

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		
First Name		GREG
Last Name		MITCHELL
Job Title (where relevant)		PLANNING DIRECTOR
Organisation (where relevant)	ACLLOYD LTD	FRAMPTONS
Address Line 1		ORIEL HOUSE
Address Line 2		42 NORTH BAR
Address Line 3		BANBURY
Address Line 4		
Postcode		OX16 0TH
Telephone number		01295 672310
Email address		greg.mitchell@framptons-planning.com
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"/> 45 - 54	<input type="checkbox"/> 55 - 64
		<input type="checkbox"/> 25 - 34
		<input type="checkbox"/> 35 - 44
		<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?

SECTIONS 1, 2, 3, 4

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).

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Part B - Commenting on the Revised Development Strategy

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Sheet of

Which part of the document are you responding to?

SECTION 5

Paragraph number / Heading / Subheading (if relevant)

5.2

Map (e.g. Proposed Development Sites - District Wide)

MAP 4

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).

PLEASE SEE ACCOMPANYING SUBMISSION.

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Warwick Local Plan

Revised Development Strategy June 2013

Land South of Sydenham, Whitnash

Introduction

These submissions are made on behalf of A C Lloyd Limited (ACL) who have been promoting the release of this land south of Sydenham, Leamington Spa for residential development as part of a Strategic Urban Extension throughout the emerging Local Plan process.

ACL supports the revised broad location for development the continued identification of an allocation of non-green belt land to the south of Sydenham following the previous consultation exercise in June/July 2012. Since then the Council will be aware that planning permission has been granted on appeal (Ref APP/TT3725/A/13/2190334) for 209 dwellings on the northern part of the proposed allocation immediately south of the existing Mill Pool Meadows development. ACL welcomes the proposed allocation

As a result, it is submitted that the remainder of the identified land south of Sydenham would achieve a sustainable pattern of development that is capable of being well connected to the existing urban area. Therefore, the identified housing allocation listed in paragraph 4.4. - Table RDS5 referring to East of Whitnash as a greenfield Strategic Urban Extension is supported.

Level of Housing Growth

As regards the overall level of development, the Revised Development Strategy (RDS) has been published in advance of the joint Strategic Housing Market Assessment (SHMA) being prepared between Coventry, NBBC, North Warwickshire BC, Rugby BC and Warwick DC. At present therefore, the Council is unable to say what its dwelling requirement for the plan period is likely to be in any considered way.

Section 4.1 of the Revised development Strategy (RDS) correctly confirms the fact that the level of housing growth is an interim figure and that this may alter as a result of the findings of the Joint SHMA and the resulting co-operation between the authorities. Against this background it is considered that the statement at the end of paragraph 1.3 of the RDS is untenable, which states, *"the Council believes that the evidence base which underpins the RDS is robust and the housing growth requirements are unlikely to change substantially as a result of the new assessment"*. The Council is not in a position to make this judgment at present. If this was the case, it would appear that the Council is effectively pre-judging the outcome of the SHMA exercise. There is no evidence to indicate that the Council's position as expressed at the end of paragraph 1.3 of the RDS is robust. It should be deleted.

The RDS makes provision for a windfall allowance of 2,800 dwellings for the period 2011-2029. This assessment is based on a Warwick District Council Analysis 'Estimating a Windfall allowance: Revised Development Strategy Stage' (May 2013).

Having reviewed the basis of the Council's position on the proposed windfall allowance, It is considered that the windfall allowance is excessive and unjustified. It seems to ignore the evidence from the SHLAA (which provides for 300 dwellings on small urban sites) and assumes an unrealistically high level of windfall sites for the plan period. The Council's evidence is based on a subjective manipulation of past trends rather than any considered examination of the evidence that may exist in term sof the potential capacity of the urban areas to accommodate such a high level of windfall moving forward. Accordingly, in the absence of a clear and robust evidence base from the Council the proposed windfall allowance is rejected.

Whitnash and South of Sydenham (RDS Section 5.2)

Preparation of a Master Plan for the area East of Whitnash (south of Sydenham) is underway is underway taking on-board strategic considerations identified in the draft Plan (Map 4) for Whitnash and south of Sydenham. It is considered that the precise location of the various facilities referred to in the key to Map 4 but not shown on the plan should be a matter that is, in any event, determined by the master plan process in conjunction with extensive local community engagement.

The principles of the Infrastructure Requirements set out in paragraph 5.2.6 onwards are acknowledged and accord with the understanding from the assessments that have been undertaken to date. However, the text of paragraph 5.2.9 needs to be amended to

acknowledge that the northern part of the site has planning permission for 209 dwellings that is served by an access from St Fremund Way (with emergency access from Church Lane). As a result it is likely that the balance of the land will be served by a new access through Campion School.

In the context of Green Infrastructure it is submitted that the precise dimension of the buffer required to protect the Whitnash Brook Local nature Reserve and to provide enhanced ecological and recreational space along Whitnash brook should be determined by detailed environmental analysis rather than being pre-determined at this stage in the plan-making process.

The Local Plan can properly record that a local wildlife site is to be provided between the new eastern edge of the built up area and the Whitnash Brook, to form a permanent wildlife and recreational corridor.

As provided for in the Site Proposals there will be large areas of open space and other community requirements to meet the needs of the future resident population. The disposition of these uses should be determined through an analytical assessment of the opportunities and constraints with the benefit of stakeholder and public consultation. For the purposes of this stage in the Local Plan process it is considered sufficient to identify the extent of the allocation as portrayed on Map 4. A consequence of this analysis is that the capacity of the site may change. Currently the RDS identifies the overall site of 41.09 ha has having a capacity of 500 dwellings. However the northern most part of 6.93 ha has

full planning permission for 209 dwellings and includes public open space and provision for an extension of the Whitnash Brook Local Nature Reserve. This would result in the balance of the site 34.16 ha being allocated for only about 300 dwellings. Even allowing for additional open space and wildlife buffers this strongly indicates that the capacity of the overall site has been grossly underestimated. A C L estimate the capacity of the overall to be about 700 dwellings rather than 500. The on-going masterplan work will corroborate this. As a result the RDS should be amended throughout to refer to the site south of Sydenham as having a capacity of 700 dwellings.

Objection is made to the proposed phasing provision identified in the site proposals listed under paragraph 5.2.2. The site is phased in periods 1, 2 and 3. However, there is no evidence provided by the Council to justify any phasing limitation. Indeed, on the basis that the site is to be developed throughout the plan period it seems absurd to seek to impose any implied phasing limitation which may adversely impact upon the need to co-ordinate on site infrastructure and services. As a general point, it is submitted that a phasing limitation is likely to artificially constrain strategic sites from being brought forward in a timely manner. Strategic sites require a significant lead-in time. Major infrastructure works are required, as is acknowledged in the RDS, involving substantial up-front costs to create developable plots. Schools, community centre, district centre facilities etc may also need to be built at an early stage of the development process. It is not appropriate to impose an arbitrary phasing restriction on their delivery which may simply serve to undermine the viability of a development. Reference to phasing should be deleted from the Local Plan.

It is acknowledged that the RDS does not include a full range of topics that will be included in the Local Plan. However, the opportunity to comment at this interim stage is supported.

However, it is apparent that the publication of the joint SHMA in early 2014 will be an important factor in determining the final format of the Local Plan. As such, it is submitted that the Council should consider a further round of consultation on the output of the SHMA prior to going forward to publish a Submission Draft Plan. At present such an event is not anticipated in the next steps set out at paragraph 2.4 of the RDS. It is noted that paragraph 2.5 does highlight the importance of the outcome of the SHMA exercise.

Further discussions with the Local Planning Authority are welcomed on the delivery strategy for the allocation controlled by A C L.