT BY E-MAIL AND POST

20<sup>th</sup> January 2014

Dear Sir / Madam

**WARWICK LOCAL PLAN : VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. We would like to submit the following representations.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

In Paragraph 2.13 of the document "*Village Housing Options and Settlement Boundary Consultation*" dated November 2013, the Council refers to an interim level of growth of 12,300 homes for the District between 2011 and 2029. As previously set out in the HBF's representation dated 29<sup>th</sup> July 2013 in response to the Council's Revised Development Strategy consultation, this figure is not accepted as an appropriate housing requirement for Warwick District Council.

As the Council acknowledges under Paragraph 2.13 this figure may be revised subject to the findings of the ongoing work on a Joint Strategic Housing Market Assessment (SHMA) with neighbouring authorities. At this time, it is noted that the "*Coventry & Warwickshire Joint SHMA*" Final Report dated November 2013 by G L Hearn states in Paragraph 7.79 that an appropriate level of provision in Warwick District Council would be 720

dwellings per annum equivalent to 12,960 dwellings over the Local Plan period.

Paragraph 2.14 of the current consultation document refers to RDS4 of the Revised Development Strategy and the broad location of 6,622 unallocated plots, of which 1,000 dwellings were to be allocated in villages. The Draft Settlement Hierarchy Report dated May 2013 focussed on the 10 most sustainable village locations as set out in the Table below :-

<b>Description</b>	<b>Nos. Dwellings identified in Draft Settlement Hierarchy Report</b>	<b>Nos. dwellings Preferred allocations (Section 7 : Village Plans &amp; Housing Options)</b>
<b>Primary Service Village</b>		
Bishop Tachbrook	100 – 150	150
Cubbington	100 – 150	75
Hampton Magna	100 – 150	100
Kingswood	100 – 150	62
Radford Semele	100 – 150	100
<b>Sub Total</b>	<b>500 – 750 (circa 600)</b>	<b>487</b>
<b>Secondary Service Village</b>		
Bagington	70 – 90	35
Barford	70 – 90	80
Burton Green	70 – 90	75
Hatton Park	70 – 90	90
Leek Wootton	70 – 90	80
<b>Sub Total</b>	<b>350 – 450 (circa 400)</b>	<b>360</b>
<b>TOTAL</b>	<b>850 – 1,200 (circa 1,000)</b>	<b>847</b>

The end column of the above Table illustrates the sites identified as preferred allocations in Section 7 “*Village Plans and Housing Options*” of the current consultation document. As shown there is a significant shortfall between the housing numbers proposed in the Draft Hierarchy Report and the “*Village Housing Options and Settlement Boundaries*” document, which is acknowledged by the Council in Paragraph 4.10. However the Council has not proposed any remedy for this identified shortfall in housing land supply. The Council must allocate alternative development sites to remedy this shortfall especially as Paragraph 5.1.32 of the Revised Development Strategy stated “*at present there is not a 5 year supply of land for housing within the District as required by the National Planning Policy Framework (NPPF)*”.

Without a five year housing land supply, the Local Plan would not be compliant with the requirements of the NPPF, so the Council must identify and release more development land or formulate a strategy to bring forward sites from later in the plan period sooner. It also remains unclear whether the Council is applying a 5% or 20% buffer in its land supply as required by Paragraph 47 of the NPPF.

The lack of a 5 year land supply is also worsened by the recommendation of the “*Coventry & Warwickshire Joint SHMA*” Final Report for a higher housing requirement figure than the interim level of growth of 12,300 homes proposed by the Council. Under the NPPF the requirement to meet the full objectively assessed needs for market and affordable housing is an absolute one except insofar as there is any inconsistency with other policies set out in the NPPF. Any deviation from this approach will render the relevant housing policies inconsistent with national policy, and therefore unsound under Paragraph 182 of the NPPF.

The Revised Development Strategy consultation also proposed that for villages currently “washed over” by Green Belt new village envelopes would be established (Paragraph 4.4.2). However the settlement boundaries shown on the Village Plans in Section 7 of the current consultation are very tightly drawn around the existing built up areas of these villages. The Council should give further consideration to the revision of these settlement boundaries to assist in alleviating the shortage of housing land available in the District.

It is hoped that these representations are of assistance to the Council in informing the next stages of the Warwick Local Plan. If the Council requires any further assistance or information please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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