

Revised Development Strategy Response Form 2013

For Official Use Only
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

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	MR	MR
First Name	DARYL	PETER J.
Last Name	HUNTER	FRAMPTON
Job Title (where relevant)		
Organisation (where relevant)	C/O FRAMPTONS	FRAMPTONS
Address Line 1		AYLESFORD HOUSE
Address Line 2		72 CLACONDON ST
Address Line 3		LEAMINGTON SPA
Address Line 4		
Postcode		CV32 4PE
Telephone number		01295 672310
Email address		peter.frampton@framptonplanning.com
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?

JUSTIFICATION FOR HOUSING LOCATIONS

Paragraph number / Heading / Subheading (if relevant)

para 4.3.5

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).

REFER TO ACCOMPANYING STATEMENT.

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Warwick District Local Plan

Revised Development Strategy July 2013

Submissions by Mr Daryl Hunter

In respect of the provision of para 4.3.5

Introduction

These submissions add to the submissions made at the earlier stages of the Local Plan preparation, in respect of the land edged red on the attached plan, which is situated off Bamburgh Grove, Northumberland Road, Leamington Spa. It is acknowledged that the analysis of the representations received following the June / July 2012 consultation revealed considerable local opposition to a substantial release of open land from the Green Belt to the north west of Leamington.

The representation that have been made throughout the plan period for the site edged red have always been made on the basis that the land should be excluded from the Green Belt to form a small discrete housing development. The deliverability and developability of this area of land has never been dependent upon the release of a more substantial area of land from the Green Belt to the north and west.

Sufficient access rights have been retained from the turning head at Bamburgh Drive to provide a suitable housing development that is compatible with the surrounding pattern of development.

It is submitted that the following characteristics justify the release of this area of land from the Green Belt.

1) Housing Strategy

It is evident that the strategy of the Local Plan in its provision for housing, at the level of housing proposed in the Plan, relies upon the release of some land from the Green Belt, at Lillington, Kenilworth and adjoining some of the villages. The submission that this site should be excluded from the Green Belt hence does not challenge a fundamental principle of the Local Plan, i.e. the redrawing of the Green Belt to accommodate housing needs. Rather the issue is the locational merit in redrawing a Green Belt to make provision for housing requirements. In undertaking this analysis it is necessary to consider how this area of land impacts upon the purposes for including land in the Green Belt.

2) Impact upon the purposes of including land in the Green Belt

As shown on the attached photographs Nos 1 and 2, this site is well enclosed by boundary shrubs and hedges. The enclosure of this site is in marked contrast with the more open area of countryside to the north and west. Photograph 3 shows the land due west of this site.

It is submitted that the release of this area of land from the Green Belt would not prejudice the following purposes of the Green Belt, namely:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns from merging into one another
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other land.

It is acknowledged that the development of this area of land would 'encroach' into the countryside. However the extent of the encroachment is confined to the development site itself. The site boundaries are so well established with hedging and trees that the extent of encroachment would not extend over adjoining open land.

As such it is considered that this site could be released from the Green Belt without fundamentally harming the purposes in the designation of the West Midlands Green Belt.

3) Housing Need

Presently pending the receipt of the Strategic Housing Market Assessment it cannot be stated with confidence that the Revised Development Strategy has made adequate provision for housing to meet the full objective assessed housing needs for market

and affordable housing (NPPF para 47) or that the Duty to Co-operate with Coventry City Council has resulted in a meaningful engagement to satisfy the requirements of para 159 and paras 178 – 181 of the Framework.

It is anticipated that in order to meet development requirements that cannot be met within the administrative area of Coventry City, particularly for ‘aspirational’ housing, there will be a need to make greater provision for housing in locations that provide good access to Coventry. It is submitted that the exclusion of this land from the Green Belt would provide an additional area of suitable land for housing that may contribute towards the provision of housing to meet the housing needs arising within the administrative area of Coventry, particularly in the context of providing housing choice.

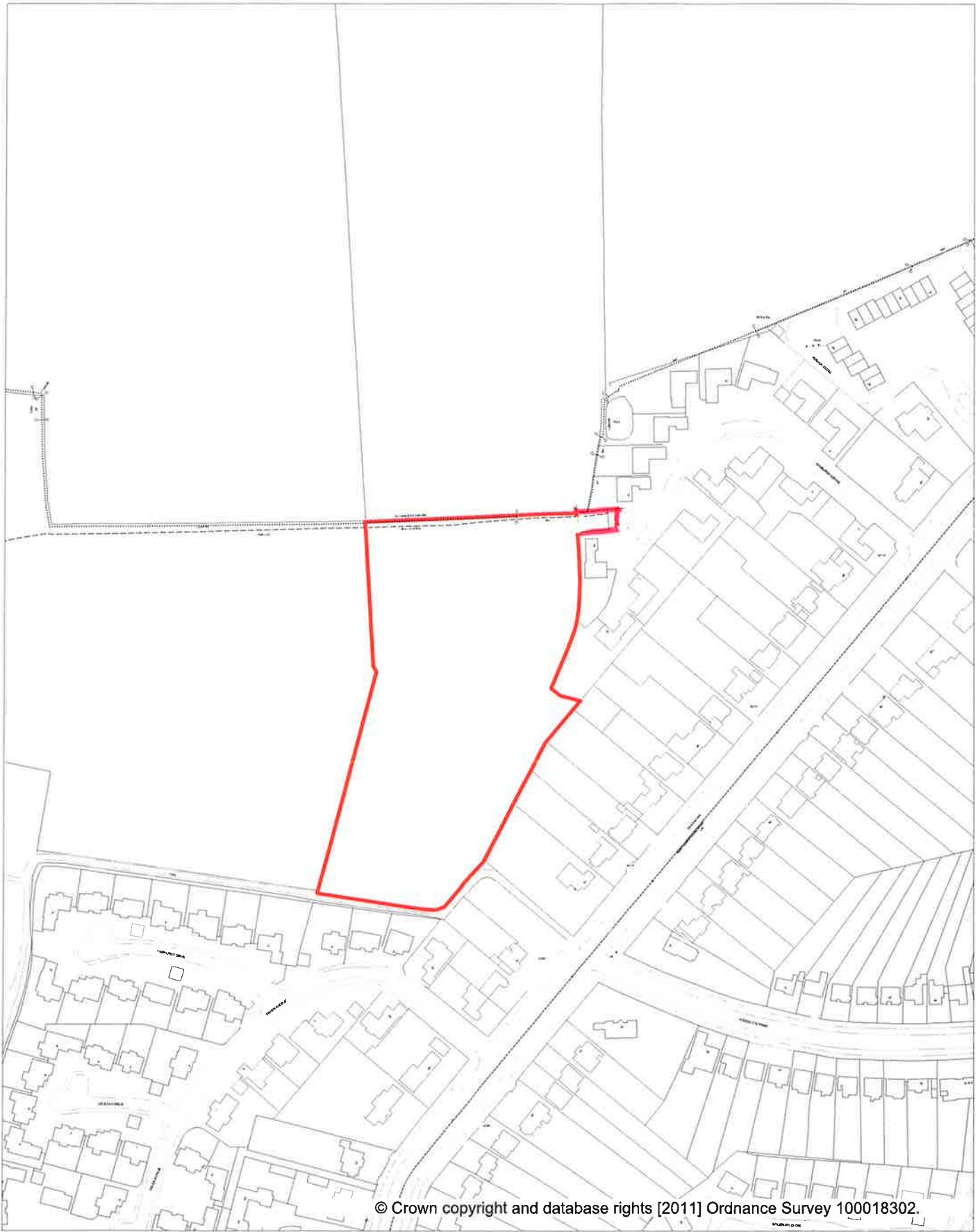
4) Deliverability

It is evident that the District cannot presently demonstrate a deliverable supply of housing land over a 5 year period. Paragraph 47 of the Framework states:

‘Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.’

It is evident that the revised housing strategy relies upon a limited number of large housing allocations. Large allocations inevitable take time to deliver through the planning process, with potential requirements for Master Plans and Environmental Statements. The Local Plan should ensure that there is sufficient housing land being identified that can be brought forward quickly following the adoption of the Local Plan in an endeavour to promptly remedy the shortage of housing land. This site has no technical or environmental constraints and can be brought forward promptly following its release from the Green Belt. The reference in the Strategic Housing Land Availability Assessment (2012) Ref Site L03 that there is physical constraint in terms of the means of access is not correct. A suitable access is available on land within control of Mr Hunter from Bamburgh Grove. The site is hence available now. The attached plan shows the connection onto Bamburgh Grove.

Enclosures: Site Plan
Photographs



L03 Northumberland Road / Bamburgh Grove

LOCATION PLAN



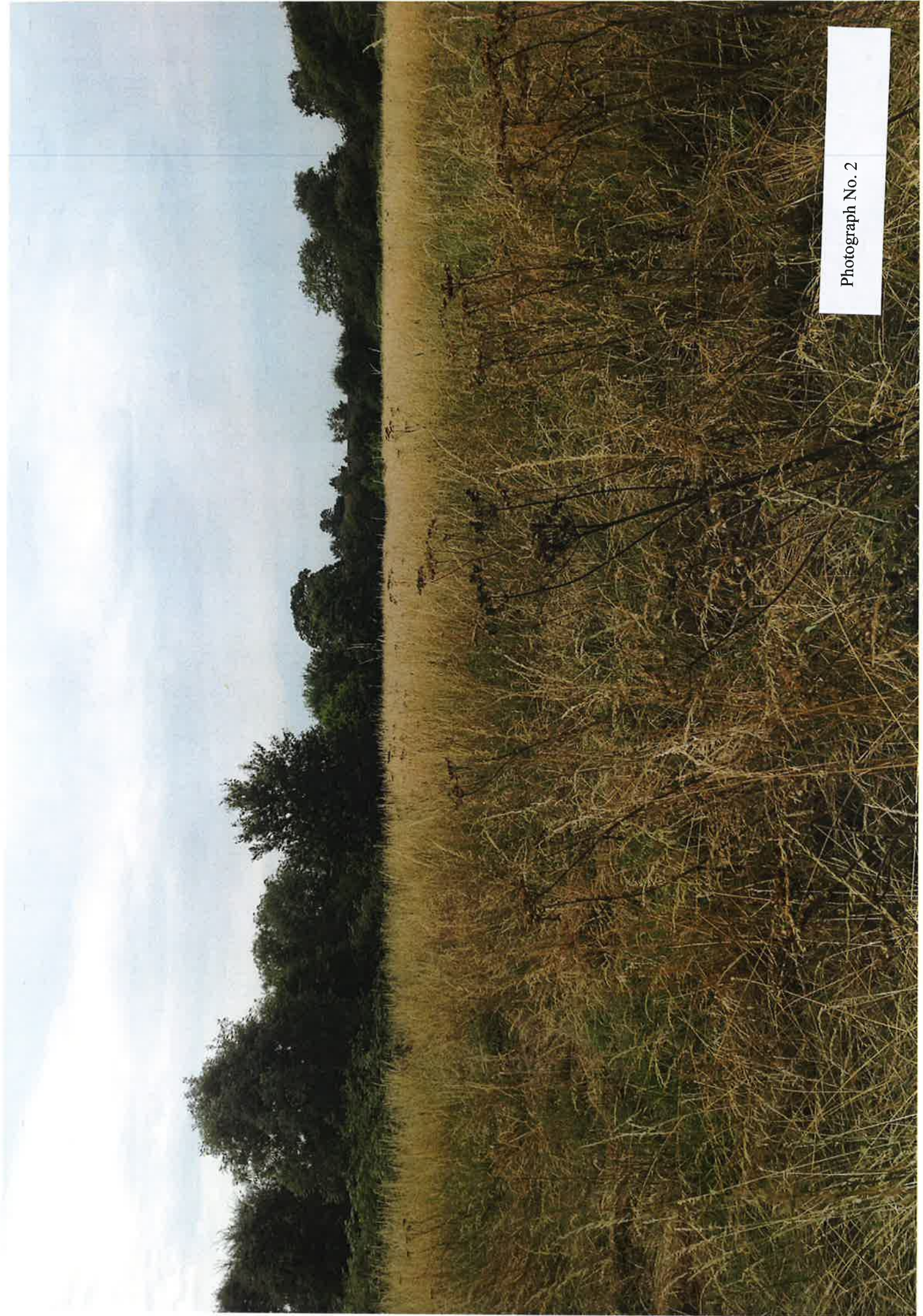
Scale: 1:2500	Drawn By: CP	Date: 20 October 2011	Grid Reference: 431289 E, 267235 N	North: 
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Development Services: P.O. Box 2178, Riverside House, Milverton Hill, Royal Leamington Spa. CV32 5QH.
 Telephone: (01926) 450000. Facsimile: (01926) 456542.



Photograph No. 1

Photograph No. 2



Photograph No. 3

