

Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

Part A – Personal Details
Part B – Your Representations

If your comments relate to more than one proposed Modification you will need to complete a separate 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 Modifications have been made available (see the table below). You can also respond online using the Council's e Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be returned by **4.45pm on Friday 22 April 2016**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or **email: newlocalplan@warwickdc.gov.uk**

Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and also at the following locations:

- Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa;
- Leamington Town Hall, Parade, Royal Leamington Spa
- Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash
- Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa
- Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick
- Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth
- Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa
- Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa
- Finham Community Library, Finham Green Rd, Finham, Coventry, CV3 6EP

Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title		Mr
First Name		Gary
Last Name		Stephens
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Hallam Land Management Limited & William Davis Limited	Marrons Planning
Address Line 1		1 Meridian South
Address Line 2		Meridian Business Park
Address Line 3		Leicester
Address Line 4		
Postcode		LE19 1WY
Telephone number		0116 2816904
Email address		gary.stephens@marrons-planning.co.uk

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Modifications to the appointed Inspector

Yes No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes No

The adoption of the Local Plan.

Yes No

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make

4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

Modification or SA:	<input type="text" value="Modification"/>
Mod. Number:	<input type="text" value="10"/>
Paragraph Number	<input type="text" value="H46A"/>
Mod. Policies Map Number:	<input type="text"/>

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes No

5.2 Sound?

Yes No

6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

Positively Prepared:	<input checked="" type="checkbox"/>
Justified:	<input checked="" type="checkbox"/>
Effective:	<input type="checkbox"/>
Consistent with National Policy:	<input checked="" type="checkbox"/>

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

Please see separate sheet.

Continue on a separate sheet if necessary

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is necessary to change the number of dwellings (estimated) for H46A Gallows Hill from 630 to 700 in order to make the Plan sound and in accordance with the Framework. It may also be helpful to attach a footnote to H46A to explain this total comprises 450 dwellings from Gallows Hill East, and 250 dwellings at Gallows Hill West.

The amended figure would then be based on evidence in accordance with paragraph 182, and would optimise the potential of the site for development in accordance with paragraph 58.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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9. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It will be necessary to test the Council's evidence, or absence of evidence, in respect of this matter through Examination.

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Gary Stephens

Date:

22/04/16

Copies of all the comments and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Q7.

Allocated Housing Site Reference H46A (Gallows Hill) is allocated for an estimated total of 630 dwellings within Table of Modifications (Part 1) January 2016 Appendix B.

The site is identified on Local Plan Policies Map 2 – Leamington, Warwick and Whitnash – Europa Way Extract, and is within the Urban Area Boundary.

The eastern half of the site was granted outline planning permission in January 2016 for up to 450 dwellings with associated access, open space, and landscaping (Appeal Reference APP/T3725/A/14/2229398 and a copy will be provided to the Examination Library).

Hallam Land Management Limited and William Davis Limited (HLM/WD) have an interest in the western half of the site. The site is referenced as W10 within the Strategic Housing Land Availability Assessment (SHLAA), and is considered suitable for development within the 2016 Update of the SHLAA.

The site is deliverable in accordance with paragraph 47 (footnote 11) of the Framework in that it is a suitable location for development, available now, and achievable with a realistic prospect that housing will be delivered within 5 years.

The allocation of the site is therefore supported by HLM/WD. Their objection to the Proposed Modifications relates to the proposed total number of dwellings that is allocated to the site.

Taking into account the planning permission granted for the eastern half of the site, the western half of the site is proposed to be allocated within Appendix B for an estimated total number of 180 dwellings. HLM/WD set out below why they consider that this estimation of capacity:

- fails to optimise the potential of the site to accommodate development in accordance with paragraph 58 of the Framework;
- is not justified based on the evidence available; and
- is not therefore consistent with achieving sustainable development.

The 2014 SHLAA Methodology (HO12) advises that capacity is estimated based on one of the following three approaches (paragraph 4.22):

- consider estimates presented by those promoting the site;
- where appropriate, for example where the location, topography or setting of the site will restrain layout, use the urban design approach; and,
- apply an appropriate density based on existing or emerging plan policies on densities.

The 2016 SHLAA Update does not advise as to which approach has been adopted by the Council in assessing the capacity of W10.

The 2014 SHLAA Main Report (HO12) also advises that the assessment of capacity is informed by (paragraph 3.15):

- the site's constraints;
- the proportion of the site which would be required for other supporting uses; and
- density.

Paragraph 3.17 advises that 'for the purposes of this study it was assumed that, in the case of sites over 10 hectares, 50% of the site would be required for other supporting uses...'

Paragraph 3.18 advises that 'the indicative capacity concluded for each site was typically around 35 dwellings per hectare...'

The 2016 SHLAA Update identifies the only physical site constraint on W10 as the 'configuration of the site'. The site does narrow at its western most point, but this is a relatively small part of the site and would logically form an area of landscaping and public open space.

The 2016 SHLAA Update also assumes 50% of W10 is developed for housing, with the balance to be used for other uses. The other uses for H46A as set out in Appendix B of the Proposed Modifications are to be provided within site H46B which has outline planning permission for the uses listed (Appeal Reference APP/T3725/A/14/2221613 and a copy will be provided to the Examination Library). In respect of W10, therefore, other uses would only be ancillary uses such as strategic landscaping, areas for sustainable urban drainage, and public open space.

The 2016 SHLAA Update also provides three potential capacities at different densities. These range from 207 dwellings at 30 dwellings per hectare, 276 dwellings at 40 dwellings per hectare, to 345 dwellings at 50 dwellings per hectare. Using the typical indicative density of 35 dwellings per hectare referred to in the SHLAA Main Report, the potential site capacity should equate to 240 dwellings (some 30% greater than proposed).

In this context, HLM/WD therefore met with officers of the Council following publication of the Proposed Modifications to understand their rationale for the proposed capacity figure of 180 dwellings. Officers advised that they were concerned as to the potential visual impact of development on the setting of the heritage asset to the west of the site (Warwick Castle Park), and that this could therefore be a constraint on developing the western edge of the site.

In response to this specific concern, HLM/WD have undertaken a masterplanning exercise to assess the potential impact on the heritage asset and the implications this may have for the capacity of the site. The illustrative masterplan document is appended to support these representations.

The document explains that the provision of structural landscaping (ranging from 15m to 30m wide), plus a green infrastructure corridor and area of public open space (ranging from 20m to 80m wide) would provide a significant buffer between the boundary of the site with Banbury Road and built development. This will ensure new housing as well as the existing Technology Park to the north would not be visible from Banbury Road, and therefore also not visible from within the heritage asset itself (although there is no public access within the Park). The incorporation of specific areas of open space and landscaping within the built development will also ensure the visual impact of development from more distant views are mitigated.

In the time available, it was not possible to consult with the Council on the illustrative masterplan prior to the submission of these representations. However, HLM/WD will continue to liaise with officers to seek to reach agreement on this matter prior to the Examination.

Based on the illustrative masterplan produced by HLM/WD, the capacity of the site is estimated to be between 235 and 275 dwellings. This assumes provision is made on site for public open space in accordance with the Council's Open Space Standards, and an appropriate density of development is achieved.

The 2014 SHLAA Methodology allows for estimates of capacity to be based on those presented by promoters of sites. The illustrative masterplan supports the view that the capacity of the site should equate to 250 dwellings, informed by the Council's SHLAA Methodology.

In the absence of any other evidence, it is recommended that the estimated total number of dwellings to be allocated to H46A is 700. This takes into consideration the 450 dwellings already permitted within the site.

The inclusion of this figure would optimise the potential of the site in accordance with the Framework, and therefore achieve sustainable development. It would also provide greater flexibility in relation to housing land supply, and potentially reduce the need for further releases of land within the Green Belt.



Hallam Land Management & William Davis

Gallows Hill, Warwick

ILLUSTRATIVE MASTERPLAN TO SUPPORT LOCAL PLAN REPRESENTATIONS

April 2016

Gallows Hill, Warwick

ILLUSTRATIVE MASTERPLAN

The masterplan for the Gallows Hill site has been reviewed in light of the emerging Council planning policy, advice from the Council Officers and the recent appeal decisions on land south of Gallows Hill.

This document has been produced to inform representations made to the consultation on Proposed Modifications to the Warwick District Local Plan in respect of land south of Gallows Hill (reference H46A). It contains an illustrative masterplan prepared in response to the Council's estimate of housing capacity of H46A within the Proposed Modifications, and comments received from the Senior Planning Policy Officer of the Council as to their approach to estimating the capacity of the land. This document should be read alongside the representations made on behalf of Hallam Land Management & William Davis.











Since the time of the original planning application in 2013 at Gallows Hill, significant planting has also taken place at the site. The masterplan has been reviewed and updated in light of these changes.








Guiding principles for the revised masterplan have included:

- Establishing a strong woodland belt and green infrastructure corridor along the Banbury Road edge of the site
- Locating Green space along the higher part of the site which is more visible from Warwick Castle towers
- Establishing a vista within the development allowing a view from within the site towards the Castle towers
- Establishing links to land to the south east of the proposed development to the west and east of Europa Way.

The illustrative masterplan follows these guiding principles. The plan shows 7.86 ha of developable area within the site of 13.77 ha. This leaves a balance of 5.91ha or 43% of the total site area for greenspace, including structural landscaping and public open space, which meets the Council's open space requirements within its Open Space Supplementary Planning Document. The site could provide a capacity range of 235 - 275 new dwellings (subject to density).

KEY

-  Site Boundary
-  Residential = 7.86 ha
-  Green Space = 5.91 ha
-  Attenuation
-  Main Streets
-  Secondary Streets
-  Private Drives
-  Proposed Trees
-  Existing trees/hedgerows
-  Views towards Warwick Castle

-  Site access to development from Gallows Hill
-  Main Streets
-  Existing Woodland
-  Proposed Balancing Ponds
-  Proposed Emergency Access
-  Potential links to Land South of Gallows Hill Development
-  Green Infrastructure link with footpath



Gallows Hill, Warwick

ILLUSTRATIVE MASTERPLAN

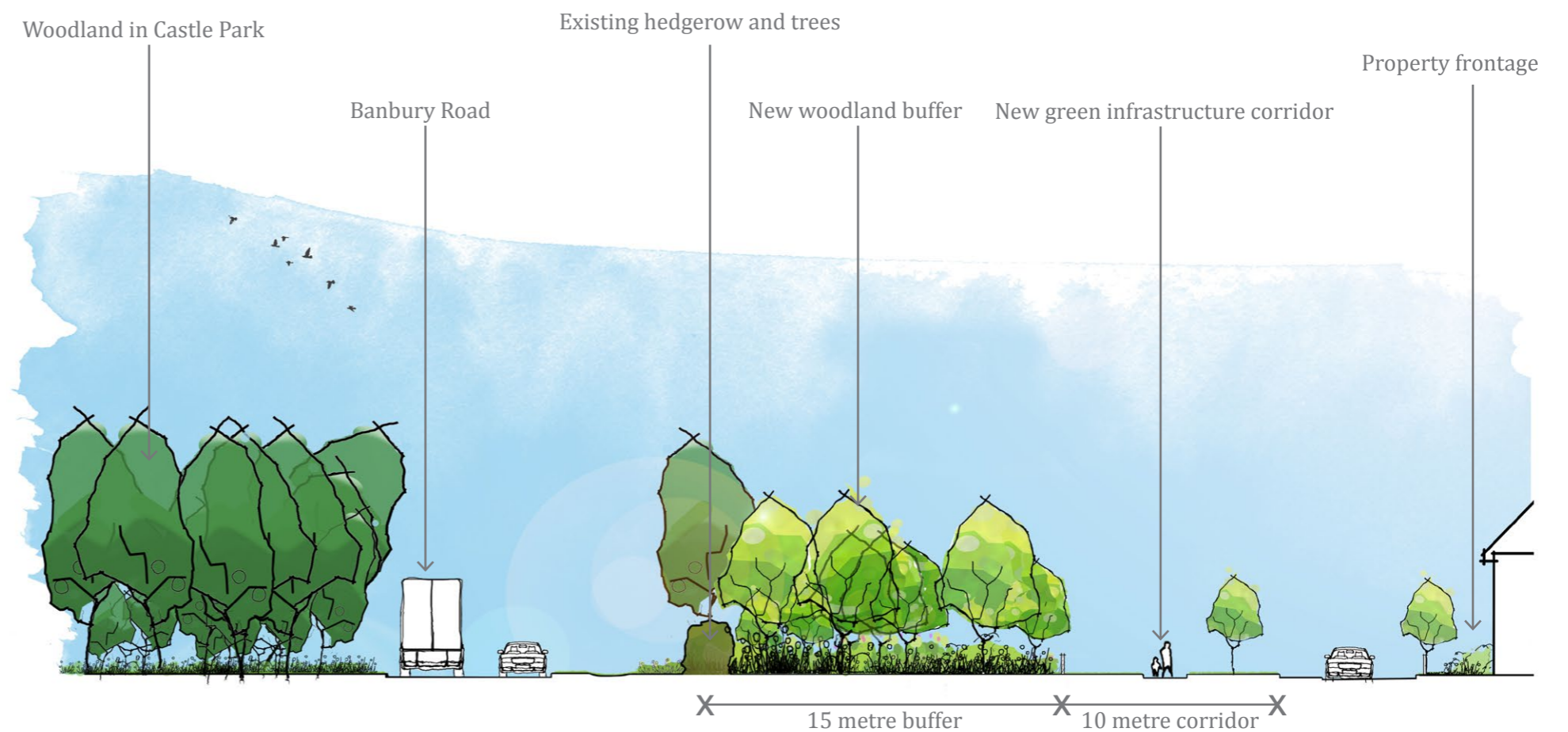
Woodland planting is now establishing on the southern edge and western tip of the site. This planting comprises a 15m wide belt of native trees and shrubs. Within a relatively short period of time this planting will provide a strong tree belt that will screen views into the site and towards the Technology Park. This approach has been adopted by the clients at Grange park in Loughborough, and the following photographs show what can be achieved, on a comparable site within 10 years.

The dense buffer of planting along the Banbury Road frontage, and setting the development back some 140m within the site at its western end, will ensure the view as you leave Warwick after the Toll House will be framed by tall vegetation on both sides and will remain 'rural' in character as you rise up the hill away from the town. Similar views will exist as you approach the town from the south with development set some 25m back from the Banbury Road behind the woodland planting and green infrastructure corridor as shown on the section opposite.

The wooded edge to Banbury Road will echo the woodland planting to southwest in Castle Park, and would provide an attractive tree lined avenue to the town which will screen out existing views of the Technology Park and potential views of development.

Within the development itself areas of greenspace would be located to allow tall growing trees to break up areas of residential development. This would provide a softer appearance to the development when viewed from the elevated location of the Castle towers.

Overall the development would provide a successful and attractive link between Warwick Town Centre and the development at Gallows Hill south and beyond. The wooded approach to the town along Banbury Road would be preserved and the visual effects of the development would be mitigated





Woodbelt at Grange Park with 10 year growth



Footpath and green infrastructure showing 10 year growth



Housing overlooking greenspace

Grange Park, Loughborough



Footpath and green infrastructure showing 10 year growth

Hallam Land Management & William Davis

Gallows Hill, Warwick

ILLUSTRATIVE MASTERPLAN

April 2016

Rev	Issue Status	Prepared / Date	Approved / Date
-	Draft	MGH/MST 8th April 2016	MST 8th April 2016
A	Draft	DWL 11th April 2015	MGH 11th April 2016

