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Our Ref: KW/MLR/K/6009

8 January 2014

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
LEAMINGTON SPA
CV32 5HQ

BY E-MAIL

Dear Sirs

LOCAL PLAN – VILLAGE HOUSING OPTIONS RESPONSE FORM

Please find enclosed representations made in connection with the above document on behalf of our clients Sir Thomas White's Charity and King Henry VIII Endowed Trust.

I trust you find the representations of assistance in preparing the Local Plan and I would be pleased to discuss them with you should it be helpful.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'M Rogers', is written over a light blue horizontal line.

Mrs Miranda Rogers BSc(Hons) MSc MRTPI
Principal Planner
E-mail: miranda@stansgate.co.uk

Enc Part A
Part B Paragraph 2.10
Part B Paragraph 3.7
Part B Paragraph 3.12
Part B Paragraph 4.10
Part B Paragraph 5.7
Part B Paragraph 6.6
Part B Cubbington Site 5
Part C Cubbington

Cc Client

Village Housing Options Response Form 2013

For Official Use Only
Ref:
Rep. Ref.

Please use this form if you wish to support or object to the Village Housing Options and Settlement Boundaries.

If you are commenting on multiple sections of the document you will need to complete a separate copy of either Part B and/or Part C 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	Sir Thomas White's Charity &	Mrs
First Name	King Henry VIII Endowed Trust	Miranda
Last Name		Rogers
Job Title (where relevant)		Principal Planner
Address Line 1	C/o Agent	Stansgate Planning
Address Line 2		9 The Courtyard (KW/MLR/6009)
Address Line 3		Timothy's Bridge Road
Address Line 4		STRATFORD UPON AVON
Postcode		CV37 9NP
Telephone number		01789 414097
Email address		miranda@stansgate.co.uk
Would you like to be made aware of future consultations on the new Local Plan?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
About You: Gender	<input type="text"/>	
Ethnic Origin	<input type="text"/>	
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44 <input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, parish council?	<input type="text"/>	
	Direct from WDC	

Part C - Commenting on the Indicative Settlement Boundaries

If you are commenting on multiple sections of the document, you will need to complete a separate sheet for each representation

Sheet of

Which settlement are you responding to?

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).

We strongly support the proposal to inset Cubbington from the Green Belt and revise the village boundary. Notwithstanding this we object to the exclusion of land around Bungalows Farm which is considered elsewhere to be appropriate for development to meet the needs of Cubbington during the Plan period. The indicative settlement boundary should be redrawn to include land abutting the school and social club, as well as Bungalows Farm itself.

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Part B - Commenting on the Village Housing Options

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?

Page Chapter Paragraph
 Table or Figure Village Plan

What is the nature of your representation?

Support Object

Please set out full details of your representation of support or objection. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

The Council, in paragraph 2.10, has correctly identified the key village housing issues:

- The shortage of housing for older people to allow them to downsize into accommodation which will meet their longer term needs whilst remaining in their home settlements and therefore close to their existing support network;
- A shortage of smaller homes for local families to buy and rent resulting in an aging population which in turn reduces support for the local services and facilities (particularly schools, shops and bus services); and
- Often a shortage of larger family homes because the older residents are not able to downsize and free up the larger dwellings.

We strongly support the Council's understanding of these problems which has led to the recognition of a need to direct new housing towards a range of more sustainable villages.

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Part B - Commenting on the Village Housing Options

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Sheet of

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Page

Chapter

Paragraph

Table or Figure

Village Plan

What is the nature of your representation?

Support

Object

Please set out full details of your representation of support or objection. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

We support the recognition that the development strategy should direct new housing not only to urban sites but also to the more sustainable villages, whether these lie within the Green Belt or beyond it. It is only by directing new housing to these villages that the key rural housing issues identified in paragraph 2.10 of the consultation document be addressed.

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Whilst it is important that additional housing is directed towards the villages it is also important that this does not cause unacceptable harm to the environment (be that landscape, flooding, Green Belt impact etc). We therefore support the Council's strategy of providing only as much housing within and adjoining the villages as can be comfortably accommodated, even if that means reducing the overall total below the previously suggested figure of 1000.

Notwithstanding this it is noted that the Coventry and Warwickshire Joint Strategic Housing Market Assessment indicates a slightly higher housing requirement for the District than previously anticipated. In the light of the need to accommodate that additional requirement it would be appropriate for the Council to revisit some of the appraisals to assess whether any of the parcels could be successfully developed given the greater need. In this respect we would particularly bring to your attention the suitability of additional land on the edge of Cubbington which has not been properly assessed to date, land adjoining Site 5.

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It is recognised that some of the Green Belt villages have substantial environmental and development restrictions which has appropriately led to a reduction in the housing numbers for those villages. Notwithstanding this, in respect of Cubbington, we find that the Council has failed to assess one parcel of land which was promoted for development. That land, being adjacent to identified Site 5, does not have the constraints mentioned in paragraph 5.7:

- It is not open and highly visible in the Green Belt;
- Development could occur without coalescence between Cubbington and Lillington;
- It is not of high ecological value; and
- The land can be appropriately developed without harm to the wider landscape.

Further information on the land is provided in separate representations.

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The National Planning Policy Framework recognises that some development in the Green Belt is appropriate, and more particularly that development within existing settlements is not harmful to the overall purpose of the Green Belt and indeed can be helpful in ensuring the sustainability of rural settlements. In the light of this it is appropriate for the more sustainable villages in the Green Belt to be removed from the Green Belt through the establishment of village boundaries. We therefore support paragraph 6.6.

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Page Chapter Paragraph
 Table or Figure Cubbington – Site 5 and adjoining land
 Village Plan

What is the nature of your representation?

Support Object

Please set out full details of your representation of support or objection. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

The Council has a strategy which requires the release of sites from the Green Belt to meet housing needs. These sites are stated to be required to meet the needs of individual settlements and also the needs arising from the Borough as a whole. Elsewhere we have strongly supported this strategy. In accordance with the NPPF the Council should release from the Green Belt those sites which are sustainably located and which would have least harm on the openness of the Green Belt and the purposes of including land within it. Cubbington is rightly categorised as a sustainable settlement due to its substantial range of local services and facilities and also its opportunities for travel by public transport, particularly to Leamington Spa. It is appropriate that it accommodate additional housing to meet local and wider Warwick District housing needs. Site 5, land north of Bungalow Farm, has been discounted for development due to its alleged poor access and elevation. Additional land around Site 5 does not appear to have been considered either in the Village Housing Options report or properly in the SHLAA. We object to these exclusions and request that land around Bungalow Farm be allocated for development in the Village Housing Options paper.

Sir Thomas White's Charity and King Henry VIII Endowed Trust together own a large swath of land between Cubbington and Lillington and have been promoting it for development for some time (see attached drawing 6009-100). The land was considered in the 2012 SHLAA which concluded it was unsuitable for development as it would 'lack cohesion' with the existing settlements. At that time a part of the site had been unintentionally excluded which would otherwise have shown that all the land between Cubbington and Lillington was available. A revised submission, showing the correct boundary, was submitted during the 2012 Preferred Options consultation but this seems not to have been acknowledged by the District Council. Moreover the Council has failed to acknowledge that it would be appropriate to consider allocating just part of the land to meet the housing needs of Cubbington.

We consider it appropriate for a larger site than Site 5 be allocated for development to meet some of the housing needs of Cubbington. It is considered suitable for the following reasons:

- Land adjoining Bungalow Farm is well related to the settlement of Cubbington and the services and facilities therein without reliance on the private car;
- A transport statement has previously been submitted to the Council which shows that adequate access can be provided to facilitate a residential development, by inserting a roundabout close to the junction with Queen Street;
- The land was identified in the Council's previous Joint Green Belt Study as being the only parcel adjoining Cubbington which was 'least constrained' in terms of Green Belt impact. Development on part of the land adjoining Cubbington would not therefore have a significant impact on the openness of the Green Belt, and arguable less of an impact than development elsewhere;

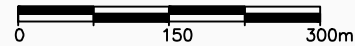
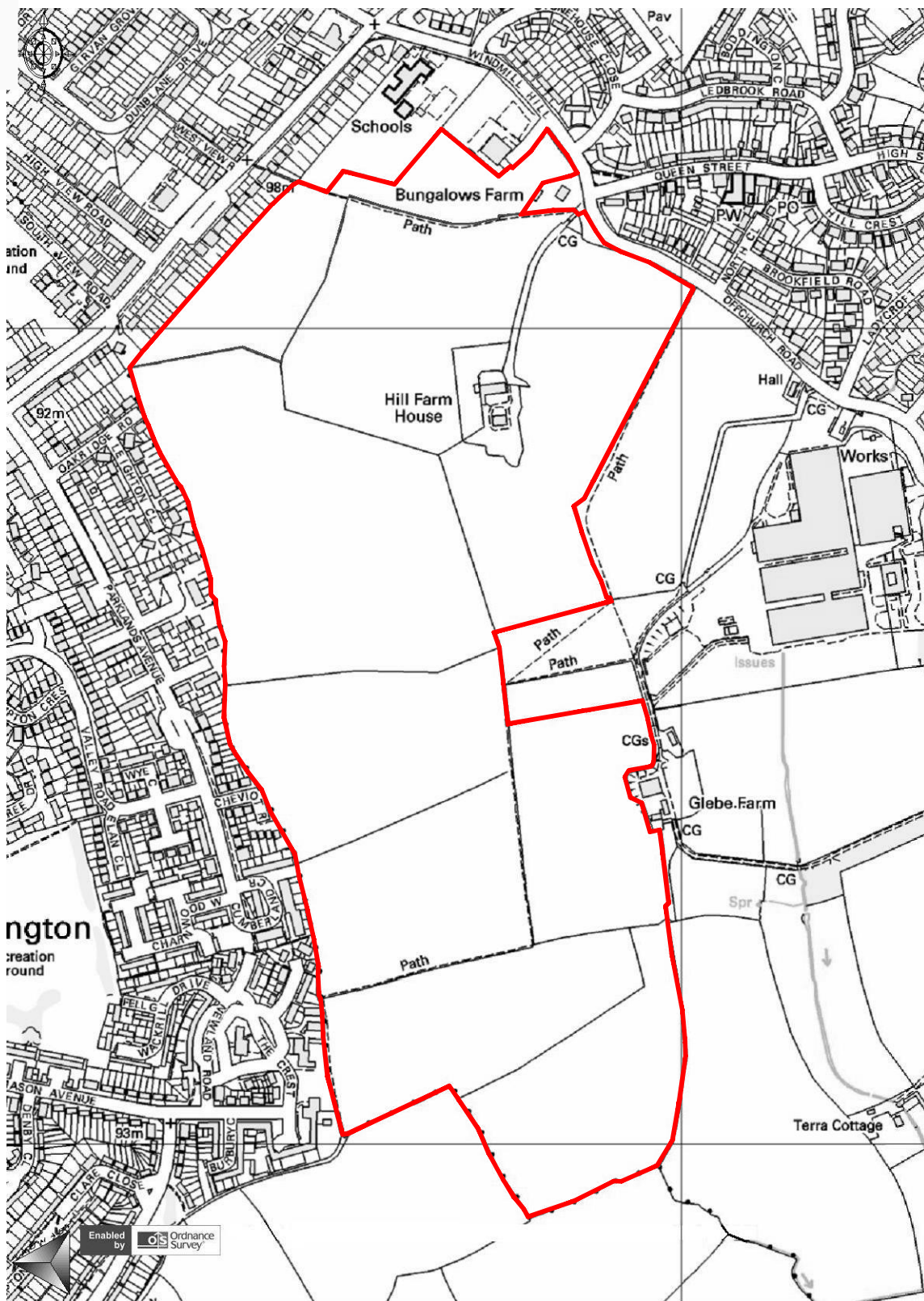
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- If only part of the land were to be developed there would be no coalescence with Lillington. Proper boundary treatments would form a permanent, defensible boundary, and would improve the current situation;
- The land closest to Bungalows Farm does not score highly in landscape value terms and thus could be developed without harm to the wider landscape. Indeed because of its location between Lillington and Cubbington it arguably has less impact on the wider landscape than development on the other edges of the village;
- The land proposed for development does not suffer from flooding;
- There are no known ecological constraints to development.

Overall the land extending from the junction with Queen Street around to the school should be reconsidered for allocation to meet housing need. In addition to meeting the needs arising from Cubbington this would help meet the wider needs of Warwick District, which appear likely to be increased following the receipt of the Coventry and Warwickshire Strategic housing Market Assessment.



Drawing	Location Plan	Drawing No	6009-100
Project	Land at Offchurch Road Cubbington	Client	Sir Thomas White's Charity
		Scale	1:7500 @ A4
		Date	July 2012


stansgate
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