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WARWICK DISTRICT COUNCIL

Revised Development Strategy Response Form 2013

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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	TO AGENT	MR
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Last Name		ROBSON
Job Title (where relevant)		DIRECTOR
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Would you like to be made aware of future consultations on the new Local Plan? ✓ Yes ☐ No

About You: Gender

Ethnic Origin

Age ☐ Under 16 ☐ 16 - 24 ☐ 25 - 34 ☐ 35 - 44 ☐ 45 - 54 ☐ 55 - 64 ☐ 65+

Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?

COUNCIL'S WEBSITE

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 1 of 4

Which part of the document are you responding to?	
Paragraph number / Heading / Subheading (if relevant)	Policy RDS1
Map (e.g. Proposed Development Sites – District Wide)	
What is the nature of your representation?	[ ] Support [X] 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).

Policy RDS1 is concerned with delivering an appropriate level of housing growth across the District. It is presently noted as an interim figure, at 12,300 homes. It is welcomed that the Council recognise that this figure could and should change as result of more up to date evidence as it emerges.

It is however important that the Council recognise the important provisions of the Framework, in particular the need to meet the full objectively assessed housing needs, and the need to boost significantly the supply of housing.

Paragraph 4.1.10 of the Plan makes reference to the historical local growth rate (GVA) across the District, and has assumed a reduced growth rate across the District in the emerging Plan period for the purposes of determining a housing need figure.

This approach fails the Framework both in terms of the need to boost significantly the supply of housing, and secondly the need to meet the full objectively assessed housing need.

In terms of evidence base influencing the overall housing figure, it is noted that the Council are having regard to the most up to date ONS household figures. Whilst these figures are up to date and should form part of the assessment on housing need, it is important to treat these figures with some caution given that they have been prepared at a point in the economic cycle where the country was experiencing a deep double dip recession. The Plan period will see sustained, buoyant economic growth where household formation is likely to be higher than has been the case over recent years. Reliance upon the current ONS household figures would therefore underplay the need for housing over the entire Plan period.

The Council are therefore invited to re-assess housing figures increasing the requirements to reflect the historical local growth; apply the ONS figures with some caution; and recognise the important requirement to meet the full objectively assessed housing need. The Council should be aware that at Examination the Inspector will scrutinise in some details the extent to which sufficient housing is being planned for, a matter that goes to the heart of 'soundness'. A number of Plans have failed at Examination on this issue alone.

Part B - Commenting on the Revised Development Strategy

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Sheet 2 of 4

Which part of the document are you responding to?	
Paragraph number / Heading / Subheading (if relevant)	Policy RDS3
Map (e.g. Proposed Development Sites – District Wide)	
What is the nature of your representation?	Support: ; Object: X

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).

The Councils general approach to distributing development and spatial strategy is welcomed given that it provides a Framework for ensuring development meets the core principles of sustainability set out within the Framework.

The desire to protect the Green Belt from development where alternative non-Green Belt sites are suitable and available is noted however Green Belt issues should be weighed in the balance with other planning objectives, for example supporting sustainable growth. In respect of the large more sustainable Primary Service Villages Green Belt release should be considered a necessary requirement of the Plan in order to deliver housing to meet needs in the location where it arises, and in order to underpin the sustainability and viability of such settlements.

The objective of distributing growth across the District including within and / or on the edge of some villages is also supported since a greater number of smaller sites will provide the Plan with inherent flexibility, more able to deal with rapid change should it occur though the Plan period; it will enable housing needs to be met in the location in which it is generated; and will also allow for the benefits of development to be spread.

The policy does not explicitly set out the levels of growth for the larger more sustainable Primary Service Villages; appropriate levels of growth should be provided and housing numbers should be reasonably significant (without undermining the urban first approach to development), given the significant number of villages and hamlets across what is largely a rural District. The Council must ensure that hosing is distributed to Primary Service Villages in order that they deliver housing in their own right as opposed to these locations being seen as a 'sweeper' once all opportunities for development at the larger urban centres are exhausted.

Part B - Commenting on the Revised Development Strategy

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Sheet 3 of 4

Which part of the document are you responding to?	
Paragraph number / Heading / Subheading (if relevant)	Policy RDS4
Map (e.g. Proposed Development Sites – District Wide)	
What is the nature of your representation?	[ ] Support [X] 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).

In terms of general commentary on housing quantum and distribution, 1,000 units identified to village locations are considered to be unreasonably low. This amounts to only 15.1% of the total housing provision. Mindful that Warwick is a largely rural District, with a significant number of villages and hamlets, the quantum of housing to be delivered to these locations in order to underpin the sustainability and viability of these villages, and meet housing need in the location in which it arises, is an important consideration. A simple calculation dividing the number of houses by the number of villages by the number of years in the Plan period demonstrates how little housing per settlement per annum is proposed in the Plan which is not considered sufficient and should be increased. Whilst the need for housing is supported the housing numbers proposed should be seen as a minimum and be increased.

Notwithstanding, the housing figure is suspiciously rounded which could indicate it is arbitrary rather than having been derived on the basis of a sustainability critique and capacity assessment of each of the villages in the District.

Locations such as Hampton Magna should therefore see increased housing given their sustainability credentials and the need to underpin their sustainability and viability.

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Sheet 4 of 4

Which part of the document are you responding to?	
Paragraph number / Heading / Subheading (if relevant)	Policy RDS5
Map (e.g. Proposed Development Sites – District Wide)	
What is the nature of your representation?	[ ] Support [X] 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).

As set out in representations to Policy RDS4, it is considered that insufficient housing is being directed to the villages and hamlets.

Indeed, Policy RDS4 identifies a suspiciously round 1,000 houses to villages; this is translated in Policy RDS5 to approximately 600 houses to primary service villages and 400 houses to secondary service villages. This distribution is questioned.

Representations elsewhere have indicated that the overall housing figure should be increased in order that the fully objectively assessed housing need is met by the Plan; and that a greater proportion of housing should be directed to village locations.

This should include increased housing provision at Hampton Magna over and above the 100 – 150 houses identified in Policy RDS5, notwithstanding that support is offered to the policy identifying increased housing at Hampton Magna.

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