

Planning and Environmental Advisers

> REPRESENTATIONS TO WARWICK DISTRICT COUNCIL VILLAGE HOUSING OPTIONS AND SETTLEMENT BOUNDARIES CONSULTATION (NOVEMBER 2013)

ON BEHALF BARWOOD DEVELOPMENT SECURITIES LTD

JANUARY 2014

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APPENDICES

Appendix 1: Land south of Mallory Road site boundary

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1. INTRODUCTION

- 1.1 These representations are submitted on behalf of Barwood Development Securities Ltd ("Barwood") in respect of land south of Mallory Road, Bishop's Tachbrook. They respond to consultation being carried out by Warwick District Council (WDC) into the Village Housing Options and Settlement Boundaries Document (November 2013). A Plan showing the land controlled by Barwood to the south of Mallory Road, edged red, is attached at **Appendix 1**.
- 1.2 The following sets out our representations to the Village Housing Options and Settlement Boundaries Document, which Barwood and its appointed representatives would be pleased to discuss with the Council in order to secure appropriate changes ahead of its formal publication and usage in the production of the new Local Plan for Warwick District.

The Tachbrook Hill Farm / Land South of Mallory Road Site

- 1.3 Barwood controls c. 7.3 hectares (18 acres approximately) of land located to the south of Mallory Road (as identified on the plan at Appendix 1). This is the same land which is referred to as 'Tachbrook Hill Farm' within the Village Options and Settlement Boundaries consultation document (and shown as Site 3 on the Plan at page 39 of the Consultation document).
- 1.4 The site currently constitutes private farmland used for grazing. It occupies two roughly rectangular fields abutting the existing settlement of Bishop's Tachbrook immediately to the east.
- 1.5 Barwood formally submitted an outline planning application in respect of this site to Warwick District Council in December 2013 (application reference W/13/1688). The application proposes up to 125 dwellings with construction of access from Mallory Road, areas of public open space, landscaping and associated works. The 13 week determination period expires in March 2014. To date, the following statutory consultees have responded to raise no objection to the grant of planning permission, subject to the standard, appropriate planning conditions being attached:



- Seven Trent Water;
- Housing & Property Services;
- Highways Agency;
- Warwickshire Fire & Rescue Service;
- Warwickshire Police;
- Natural England;
- Environment Agency; and
- Public Rights of Way Officer.
- 1.6 In considering which sites should be allocated in the new Local Plan, we recommend that the Council gives careful consideration to the detailed technical evidence base supporting this planning application. This demonstrates that the site is deliverable and represents an excellent opportunity for a high quality and sustainable housing scheme which would make a positive contribution towards Warwick DC's housing supply and will deliver a number of important benefits for the village. We expand on this in section 3.



2. EMERGING PLANNING POLICY

Warwick District Council's new Local Plan

- 2.1 Warwick DC is currently preparing its new Local Plan that will guide future development in the District for the next 18 years. Most recently a public consultation on the Revised Development Strategy ran from 14th June to 29th July 2013 and comments are currently being analysed by Warwick DC to inform the next stage of the plan.
- 2.2 The draft Local Plan recognises that, in order to meet its future housing requirements, housing will need to be delivered on greenfield sites outside its previously defined settlement boundaries. It also recognises that the allocation of sites for a reasonable level of housing growth within and on the edge of its most sustainable villages (currently c. 15% of the total housing requirements set out in the emerging new Local Plan). This includes Bishop's Tachbrook, which is identified as a Primary Service Village, which should accommodate between 100 and 150 new homes over the Plan period (Warwick DC Revised Development Strategy, June 2013).
- 2.3 We agree that the expansion of sustainable villages through housing growth will contribute to a more sustainable pattern of future growth. Housing growth will provide much needed affordable housing and a more balanced housing mix, including the creation of opportunities for first-time buyers, those looking to downsize and families. In turn, this will help support and enhance local services and facilities that may be under threat.
- 2.4 We welcome this early opportunity to comment on the village housing options identified. But we also recognise that the new Local Plan is at a very early stage in its preparation and that the findings of the Joint Strategic Housing Market Assessment (JSHMA) will require the Council to reconsider its overall strategy in respect of its future housing requirements and distribution (Coventry & Warwickshire Joint Strategic Housing Market Assessment, November 2013). In light of the Joint SHMA findings, it is very likely that Warwick DC will need to release more land in order to help meet both its own and potentially neighbouring



authorities' requirements and allocating more housing to the most sustainable villages will necessarily be one option that requires further consideration.

2.5 We trust these representations and supporting evidence base will help inform this process and look forward to further opportunities to comment on the emerging new Local Plan before it is submitted.

Village Plans and Housing Options Consultation Paper

- 2.6 The Village Housing Options and Settlement Boundaries Report has been produced to help inform the emerging Local Plan. Section 2 establishes the Council's preferred broad locations for development in line with its draft Local Plan strategy summarised above.
- 2.7 The document makes clear that 15 housing options which were initially assessed by Warwick DC for Bishop's Tachbrook which was reduced down to 3. The final 3 options were then examined further via a more thorough investigation. The resultant outcome of this work has identified that the 'Land south of the school' is currently the Preferred Option for housing growth in Bishop's Tachbrook whilst 'land west of Bishop's Tachbrook' and 'land at Tachbrook Hill Farm' have been discounted by Warwick DC. The latter site is the subject of these representations.

Comments on the Evidence Base

- 2.8 In respect of Bishop's Tachbrook, the Options paper states that the preferred option (i.e. the land south of the school) has been chosen due to the "*potential regenerative impact on the village and potential improvements for accessing the primary school*" and discounts the land south of Mallory Road on the basis that it is a "*larger scale site with lower regenerative benefits than the preferred option*" (page 38 of Village Housing Options and Settlement Boundaries Document, November 2013).
- 2.9 Nowhere in the report does it explain what the specific regenerative benefits are that only the land south of the school can offer and so far as we are aware no evidence has been provided which supports the conclusion that the land south of the school would deliver regenerative benefits that are of overriding importance and sufficient to justify discounting other potential housing sites.



2.10 In the absence of a robust evidence base, we must object to the conclusions drawn as to which sites should be allocated and which should be discounted at Bishop's Tachbrook. Unless the Council's decisions are based on a proportionate evidence base, we consider the Local Plan will not be justified or consistent with national policy and is likely to be found unsound.

An Incomplete Evidence Base

- 2.11 We also note that the Council recognises it has not yet consulted fully with key stakeholders, including the County Highway Authority. While the formal opportunity to comment now is welcomed, discounting or preferring sites for allocation now seems premature in light of this.
- 2.12 For example, while it is not stated explicitly, it seems possible that the "regenerative benefit" that the Council considers only the land south of the school can offer (and justifies all other sites to be discounted entirely) is the potential for it to deliver a new access for the school. We are aware that the Parish Council would like to see a new access for the school in order to discourage vehicular movements through the centre of the village. However, there appears to be no technical evidence to demonstrate there is an issue which needs to be mitigated or that a new access, coupled with a second access identified to be needed to serve the land south of the school, can be achieved satisfactorily.
- 2.13 We would also add that, particularly as both the sites at Mallory Road and south of the school are sustainably located within a convenient walking distance of the village centre, it seems to us that both will offer important regenerative benefits and would note that only the Mallory Road site is within 300m (from the centre of the site) of existing bus stops. Discounting the site south of Mallory Road on this basis is therefore not justified and we strongly recommend that this is reconsidered with the benefit of a proportionate evidence base consistent with the NPPF.

Application of the Evidence Base

2.14 In addition to our concerns about the robustness of the Council's evidence base, it is not clear how that evidence base is being applied in the consideration of each site. For example, the Council's own Landscape Sensitivity and Ecological &



Geological Study (November 2013) considers a large 'zone' that washes over both the land south of the school and south of Mallory Road. In conclusion, it sets out that the ground rises east to west across the zone, forming a very prominent skyline" and goes on to state that "development on the prominent skyline must be avoided".

- 2.15 We agree that there is a localised ridgeline where the land south of the school is located. It also affects a small area to the south of the Mallory Road site but, as demonstrated on the indicative layout submitted with Barwood's planning application, a development of up to 125 homes can be delivered on the site without any development above the ridgeline where the land starts to rise. This part of the site, above the ridgeline, is not proposed for any development, and instead is intended for open community use.
- 2.16 In the absence of any explanation or other evidence this places into serious question whether the Council's decision on which sites to allocate or discount is justified. This is particularly in consideration of the NPPF which states that "Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework" (paras. 17 and 110).

Summary

- 2.17 We support the Council's recognition that expansion of the most sustainable villages, including Bishop's Tachbrook, though housing growth will support a sustainable pattern of development and is an essential component of the Local Plan.
- 2.18 Notwithstanding this, we continue to have serious concerns about the adequacy and application of the evidence base underpinning the emerging New Local Plan. Because of this, we must question the Council's judgement about which sites should be discounted and which should be allocated. Unless this is addressed, we do not believe the Local Plan can be found sound.
- 2.19 To assist the Council's further consideration, the following section explains why the land south of Mallory Road is deliverable and can offer a number of important planning gains, including regenerative benefits.



3. MALLORY ROAD SITE

Warwick District Council's New Local Plan

- 3.1 The NPPF makes clear that local authorities must *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"* (para. 47). Furthermore, it sets out that, to be considered deliverable, sites should be:
 - Available now,
 - Offer a suitable location for development now, and be
 - Achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.
- 3.2 This section of our representations therefore explains how the land south of Mallory Road satisfies these criteria and should be allocated as part of the District's emerging Local Plan. This is informed by the detailed technical assessments supporting Barwood's current planning application, which include:
 - Design & Access Statement;
 - Findings of Arboricultural Assessment (Incorporating Arboricultural Impact Assessment and Tree Protection Measures);
 - Ecological Appraisal;
 - Flood Risk Assessment;
 - Ground Conditions Desk Study (Phase 1 Contaminated Land);
 - Landscape and Visual Impact Assessment;
 - Noise Assessment;
 - Statement of Community Involvement;
 - Supporting Planning & Sustainability Statement;
 - Transport Assessment;
 - Framework Residential Travel Plan;
 - Existing Utilities and Supply Assessment and
 - Heritage Statement.



3.3 A copy of the entire outline application submission is appended to these representations at Appendix 2.

A Site that is Available Now and can be Delivered Within Five years

- 3.4 Barwood controls the site in it's entirely. It has entered into a promotion agreement with the landowner, who currently uses the site for grazing. It is available for development immediately, with any grazing stock being moved elsewhere within the landowner's farm estate, which spans over 1,000 acres.
- 3.5 Subject to the grant of planning permission the site can be delivered within five years. If the planning authority grants outline permission in March, development could commence later in late 2014, with completion during 2016-2017.

It offers a suitable location for development now

- 3.6 The site is included in the Council's latest (2012) Strategic Housing Land Availability Assessment (SHLAA) under site reference R31. The site considered in the SHLAA is a larger area extending to 18.43 hectares. The SHLAA notes that it is available with a willing landowner and that some of the site could potentially be suitable subject to evidence of local housing need and scale of development in relation to the existing settlement. The Councils own evidence base establishes the appropriate level of housing need for the village, which this site is consistent with.
- 3.7 The evidence we have submitted also demonstrates that the site is a sustainable location and suitable for development and that any impacts of development can be mitigated effectively. This is supported by the responses from the statutory stakeholders to the current planning application, none of which have raised any objection, subject to standard planning conditions being attached.
- 3.8 The current planning application submission also sets out a number of direct and indirect benefits that development of the land south of Mallory Road would deliver. We would highlight the following in particular:



- It would provide a mix and range of house types, which is identified as being required to help meet the needs of the village's existing population and to encourage a wider demographic mix. This will include opportunities for downsizing, first time buyers and families, as well as providing affordable housing, for which there is a significant and urgent need.
- There is clear potential for landscape enhancement existing mature boundary landscape features can be retained and improved through additional tree and hedgerow planting, which would both 'soften' the settlement edge and fill in the currently 'gappy' hedgerows.
- 3. The southern part of the Mallory Road site, which sits within the 'localised ridgeline' which spans most of this area of the village, provides a good opportunity to provide a sizeable (c. 2ha) area of public open space. This could be transferred to the Parish Council and could be used for a variety of community uses.
- 4. Public consultation undertaken with the village before the outline planning supplication was submitted highlighted a desire to see areas of open space in the village that can be used to support education, such as a 'nature trail'. The proposed area of public open space could deliver this.
- 5. The existing Public Right of Way through the site will be retained and enhanced, an approach which is supported by the Mid-Warwickshire Group Ramblers Association and the Council's own Public Rights of Way Officer. This, coupled, with the open space on the site will encourage activities that will also promote health and well-being.
- 6. The site is within 300m of bus stops and 900m of the village centre (measured from the centre of the site). Improvements to the public right of way and footpaths and a pedestrian connection onto Mallory Road in the North West corner of the site will further encourage people to walk and cycle into the village and to use, sustain and improve local bus services. In turn, this will support local services and community



facilities, which are currently under threat from a recognised declining population.

7. There are significant opportunities for ecological and biodiversity enhancements on the site, as demonstrated by the biodiversity calculations that have been submitted to the Council which shows a net gain following development.

Development of this site is viable

- 3.9 Barwood has secured this site within the last 12 months and in entering into a Promotion Agreement, it is required to demonstrate to itself, the landowner and its investors that it will deliver acceptable returns for all parties.
- 3.10 Its assessment of viability was informed by the technical evidence base and a clear understanding of the anticipated development and infrastructure costs and mitigation needed to deliver a residential development on the site. It also factored in the provision of up to 40% affordable housing, in line with the Council's policy.
- 3.11 Barwood is therefore confident that the development proposed is viable, would provide acceptable and competitive returns to the willing land owner and to Barwood or another willing developer. We would be willing to discuss this in more detail with the local authority as it progresses its work on the Local Plan in order to inform its own viability assessments that are needed for Examination of the plan.

Summary

- 3.12 The site is available for development now, is suitable for development now, is viable and can be delivered well within the next five years. The additional benefits that development of this site could deliver should also not be ignored in assessing which sites to allocate in the new Local Plan.
- 3.13 We trust this will be helpful in supporting the Council's preparation of the new Local Plan and the additional technical evidence submitted will be considered and properly taken into account. We would welcome further discussions with the Authority in due course.



4. DETAILED RESPONSE TO COUNCIL'S SITE APPRAISAL

4.1 Appendix 6 of the Village Housing Options and Settlement Boundaries document sets out the findings of the Council's detailed site appraisals of the potential options for housing growth delivery. The below table establishes the Council's findings in respect of Site 3 'land at Tachbrook Hill Farm' (referred to as land south of Mallory Road within these representations) and HOW's response to each of topic of the appraisal.

Appraisal	Warwick District Council				
Торіс	Response	HOW Planning Response			
		Site has been discussed with			
		Neighbourhood Plan Group			
Option	Limited discussions with the	through consultation event and			
•	NP group although it has	at Development Forum			
Progress	potential links to BT01.	Presentation. Formal planning			
		application has been submitted			
		- reference W/13/1688.			
		Outline application submission			
Capacity	123	at the site proposed up to 125			
(Revised)	125	dwellings - therefore in line with			
		Council's assertions.			
		A planning application has been			
		submitted at the site which is			
	There is a strong interest in a	accompanied by a Transport			
	planning application for the	Assessment and Travel Plan.			
	site but no formal consultation	This was produced in			
Highways &	has been undertaken with	consultation with Warwickshire			
Transport	Highways. There are currently	County Council Highways. It is			
Issues	visibility issues which restrict	also confirmed that a Speed			
	access to the site and a speed	Survey informed the findings of			
	survey will be required to be	the Transport Assessment.			
	undertaken first.	Consultation is now ongoing			
		with Warwickshire County			
		Council during the			



		determination of the application.			
	Air, light and noise pollution	These issues identified will need			
	along with waste and	to be considered with any			
	emissions are likely to	housing option to the edge of			
	increase in the short-term. It	Bishop's Tachbrook. A Noise			
	is recommended that there	Impact Assessment has been			
Environmental	should be a requirement for	submitted with the outline			
Health Issues	an EMP (construction &	application made at the site			
	occupation) including	which confirms that noise			
	monitoring. Potentially some	should not pose a constraint to			
	noise issues from the M40 -	development providing the			
	particularly in more elevated	recommended mitigation			
	sections of the site.	measures are implemented			
Flooding, Water & Drainage Issues	Surface water run-off will need to be effectively managed. A suitable sewage / drainage system will be required to support the development and not add to any current localised problems. Generally a more elevated location with minor risk of flooding.	A Flood Risk Assessment and Utilities Technical Note have been submitted with the outline application made at the site. These documents confirm that flood risk considerations do not constitute a barrier to the granting of planning consent at the site and that appropriate infrastructure can be provided to serve the proposed development. The Environment Agency and Severn Trent Water have raised no objection to the application, subject to the			
		imposition of appropriate planning conditions.			
Site and		A planning application has been			
Planning	A planning application is	submitted and validated at the			
Application	expected very shortly.	site. Reference number is			
History (part		W/13/1688 and it is due to be			
or all of site /		determined in March 2014.			



1990-2013)		
SHLAA – Location	Edge of Village and extending beyond. Bishop's Tachbrook has been identified as a growth village with a range of services and facilities.	Agree that Bishop's Tachbrook is a sustainable village that can accommodate growth with a range of services and facilities.
SHLAA: Policy Context / History	Emerging policy direction supporting limited new housing in the more sustainable village locations. Neighbourhood Plan area.	Agree that Bishop's Tachbrook is a sustainable village that can accommodate growth with a range of services and facilities.
SHLAA: Physical Constraints: Access / Infrastructure / Layout	TPO113 on site. Site access may be restricted due to insufficient visibility splay. Layout would need to respect existing residential properties and connect well with existing village.	No 'A' grade trees of high quality and value were recorded within the Arboricultural Assessment submitted as part of the outline planning application submitted at the site. The constraints of the trees on site have been incorporated into the Illustrative Masterplan.
SHLAA: Potential Impact	Impact on the physical form of the village. Little potential connectivity to the village - essentially a new estate on the edge of the village. High landscape impact.	A Landscape and Visual Impact Assessment has been submitted with the outline application made at the site. This document concludes that the site has the capacity for the development as proposed on the Illustrative Masterplan and that there is no 'in principle' or policy landscape, or visual reason why the site should not be developed. The proposal development at the site has located and designed to minimise effects on the character and setting of the



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		Bishop's Tachbrook.			
	Unsuitable as a large	Unsuitable as a large			
	development due to landscape	development due to landscape			
SHLAA:	impact, erosion of rural	impact, erosion of rural			
Overall	character and concerns over	character and concerns over			
Suitability	suitable site access, site	suitable site access, site			
	configuration and connectivity	configuration and connectivity			
	to existing built form.	to existing built form.			
	Land in single ownership and	Agrood - planning application			
SHLAA:	the owner has expressed an	Agreed – planning application			
Availability	interest in bringing the site	submitted in agreement with			
	forward for development.	land owner.			
		Landscape issues considered			
		under 'SHLAA: Potential Impact'			
	Not achievable as a large	Topic. Also addressed elsewhere			
SHLAA:	5	in these representations and in			
Achievability	scheme due to high landscape	Landscape and Visual Impact			
	impact and associated issues.	Assessment submitted with the			
		outline planning application			
		made at the site.			
SHLAA –	2014/19	Could be fully developed by			
Timeframes	2014/19	2017.			
	Area was seen as 'edge of				
	'Bishop's Tachbrook' and				
	some distance from core	Site is within 900m from core			
	village services and facilities.	village services (measured from			
	Not sure how development	centre of the site). Development			
Parish Council	would help regenerate or	<i>,</i>			
Feedback	sustain village services.	proposals for the site can			
гееираск	Envisaged that there may be	deliver many regenerative			
	substantial opposition to	benefits and sustain village			
	development in this area,	services, as identified in Section			
	given its proximity and scale	3 of these representations.			
	to nearby residential				
	properties.				
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Sustainability Appraisal: Significant Effects	All potential allocations are likely to lead to major positive long-term effects on housing needs as all sites make provision for housing. Potential site allocation has excellent access to public transport with a bus stop within 0-400m and there are pavements which provide safe access for pedestrians into the village centre or to public transport. The site is considered to be of high landscape value and therefore there is potential for major long-term negative effects.	Agree that development on this site would lead to major positive long-term effects on housing need. The site is in close proximity to existing bus stops and adequate pavement provision provides excellent pedestrian access from the site to village services and facilities. Landscape issues considered under 'SHLAA: Potential Impact' Topic. Also addressed elsewhere in these representations and in Landscape and Visual Impact Assessment submitted with the outline planning application made at the site.
Greenbelt / Greenfield Assessment: Summary	Generally a well-connected parcel which plays an important role in preserving the open setting of the village from the south. Some potential for enhancement.	The southern part of the Mallory Road site, which sits within the 'localised ridgeline' which spans most of this area of the village, provides a good opportunity to provide a sizeable (c. 2ha) area of public open space. This could be transferred to the Parish Council and could be used for a variety of community uses.
Landscape Character Assessment: Summary	Lies within LCP BT_04. This zone lies to the west of the settlement, bordered by Mallory Road to the north, A452 Banbury Road to the west and the M40 to the south-west. It comprises a	Landscape issues considered under 'SHLAA: Potential Impact' Topic. Also addressed elsewhere in these representations and in Landscape and Visual Impact Assessment submitted with the outline planning application



regular, medium to large field	made at the site
pattern of mixed farmland.	
Ground rises to a high point of	
91m in the middle of the	
zone, giving rise to some	
distant views. There is one	
property within the zone –	
Tachbrook Hill Farm – which	
is a listed building. Hedgerow	
condition is mixed, with some	
internal hedgerows becoming	
gappy and very open at the	
base. There are few	
hedgerow trees within the	
zone, but roadside hedgerows	
have good tree cover and	
there are also small clusters	
of trees associated with	
several field ponds within the	
zone. PRoWs W106 and	
W109 run through the zone.	
The zone has a strong rural	
character and functions as	
part of the wider farmed	
landscape, providing a green	
buffer between the edge of	
the settlement and the	
Banbury Road.	
The existing settlement edge	
is very prominent in this zone	
and any further development	
would exacerbate this and	
erode the rural character of	
the zone and the setting of	
the listed building.	



	Development on the higher				
	ground would be particularly				
	visible and should be avoided.				
		Disagree - the site has the			
Landscape		capacity for up to 125 homes			
Character	High	with no `in principle' or policy			
Assessment:	Tign	landscape, or visual reason why			
Value		the site should not be			
		developed.			
		It is considered that			
		development within the site			
		would not contravene any			
		legislation or planning policies.			
		At a national and county level,			
	Majority of the site operates	the development provides			
Habitat	as open commercial farmland - options for enhancement around field edges - hedgerows and trees.	retention and enhancement of			
Assessment:		habitats to meet the objectives			
Summary		of the NPPF. At a local level, the			
		development also			
		retains/replaces hedgerows and			
		retains mature trees, and			
		therefore meets the objectives of the WDLP.			
Habitat					
Assessment:	Medium	Disagree. Should be reclassified			
Value		as low given the above.			
		Strongly disagree. The outline			
	Edge of village site with little	planning application submitted			
	or no major connectivity to	at the site complies with those			
	the main village. Distinctly	saved Local Plan policies that			
Summary and	rural environment which	are considered to be consistent			
Conclusions	would have a significant	with the Framework. The			
	impact on landscape character	proposals also accord with all of			
	if developed.	the relevant provisions of the			
	'	Framework for delivering			



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	sustainable development.
	Residential development at this
	site would generate significant
	and mutually reinforcing
	economic, social and
	environmental gains and thus
	constitute the achievement of
	sustainable development in line
	with the Government's
	aspirations as outlined in the
	Framework. The site is located
	in a demonstrably sustainable
	location on the edge of Bishop's
	Tachbrook and in close
	proximity to core shops,
	services, amenities and public
	transport facilities.



5. CONCLUSIONS

- 5.1 In summary, we support the future housing growth and expansion of sustainable villages including at Bishop's Tachbrook, which we agree contributes towards delivering a sustainable pattern of future development.
- 5.2 The opportunity to comment on the village housing options and settlement boundaries is welcomed but we feel that the decisions reached on which sites should be allocated and which should be discounted is premature in the absence of important evidence that would justify those decisions. Indeed, we have serious concerns about the quality and robustness of the evidence base upon which the Council has to rely upon in preparing the Local Plan. We do not consider it comprises a proportionate evidence base (i.e. an evidence base which is **adequate, up-to-date and relevant**) and unless this is addressed before the Council submits its Local Plan for Examination, it is likely to be found unsound.
- 5.3 With this in mind, we object in particular to the site south of Mallory Road apparently being discounted on the basis that it 'cannot deliver the same regenerative benefits' as it is suggested the land south of the school can deliver. It is impossible for consultees to respond in detail on this specific point as there is no explanation as to what those claimed regenerative benefits are or why they are of such importance that a particular site should only be allocated if those specific benefits can be delivered.
- 5.4 To inform the Council's assessment of the village options and the preparation of the New Local Plan, we have gone on to provide a technical evidence base, which robustly demonstrates that it is deliverable in the immediate short term and would make a valuable contribution to the District's immediate need for market and affordable housing and could deliver a number of benefits, including regenerative benefits for the village.
- 5.5 We would welcome further discussions with the Local Authority and look forward to future opportunities to comment on the emerging New Local Plan.

HOW Planning LLP January 2014



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Appendix 1: Land to south of Mallory Road site boundary



Appendix 2:

Application submission reference W/13/1688

TO BE PROVIDED ON A CD DISPATCHED

WITH THE HARD COPY SUBMISSION

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