

## 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](http://www.warwickdc.gov.uk/newlocalplan)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		MR
First Name		MICHAEL
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?		<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"/> 25 - 34 <input type="checkbox"/> 35 - 44 <input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 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  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?

Policy RDS1

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).

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.

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Policy RDS3

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).

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 at Kenilworth which is regarded as a high ranking settlement.

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, coupled with strategic sites which are important to the Plan strategy, 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.

Concern is expressed in relation to proposals for large scale Green Belt release at Kenilworth, since the proposed allocation comprises a significant tract of land fully within the Green Belt which has significant deliverability issues firstly given the considerable number of landowners not all of which agree on the approach to bringing the site forward, and secondly due to the need to replace existing playing pitch and football / rugby club provision on which the Plan is silent. Alternative options are available, including land at Kenilworth Golf Course which has urban influences, is in single ownership with an available replacement golf club, and should therefore be considered as a 'reasonable alternative'.

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Policy RDS4

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).

As set out in representations in respect of Policy RDS3, there are significant concerns regarding the Council's strategy for the broad location of development. Policy RDS4 makes clear that approximately 17% of the proposed allocated housing (excluding village developments) will be located within the existing Green Belt. This is a considerable amount, and in such circumstances the Council should be actively seeking out growth options which do not include prime Green Belt with delivery constraints (as is the case with the proposed Kenilworth allocation) and instead should be identifying deliverable sites. One such site is Kenilworth Golf Club.

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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).

Objections are lodged in respect of the proposal to allocate 700 houses on 46.5 hectares of Green Belt at Thickthorn, Kenilworth.

The site represents a large tract of land. The site has significant deliverability issues firstly given the considerable number of landowners not all of which agree on the approach to bringing the site forward, and secondly, due to the need to replace existing playing pitch and football / rugby club provision on which the Plan is silent.

In circumstances where alternative options are available to meet the housing requirements of the Plan the emerging allocation cannot be regarded as being sound.

One such alternative is allocating land at Kenilworth Golf Club which has urban influences, is in single ownership with an available replacement location for the golf club already identified and should therefore be considered as a 'reasonable alternative'.

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