

## 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)
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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?		

# 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?	LEVEL OF HOUSING GROWTH 2011-2029
Paragraph number / Heading / Subheading (if relevant)	4.1
Map (e.g. Proposed Development Sites - District Wide)	
What is the nature of your representation?	<input type="checkbox"/> Support <input checked="" type="checkbox"/> 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).	
REFER TO ACCOMPANYING STATEMENT.	

## **Warwick District Local Plan**

### **Revised Development Strategy July 2013**

#### **Submissions made by Catesby Estates Ltd**

#### **In respect of land at Oak Farm, Rouncil Lane, Kenilworth**

### **Introduction**

The following submissions are made on behalf of Catesby Estates Ltd in respect of the land edged red, located on Rouncil Lane, Kenilworth. For the reasons stated below it is considered that the Revised Development Strategy does not satisfy the tests of soundness in that it has not been (NPPF para 182):

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with national policy.**

The revocation of the regional strategies has brought a responsibility for local planning authorities when preparing development plans to make adequate provision for housing (and other development) needs. Indeed for consistency to be met with the provisions of up to date national planning policy, the message from the Coalition Government could not be made clearer. At paragraph 47 of the Framework it is stated:

*'To boost significantly the supply of housing, local planning authorities should*  
(emphasis added):

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework...'*

The Revised Development Strategy fails to meet this imperative in the following ways:

- 1) Housing Land Supply**
- 2) Housing requirement arising within Warwick District**
- 3) Housing provision arising from the housing needs of Coventry**
- 4) The provision of land to meet possible future development needs beyond the plan period (Safeguarded Land).**

#### **1) Housing Land Supply**

Paragraph 5.1.32 'quietly' admits to the fact that there is not a 5 year supply of deliverable housing within the District, without any transparency as to the extent of the shortfall. The deliverable supply of housing land is not close to a 5 year land supply. Rather is it submitted that there is a very substantial, and serious shortfall in the supply of deliverable housing land.

In consequence it should be an incumbent responsibility of this Local Plan to rapidly address the problems of housing delivery in view of the adverse social and economic effects that are brought about where inadequate land for housing is provided.

Paragraph 47 of the Framework explains how local planning authorities should attend to this deficiency, namely:

*‘Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) (emphasis added) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.’*

In short form, the Government requires those local planning authorities who are unable to demonstrate the ‘minimum’ deliverability of a 5 year supply of housing land to identify sufficient housing sites so that the shortfall can be promptly addresses, rather than being ‘massaged’ over the entire length of the plan period.

In order to significantly boost housing land supply the Plan should identify a broader range of housing sites, which are free from technical and environmental constraints, and where house builders are keen to build new homes early in the plan period. The land identified off Rouncil Lane is free of constraints that might preclude the early delivery of new homes, other than the policy constraint imposed by the Green Belt.

It is evident that the housing strategy for the number of houses presently proposed in the Local Plan relies upon some provision of land from the Green Belt. As such the exclusion of this site from the Green Belt does not raise a fundamental matter of principle, whether land from the Green Belt is required. Rather the issue is the amount of land that should be released from the Green Belt in order to ensure that the housing policies in the Local Plan are sound and predicated upon a robust evidence base.

In conclusion it is submitted that the release of this site is justified in order to contribute to the housing needs of the District in the early part of the plan period. It is acknowledged that development would result in ‘an encroachment into the countryside’. However in order to meet development needs which cannot be satisfied from an existing urban area such as Kenilworth, this consequence has to be accepted.

It is submitted that the release of this site from the Green Belt would not harm any other purpose for the inclusion of land within the Green Belt (Framework para 80). A sustainable pattern of development would be achieved that is consistent with the guidance set out at paragraph 84 of the Framework. The extended edge of the urban area would become the defining boundary of the redrawn Green Belt, and clearly recognizable. ‘Permanence’ will be provided by the application of Green Belt policy for the surrounding land.

## 2) Housing requirement arising within Warwick District

It is acknowledged at paragraph 4.1.1 that for the purposes of this consultation:

*‘the Council is adopting an interim level of growth of 12,300 homes between 2011 and 2029. This may be revised pending the findings of the Joint SMA and the resulting co-operation between authorities.’*

It should not be assumed that the potential revision may be required only in response to the outcome of the Joint SMA. The first consideration is whether sufficient housing provision is being proposed in the District to meet the housing needs arising therefrom. Paragraph 4.1.6 states in reference to the Strategic Housing Market Assessment undertaken by G L Hearn (March 2012):

*‘If the District wished to achieve economic growth rates in line with national forecasts, then what levels of inward migration would be required in order to retain the required levels of people of working age?’*

This posed question is then answered:

*‘With an ageing population, economic growth cannot be achieved without inward migration. The SHMA projections showed that between 11,300 and 14,300 new homes could be required between 2011 and 2028 depending upon whether or not existing levels of commuting remained the same.’*

The Revised Strategy is adopting an interim figure of 12,300 homes over a plan period extending to 2029. The Revised Strategy contains no robust evidence as to how the proposed interim level of housing satisfies the requirements of paragraph 47 of the Framework, especially when the Government is ‘committed to securing economic growth in order to create jobs, and prosperity, building upon the country’s inherent strengths, and to meeting the twin challenge of global competition and of a low carbon future’ (Framework para 18).

It is submitted that the Revised Strategy would, if submitted for Examination, fail all tests of soundness set out at paragraph 182 of the Framework.

### **3) Housing provision arising from the housing needs of Coventry**

The Planning Inspector appointed to examine the Coventry City Council Core Strategy, was ‘struck’ by the proposition that the previous Core Strategy had been found to be sound in 2010, with provision for 33,500 dwellings, and it was now suggested the new Core Strategy was ‘sound’ with provision for just 13,500 dwellings. In response to this well founded criticism a Joint SHMA is being undertaken.

The outcome of the SHMA prepared pursuant to the guidance at paras 178 – 181 of the Framework may be a requirement for a spatial response from within Warwick



District to address the shortfalls within Coventry City to meet its housing requirements quantitatively and qualitatively.

Coventry City has recognised for some period of time that it is not able to provide sufficient housing choice in location of housing land, particularly in the form of ‘aspirational housing’ to support the drive for inward investment and economic growth in the city. In so far as it may be reasonable to assume that Warwick District will need to make a spatial response to the housing needs of Coventry, Kenilworth is well placed to accommodate some of this additional housing need, particularly in view of its proximity to Coventry, and transportation connections – road and shortly rail. It is understood that the rail station at Kenilworth should be open by the end of 2016 (Patrick McLoughin, Secretary of State for Transport 3<sup>rd</sup> June 2016). If it is assumed that an adopted Local Plan is achieved by the end of 2014, the Kenilworth station might reasonably be anticipated to be operational within 12 months of new homes being provided on this site.

In conclusion it is submitted that this site could usefully provide a contribution to housing requirements arising from the needs of Coventry which cannot be met within the administrative area of the city. Additional housing provision at Kenilworth would also be well related to the now committed development at Coventry and Warwickshire Gateway.

**4) The provision of land to meet possible future development needs beyond the plan period (Safeguarded Land)**

Paragraph 85 of the Framework states (second bullet point):

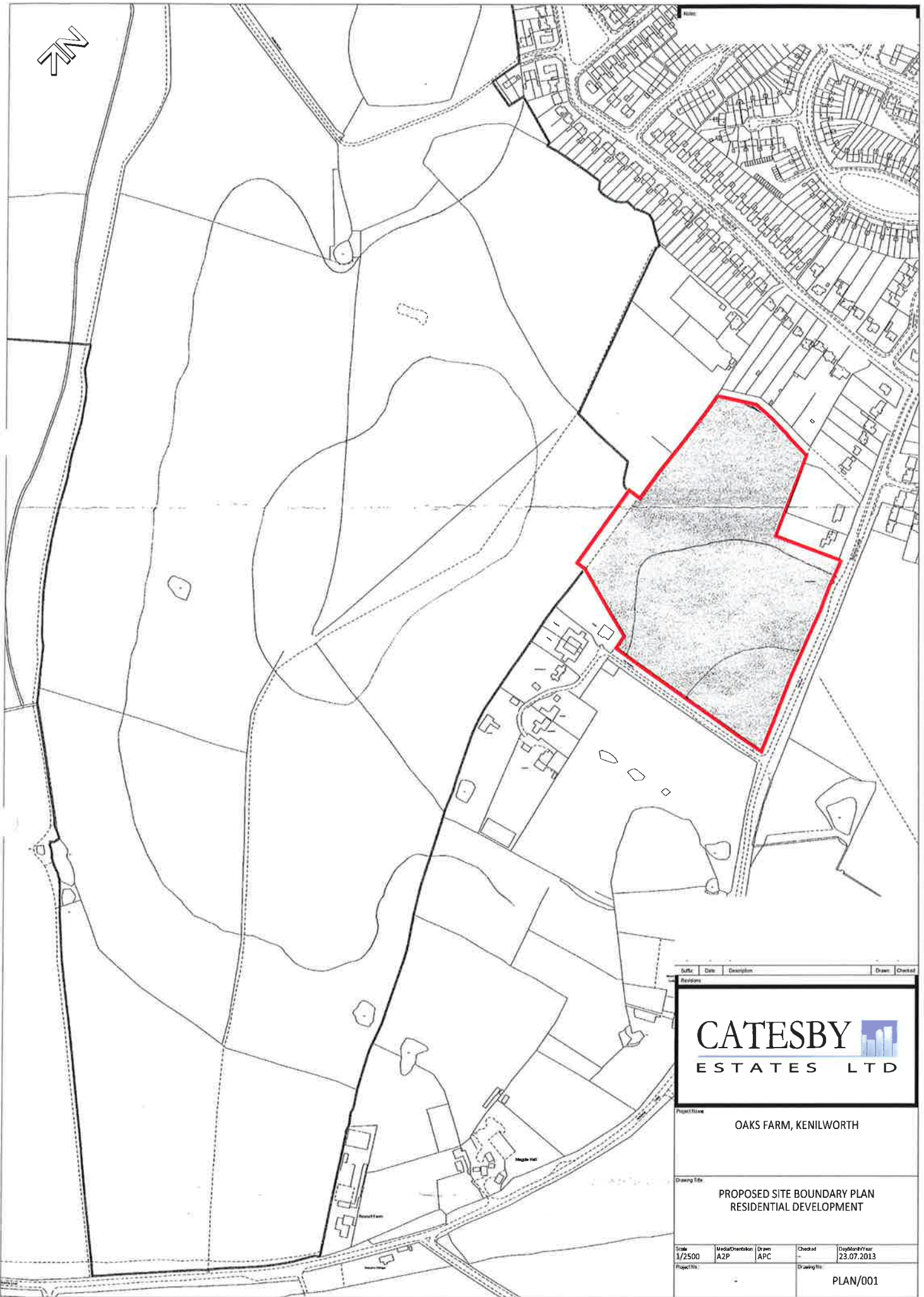
*‘When defining boundaries, local planning authorities should:*

- *not include land which it is unnecessary to keep permanently open.’*

In that it is evident the strategy of the emerging Local Plan requires the release of land from the Green Belt to achieve sustainable patterns of development, it is almost inconceivable that a future strategy will not similarly require further releases of land from the Green Belt. In order to make provision for longer term development needs, this Local Plan should identify ‘Safeguarded Land’.

If contrary to the submissions that have been made above, it is concluded that this site is not required to meet housing needs arising from within the plan period, then it is submitted that the site should be excluded from the Green Belt to meet possible future development requirements beyond the Plan period.

**Enclosure: Plan/001**



Issue	Date	Description	Drawn	Checked
Revisions				



Project Name  
**OAKS FARM, KENILWORTH**

Drawing Title  
**PROPOSED SITE BOUNDARY PLAN  
 RESIDENTIAL DEVELOPMENT**

Scale 1/2500	Media/Drawn A2P	Drawn APC	Checked -	Day/Mon/Year 23.07.2013
Project No. -			Drawing No. PLAN/001	