

Mr Dave Barber  
Planning Policy Manager  
Warwick District Council  
Riverside House  
Milverton Hill  
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CV32 5HZ

24707/A3/VL/RC/Ifw

22<sup>nd</sup> April 2016

Dear Mr Barber,

**REPRESENTATIONS TO WARWICK DISTRICT DRAFT LOCAL PLAN (PART 1) MAIN MODIFICATIONS: BIRMINGHAM ROAD, HATTON PARK**

We write on behalf of Taylor Wimpey UK Ltd in respect of their land interests on land east of Hatton Park on Birmingham Road. A site location plan is enclosed with these representations at **Appendix 1** alongside a leaflet detailing the development proposals for the Site at **Appendix 2**.

The site is a proposed allocation (in part) as a housing allocation (Site H28) which we are clearly supportive of, given its sustainable location and proximity to services and facilities within the village. The Main Modifications extend the Site area to the north and increase the proposed allocation from 80 to 120 dwellings, when compared to the Submission version of the Plan.

In relation to this Site, we comment on the Main Modifications as follows:

Mod 4 – Policy DS6

Whilst we are generally supportive of the Council's approach to increasing the housing target, taking account of unmet needs to assist the HMA in meeting the requirements of the NPPF and satisfying the Duty to Cooperate, we remain concerned that the level of uplift at the HMA and District levels is insufficient.

We enclose at **Appendix 3** a critique of the Council's position on meeting housing needs across the HMA.

At this time, we are of the view that the housing requirement for the HMA over the period (2011-2031) should be a minimum of 100,200 dwellings (5,010 dpa), with our updated and preferred methodology increasing this to 126,000 dwellings (6,300 dpa).

For Warwick District we consider that the OAN is a minimum of 20,800 dwellings (1,040 dpa), with our updated and preferred methodology increasing this to 23,400 dwellings (1,170 dpa).

The figures for Warwick do not take account of any need to redistribute housing within the HMA based on the Duty-to-Cooperate and Local Authorities, such as Coventry City, being unable to meet their own housing needs.

### Mod 6 – Policy DS7

Notwithstanding our response to Mod 4, and the contention that the housing requirement should be increased further to 23,400 dwellings (1,170 dpa) for Warwick District over the period 2011-2031 (not accounting for unmet need within the Coventry HMA), we wish to comment on the amended Policy DS7, which sets out how the housing requirement will be met.

The Council has proposed to allow for the delivery of an additional 811 dwellings over and above the proposed requirement of 16,766 dwellings for the Plan period (2011-2029). Regardless of any changes to the housing requirement, we support the approach of the Council in seeking to allocate additional land; as such an approach adds significantly to the soundness of the Council's approach by providing a positively prepared Plan that will be more effective in delivering the minimum housing needs of the area, and is flexible to changing demands over the Plan period.

The inclusion of safeguarded land will also play a key role in achieving these outcomes, which is supported in the NPPF at paragraph 14 – where Councils are asked to provide sufficient flexibility to adapt to rapid change in meeting OAN.

The proposed approach to allocations and safeguarding land will also assist the Council in demonstrating that they have been both aspirational and realistic in progressing the Plan in accordance with paragraph 154 of the NPPF; with the slight overprovision allowing for any slippages in the delivery of the strategic sites within the District – which may be particularly helpful given the proximity of a number of allocations to the south of Warwick/Leamington Spa – and maximising the chance of a five year housing land supply being demonstrable over the Plan period.

### Mod 7 – Para's 2.21 to 2.24

Further to our suggestion for the provision of appropriate flexibility in the Plan, we note the housing trajectory that sits behind Policy DS7, which depicts the timeline for the delivery of housing over the Plan period.

The trajectory is seeking a sharp increase, from circa 850 forecast completions in 2015/16 to a minimum of circa 1,400 dpa over the period 2017/18 – 2022/23.

Such an increase is considerable, and to maximise the chances of this being delivered then the Council will require as many deliverable sites as possible to come forward to help meet this need.

We are therefore supportive of Site H28 being allocated for additional housing development, which is capable of early delivery and will assist in meeting its OAHN.

### Mod 9 – Para's 2.37 and 2.38

We have no specific comments to make, other than to agree with the justification for releasing sites from the Green Belt to meet the needs of the Housing Market Area.

Furthermore, we note that the NPPF requires at paragraph 47 for the needs of the HMA to be met, however, how this is distributed across the District is a matter of planning judgement for the Council taking account of a number of considerations. As an example, elsewhere in the HMA it can be seen that North Warwickshire has adopted a Sound Plan in accordance with the NPPF that includes within it 500 dwellings to meet the needs of Tamworth without any sites immediately adjacent to the urban area from which unmet needs are originating.

Consequently, we consider that paragraph 2.38 should be amended to simply state:

*'In selecting sites on the edge of urban areas, non-Green Belt sites are favoured over Green Belt sites where possible. However, where there are no suitable non- Green Belt alternatives to meet an identified need, sites are removed from the Green Belt to enable development to take place which will help to meet the needs of the Housing Market Area. ~~This applies to land to meet the needs of Coventry, Leamington, Kenilworth, some of the villages and land on the edge of Lillington to assist in the regeneration of the area.~~' (added / deleted)*

#### Mods 10 and 11 – Policy DS11 and Para's 2.41 to 2.53 and Map 21

We agree in principle with the proposed allocation of Site H28 for approximately 120 dwellings given it offers a sustainable and logical extension to the settlement of Hatton Park.

We have commented previously on the suitability of the Site to deliver residential dwellings and enclose a leaflet which demonstrates how the Site could sensibly be delivered (**Appendix 2**), as well as technical notes updating the position in relation to ecology/archaeology/agriculture and highways/drainage at **Appendix 4** and **5** respectively.

In addition, with regards to Site H28 we do however wish to note the following. There is a strip of land to the east of the proposed allocation which is within the control of Taylor Wimpey adjacent to Ugly Bridge Road. In our view, extending the allocated area to cover the entirety of the land in Taylor Wimpey's control would form a more logical extension to Hatton Park. Moreover, the omission of this strip of land will render it redundant from any viable continued use as an agricultural landholding.

The Landscape Addendum (2016) set out that *"...Both fields could accommodate housing development but any development must:*

- *provide a minimum of a 50m planted landscape buffer on the eastern boundary (alongside the current footway/cycleway access route) to provide physical connectivity between Smith's Covert, the planting adjacent to the footway/cycle route and the copse adjacent to the Birmingham Road;*
- *any development in the northern field should be used to soften the hard edge of the existing settlement."*

Should the Council be seeking to enhance landscaping on the eastern edge of the proposed residential development, then we consider that this would be better achieved by including the land within the allocated area but adding appropriate wording in the Plan to ensure the delivery of suitable landscaping to the east. In our view the same would be appropriate along the northern edge, where a 15 metre buffer is to be provided to Smith's Covert.

It should be noted that Taylor Wimpey's proposals for the Site already include an appropriate stand-off from Smith's Covert and enhancement of the (already strong) boundary provided by Ugly Bridge Road and the associated landscaping.

Given the above, we support this allocation in principle albeit we object on the basis that the entire parcel is not allocated thereby rendering a strip of land redundant to any potential alternative or continued use.

#### Mod 16 – Para 2.81

We support the release of the land to the east of Hatton Park from the Green Belt, which will be essential to the delivery of a sustainable residential development on this land.

In 2015, the Council undertook a review of the Joint Green Belt Study (Parcel HA1). The parcel scored 15/20 in this assessment. However, this assessment covered a wider area and thus does not accurately assess the allocation.

Therefore, we have prepared our own Landscape and Visual Appraisal of the Site – which respects the boundaries of the proposed release. This is enclosed at **Appendix 6** and summarises that: *"In terms of its location in the Green Belt, a planned release of land in*

*this location would not result in urban sprawl or represent an encroachment into the wider countryside; it would not impact on local heritage assets or on the setting of historic Warwick; nor would it result in the coalescence between adjoining settlements. Accordingly, development could be accommodated without resulting in significant landscape and visual effects, or offending the objectives of Green Belt policy."*

Mod 20 – Policy DS NEW 1 Directions for Growth South of Coventry

In relation to this Policy, we wish to support the Council in their approach to capping of the assumed delivery of the Westwood Heath and Kings Hill sites due to infrastructure and delivery rates respectively.

It is important in meeting the needs of the HMA that the Council are realistic in this regard in order to ensure that the Plan is effective and deliverable by 2029.

Given the timescales for adoption of the Plan and progressing a site of the scale of Kings Hill, 1,800 dwellings by 2029 should be considered aspirational – and in order to ensure that the Plan remains realistic, consider that no uplift to this figure is appropriate. Indeed, the Council should ensure that they are fully confident of the build rates suggested being delivered before progressing the Plan.

**Conclusion**

We trust that you will take these comments are helpful in progressing the Plan. Should you require any further information, do not hesitate to contact me as per the details on this letter.

Yours sincerely



**RUSSELL CROW**  
Associate

Enc.