

Preferred Options Response Form

2012

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

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 for members of the public. 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
First Name		Alasdair
Last Name		Jones
Job Title (where relevant)		Director of Planning
Organisation (where relevant)		Marrons
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 289 2200
Email address		alasdairjones@marrons.net
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+

Part B - Commenting on the Preferred 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 document are you responding to?
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Preferred Options (Full Version)

Which part of the document are you responding to?
Preferred Option Box (e.g. PO1)

PO4 Distribution of Sites for Housing

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

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).

Please see attached sheet.

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Policy PO4 Distribution of Sites for Housing

In order to provide land for 10,800 new homes to be completed 2011 – 2029 Policy P03 outlines the preferred Broad Locations for growth. The Council’s preferred option is to concentrate most development in or on the edge of the existing urban areas.

These locations are described as the most sustainable and for the most part we would agree with this approach and the resulting broad strategy. In particular, our clients consider that the strategic expansion of Warwick/Leamington Spa, to the south of the two towns offers a number of advantages over the approaches to the distribution of growth, for the following reasons.

- a. Such scales of growth will provide a better framework for the implementation of garden suburbs principles.
- b. The levels of development proposed will secure the viable provision of off-site infrastructure works necessary to the proper planning of the proposed schemes.
- c. The proposals are of a scale that would provide for viable on site local facilities and services.
- d. Growth at these locations avoids the use of Green Belt land, which is a key strategic component of the urban structure in the more northern parts of the Coventry, Solihull and the Warwickshire sub-region.
- e. The information in the SHLAA supports the release of these sites.

The components of the anticipated forward supply of land to sustain the strategy are set out in the tables at 7.1 and 7.2. Table 7.1 sets out the “known” supply at 2011. This includes existing commitments (planning permissions), small urban SHLAA sites and Windfalls. Para 7.20 states that over the period of the plan a number of small “windfall sites” will be developed for housing. Some of these are identified in the SHLAA.

Windfalls

On the basis of the advice in paragraph 7.20, it is assumed that the windfall component of the forward supply is as follows:

a. Small Urban SHLAA sites	290
b. Other Windfall Housing sites	<u>2,300</u>
c. Total	2,590

In total windfall sites will provide some 24% of the dwellings to come forward over the plan period to meet a requirement for 10,800 dwellings. As a percentage of the new land required, this is 27% (i.e. 10,800 less 1,224 commitments = 9,576. $2,590 \div 9,576 \times 100$).

We consider that the above figures indicate an “over reliance” on sites which have not been specifically identified as available. Nor does the evidence base (the SHLAA) set out evidence to support that such a level of provision can be secured from previously developed sites. Table 3 of the SHLAA records completions on windfall sites 2001/2 to 2010/11. There

is no breakdown between brownfield and greenfield sites or those which involved the use of urban garden sites. It does not therefore provide an appropriate basis to suggest 2,590 new homes will come forward from windfall sites at the rate of 130 dwellings per annum.

The SHLAA has identified sites capable of providing 13,385 dwellings (2014 – 2029) (Table Four). The plan requires that 9,576 dwellings will need to come forward from sites over and above existing commitments. On that basis, the windfall allowance should be significantly reduced to a figure that we consider should represent no more than 10% of the requirement to be met from new sites. A figure of about 960 dwellings from unidentified windfall sites on previously developed land would, in our view, be more appropriate.

Accordingly, Table 7.1 should be revised as follows, taking account of the view we express about Policy PO1.

Housing Requirement	12,800
Committed Housing Sites	1,224
Other Windfall Housing Sites	<u>960</u>
Total:	<u>2,184</u>
Balance to be allocated in Plan	10,616

Distribution of Housing

We agree that the provision for new housing in the District will have to rely substantially on the allocation of land as urban extension sites. Paragraph 52 of the NPPF advises that the supply of new homes can sometimes be best achieved through planning for larger scale development in the form of extensions to existing towns. Where this occurs, it may be appropriate to follow the principles of Garden Cities.

This approach has clearly been followed by the Council. In so far as development proposals to the south of Warwick and Leamington Spa are concerned and expressed previously, we support this strategy.

It is noted that the total of identified sites represents some 20% or 1,374 dwellings more than “balance to be allocated” set out in Table 7.1. Para 7.22 notes that this flexibility allows, inter-alia, for some sites to be removed, depending on the response to consultation and any further evidence that is provided. We consider that, in the event of the “additional allocations” not being required, then it must fall to the “Green Belt” sites to be removed from the plan in the first instance.

However, the Council will be aware that at recent Core Strategy Examinations, Inspectors have expressed concerns about the apparent lack of “flexibility” in the forward supply of development land, particularly for housing. Accordingly, it would seem to be appropriate that, in so far as this plan is concerned, some flexibility should be maintained. As the Council have assessed this to be in the order of 20%, we would support this approach.

The proposed allocations are set out in Policy PO4. Our clients’ land forms part of the allocation south of Gallows Hill/West of Europa Way. It is defined in the SHLAA; site

reference W10. The development of this site is supported either as a part of the proposed wider strategic urban extension or as a discrete development parcel, representing a first phase of the strategic site.

The Council will be aware that Hallam Land Management and William Davis have undertaken background studies of the land in which they have an interest (site W10). They are able to confirm that the site is capable of delivering about 250 dwellings in the first phase of the plan period. Note that the capacity of the site will be influenced by the application of the Garden Suburbs principles. We anticipate that densities will be lower than those evident at Heathcote to the east.

Guidance on Making Representations

- Please use the attached response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/newlocalplan
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing.
- All forms should be received by **4.45pm on Friday 27th July 2012**.
- Copies of all the objections 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.
- To return this form please drop off at one of the locations below, 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 Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations.

Location	Opening Times	
Warwick District Council Offices Riverside House, Milverton Hill, Royal Leamington Spa	Mon – Thurs Fri	8.45am – 5.15pm 8.45am – 4.45pm
Leamington Town Hall Parade, Royal Leamington Spa	Mon – Thurs Fri	8.45am – 5.15pm 8.45am – 4.45pm
Warwickshire Direct Whitnash Whitnash Library, Franklin Road, Whitnash	Mon – Weds Thurs Fri Sat	10.30am – 5.00pm Closed 10.30am – 4.00pm 10.30am – 1.30pm
Leamington Spa Library The Pump Rooms, Parade, Royal Leamington Spa	Mon – Weds Thurs Fri Sat Sun	9.30am – 6.00pm 10.00am – 7.00pm 9.30am – 6.00pm 9.30am – 4.30pm 12.00am – 4.00pm
Warwickshire Direct Warwick Shire Hall, Market Square, Warwick	Mon to Thurs Fri Sat	8.00am – 5.30pm 8.00am – 5.00pm 9.00am – 4.00pm
Warwickshire Direct Kenilworth Kenilworth Library, Smalley Place, Kenilworth	Mon and Tues Wed Thurs and Fri Sat	9.00am – 5.30pm 10.30am – 5.30pm 9.00am – 5.30pm 9.00am – 1.00pm
Warwickshire Direct Lillington Lillington Library, Valley Road, Royal Leamington Spa	Mon Tues and Fri Weds Thurs Sat	9.30am – 12.30pm & 1.30pm – 6.00pm 9.30am – 12.30pm & 1.30pm – 5.30pm Closed 9.30am – 12.30pm & 1.30pm – 7.00pm 9.30am – 12.30pm
Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa	Mon - Thurs Fri	9.00am – 5.00pm 9.00am – 4.30pm
Finham Community Library Finham Green Rd, Finham, Coventry, CV3 6EP	Mon Tues, Thurs and Fri Sat	1.00pm – 7.00pm 9.00am – 7.00pm 9.00am – 4.00pm

Warwick District Council strives to ensure that all people regardless of ethnic origin or disability can access its services. Where possible, information can be made available in other formats, including large print, cassette tape, CD & other languages if required. Telephone 01926 450000.