

DSD/ads/093-12

28th July 2013

D2 PLANNING

TOWN PLANNING * DEVELOPMENT * ENVIRONMENTAL CONSULTANTS

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Dear Sir

Warwick Revised Development Strategy
Representations on behalf of Crest Strategic Projects Limited

We have been instructed by Crest Strategic Projects Limited to submit representations in respect of the Warwick Revised Development Strategy. Accordingly, we enclose our representations in respect of the following policies:

- i) Duty to Co-operate;
- ii) Policy RDS1 – Level of Growth 2011-2029;
- iii) Policy RDS2 – Meeting the Housing Requirement;
- iv) Policy RDS3 – Broad Location of Development Housing.

We look forward to receipt of these representations in due course and if you require any additional information then do not hesitate to contact us.

Yours faithfully



D2 Planning Limited

Encs

Revised Development Strategy Response Form 2013

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Local Plan - Revised Development Strategy.

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 (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		Mr
First Name		Des
Last Name		Dunlop
Job Title (where relevant)		
Organisation (where relevant)	Crest Strategic Projects Ltd	D2 Planning Limited
Address Line 1	C/o Agent	Suites 3 & 4 Westbury Court
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Address Line 4		Bristol
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Would you like to be made aware of future consultations on the new Local Plan?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16	<input type="checkbox"/> 16 - 24
	<input type="checkbox"/> 45 - 54	<input type="checkbox"/> 55 - 64
		<input type="checkbox"/> 25 - 34
		<input type="checkbox"/> 35 - 44
		<input type="checkbox"/> 65+
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?		

Part B - Commenting on the Revised Development Strategy

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

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 (Use a separate sheet if necessary).

See separate sheet

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Duty to Cooperate

Under paragraph 181 of the National Planning Policy Framework (NPPF) Local Planning Authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their local plans are submitted for examination.

Warwick District has a number of neighbouring Councils in the County and Warwick sub region e.g. Coventry City, Nuneaton etc. Under paragraphs 17, 157 and 178 of the NPPF neighbouring authorities should work jointly together and cooperate to address planning issues which cross administrative boundaries or on matters that are larger than local issues e.g. in meeting housing needs.

The duty to cooperate is particularly pertinent here since the inspector who recently considered the Coventry City Core Strategy (July 2013) concluded that it was not sound due to a lack of duty to cooperate on cross boundary issues namely in meeting Coventry's housing needs.

It is not disputed that Warwick District forms part of a larger strategic housing market assessment area which includes Coventry. Following on from the inspector's conclusion on the Coventry City Core Strategy a new Joint Strategic Housing Market Assessment is underway. The results of that will not be known for some time yet. However given the previously adopted Coventry Core Strategy it will no doubt conclude that there is a significantly greater level of housing need for Coventry than originally concluded. Furthermore, not all of that housing need can be accommodated within Coventry City's administrative area. Accordingly part of the need may have to be identified in Warwick District as previously identified in the RSS. Accordingly this Local Plan needs to acknowledge that there is likely to be a requirement to accommodate some of Coventry's housing need in the District and plan accordingly for it. This will entail identifying opportunities in the most sustainable location which is to the south of Coventry on land currently within the green belt.

Recommendation

Make explicit the request regarding the duty to cooperate and also the potential to accommodate some of Coventry's housing provision within Warwick District.

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Which part of the document are you responding to?

Policy RDS1 Level of Growth 2011-2029

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

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Policy RDS1 Level of Growth 2011-2029

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. Indeed the evidence here is not complete given that the joint Strategic Housing Market Assessment is not finalised.

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).

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 RDS1 sets out an interim level of growth of 12,300 dwellings between 2011 and 2029 i.e. 683 dwellings per annum. This level of growth is insufficient as it is lower than the evidence in the SHMA as well as recent household projections. These issues will be outlined in more detail below.

Strategic Housing Market Assessment (SHMA)

Turning to the evidence which underpins the Local Plans 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 not known how (if at all) the figure of 698 affordable houses per annum relates to the interim level of housing growth. The SHMA needs to set out what the quantity of need is for both market housing and affordable housing for the plan period. At present the preferred option does not explain why it is disputing the evidence of need in the SHMA.

Household Projections

The plan makes reference to the interim 2011 based population projections. However these are incomplete and so the 2008 based projections are at present the most reliable source until more up to date population projections are published and are complete. 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. The Council indicate that the employment projection is likely to be optimistic 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

In relation to our representations however 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 e.g. Coventry. 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 and have commenced a Joint Strategic Housing Market Assessment. Providing part of Coventry's housing requirement in Warwick District has previously been proposed. 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 because:

- i) The Coventry Joint Green Belt Review identified the site is one of the least constrained proposals of land to the south of Coventry which could potentially be released from the Green Belt;
- ii) The SHLAA has assessed the site's potential and concluded that:
"Potentially suitable in part only (18.5 hectares) excluding southern extensions to the site which could impact upon potential SINCS. Any development would be subject to satisfactory measures to mitigate against impact on areas of high landscape value."
- iii) The Strategic Transport Study concluded that development in the Westward Heath Road area has minimal impact on the surrounding road network.
- iv) The site is identified as not identified within an area liable to flooding. This does not therefore represent a constraint to development on the site.
- v) The site lies in a highly sustainable location next to the University of Warwick, employment operators and good public transport linkages; and.
- vi) The High Speed Two Rail Link proposal is being given further consideration. If approved the route would cross to the south of the site which would potentially provide a further defensible boundary.

Clearly if some adjoining Authorities e.g. Coventry City 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 needs to be assessed against an updated strategic housing market assessment.

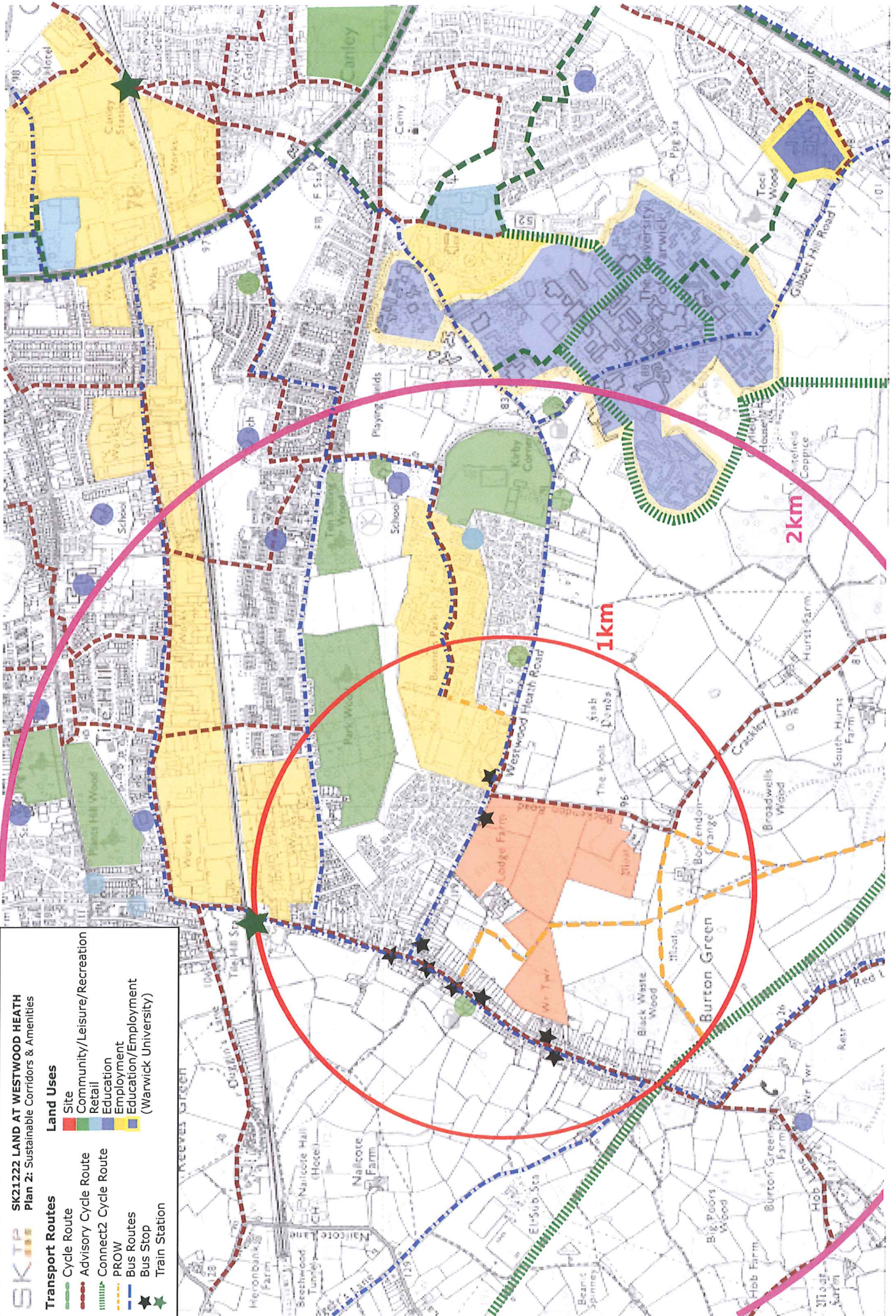
The level of housing provision needs to be increased and sites identified/released from the green belt to be able to accommodate Coventry's future housing requirement e.g. land at Westwood Heath Road.

Transport Routes

- Cycle Route
- Advisory Cycle Route
- Connect2 Cycle Route
- PROW
- Bus Routes
- Bus Stop
- Train Station

Land Uses

- Site
- Community/Leisure/Recreation
- Retail
- Employment
- Education/Employment (Warwick University)



Part B - Commenting on the Revised Development Strategy

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Sheet of

Which part of the document are you responding to?

Policy RDS2 Meeting the Housing Requirement

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

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Policy RDS2 Meeting the Housing Requirement

Objections are lodged to supply of housing sites identified in Table 1.

The recent appeal decision on land south of St Fremund Way, Whitnash Leamington Spa identified that the Council could only demonstrate a 2.6 year supply of housing land (May 2013).

Table 1 does not make any provision for a 5% or 20% buffer as required by paragraph 47 of NPPF. Given the Leamington Spa appeal decision it would appear that the Council has consistently underperformed in its housing delivery and accordingly there should be a 20% buffer applied. In addition there is no reference within this policy or the supporting text to the Council consistently underperforming in meeting its housing needs.

Furthermore, paragraph 47 of NPPF states that identified sites should be deliverable. It is unclear how the Council has arrived at its 300 small urban SHLAA sites as being deliverable. These sites usually exhibit complex ownership and assembly issues. It is unclear whether this level of development can be achieved for these sites. In addition it is unclear how the level of windfalls was arrived at as there appears to be 'no compelling evidence' to justify the proposed level of windfall, as required by paragraph 48 of NPPF.

In conclusion the supply of housing sites is not robust and indicates that additional land for housing needs to be identified.

Recommendation

Reassess the supply of housing sites and identify more deliverable sites.

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Which part of the document are you responding to?

Policy RDS3 Broad Location of Development Housing

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

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Policy RDS3 Broad Location of Development Housing

Recommendation

As stated in our objection to the level of proposed development (Policy RDS1) there is a recognised and identified need for additional housing within the District not just to meet the District's housing needs but 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. At present this is not the case.

It is considered that in meeting the actual housing needs for the District (and those of adjoining Districts) that land currently within the green belt will need 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).