



Representations on behalf of

Federal Mogul

on

Warwick District Council

Revised Development Strategy June 2012

July 2013

Comments on the Revised Development Strategy (June 2012)

prepared by Pro Vision Planning & Design

on behalf of

Federal Mogul

- 1.1 Our client owns an area of land on the edge of Radford Semele. It is contiguous with land between Leamington and Radford.
- 1.2 Our client supports the overall level of development suggested in RDS4. However, we question whether this is enough in order to effect the "step change" in housing development that is now required by Government Policy.
- 1.3 The proposed allocation of 5,630 new homes on a combination of urban and other brownfield sites, and strategic urban extensions on greenfield land (see RDS5, p18) is accepted.
- 1.4 Further, the inclusion of Radford Semele as a Primary Service Village in the settlement hierarchy (RDS5, p19) is supported.
- 1.5 The changes made in relation to the **Broad Location of Development for Housing** following the June/July 2012 Consultation are noted.
- 1.6 Our client supports the strategy set out in RDS3 which states that it is the Council's Preferred Option for the broad location of development to:
 - Protect the Green Belt from development where alternative non-Green Belt sites are suitable and available;
 - Distribute growth across the District, including within and/or on the edge of some villages; and
 - Allow for a higher level of growth in larger, more sustainable villages with a reasonable level of services
- 1.7 RDS3 responds to the June/July 2012 Consultation which highlighted considerable opposition to development in the Green Belt especially where alternative locations south of Warwick and Leamington Spa, which are outside of the Green Belt, are available. This is consistent with the NPPF (paragraphs 79-89).

- 1.8 Since the 2012 Consultation, further research relating to landscape, transport and employment has been carried out which supports the potential for concentrating more development in areas outside of the Green Belt.
- 1.9 This is welcomed, yet, on behalf of our client, we question the balance of development between that proposed to the north of Warwick and Leamington Spa, which is also located within the Green Belt, and that proposed to the south of these settlements, which is located outside of the Green Belt.
- 1.10 Currently the strategy suggests approximately 510 – 720 new dwellings in the Green Belt compared with only 270 – 390 new dwellings on land not included in the Green Belt. There is an absence of clear evidence to justify this imbalance.
- 1.11 We consider that less development should be allocated to the more sensitive parts of the District, such as the Primary Service Centres at Cubbington, Hampton Magna, and Lapworth. The allocation of new housing to all Secondary Service Centres in the Green Belt such as Hatton Park, Leek Wootton and Bagington should also be removed or significantly reduced.
- 1.12 It follows that more development should be allocated to the Primary Service Centres outside the Green Belt.
- 1.13 In this respect the settlement of Radford Semele scores highly. It is:
- not in the Green Belt;
 - relatively unconstrained;
 - well served by local facilities and services (including a Primary School and recreation ground);
 - has a range of existing employment opportunities; and
 - is in a sustainable location close to public transport links.
- 1.14 We suggest that the allocation of proposed new housing in Radford Semele should be increased to approximately 200 – 250.
- 1.15 Our client's land ownership extends to approximately 30 hectares of farmland between Radford Semele and Sydenham.
- 1.16 It is considered that a 3 hectare parcel of our clients land adjoining the south-west edge of the existing settlement boundary of Radford Semele represents a sustainable and appropriate location for new housing with good access to existing facilities and services in the village. This land represents a logical rounding off of the existing urban area and

would not reduce the existing physical gap with Sydenham. This is supported by the landscape capacity study prepared by Richard Morrish Associates (November 2012) which states that "*Smaller land parcels are suggested for possible development where there would seem to be potential to retain the separate identity of Radford*" (paragraph 8.9). Figure B2 of the RMA study illustrates how development could be accommodated at Radford without compromising the settlement gap.

- 1.17 The gap between Radford Semele and Sydenham is an area of open countryside with natural features including a stream, hedgerows and tree belts. A public footpath crosses the land linking the village with Sydenham urban area.
- 1.18 To ensure the continued separation of Radford Semele from Sydenham/Leamington Spa, our clients remaining 27 hectares could be made available as open space that should be permanently managed and maintained to fulfil its role as a settlement gap.