

Warwick Local Plan Examination

Matter 7d . Proposed Housing Site
Allocations - Growth Villages and
Hockley Heath

Matter 7d: Growth Villages – Radford Semele

Whether the proposed housing site allocations at the Growth Villages and Hockley Heath are justified, effective and consistent with national policy.

**Policies DS11 and DS NEW3 - Questions
 Radford Semele: H38 – North of Southam Road & H52 – Land at Spring Lane**

1) What is the current planning status of the site?

The current planning status of the sites and the village of Radford Semele is set out at **Appendix 1**. This includes the site proposed for 115 dwellings by Taylor Wimpey which is the subject of a proposed outline planning application. The current planning status of the village, as identified at **Appendix 1** is also listed as follows:

Site	Location	Planning Status of Site
Site A	Land at Spring Lane	Consent granted for 65 dwellings at appeal (WDC Ref W/14/0433)
Site B	Land south of Spring Lane	Proposed Housing Allocation (DS11) for 60 dwellings
Site C	Land north of Southam Road	Proposed Housing Allocation (DS11) for 60 dwellings <u>and</u> consent granted for 60 dwellings (WDC Ref W/14/0322)
Site D	Land south of Offchurch Lane	Consent granted for 150 dwellings (WDC Ref W/16/0196)
Site E	Land west of Southam Road	Consent granted for 25 dwellings (WDC Ref W/15/1761)
Site F	Land south of Southam Road	Proposed outline application for 115 dwellings

2) How does it fit within the overall spatial strategy?

Mod 9 (Policy DS10) indicates (para 2.37) the spatial strategy aims to meet housing needs by allocating sites in and adjacent to the main urban areas and more sustainable villages and (2.38) Non Green Belt sites are favoured over Green Belt sites:

2.37 The spatial strategy aims to meet housing needs of the District and the Housing Market Area by allocating sites in and adjacent to the main urban areas and in the more sustainable villages.

2.38 In selecting sites on the edge of urban areas, non-Green Belt sites are favoured over Green Belt sites where possible.

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The Development Strategy of the Plan, as further explained through Policy DS4 g), is one which proposes a clear sequential approach to releasing Green Belt sites, only after the availability of alternative suitable sites outside the Green Belt has been thoroughly considered. RPS is not suggesting the Spatial Strategy proposes a non-Green Belt only approach, that is clearly not what DS4 does and in the context of an authority with approximately 80% Green Belt that would not be appropriate. Policy DS4 does though clearly state through Criterion g) (i) that the *'availability of alternative suitable sites outside the Green Belt'* is a basis for demonstrating that exceptional circumstances may not exist.

In RPS view, given the non-Green Belt status of Radford Semele, its identification through Policy DS11 as a Growth Village and its proximity to Warwick/Leamington with excellent public transport connections, where it effectively acts as a sustainable component of the Warwick/Leamington urban area, the level of growth through commitments/allocations at Radford Semele is inconsistent with the spatial strategy of the plan. It is a highly sustainable non-Green Belt growth location, where additional growth beyond that already allowed for can and should be accommodated through the plan.

The Council's Village Settlement Hierarchy Report (Exam Doc VO1) identified Radford Semele as one of 5 Primary Service Villages and whilst that classification has not found its way into policy formation, it is evident that the village is able to deliver additional housing beyond existing commitments. It is also noted that the Preferred Options Report (Exam Doc LP05) classified Radford Semele as a Category 1 Village. The village scores 3rd highest out of all the villages (Table 4.4 of the Report) with a score of 53 and is the highest ranking Non Green Belt settlement.

The only reason it does not come out on top of the settlement rankings is due to the lack of a GP's practice within the village. Radford Semele is however, located extremely closely to the Croft Medical Centre (on the edge of Leamington) in Sydenham. This is only separated from the village by a fields width (500m) and very easily accessible for existing and future residents of Radford Semele. Should the location of that GP be factored into the Settlement Hierarchy, Radford Semele would have a score of 58 and be classified as the most sustainable village settlement in the whole District.

Given the Spatial Strategy's requirements of directing future development to non-Green Belt locations, RPS would suggest a significantly greater and disproportionate level of growth should be directed to Radford Semele compared with the other Green Belt villages, particularly given the availability of otherwise suitable land around the settlement.

4) What are the potential adverse impacts of developing the site? How could they be mitigated?

In relation to site H52 it is noted that the Council's 2012 Urban Expansion study LO01 raised concerns at para 2.3.1 regarding the potential of coalescence of the two communities of Sydenham and Radford Semele. Given the existing commitment to the immediate north of H52 (AC Lloyd site) the buffer land has already been reduced and arguably therefore there is now a greater pressing need to retain as much as possible that remains of that buffer between Sydenham and Radford Semele, particularly on its south western side.

RPS is not suggesting H52 should be removed as an allocation, however irrespective of the merits or otherwise of retaining this parcel as additional buffer land, the objective basis for

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both stating and then considering mitigation of adverse impacts of the sites at Radford Semele should be established through the Sustainability Appraisal (SA).

Our concerns in relation to the Sustainability Appraisal relate to the lack of an individual site assessment for Taylor Wimpey’s land interest at Radford Semele as a reasonable alternative site and whether therefore the SA enables a balanced and objective consideration of the potential adverse impacts of developing various sites and the weight to be given to such impacts, compared to developing elsewhere, particularly in the district’s Green Belt villages.

A screen print is provided below of the SA assessment from Table 4.20: Summary of Approach to Alternatives Assessment and Selection, which appears to represent the Council’s consideration of Alternatives, in the context of Radford Semele. Taylor Wimpey’s land interests relate to their land south of Southam Road (RS1*O). This rejection is confirmed in Appendix VIII of the 2015 SA (page 90) as indicated below.

Figure 1 . Extract from Feb 2015 SA (page 90)

Radford Semele	
Site(s): RS1*O – Land South of Southam Road	Rejected option – site is located within an area of high landscape value. Limited options to contain development.
Site(s): RS1*O – Land South of Southam Road (Expanded)	Rejected option – site is located within an area of high landscape value. Limited options to contain development.

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Enfusion

Warwick District Council Submission Local Plan
 SA Report

RS2*O – Land North of Southam Road	Site progressed – originally rejected on insufficient highways access, which has now been resolved. Site will require substantial environmental screening, but development will need to minimise ribbon development along the A425.
RS3*O – South West Radford Semele	Rejected option – local concerns about the coalescence of settlements at this sensitive south western corner of the village, also likely to add significantly to congestion within the village along School Lane.
RS4*O - Land to the East of Church Lane	Rejected option – site revaluated as high landscape value, development of which would lead to a loss of valued land providing a rural setting to the village and church.

It is noted the site (RS1*O) was considered along with all other potential site allocations at Radford Semele in the 2015 SA (Appendix VI page 47). This provided some commentary on selective aspects of the assessment for the sites in the supporting text. This did not, however, provide an individual assessment for the site within the SA to enable Taylor Wimpey to gain an understanding of why its site was rejected in comparison with alternative individual site locations. Instead it appears to have grouped all such sites under one heading.

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Figure 2 Extracts from 2015 SA (Appendix VI . page 47)

Radford Semele																	
Site(s): R51*O – Land South of Southam Road; R52*O – Land North of Southam Road; Expanded R52*O; R53*O – South West Radford Semele; R54*O - Land to the East of Church Lane																	
SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land and natural resources	Natural environment & landscape	Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Appraisal Summary for Village	?	+	-	-	-	-	+	-	?	-	-	=	++	+	=	+	?

The consideration of Alternatives is then referred to in the 2016 SA Addendum (Appendix IV) in the context of the up-lift in housing requirements and the Potential Village Site Allocations. In relation to Radford Semele a screen print is provided below of the Addendum’s limited assessment of the site.

Figure 3 Extract from 2016 SA Addendum (Appendix VI)

Radford Semele									
Site(s): R51*O – Land South of Southam Road	R41	Discounted Option.	Subject to SA, appraisal presented alongside the Consultation Doc for public consultation in November 2013.	No change to site. Discounted Option.	No further appraisal work required. Reasons for the selection/ rejection of Options provided in Section 4 of the SA Report.	No change to site. Discounted Option.	No further SA work required. Appraisal of site presented in Appendix VI and reasons for rejection provided in Table 4.20.	Site still not included. No changes.	No further SA work required.
Site(s): R51*O – Land South of Southam Road (Expanded)	R129	Discounted Option.	Subject to SA, appraisal presented alongside the Consultation Doc for public consultation in November 2013.	No change to site. Discounted Option.	No further appraisal work required. Reasons for the selection/ rejection of Options provided in Section 4 of the SA Report.	No change to site. Discounted Option.	No further SA work required. Appraisal of site presented in Appendix VI and reasons for rejection provided in Table 4.20.	Site still not included. No changes.	No further SA work required.
R52*O – Land North of Southam Road	R67	Discounted Option.	Subject to SA, appraisal presented alongside the Consultation Doc for public consultation in November 2013.	Updated evidence now indicates no major issues with highways access Preferred Option.	Appraisal for this settlement has been updated to reflect the evidence. Please refer to Appendix VII. Reasons for the selection/ rejection of Options provided in Section 4 of the SA Report.	No change to site. Preferred Option.	No further SA work required. Appraisal of site presented in Appendix VI and reasons for selection provided in Table 4.20.	Site has planning permission and is included in commitments. Site allocation H38.	No further SA work required.

The above assessments indicate that the site was rejected in 2015 due to its high landscape value. This appears to be (through the SA) the basis for rejection of the site. As indicated through the 2016 Addendum, no further SA work in relation to the site was subsequently carried out.

The approach taken is in contrast with the way in which the Council has now undertaken its assessment of its preferred site at Radford Semele. Here the Council has undertaken a detailed assessment (on its own) of the Land at Spring Lane. As extract of the SA assessment of this site is provided in Figure 4 below:

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Figure 4 SA Addendum 2016 (Appendix III page 45)

Radford Semele

Site: Radford Semele - Land at Spring Lane Size & Approx. Capacity: 60 dwellings SHLAA Ref: Extension to previously assessed site R5310 (Submission Local Plan SA Report 2015)																	
SA Objectives	Economy	Sustainable transport	Reduce need to travel	Waste & Recycling	Prudent use of land and natural resources	Natural environment & landscape	Built environment	Historic environment	Air, water & soil quality	Climate change mitigation	Climate change adaptation - flood risk	Housing needs	Local services & community facilities	Health & well being	Poverty & social exclusion	Crime	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
Appraisal Summary	+	+	-	-	= ?	-	= ?	=	-	-	=	+	+	+	= ?	+	= ?

In relation to the SA and in particular the Modification process, an additional up-lift in housing requirement following the Inspector’s Interim conclusions is required. The Council’s preferred option is the focus of growth via Option 5 of the Addendum necessitating the protection of the Green Belt. Given this Option, there does not appear to have been a consistent and appropriate consideration of reasonable alternatives to growth at Radford Semele.

Consideration of reasonable alternatives should be fair, equitable and by public scrutiny. Despite Taylor Wimpey’s continued promotion of the site over several years through the Development Plan and SHLAA process the site does not appear to have been appraised through the SA on an individual basis and therefore it is very difficult to consider what the potential adverse impacts are of developing the allocated sites from the Local Plan.

5) Is the scale of development proposed compatible with the capacity of the village to accommodate further growth in terms of its character and appearance, the level of services and existing infrastructure?

As it stands, RPS take the view that the scale of the development at Radford Semele in the Local Plan is not compatible with the capacity of the village and further growth can be accommodated, as evidenced in response to question 6 below.

RPS believe question 5 and question 2 are inexorably linked to the role which Radford Semele should perform under Policy H1 of the emerging Local Plan as a Growth Village being one of just three, (the others being Bishop’s Tachbrook and Barford) which do not lie within the Green Belt. The Village Settlement Hierarchy Report identifies it as the largest and most sustainable of those three villages.

That Radford Semele is a suitable location to accommodate the housing shortfall within Warwick is evidenced by recent housing commitments in the village (see response to question 2).

According to the 2011 Census, Radford Semele Ward comprises of 1,024 dwellings and 2,442 residents. The settlement is indicated in the 2014 Parish Plan, prepared by Radford Semele Parish Council, as comprising 803 dwellings. Taken together, the committed housing developments in Radford Semele amount to 360 dwellings since the 2011 Census.

These commitments in Radford Semele amount to a growth of just 35% in the size of the Ward or 45% in the size of the village. Should Taylor Wimpey’s site south of Southam Road

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be included (115 dwellings) these proportions would rise to 46% and 59% respectively. Including TW land would increase the total numbers to 475 dwellings representing just 2.7% of Warwick’s total housing supply of 17,577 dwellings.

Given the linkage between questions 2 and 5, the question that arises is would a 2.7% increase be appropriate and in RPS view, given a) there exists a Spatial Strategy which favours non-Green Belt locations and b) with Radford Semele being the most sustainable such location in the District (using the Council’s own evidence), the answer is yes it would be an appropriate scale of development.

By way of example, reference to this issue was recently considered at the Stratford Examination (2016) and provided below is a table which indicates the way in which the housing growth was divided in the now adopted Core Strategy between the Green Belt and non-Green Belt Main Rural Centres (comparable to Warwick’s Growth Villages).

	Core Strategy Housing Supply	Green Belt	% of Core Strategy Total Supply
Alcester	526	Yes	3.2%
Bidford	768	No	4.7%
Henley	85	Yes	0.5%
Kineton	212	No	1.3%
Shipston	508	No	3.1%
Southam	1,080	No	6.6%
Studley	100	Yes	0.6%
Wellesbourne	830	No	5.1%

RPS acknowledges each plan must appropriately assess its own strategy for growth, however, what this table demonstrates is that the non-Green Belt settlements at Stratford, took a disproportionate level of housing development from the total District supply of 16,423 dwellings. Compared with this approach, it would not be unreasonable for Warwick’s most sustainable non-Green Belt Growth Village to accommodate 2.7% of the District’s total housing supply and the scale of the development in the village to increase by 115 dwellings accordingly.

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6) What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

The Council's 2016 Village Profile and Housing Allocations Document (Feb 2016) indicates that all sites within the village of Radford Semele offer a sustainable location for a further increase in the number of houses but appears to stop short of considering additional allocations above the 60 units suggested at Land south of Spring Lane due to concerns about the capacity of the local primary school. Paragraph 12.11 states:

'Although this village is well placed to provide a sustainable location for an increase in the number of houses allocated, the additional site has been capped at 60 dwellings to reflect the capacity of Radford Semele Primary School.'

However, the acknowledgement that Radford Semele can accommodate further growth is entirely appropriate and has been borne out in additional approvals in the village above the 60 dwellings proposed for allocation. This includes applications for 150 dwellings (WDC Ref W/16/0196) and 25 dwellings (W/15/1761) approved by the District Council. In both instances the Local Education Authority (LEA) did not object to the applications, a position it has also taken in TW pre-application discussions regarding its own site. Accordingly, concerns over school capacity as a reason for rejecting additional growth at Radford Semele as raised in the 2016 Village Profile and Housing Allocations are considered to lack justification.

Furthermore, it is evident from the suite of evidence based reports that Taylor Wimpey have undertaken in support of their own outline application at land south of Southam Road (Site R129) that there are no other infrastructure and/or physical constraints that should preclude this particular site being taken forward and contributing to the District's housing supply. The Village Profile and Housing Allocations Document indicates that the TW site was discounted on account of poor vehicle access; susceptible of ground water flooding; being beyond the village envelope and remote from village services and its high landscape value.

In respect of vehicular access, the outline application proposes full details of means of access onto Southam Road via a new priority junction. Pre-application discussions with the County Highway Authority have confirmed no objection to the proposal. In respect of flooding the site lies within Flood Zone 1 and it has been demonstrated within a supporting FRA that the development will not increase flood risk at the site or elsewhere and that the development will offer betterment to the existing surface water drainage runoff which currently exists at the site.

A site specific Landscape and Visual Impact Assessment (LVIA) has been presented to the Council that demonstrates that concerns over landscape impact lack justification and that the site is suitable in landscape terms to accommodate development. The LVIA acknowledges that landscape studies carried out by Warwick District Council and Warwickshire County Council concluded that the wider landscape context of the Site was open in character and highly sensitive to residential development. However, within the WCC Landscape Sensitivity and Ecological & Geological Study under the heading %Landscape Characteristics (Desktop)+ the visual sensitivity of the land cover parcel within which the site sits is described as %Moderate+. Typically within the studies the site has been included within a large landscape parcel including the countryside to the south and south-east of the Site.

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Taylor Wimpey's LVIA provides a more site specific assessment of the site than the much wider assessments undertaken by the Council and concludes that the site is not as visually sensitive as the countryside to the south and south-east of the site due to the intervening topography screening it from longer distance views. Furthermore, the development presents significant opportunities to improve the structural landscape within the site, integrate the site within the context of the village settlement and increase habitat potential and biodiversity. In addition, the original allocation site for 60 dwellings currently being developed opposite on land north of Southam Road also extends into what is regarded as a sensitive landscape area and this more recent development clearly changes the context within which previous landscape studies were undertaken.

Finally, in relation to concerns over archaeology the archaeological work undertaken in support of Taylor Wimpey's outline application included a trial trenching programme agreed with the County Archaeologist that did not reveal the presence of remains of a high (national) importance that would preclude development. A future field evaluation (through condition on any approval) will allow the opportunity for a full recording and preservation to take place post determination and has been agreed in principle with the County Archaeologist.

It is recognised that Radford Semele has consents totalling 300 dwellings and a proposed allocation of a further 60 dwellings. However, the village is the most sustainable Growth Village outside of the Green Belt and capable of additional residential growth, beyond existing commitments and without significant constraint. One such site that can contribute is Taylor Wimpey's site at land south of Southam Road, which is free of both physical and all other constraints. Village based concerns raised about education capacity as a reason for ruling out additional growth have since been found to be without foundation. As such, should the Examination process establish that additional sites are required, then in Taylor Wimpey's view Radford Semele is well placed to accommodate some of that additional growth.

9) What would be the effect of the proposal on the purposes of including land within the Green Belt? 10) What would be the effect on the openness of the Green Belt? 11) Are there exceptional circumstances which justify altering the Green Belt? If so, what are they?

RPS concerns relate to the fact that the Modifications and the Local Plan place insufficient reliance on Radford Semele as a Non-Green Belt settlement in order to accommodate the growth needs of Warwick.

The Local Plan establishes a clear Development Strategy as identified at Policy DS4 – Spatial Strategy with a clear sequential approach to releasing Green Belt sites only after the availability and suitability of alternative suitable sites outside the Green Belt has been thoroughly considered and discounted. The sequential approach identified in Policy DS4 establishes as a final resort the allocation of Green Belt sites at DS4 (part g). This states as follows:

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g) 'sites that are currently in the green belt will only be allocated where exceptional circumstances can be justified. The following will be taken into account in considering exceptional circumstances:

- i) The availability of alternative suitable sites outside of the Green Belt;*
- ii) The potential of the site to meet specific housing or employment need that cannot be met elsewhere;*
- iii) The potential of the site to support regeneration within deprived areas; and*
- iv) The potential of the site to provide support to facilities and services in rural areas.*

Whilst it is acknowledged that this does not mean that Green Belt sites should be automatically discounted, and indeed in a district where Green Belt washes over a large proportion (approx. 80%) of the area some may be suitable for development, it does impose a strict requirement that other sites outside of the Green Belt should first be considered and discounted.

Mod 9 under Policy DS10 indicates (para 2.37) that the spatial strategy aims to (first) meet housing needs by allocating sites in and adjacent to the main urban areas and more sustainable villages. Non Green Belt sites are favoured over Green Belt sites (para. 2.38).

A preferred option of the Council is to support the growth of the largest and best served villages of the District. There can be no doubt that Radford Semele is the best example of such a village, it being the largest and highest scoring in the Council's sustainability ratings within the Settlement Hierarchy Report of all Growth Villages located outside of the Green Belt.

The Council's Distribution of Development Paper 2016 acknowledges that the distribution of development has never sought to exclude Green Belt development where exceptional circumstances exist (para.13) and identifies a three stage approach (para.14) to assessing Exceptional Circumstances on any particular site including:

- Is there an essential need that has to be met;*
- Are there any suitable sites outside of the green belt that can meet this need.*

RPS notes that in contrast to the Development Strategy outlined in Policy DS4, a very significant proportion of the overall housing requirement for the Local Plan is proposed within the Green Belt. Indeed, in relation to Growth Villages, the 2016 Modifications to the Plan propose some 535 of 700 dwellings (76%) for allocation to Green Belt Villages, despite the 3 Non Green Belt villages (Radford Semele, Bishops Tachbrook and Barford) being amongst the largest and most sustainable in the Council's Settlement Hierarchy. Furthermore, Policy DS19 of the Local Plan as amended as part of the 2016 Modifications seeks to allocate some 3,750 out of 3,916 additional allocations or 96% of overall additional allocations within the Green Belt to meet overspill needs from Coventry.

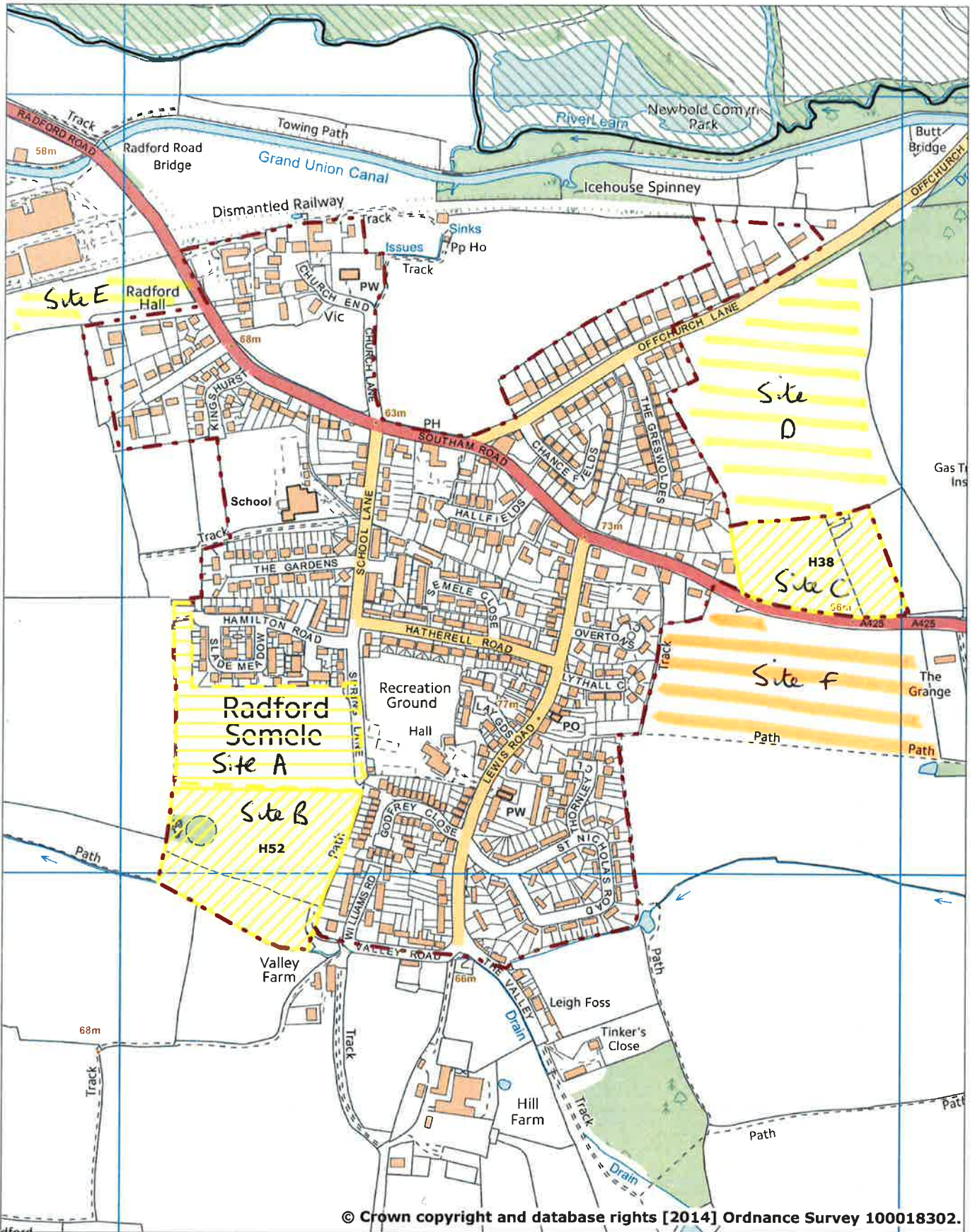
RPS contends that while a proportion of Green Belt sites will be required such a distribution of growth as described above lacks justification and would appear to be in contrast to the overall Spatial Strategy which requires alternative Non Green Belt locations to be considered and discounted first.



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APPENDIX 1: Updated Local Plan Policies Map No.15: Radford Semele



Key

- WDLP - Green Belt (DS19)
- WDLP - Housing Allocations (DS11)
- Site Ref
- WDLP - Growth Village Envelopes (H10)
- WDLP - Major Housing Commitments (DS7)

Proposed outline application

**15. Radford Semele
(Proposed Mod. 2016)**

**Local Plan
Policies
Map**

