

WARWICK DISTRICT COUNCIL

PUBLICATION DRAFT REPRESENTATION

STATEMENT

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1.	1	1.4	The vision is inconsistent with the Plan Period.
2.	2	1.7	Again, there is reference to a 15 year time period and projections to carry forward housing and employment requirements need examination.
			We believe insufficient evidence has been supplied about the cooperation which has taken place to achieve a Plan that satisfies needs of neighbouring authorities.
3.	2	1.8	We believe the Plan as prepared is not consistent entirely with the four key tests of soundness.
4.	5	1.22	The second sentence indicates that the other District's ability to delivering housing requirement is not known and this is key to making sure that there is a sound Plan where the parties are cooperating and making sure that they can supply the housing requirements that are needed for the housing market area, not just for the Warwick District Council area. Evidence of the work that has taken place is needed and it needs to be at a much more advanced level to make sure that the Plan is sound in that it delivers the key strategic issues which are alluded to in this report.
5.	5	1.23	This reinforces our view that this Local Plan has been rushed through without the necessary tests being undertaken and that it is premature.
6.	6	1.29	As before re Plan Period and forward projections and detailed analysis of housing/employment growth.
7.	7	1.30(a)	There is evidence of substantial employment taking place and needs and out-commuting from properties in proximity to the Hatton Green/Hatton Park area and this is an area which should receive a higher land allocation – see comments below in relation to distribution of housing.
8.	7	1.30(d)	Relevant to comments to be made later reference to the size and condition of existing community facilities – we feel this has been inaccurately assessed and considered in relation to the Hatton Green/Hatton Park area.
9.	8	1.36	We expect that our previous submissions in relation to the subject matter, and in particular our client's interest in land at Hatton Green, will be taken into consideration and will be part of the Evidence Base that is considered when the Inquiry takes place. We will subject with pre-Inquiry papers further copies just to make sure that these are recorded and to show the background to the comments which have been made and which should have been considered before.
10.	10	1.42	We feel in places insufficient regard has been had to the key strategic priority of – “supporting sustainable communities” – this is relevant to our previous submissions over Hatton Green and this interlinks with 1.43 – bringing forward Greenfield sites in sustainable locations.
11.	13	1.55	We feel in the analysis of the Housing Site Options insufficient regard has been

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			taken to enabling improvements to facilitate key services, such as was indicated in terms of outlining the benefits of the land at Hatton Green.
12.	15	2.8	Again, in assessing sites we feel insufficient regard has been had to scoring issues such as social infrastructure provision as is alluded to in b) at the bottom of page 15 and c) over the page. See later re site analysis and justification. See also 2.12.
13.	16	DS4	STRATEGIC POLICY DS4 – we contend that in the selection process of sites, this has not been adequately taken into account when assessing the options and in particular, the relationship between the sites at Hatton Green and Hatton Park. For example, the land at Hatton Green certainly would, in our opinion, be a better site when looked objectively against criteria b) and g) iv.
14.	18	DS7	We contend: <ul style="list-style-type: none">• The number provided is insufficient.• The allocation and distribution is inappropriate.• There has been too higher regard for windfall sites which should not be part of the 12,860 which is indicated. They should be in addition and the Plan should properly provide policies and allocate sites that will deliver rather than those which might deliver. What has happened in the past is immaterial as it probably reflects the fact that the Plan was either out-of-date or did not cater adequately for housing growth. It is essential, therefore, to make sure that there are sufficient sites available and that windfalls will be objectively assessed at the time and not be seen to be those which should receive primary support as this policy would now suggest.
15.	23	DS10	See our comments above in relation to the quantum of housing growth and this obviously will affect the table showing the broad allocation of allocated housing sites. As we have suggested before, we feel insufficient regard has been had to the needs of sites within the rural area to make sure that other key objectives of this Plan can be satisfied in terms of the quantum of growth and also to make sure that sustainable communities can be improved and new services provided and existing services safeguarded.
16.	24	DS11	Generally we contend that some of the sites indicated are insufficiently tested and that their allocation is inappropriate. Secondly, in terms of the growth villages, the distribution between the growth villages is inappropriate when looking at the wider District needs and the most appropriate places for development. In particular, we contend that the land at Hatton Green, over which representations have been made before, should be allocated either in place of Site H28 or in addition to. The Hatton area generally is very close to the outskirts of Warwick employment areas and tourism facilities that need to be supported and it should be ranked more highly in terms of looking at the distribution within the growth villages and also in terms of making sure that there is adequate numbers to be allocated to growth villages in terms of the District distribution. Also, when evaluating this it should also be remembered that it is quite possible some of the larger strategic sites could be

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			delayed and there would appear to be an absence of the information showing how the land supply will meet the targets to ensure that there is a continuing adequate supply of housing land over the Plan Period. This data is not readily available and justified. We challenge the process and outcome of the Site Specific Allocations.
17.	39	PC0	In terms of the Site Allocations etc, we feel insufficient regard has been had to the over-reaching policy indicated in PC0 to make sure that there is; <ul style="list-style-type: none">• Balanced housing growth across the District• Protecting and supporting a strong tourism sector.
			This particular Policy does not have sufficient regard to the need to provide new and supplement existing services in key locations – Hatton Green has an important School facility in the locality. See our previous representations regarding community benefits and other facilities that could be provided as part of the Plan proposed. We would also like to cross-reference this to Policy CT4 on page 70 – the Hatton Green/Park area is an area which is important in terms of tourism, cultural and leisure facilities and this, together with its proximity to Warwick, means it should receive a higher distribution of the housing growth expected within the District and in particular, with regard to the growth villages.
18.	70	CT4	See above.
19.	79	H0	Insufficient regard has been had in other places in the report and the site analysis to in particular, criteria b) – as emphasised before, insufficient regard has been had to the support and regeneration of existing communities.
20.	80	H1	Generally our comments above should be taken into consideration as should previous representations. We challenge the distribution and in particular, the table which features at 4.7 and the classification of the areas at Hatton Park and Hatton Green separately. We contend that Hatton Green should be considered in the context of the Hatton area generally and be more aligned to a growth village. It should feature highly and this is supported by the first sentence of 4.7 which recognises the need to direct growth to those villages which “have a reasonable range of services and facilities” – it should feature more highly in the mix of Site Allocations. There are more key services available in the Hatton Green area than at Hatton Park.
21.	82	H2	We feel the Policy is unsound and needs to be challenged on the basis that it indicates there should be a minimum of 40% affordable. We should suggest that it should be up to 40% subject to viability and establishing local needs. Whilst it is accepted there may be an affordable housing problem, much of this has been due to the lack of supply of housing land as a result of ineffective Plans from the past and the inability to delivery adequate land for housing growth. Greater flexibility should be introduced into Policy H3 about the delivery of housing on Rural Exception Sites.

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22.	86	H3	See above.
23.	98	H10	With regard to a), whilst consultations in the “Neighbourhood Age” are generally welcomed and sensible planning, it is essential to make sure that negative and overly prescriptive views of Parish Councils, Neighbourhood Plan teams and local residents are taken into consideration and judgements are made on sound planning grounds, particularly if they object to sensible, sound and deliverable schemes. The emphasis of this particular point in terms of the expressions “collaborative approach” perhaps should be toned down with a more “consultative approach”.
			With regard to b), clearly this also needs to reflect things on a wider basis than just purely local housing need with regard to parishes and villages. Although it alludes to neighbouring parishes, in many rural areas, it is more to do with the general locality and the District need provided the sites are strategic and comply with other Plan Policies. Again, the Policy should be amended accordingly.
			With regard to c), this also interlinks with previous comments made about the lack of a managed supply of land and we feel it is unnecessarily prescriptive to indicate that sites of more than 50 houses need to be developed over more than 5 years. This is not indicative of how sites tend to get developed and managed by developers and it should be more needs and market assessed to make sure that sites can be delivered in good time and comprehensively.
24.	104	SC0	This interlinks with comments made before about criteria to assess Housing Site Allocations and the scoring which has been used, in our opinion inappropriately.
25.	125	HS4	Note our previous comments with the regard to the provision of sport and recreational and other service facilities to facilitate a sustainable growth and to support the sustainability and viability of rural settlements. This also interlinks with Policy HS5 and page 126.
26.	127	HS6	We feel this has not been adequately reflected in the assessment of the sites and the benefits that our client’s proposals at Hatton Green can deliver to the community.
			Note our proposals include sport and recreational facilities, car parking, improved access and parking and amenity issues relating to the local School. This will also benefit the residents of Hatton Green generally.
27.	169		Delivery and Monitoring – we do not feel that adequate information is supplied to show how there will be adequate delivery of housing land sites through the period of the Plan, and how this will be managed from the allocations proposed and how this will be constructively reviewed if change is needed. There is quite a high dependence on larger strategic sites which may not deliver in accordance with the Council’s expectations.