

[REDACTED]

From: Maria Sheridan [REDACTED]
Sent: 18 August 2020 15:05
To: Planning Policy
Cc: David Green
Subject: RE: A.C. Lloyd Homes Representations - Radford Semele Neighbourhood Development Plan Regulation 16 Submission
Attachments: A.C. Lloyd Homes Attachments Policy RS12.zip

Dear Sir/Madam,

We write on behalf of our client A.C. Lloyd Homes to make representations to Radford Semele's Neighbourhood Development Plan Regulation 16 Submission. Please see below representations to Section 6, Policy RS6 and Policy RS12.

Respondent: A.C. Lloyd Homes
Agent: Delta Planning
Document: Radford Semele Neighbourhood Plan - Regulation 16 Submission
Section: 6.0 Neighbourhood Plan Policies
Type: Object

Policy Map 1 needs to be updated to outline the major housing commitments in Radford Semele such as A C Lloyd's permission for 65 dwellings at Spring Lane which is currently under construction (permission ref: W/14/0433 & W/15/2129).

Respondent: A.C. Lloyd Homes
Agent: Delta Planning
Document: Radford Semele Neighbourhood Plan - Regulation 16 Submission
Section: RS6: Conserving and Enhancing Radford Semele's Landscape Character
Type: Object

Policy RS6 (f) seeks to protect the essential character and quality of a number of views within the Parish. We object to the proposed Community Valued View RS6/5 (iew from footpath south of new Spring Lane development).

It is considered that this policy is not supported by a robust evidence base. Appendix 3 of the Neighbourhood Plan includes a short description of each view and why they are considered to be important. The reasoning for RS6/5 is as follows: *"View of tranquil, open countryside towards the brook. with the Copse closer to the viewpoint. In Spring and Summer, birds of prey often bring up their young, giving spectacular displays to the many who use the footpath (W121)"*.

It is noted that Policy RS6 is not supported by Warwick District Council. Within the Consultation Statement (April 2020) published alongside the Neighbourhood Plan Warwick District Council state that, *"policies regarding protecting views are often challenging, and have been resisted by WDC in other neighbourhood plans across the district. They have the potential to raise local expectations of preventing development, and often extend beyond the parish boundary, where the neighbourhood plan has no jurisdiction. Warwick District Council goes on to state that "many of the views identified within this draft policy will inevitably be altered to some degree over the plan period, making this policy difficult to interpret. For example, view 5 as identified, may be significantly altered by the development of housing allocation H03 (East of Whitnash / South of Sydenham) in the local plan (part of the strategic spatial strategy and policies of the local plan, and beyond the parish boundary). I note the accompanying text in paragraph 6.22, that it is not the intention of the policy to preclude development, however it is difficult to foresee how the policy might be interpreted in practice to 'retain the overall qualities of the views'."*

We share Warwick District Council's concerns regarding the interpretation of the protected views and consider that this element of Policy RS6 should be omitted.

Respondent: A.C. Lloyd Homes

Agent: Delta Planning

Type: Object

Document: Radford Semele Neighbourhood Plan - Regulation 16 Submission

Section: RS12: Area of Separation

We object to the proposed Area of Separation under draft Policy RS12 as it is considered that land immediately south of A C Lloyds' residential development situated off Spring Lane (see attached Site Location Plan) should not be included within the proposed area of separation.

In terms of the background of A C Lloyd's residential development, outline planning permission was granted through an appeal in March 2015 (permission ref: W/14/0433). We attach the approved Site Location Plan, Illustrative Site Layout Plan and Appeal Decision. A reserved matters consent was granted in March 2016 and development has since commenced. We also attach a copy of the Proposed Site Plan and Decision Notice approved under the reserved matters consent (W/15/2129). It is noted that at the time of the appeal, the previous Local Plan (2007) was in place which included a designated Area of Restraint (AoR). The appeal site formed part of the wider AoR. The Inspectors report into the appeal includes a detailed discussion on the AoR and concluded that the appeal site did not play a valuable role in preventing coalescence (paragraph 29). The Inspector goes on to state that, "*The principle of the AoR is clearly important and any coalescence would be seriously harmful to the character and identity of Radford Semele as well as to the landscape quality of the valley, but that is not the case here*" (paragraph 30).

The land immediately to the south of this development (as outlined on the attached location plan) was promoted for residential development during the preparation of the Warwick District Local Plan, adopted in September 2017. Warwick District Council supported residential development of the site during the latter stages of the Local Plan preparation and suggested that the site had capacity for approximately 60 dwellings (Site Ref: 52). However, the site was not taken forward by the Inspector on the grounds that Radford Semele had seen too much growth and the village did not need more houses at that stage. It is important to note that the Local Plan Inspector considered that development of this land would have a "*limited effect on the gap to Sydenham*" (paragraph 338).

Furthermore, it should be noted that the Council's most recent Landscape Sensitivity Assessment (April 2014) shows this area within the same medium/high sensitivity zone as A C Lloyd's residential development to the north (Land Parcel Ref: RS07). This land parcel is a lower category than all the surrounding land west of Radford Semele which is identified as being within the high sensitivity zone. It should be noted that the land immediately to the south of A C Lloyd's development slopes down to the brook and so is generally at a lower level than the development under construction. The land to the south would also form a natural continuation of the existing development site. We are not suggesting that the land immediately south of A C Lloyd's permission should be allocated for residential development at this stage as this is a matter for a future Local Plan review.

It is therefore considered that the boundaries of the proposed Area of Separation should be reviewed as land immediately south of A C Lloyd's residential development would not lead to coalescence and should not be included within the Area of Separation.

We would be grateful if you could confirm receipt of the above representations and attachments.

Kind regards

Maria Sheridan MRTPI
Senior Planner
Delta Planning



