

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

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	40 AGENT	MR
First Name	/	MICHAEL
Last Name		ROBSON
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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?	COUNCILS 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)

Policy RDS1

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).

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 significantly 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 rate; apply the ONS figures with some caution; and recognise the important requirement to meet the full objectively assessed housing need.

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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

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 in respect of strategic housing growth.

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, to some extent, performs a Green Wedge and assists in avoiding coalescence between settlements. The Plan is clear that Green Belt release should only be considered where all non-Green Belt sites have been exhausted. The Plan has not adequately demonstrated that all non-Green Belt sites have been exhausted (or that less sensitive Green Belt is not available) the Council for example are encouraged to consider in more detail the Duty to Co-operate (an important test of soundness) in terms of meeting its own housing requirements outside of its boundaries. Strategic development sites are available to meet the District's needs in proximity to the District's administrative boundary, for example land within Stratford-upon-Avon District at Southam. This site, which is being promoted with Stratford-upon-Avon District Council is both suitable and available and can be regarded as an exemplar opportunity which could deliver between 1,200 and 1,200 houses in a mixed use new village.

This is an appropriate alternative strategy which does not involve sensitive Green Belt release, meets the objectives in respect of the Duty to Co-operate, whilst meeting Warwick District's housing needs.

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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).

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.

The Plan is clear that Green Belt should be regarded as a last resort, in circumstances where all non-Green Belt alternative sites have been exhausted.

Having regard to the Council's important Duty to Co-operate, and the need to meet the full objectively assessed housing needs, the Council should consider alternative non-Green Belt sites, not only within their administrative boundary, but also in relation to neighbouring authorities.

One such alternative option available is to consider less sensitive Green Belt release; alternatively to direct housing to meet Warwick District's housing requirements in a sustainable manner.

This approach would avoid the need for the release the significant tract of land on the edge of Kenilworth which is presently being identified for 700 dwellings.

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Paragraph 5.4

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, of significance given it performs all of the Green Belt functions set out within the Framework. It operates as a Green Wedge and serves to avoid coalescence with Leamington. It is highly visible and is regarded as sensitive in landscape, visual and openness terms (openness being the primary purpose of designating Green Belt).

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 option includes allocating land in Stratford-upon-Avon District, close to Southam, where a site is being actively promoted and could accommodate between 1,000 and 1,200 houses in the Plan period.

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