

SUBMISSION – MATTER 9**SHARBA HOMES LTD**

9.1 NWBC11 gives completions since 2011 as 1,272 homes (superseding table 7 of the plan as submitted [CD0/1]). Table 7 of the plan gives remaining capacity on sites with planning permission as 1,135 homes. Are those figures current and are they supported by suitably detailed evidence?²³

Table 7 should be brought up to date to reflect the latest evidence as set out in CD8/13B – with regard to the question here, the figure for sites with planning permission should read as 1,306 dwellings.

9.2 With reference to NWBC18 and policy LP8 subject to MM45, MM46, MM47 [NWBC20A], is an anticipated annual contribution of 60 dwellings a year from windfall development robust with reference to NPPF2012 paragraph 48?

No comment

9.3 With reference to CD8/13B and PS.M8.01 are allocation yields and delivery trajectories justified and robust, including over the next five years? (noting some inevitable overlap with strategic matters 7 and 8)

It has been agreed at Matters 7 and 8 that the Council are reliant on the delivery of large strategic sites. It is for this exact reason that the Council have sought to identify flexibility with the inclusion of reserve sites, of which Site RH1 is one.

However, there has already been discussion at this examination in respect of the ability of Site RH1 (Dairy House Farm Phase 3) to come forward to facilitate the delivery of the Grendon by-pass which, it is now accepted, is absolutely essential to deliver planned growth. At the Matter 7 EiP session, the Inspector suggested a potential Main Modification to deliver additional development which would facilitate infrastructure delivery (over and above the allocated sites). Site RH1 would clearly fall under such a provision. Given the potential for slippage across any of the allocated sites; the undoubted benefit and necessity to deliver the Grendon by-pass; the fact that the site has already been through the SA process for this local plan review – when there is a need for an additional allocated site to come forward as there is in this case, Site RH1 is the most logical site to bring forward and allocate now.

On this basis, we set out below a trajectory for Site RH1. In doing this, we highlight that as set out in our Promotional Document and as expanded upon in our later responses, we consider that the capacity for Site RH1 (delivering the by-pass; community hub; protecting the Ancient Woodland and developing at approximately 30-35 dph) is at least double the number of dwellings proposed by the Council.

18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	31/32	32/33
0	0	0	0	50	100	100	150	150	150	150	100	0	0

The evidence which has been put forward by Warwickshire County Council shows that the by-pass is required to be operational by 2028 at the very latest to ensure that the network does not become critically overloaded. Assuming a 3-year design and build construction programme, this means work (and funding) will need to be in place by 2024/25. Detailed designs, approvals, tendering and lead-in will require a similar period of time, meaning that the initial design criteria and scoping of the corridor should be scoped now to avoid unnecessary delays to relief of identified serious traffic congestion. Sharba Homes Ltd have already advised that they will work with Highways England and Warwickshire County Council to design the route.

The modelling which has been undertaken to date by Warwickshire County Council and Vectos has indicated that approximately 250 dwellings can be taken from this site (on top of the existing planned growth on other sites) before the bypass is required.

Clearly however if there are any downward revisions to the trajectories for any of the large sale strategic sites through this examination, then this creates capacity in the short term for further dwellings on the network from Site RH1 before the by-pass is required. On this basis, it could be possible for nearly all of Site RH1 to be delivered prior to the need for the by-pass and thus, the inclusion of this site as a replacement for any dwellings lost through such a revision to trajectories would cause no issues of concern for the Council’s overall trajectory.

9.4 Has the comparative assessment of sites resulting in those included for allocation in the plan been undertaken in a proportionate and consistent manner? (with particular regard to the SHLAA [CD8/17] and SA for site allocations, section 2 in particular [CD3/1]).

Whilst we are aware that matters relating to the Council’s latest iteration of the SA are to be discussed on the 2nd April, at which point appropriate arrangements will be made for consultation, it is not feasible to answer this question without reference to it.

We do not consider that Site RH1 has been assessed fairly or in a way which is comparable to the assessment of other sites. We therefore include, at **Appendix 1**, a revised assessment for Site RH1 – including details of those amendments which have been made and the reason for the amendments.

9.5 Local Plan paragraph 8.4 and policy LP7 indicates that the residential density of development should be at least 30 dwellings per hectare ('dph'). The average density for site allocations, excluding H23 Austrey, based on policy LP39 appears to be around 20.5 dph. The lowest densities at allocations H7, H18 and H19 are between 12 and 14 dph. Is the plan's approach to density appropriate?

The approach of the Plan to seek a minimum density of 30 dph is correct. This matter was discussed in Matter 7 where the Council advised that this figure was calculated on the basis of a net developable area and that average net densities are in fact close to 34dph – it may be that this should be clarified in the Plan. Although as we highlight later this approach does not appear to have been carried through to Site RH1 where the extent of developable area and density have both been significantly under-estimated.

9.6 There are several existing employment sites referred to throughout the plan, the history or status of which is not readily identifiable.²⁵ Local Plan table 8 indicates that since 2011 completions have amounted to 3.22 hectares of some form of employment land, and that extant permissions amount to around 31.58 hectares. However those figures do not readily tally with those in policy LP40 or in NWBC21. Are the figures in respect of employment land delivery and extant consents current and supported by appropriate evidence?

No comment.

9.7 Are the categorisations of settlements in policy LP2 appropriate with regard to the updated Settlement Sustainability Appraisal ('SSA')[CD6/3C]?

(a) Is there a conflict between bullets 3 and 4 which seek to ensure separation and connectivity respectively with peripheral settlements?

(b) Should certain 'category 5' settlements be re-assigned based on their current scoring in CD6/3C?²⁶

(c)Proportionately, are allocations aligned with the scale and function of settlements?²⁷ If not, is there compelling justification for that? NB. This question will also fall to discussions on individual sites as necessary.

Baddesley with Grendon serves as a single local service centre which is the correct approach given their functional and geographical relationship. Whilst the level of development proposed would be larger than that normally expected for a local service centre, the compelling justification referenced in the question clearly exists for this site. As already discussed at this examination, the provision of a by-pass through Site RH1 is required to be able to deliver the full planned growth. The alignment of the by-pass will then clearly set a new northern boundary across Dairy House Farm. The Council have been pro-active in allocating this land for development rather than risking piecemeal development. Clearly housing on this site, in a logical and sustainable location, will also contribute to the funding of the by-pass which, it has been agreed, is a vital and necessary component of the A5 upgrades.

Acknowledging the level of growth proposed, the proposals for the site (**Appendix 2**), include the provision of a community hub. The composition of this will be the subject of further discussion with the Council and the local community but can include a community hall / small retail facility / public house for example – all / any of these facilities would provide additional facilities serving the existing local community also.

9.8 Do allocations for housing and employment, were they to be subject to MM9 and MM39 [NWBC20A], contain sufficient flexibility or contingency for future change and to ensure delivery in line with forecasts?

This question has two distinct parts – part (i) relates to the potential for future change; and part (ii) relates to delivery in line with forecasts.

In respect of part (i), it is generally more common for matters relating to a future plan review to be dealt with in policy rather than the reasoned justification. The former carries greater weight and gives a greater commitment.

With regard to part (ii), in seeking to ensure delivery is in line with forecasts, the Council have correctly chosen to identify reserve sites as a buffer to non-delivery of housing numbers from the allocated sites. However, with potential downward revisions to trajectories being considered through this examination together with the Inspector's potential Main Modification to consider additional development over and above the plan

proposals to support the infrastructure growth in line with the NPPF and with housing numbers to be seen as a minimum, we suggest that a further allocation is required now to provide additional flexibility and ensure that the necessary and vital infrastructure is delivered.

It is our view that Site RH1 is capable of accommodating at least double that number based upon the net developable area shown on the submitted concept plan. Given that this is an infrastructure led strategy; that Site RH1 delivers a critical component of that infrastructure upgrade; that every dwelling delivered on Site RH1 will contribute towards the funding and delivery of the by-pass; that housing numbers are set as a minimum; that there is a clear need to boost significantly the supply of housing; then there are clearly many significant benefits to allocating this site for development to mitigate the risk of slippage in the trajectory to ensure that the planned growth can be delivered in a sustainable manner.

9.9 Is there a rationale for referencing certain Local Plan requirements inconsistently, such as provision of Sustainable Urban Drainage Systems in certain allocations but not others? Is there a rationale for setting only certain allocations as a minimum number? Should a consistent size threshold be set for terming a site 'strategic' or requiring that masterplans are prepared?

No comment.

9.43 Are reserve sites suitable, developable and is it clear what circumstances or monitoring indicators would result in their being considered for development before 2033?

Through Policy LP39(a), the Council have sought to build in safeguards with the identification of two Reserve Sites. RH1 – Dairy House Farm Phase 3, is identified for 360 dwellings and the safeguarding of a route for dualling of the A5. Sharba Homes Ltd are working with the landowners to bring this site forward for development. The wording of the policy suggests that the LP39(a) sites are the first point of call should the annual housing target fail to be met. However as referenced previously, the site also provides land to facilitate the delivery of the corridor for the dualling of the A5 as well as housing, both of which are now vital and necessary to meet planned growth. Whilst the wording of RH1 also does not impose any restriction on the timing of the delivery of the site, we consider it should instead be identified as an allocated site albeit clearly seeking to ensure that the site assists in facilitating the essential A5 works.

This location is clearly sustainable and suitable given that the Council have already consented Phase 1 and a draft allocation H18 is proposed for Phase 2 (which now benefits from outline planning permission for up to 120 dwellings).

Site RH1 is included in the Council's Strategic Housing Land Availability Assessment (2016) as site reference PB220. The finds are summarised below:

- Net Suitability 2 (3 being the most suitable) – sites scoring 2 are potentially suitable but face some constraints and should not be included in the 5 year housing land supply. Constraints identified for this site are the presence of a PROW and an Ancient Woodland within the site. Both of these can be accommodated in a sensitively and suitably designed scheme without any undue delay and are not matters which would prevent the site from delivering some dwellings within 5 years. On this basis, we consider that the score should be improved to 3.
- Net Availability – 2. At the time the consultants undertook the SHLAA, the site was not under the control of a developer. However the site is now being promoted by Sharba Homes Ltd – a developer who has extensive experience of promoting sites through Local Plans and delivering sites through planning applications that contribute to the first 5 years of housing supply. On this basis, the sub-score should be increased to 5 (i.e. held by developer / willing owner) resulting in an overall availability score of 3 (site is available and can be included in the 5 year supply).
- Net Achievability – sub-score of 3. Based on the Council's scoring, the site was identified as an Amber Site i.e. likely to be developable over the next 10 years but not deliverable within the first 5 years. However based on our revised scoring, the site now moves to a Green site which are those which are considered to be deliverable. They offer a reasonable prospect that housing will be delivered on site within 5 years from the adoption of the plan.

On this basis and based on the Council's own identification of the site as one of the next suitable and sustainable sites, the principle of residential development is clearly accepted, particularly when considering the potential for slippage on any of the allocated sites.

Within Policy RH1 there is a requirement for the safeguarding of the route for dualling of the A5. Sharba Homes Ltd support this and are committed to working with the Council and the funding bodies to secure early delivery of this vital infrastructure and as set out previously, discussions have already commenced in this regard. However given that the previously referenced Strategic

Transport Assessment highlights the importance of the A5 improvements to the delivery of the requisite housing numbers, we consider it is important to allocate the site rather than simply reserve the site. Without this site coming forward, the Grendon by-pass may not be delivered in time to facilitate the later housing and employment growth needed elsewhere later on in the plan period. The allocation will ensure a comprehensive joined up approach to resolving issues with the A5 and also to delivery of the vital bypass and additional housing numbers.

To further assist with funding, the Council have identified the site for 360 dwellings which we assume, is taken from a net developable area of 12 hectares at 30dph. The market in this area is such that a scheme of 35 dph is more realistic and indeed, this reflects the density of similar current housing developments in and around Warwickshire. Furthermore, the masterplans included within the submitted Vision Document shows that allowing the the dualling of the A5; the retention, the protection of the Ancient Woodland and appropriate buffers and the inclusion of a community hub; results in a net developable area of at least 27ha.

We have submitted with this statement – a Vision Document which includes 2 Concept Masterplans showing how the by-pass can be delivered. One option (concept plan A) can be delivered in land within the control of either Warwickshire County Council and/or Sharba Homes Ltd and the other (concept plan B) requires the addition of third party land to the east which would potentially be a more protracted and expensive option. The Vision Document clearly sets out the aims and objectives for the development of the site. The differences between the two in highway terms is clearly set out in our Matter 10 Statement which we append to this submission also for ease of reference.

It is unclear as to how the Council have derived a developable area of only 12 ha (less than 25% of the site), however clearly if the site is to be allocated, it is necessary to ensure that the land is used efficiently. In addition, increased numbers will provide further funding towards the bypass and will enable to the provision of a community / local hub on site – all in the context of housing numbers being seen as a minimum with additional housing providing contingency and, in this case, critical infrastructure funding. Finally, using land efficiently and ensuring numbers are provided will clearly assist in boosting the supply of housing. On this basis, we request that the allocation for the site be confirmed and it's capacity should be set as a range from 750 dwellings (minimum) to 950 dwellings.

The site can come forward early with the land safeguarded for the dualling of the A5 via the bypass of Grendon, utilising access from Spon Lane for early delivery. On this basis, we consider that site RH1 should move from Policy LP39(a) into an allocated site under Policy LP39.

With regard to Site RH2 (north of Ansley Common), we highlight that the site does not offer anything over and above a housing development. Whilst clearly the provision of housing is important, the attractiveness of this site as a reserve site should be considered against the lower sensitivity and greater sustainability credentials of site RH1 which is assisting in providing a vital piece of borough wide infrastructure which is necessary for the planned growth to be delivered.

In summary, we propose the following Main Modifications in respect of Site RH1:

MM to LP39

Site 18a – Dairy House Farm (Phase 3), Spon Lane, Grendon – 49ha – 950 dwellings

MM – new Policy H18a

H18a – Dairy House Farm (Phase 3), Grendon

Some 49ha of land at Dairy House Farm, Spon Lane, Grendon will form Phase 3 of housing to deliver housing for a minimum of 750 dwellings (with a potential capacity for up to 950 dwellings). Development will include:

Land safeguarded for the dualling of the A5 to the north of the site to join from the current A5 to the west of Grendon and re-join the current A5 east of Grendon.

Housing will be located to the south of the new road.

A local centre providing community facilities

A 15m minimum buffer will be provided around the Ancient Woodland

A landscaped buffer along the new A5

The current Watling Street will be downgraded, and pedestrian crossing will be provided to allow for greater cohesion with the main part of the settlement to the south

(nb: this is replicated from Policy LP39a however we highlight that the delivery of this is beyond the control of the developer and is perhaps better contained within the IDP than within the policy itself)

Improved cycling will be provided along Watling Street.