

## 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		
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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"/> 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

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?

SECTION 5

Paragraph number / Heading / Subheading (if relevant)

5.1

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

MAP 3

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 Harbury Lane, Warwick****Introduction**

These submissions are made on behalf of A C Lloyd Limited and Northern Trust Company Ltd who have been promoting the release of this land south of Harbury Lane, Warwick for residential development as part of a Strategic Urban Extension throughout the emerging Local Plan process.

These parties support the revised broad location for development that has emerged following the previous consultation exercise in June/July 2012. The parties welcome the proposed allocation of non-green belt land to the south of Warwick/Leamington/Whitnash, including brownfield land at the former Severn Trent Sewage Works.

As a result, it is submitted that the identified land south of Harbury Lane would achieve a sustainable pattern of development that is capable of being well connected to the existing urban area. Therefore, the identified broad locations in Table RDS5 referring to the brownfield Former Severn Trent Sewage Works (south of Harbury Lane) and the 'southern sites' Strategic Urban Extension are 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 terms of 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.

**Southern Sites on the edge of Warwick, Leamington and Whitnash (RDS Section 5.1)**

Preparation of a Master Plan is underway taking on-board strategic considerations identified in the draft Plan (Map 3) for the Southern Sites: South of Warwick and Whitnash. It is considered that the precise location of the various facilities should be a matter that is determined by the master plan process in conjunction with extensive local community engagement.

The principles of the Infrastructure Requirements set out in paragraph 5.1.13 onwards are acknowledged and accord with the understanding from the assessments that have been undertaken to date. In the context of Green Infrastructure it is submitted that the precise dimension of the 'Country Park' is 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 'Country Park is to be provided between the new southern edge of the built up area and the Tach Brook, to form a permanent wildlife and recreational corridor. The potential for an expansion to the south of the Tach Brook will be dependent on the availability of land. In this context, and as previously submitted, A C Lloyd Ltd controls additional land north of Tach Brook and south of Harbury Lane as portrayed on the attached plan. This extended area should be included within the area shown on Map 3. provide open areas for amenity and recreation; habitats to support a diverse ecology and to integrate development in the landscape and surrounding settlements.

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 Map3, subject to the revisions in terms of the extent of the area as noted above.

Objection is made to the proposed phasing provision identified in the site proposals listed under paragraph 5.1.2. There is no evidence provided by the Council to justify a phasing limitation. Indeed, on the one hand the Council at paragraph 5.1.11 identify the need to co-ordinate on site infrastructure and services but provide no evidence to indicate how this translates in to a phasing policy. 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. In the event the Council continues to impose a phasing restriction against our objection it is considered that the former sewage treatment works can be brought forward with the adjoining land and therefore ought to be recognised as potentially delivering units in phase 2 and not solely phase 3.

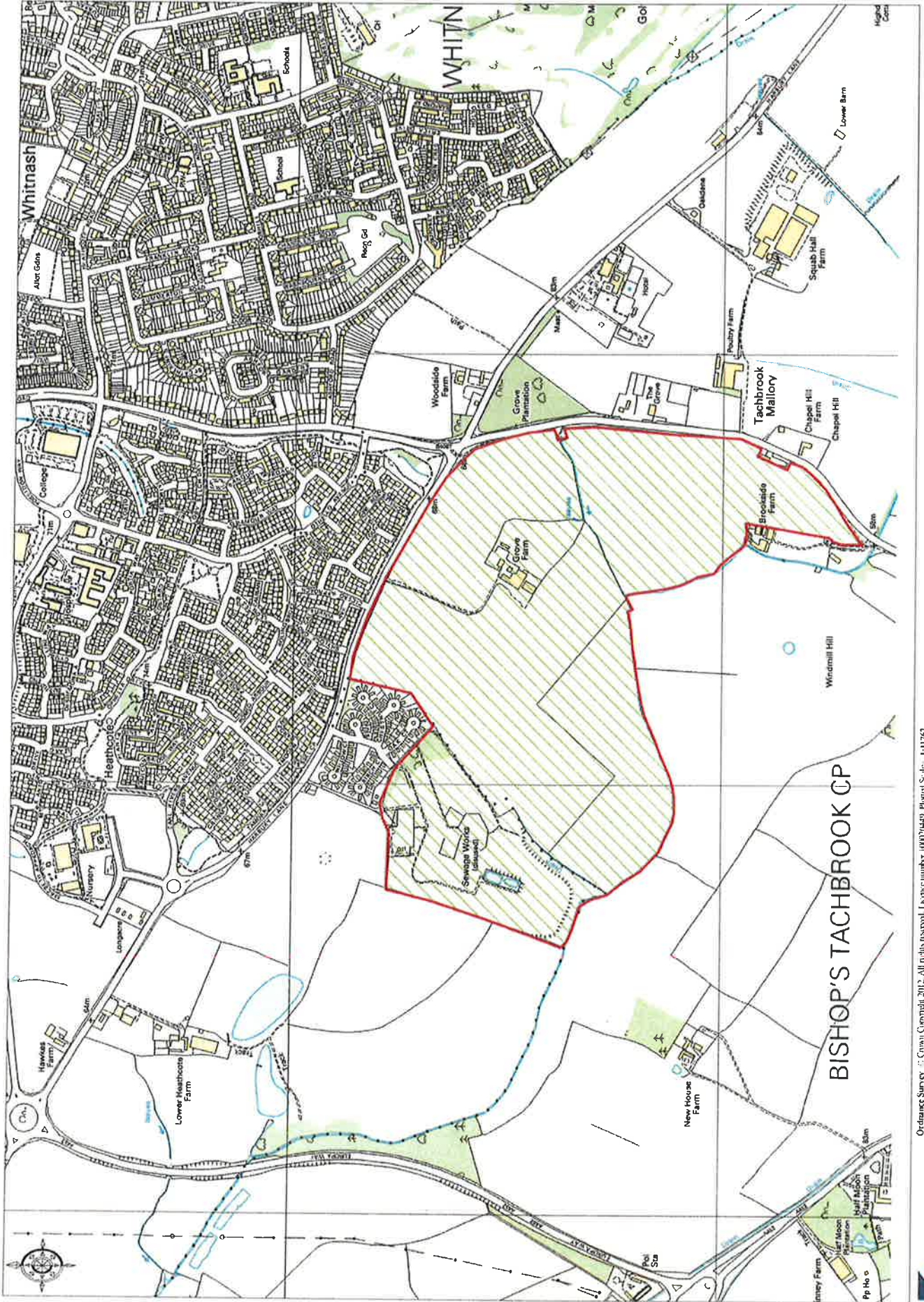
It is acknowledged that the RDS does not include a full range of topics that will be included in the Local Plan. However, the opportunity to comment at this interim stage is supported.

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 Lloyd Ltd and Northern Trust Co Ltd.

A C Lloyd Homes Limited and Northern Trust - Land at Grove Farm, Warwick



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