

Annex to Response Letter to WDC Local Plan Condocre Housing Development

Submitted by Michael & Louise Wilks, 22 July 2012

This annex provides our detailed representation regarding the proposed housing development in Section 7 of the Local Planned Preferred Options Consultation document. It is structured as follows:

- Headline message
- Key supporting points which underpin our headline message
- Detailed supporting assessment we have undertaken to derive the above
- Collated evidence - as sourced from documents within WDC Evidence Base – this underpins the above and is provided for stand alone reference

1. Headline Message

We believe the Milverton site as defined in Map 4 of the Local Plan Preferred Options Consultation document, should be removed from the Local Plan for housing (and business) development for the reasons outlined within this annex.

The Local Plan currently allows for an extra 1334 houses to be developed above that determined as necessary by Warwick District Council (WDC) in its own extensive assessment exercise - Strategic Housing Market Assessment (SHMA). We believe WDC should cut this excess, not retain it for "flexibility". We propose that the Local Plan;

- a) eliminates the Milverton site and most of Blackdown (NE part); or
- b) If WDC choose to retain housing development "flexibility", the Milverton and Blackdown sites can be replaced with South of Harbury (part) and Glasshouse Lane/Woodside.

These sites are more suitable for development, more consistent with WDC's planning objectives and criteria (for economic growth, affordable housing, transport etc), as well as the UK Government's overarching National Planning Policy Framework (NPPF).

2. Key Supporting Points

Below we outline our key points supporting our headline message above:

1. The level of housing development of the Green Belt put forward by Warwick District Council (WDC) in their Local Plan Preferred Option Consultation (LP condoc) is:
 - a. excessive and not required – both in terms of absolute level and location of proposed development.
 - b. not consistent with WDC's own stated objectives for (a) enhancement of green infrastructure, and (b) distribution of growth across the district;
 - i. both relative to greenfield development in non-Green Belt locations,
 - ii. locality to existing business areas and known expansion of business e.g. Jaguar Land Rover, University of Warwick; and
 - iii. locality to both existing and most easily enhanced strategic transport infrastructure.

- c. not justified by key documents within WDC's evidence base, including WDC's own extensive detailed assessments conducted as part of the Strategic Housing Market Assessment (SHMA), Strategic Housing Land Availability Assessment (SHLAA), Coventry Joint Green Belt Review- referred to as the Joint Green Belt Study in the Local Plan (JGBS), and Strategic Transport Assessment Overview Report (STAOR); and
 - d. fails to comply with the UK Government's National Planning Policy Framework (NPPF) in terms of "exceptional circumstances" and need to develop within "clearly defined boundaries" to avoid future coalescence.
 - e. Uses more valuable Green Belt sites for development (the proposed Milverton site) and is least compliant with NPPF boundaries requirement so should be removed from Local Plan.
2. Where WDC wish to retain current excessive level of development potential for "flexibility" reasons; a more appropriate broad location of growth compliant with NPPF and supported by its own evidence based (2.1.c above) would be as follows:
- a. Greater use of non-green belt sites especially where close to existing major business locations and strategic transport infrastructure e.g. at least partial development South of Harbury Lane, with its better proximity to existing businesses around Tachbrook Park and Europa Way, and access to the M40
 - b. For any unavoidable Green Belt development;
 - i. It should be determined with referral to the assessment of relative merits within the JGBS
 - ii. Deployed to reflect proportionate development across region e.g. less in Leamington/Warwick and more in Kenilworth as available on Glasshouse Lane/Crew Lane (inc. Woodside Management Centre)
 - iii. better proximity to known employment expansions (e.g. University of Warwick, Jaguar Land Rover) such as that provided at Westwood Heath, Glasshouse Lane/Crew Lane and South of Harbury Lane
 - iv. better proximity to existing strategic transport infrastructure such as that provided (i) in the Glasshouse/Crew Lane area, (ii) South of Harbury Lane, and (iii) at Westwood Heath.

3. *Detailed supporting assessment*

Below we outline our detailed supporting assessment underpinning our headline message and key supporting points above:

EXCESSIVE HOUSING DEVELOPMENT

1. In paragraph 7.22 of the Local Plan Preferred Options consultation document (LP condoc) it explicitly states that the draft Local Plan (LP) currently entails substantially excess housing growth. This is beyond that identified in Warwick District Council's (WDC's) own comprehensive assessment within its Strategic Housing Market Assessment study (SHMA) of the order 1370 houses – with reference to Table 7.1 and 7.2

2. In paragraph 7.26 of the Local Plan, it clearly states that one appropriate option is to reduce the housing development to that deemed required from the SHMA and as identified in Table 7.2 therein. The other option being to retain the excess for "flexibility".

The option to reduce the housing development by 1370 is clearly the appropriate option and should be used to mitigate Green Belt development. Where there is a strong view to retain flexibility then (a) it should consist of non-Green Belt development sites and/or (b) be closer to known major business developments (e.g. Jaguar Land Rover at Gaydon) or potential major business developments (e.g. the Coventry Gateway site near Baginton).

PROTECTION/DEVELOPMENT OF GREEN BELT

3. Within the UK Government's National Planning Policy Framework document (NPPF), it explicitly states as a core planning principle (pg 5) that Local Plans should be "protecting the Green Belts" and "recognising the intrinsic character and beauty of the countryside"; and furthermore under Section 9 (Protecting the Green Belt, para 83) that "Green Belt boundaries should only be altered in exceptional circumstances"
4. The Green Belt to the north of Leamington, especially that in Milverton, meets at least three of the 5 Green Belt purposes specified in the NPPF, namely "to check the unrestricted sprawl of large built up areas", "to assist in the safeguarding of the countryside from encroachment" and "to preserve the setting and special character of historic towns".
5. In paragraph 7.29 of the Local Plan it clearly states that WDC's own Strategic Housing Land Availability Assessment study (SHLAA) identified a capacity of 7,200 dwellings not including Green Belt and Urban area development. In other words there is sufficient development sites outside of the Green Belt to meet the full housing development deemed necessary under the LP (6,986).
6. PO15 states "*Developments will only be permitted which protects and enhances important green infrastructure assets and positively contributes to the character and quality of its natural environment through good habitat/landscape design and management*". By definition Green Belt land is our most important Green Infrastructure – hence its legal status - and development (and thus destruction/devaluing) of it when it is not required to meet housing needs and given other development options available is clearly not compliant with this statement.
7. In PO4 box – a policy to avoid coalescence of settlements is proposed. This is one of the key purposes of Green Belt; and yet it is proposed to override this to protect non-Green Belt development. Such treatment is inappropriate.

Historically as the population has grown in the UK, towns and cities have developed by expanding their outskirts – subject to the restrictions of Green Belt – and in the process coalesced with villages most adjacent to the urban fringes. If the assumption is that population growth will continue then it is inevitable that this amalgamation of towns/villages – subject to the restrictions of Green Belt – will continue. Consequently, the

argument of protecting the urban creep towards Bishops Tachbrook in non-Green Belt land at the expense of Green Belt development is not sustainable.

8. In PO3 box - avoid development in locations which could potentially lead to the coalescence of settlements. The NPPF requires clear permanent boundaries, something which is not evident in the case of East Milverton on its western boundaries and risks coalescence with Old Milverton Village. The same is not true of the Glasshouse Lane / Crewe Lane site.
9. Where Green Belt development is required, it should be driven by extensive assessment of the relative merits of different Green Belt areas. WDC has conducted such a study jointly with Coventry Council (CC) and this JGBS clearly established a ranking of Green Belt areas – which is necessary/justified under “exceptional circumstances” – could be reclassified and/or developed. WDC’s preferred location of development is not consistent with this detailed study. Furthermore, the Initial Sustainable Appraisal study (ISA), apparently used by WDC as the basis for its selection of Green Belt development, is
 - a. simply a desk top study with no detailed supporting evidence or apparent physical site assessment work to justify scoring and overall assessment
 - b. is inconsistent with the findings of the more rigorous JGBS in its scoring of Green Belt areas
 - c. contains no supporting evidence to justify its alternative assessment of relative merits of different Green Belt areas to that within the JGBS
 - d. contains clear examples of inaccurate and inconsistent scoring used to determine sites scores (the scoring matrices within Appendix 3).

DISTRIBUTION OF HOUSING DEVELOPMENT

10. In paragraph 7.30, it cites three reasons for reducing the level of development to the south of Leamington/Warwick
 - a. housing choice - this did not appear to be a factor or problem in the development and population of Warwick Gates. Development to the south of Harbury Lane will not reduce housing choice, merely supplement an already diverse housing stock. It is often proximity to amenities such as local schools that drive housing choice.
 - b. market capacity to build in a localised area – this is a matter of scale not location and indeed it is actually easier to develop larger sites as WDC themselves cite in paragraph 7.18 when choosing the strategy for housing development
 - c. transport implications – as detailed in the STAOR substantial development in the south of Leamington/Warwick can be accommodated at same cost and post-mitigation impact as other less southerly dominated options and furthermore it clearly states in Para 6.9 of the “Conclusions” that additional southern development (South of Harbury Lane) can be accommodated by that infrastructure)

We note that there is no evidence presented in the LP consultation or within the Evidence Base documents to justify the assertions in this critical paragraph which seeks to explain the proposed lower development of “white belt” land at the expense of higher level of development on Green Belt land.

11. In paragraph 7.31, it suggests three advantages of development of North Leamington Spa/Warwick
- a. Inclusion of employment land to reduce cross town trips – the WDC Strategic Transport Assessment Modelling (STAM) clearly shows minimal impact on average traffic travel times and no difference in costs (£28.35m) of transport mitigation measures against other options with less development north of Leamington/Warwick
 - b. Greater choice of location of homes – this overlooks substantial development of urban sites within Leamington and other distributed sites. There is no evidence that such concentration presented a problem for the population of the Warwick Gates developments.
 - c. The benefits of realised from a Northern Relief Route (NRR) –The STAM demonstrates lack of a NRR means traffic flows are no worse than other housing development options (excluding the option which minimises Green Belt development south of Leamington which is clearly not a credible option). The NRR:
 - i. Is estimated to cost nearly 70% of all of the other planned transport infrastructure investment for the whole WDC region (£20m c.f. £28.5m increasing costs from £ 3,327.46 per household to £ 5,674.88 per household) – given the environmental issues to mitigate on the route of the NRR this is probably an under-estimate;
 - ii. does not encourage sustainable travel by encouraging further in and out commuting across Leamington – which conflicts with the WDC stated sustainable development objectives for the Local Plan;
 - iii. does not actually enable/encourage travel to Leamington itself so adds no value to the local economy; and
 - iv. destroys a substantial further area of Green Belt (further encroaching on the countryside also being built across and potentially along a major flood plain; and
 - v. is not justified on cost benefit grounds given the cost, the damage to the environment and most importantly the lack of justification for the need for development of North Leamington
12. The level of housing development proposed for the Green Belt under the draft Local Plan is higher than 3 of the 4 Options subject to detailed transport modelling assessment under WDC's Strategic Transport Assessment Overview Report (STAOR) and accompanying appendices. The preferred option of WDC (PO4 box) provides for the
- a. least development in the north of the WDC region containing zero development of the northern fringes close to existing major business locations (Coventry) and known planned major new business development (Univ of Warwick); and
 - b. least development of Kenilworth – placing the greatest burden on development around the Leamington urban fringes – when the Joint Green Belt Review study (JGBS) conducted with Coventry clearly identifies that the Green Belt to the east of Kenilworth is less valuable than the Green Belt to the north of Leamington.
 - c. Reduced development of non-Green Belt land south of Leamington Spa (via removal of South of Harbury Lane, previously part of Local Plan) vs. two viable STAOR options

TRANSPORT CONSIDERATIONS

13. The STAOR clearly indicates that the impact of mitigating actions for transport infrastructure result in essentially similar outcomes for all four Options and that only the cost of the Option with least development of non-Green Belt land is different (£5m cheaper); and furthermore it highlights in its conclusions that further development on non-Green Belt land to the south of Leamington Spa (specifically South of Harbury Lane) would require no further transport mitigation measures.

ALTERNATIVE HOUSING DEVELOPMENT OPTIONS

14. Map 4 of the Local Plan illustrates WDC's proposed housing development. Map 2 shows all sites identified as suitable for housing development of the SHLAA. Map 2 clearly indicates:
 - a. Substantial development opportunity in non-Green Belt land to the South of Harbury Lane – which would reduce need for Green Belt development
 - b. Substantial development opportunity at Westwood Heath which is close to known expansion of Warwick University and strategic transport infrastructure as well as businesses in Coventry
 - c. Substantial further development opportunity to the north east of Kenilworth – which is well bounded by the A46 and existing local roads and would provide more proportionate development of Kenilworth within the overall development of the WDC region

In combination with reduction of the excess housing development in the draft Local Plan, development of each of these would avoid need for any development of North Leamington

4. Collated evidence – as sourced from documents within WDC Evidence Base

This section compiles a number of directly extracted material from WDC's Evidence Base which we have informed our assessment of the Local Plan and underpinned the development of our Headline Message and Key Supporting Points.

Some of the evidence below is referred to directly within our Detailed Supporting Assessment above. Others are provided given they merit further review and in some cases potential revision by WDC.

UK Government's National Planning Policy Framework

This is the fundamental document which provides guidelines which Councils must adhere to in the development of their Local Plans and to which any UK Government Planning Inspector will refer to as part of their assessment of the validity of any proposed Local Plan from WDC. As such we believe evidence from this NPPF document which supports our representation to WDC must be given particularly serious consideration. There are two key facets which are relevant to our representation, namely (i) justification for development; and (ii) the nature of allowed development.

(Page 6) Core Principles (Para 17 5th Bullet) - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

(Page 19) Para 80. Green Belt serves five purposes:

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

(Page 19) Para 83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

(Page 20) Para 85. When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open; where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Coventry Joint Green Belt Review aka Joint Green Belt Study Feb 2009

This document provides the most authoritative recent assessment of Green Belt within the Evidence (c.f. the Initial Sustainable Appraisal which has no supporting material to justify its scoring assessment of potential development sites); and highlights some key distinctions between the quality of Green Belt at Milverton and Blackdown compared to that bounded by Glasshouse Lane and Crew Lane to east of Kenilworth.

JGBS Appx 11 – (WL6a/6b) East and West Milverton “We recommend that this area is considered for further detailed study, but that the majority of it is retained within the Green Belt. Score for Landscape Value WL6a – 2 (Medium Value); WL6b – 2 (Medium Value)”

JGBS Appx 12 - (WL6a) “The Countryside Agency’s Character of England Map identifies that this parcel is located within the Arden Landscape Character Area.”

JGBS Appx 11 – (WL7) Blackdown “ The area lies within the Arden character area and the Arden Parklands character type. The area is principally arable agriculture, but there are some substantial (former?) residential premises – most notably West Hill house. Visually diverse due to local topography, trees and hedges. The housing along Leicester Lane is quite visibly prominent and creates a strong edge to Leamington. Some declining estate parkland noted. [but] Landscape Condition Reasonably good. Our view is that the existing road system strongly defines the existing

settlement pattern and urban expansion into this area would be difficult to justify. We recommend WL7 is wholly retained within the Green Belt. Score for Landscape Value WL7 – 3 (High Value)”

JGBSAppx 11 – (K4) Glasshouse Lane/Crewe Lane; “presently forms a definitive edge to the east side of Kenilworth at this location and appears to enable the agricultural landuse to have continued in K4 without obvious urban fringe conflicts. However it could be argued that the A46 road has already undermined the historic landscape continuity between Kenilworth and the Avon valley and that it is the A46 corridor that forms the real interface between the settlement and the rural landscape setting. It might be demonstrated that further development up to the A46 corridor would not have major impacts to the wider landscape context. Existing mature vegetation would allow this area to be visually contained whilst sensitive design could extend this enclosure. We consider that area K4 could be identified for a further level of detailed study and consideration for removal from the Green Belt. Score for Landscape Value K4 – 1 (Low Value)”

JGBSAppx 12 - (K4) Parcel K4 is directly connected to the urban area. The Countryside Agency’s Character of England Map identifies that this parcel is located within the Arden Landscape Character Area. The landscape study identifies that the A46 corridor creates an enclosure and a notable visible break from the wider countryside. It is considered that the A46 has undermined the historic landscape continuity between Kenilworth and the Avon Valley and that in this location, further development along the A46 would not have major impacts upon the wider landscape context.

Landscape Character Assessment for Land South of Warwick and Leamington - February 2009

This document whilst not focused on North Leamington, does make a reference to another assessment which we could not find as a separate document within the Evidence Base, which provides a key reference to the landscape value of North Leamington Sites, highlighting the high value of Milverton and also the differing merit of the two parts which form the Blackdown site in the Local Plan.

Site	Comment	Landscape Value
WL5 a / b (Milverton / Avon)	Important Avon green wedge with many other Green Belt functions.	High
WL6 a / b (Sandy Lane / Blackdown)	The existing settlement edge is quite well defined but there are areas of degraded land along Sandy Lane and possible development opportunities around Blackdown.	Medium
WL7 (Blackdown / West Hill)	Well preserved rural landscape on higher ground, opposite an established settlement boundary.	High

Warwickshire County Council Highways Agency Strategic Transport Assessment Overview Report - March 2012&Warwick District Council Strategic Transport Assessment Modelling PARAMICS Testing & Results Report – March 2012

These documents comprehensively present extensive transport modelling and assessment of 4 housing development options – we note none of which are directly comparable to WDC’s preferred

option. It shows the cost of transport mitigation options are largely the same (except where NRR is built – which doubles the cost of any option). It contains a key comment relevant to consideration of further housing development on part of the South of Harbury Lane site.

Four housing development options considered – includes 600 houses south of Harbury Lane

(Conclusions Para 6.9) “the reduced site south of Harbury lane appears to be accommodated by the proposed mitigation along the Europa Way corridor.”

Strategic Housing Land Availability Assessment (SHLAA) – May 2012

The SHLAA is a very large document containing detailed assessments of all candidate sites in WDC region. It contains some critical assessment comments in relation to the Milverton site highlighting some major issues it faces and also relative merits to other sites.

L07 – Land North of Milverton: Physical Constraints Small part of the site to north east is within Flood Zone 3A. “Within an area of medium landscape value [Note LSA of SL/.W indicates “High”]. Part adjacent to Leamington Spa Conservation Area on southern boundary. The north/north eastern part of the site is within a Water Source Protection Zone and an area of Groundwater Vulnerability” - would require “ consultations with the Environment Agency on groundwater protection.” Also “Loss of Grade 2 Agricultural Land” .

L48 – Land North of Blackdown: Physical Constraints - The site is within a Water Source Protection Zone and an Area of Groundwater Vulnerability. A minor watercourse traverses the site. A public footpath traverses the site. Potential Impacts - Loss of Grade 2 agricultural land over large area of site; Area of High Landscape Value; No recent detailed information on bio-diversity but previous surveys suggest that none of the findings give cause for concern. Further work will be undertaken. Environmental Conditions Satisfactory
Overall Suitability - Potentially suitable subject to alteration of Green Belt boundary.

Area defined as K4 in JGBS is presented as two/(three sites encompassing Woodside Management Centre (southern part) and Glasshouse/Crew Lane (northern part)

K19 – Woodside Management Centre – Indicates “the site is still in use but in the control of a developer” and that “Achievable with a strong housing market and subject to appropriate contributions being made towards improving infrastructure and services”. Indicates could provide 150 houses in LP Phase 1 - 2014-2019; 200 in LP Phase 2 – 2019-24 and 250 in LP Phase 3 – 2024-2029.

K18 – Glasshouse Lane/Crewe Lane - Indicates “Promoters are in the process of securing control of the land and, if successful, would be willing to bring the site forward for development” and “Achievable with a strong housing market and subject to appropriate contributions being made towards improving infrastructure and services. Indicates could provide 200 houses in LP Phase 1 - 2014-2019; and 450 in LP Phase 2 – 2019-24

The western part of K19 is separately assessed as K17 – Southcrest Farm and is indicated as “Available - the site is in the control of a developer” and could provide 200 houses in LP Phase 1 - 2014-2019; and 115 in LP Phase 2 – 2019-24. In other words could proceed with K17 Phase 1 development with range of 115-450 additional houses possible in Phase 2 dependent on outcome of purchase of eastern half of K18 i.e. excluding K17 site (and thus control of whole site by developer(s))

Initial Sustainability Appraisal - May 2012

This document is very short compared to for example the JGBS and provides no details of basis of assessment; and in some places it appears the detailed scoring is inconsistent and/or not justified with reference to other documents in the WDC Evidence Base – to the detriment of the East Milverton site. Nonetheless it does highlight some key distinguishing merits of the East Milverton site compared to others not included in the Local Plan at present.

(Preferred Option) Broad Option 2 - Distributed around urban fringe - Would have a positive effect in supporting economic growth, sites well related to the urban areas could reduce the need to travel and have the potential to meet all housing needs. Distribution of sites is less likely to have a significant impact on the landscape and historic environment.

ISA - "Appraisal of Individual Sites"

Page 9-11:

North of Milverton (West) (Score =1) Scores well for economy and meeting housing need. Less likely to enable a range of sustainable transport options. No biodiversity designations but loss of greenfield land.

North of Milverton (East) (Score=2) Scores well for economy and meeting housing need. Less likely to enable a range of sustainable transport options. Includes minor watercourse designated as a local wildlife site (LWS) linked to the River Avon.

North of Milverton (whole site) (Score=5) Scores well for economy and meeting housing needs. Development of the whole site has the potential to support new transport infrastructure and provide facilities on the site reducing the need to travel. Includes minor watercourse designated as a local wildlife site (LWS) linked to the River Avon. *NOTE: this option is invalid under NPPF guidelines due to coalescence of Old Milverton.*

South of Harbury Lane (Score = 8) Scores well for economy and meeting housing need. Scores well for enabling a range of sustainable transport options and reducing the need to travel – would connect into existing road network and provide a large range of local facilities & services. Tach Brook (tributary of River Avon LWS) on southern boundary of site.

Glasshouse Lane/Crewe Lane (Score =2) Scores well for economy and will meet some housing needs. Does not relate as well to existing centres as Thickthorn. Likely to enable a range of sustainable transport options, potential to provide new facilities. LWS on south eastern edge (wood).

Land at Blackdown (Score=1.5) Scores well for economy and meeting housing need. Less likely to enable a range of sustainable transport options. Includes minor watercourse designated as a local wildlife site (LWS) linked to River Avon and loss of greenfield land deemed of high landscape value. Critical mass to provide facilities on site and support adjacent services.

ISA - Appendix 3

We made three key observations:

- (i) much higher score of South of Harbury site – even part developed
- (ii) Whilst total score of Glasshouse Lane/Crewe Lane same it is worse for reduction in travel – no justification of why does not meet needs of community

- (iii) Inconsistencies/inaccuracies in North Milverton East score which does not reflect flooding risk and site water issues identified in SHLAA nor historic environment (Arden, JGBS) or landscape value c.f. Blackdown – so North Milverton East merits lower score.

As the ISA scoring seems to be pivotal in selection of sites within Local Plan it is critical that the scoring is justified based on Evidence Base and accurate/robust.

Assessment Criteria	North of Milverton (West)	North of Milverton (East)	Land at Blackdown	Glasshouse Lane/ Crewe Lane	South of Harbury Lane	Part of South of Harbury Lane	North of Milverton (whole site)
1. To have a strong and stable economy	++	++	++	++	++	++	++
2. To enable a range of sustainable transport options	-	=	-	=	++	++	=
3. To reduce the need to travel	=	=	=	+	++	+	+
4. To reduce the generation of waste and increase recycling	=	=	=	=	=	?	=
5. To ensure the prudent use of land and natural resources	-	-	-	-	-	-	-
6. To protect and enhance the natural environment	-	-	--	-	-	-	-
7. To create and maintain safe, well-designed, high quality built environments	?	?	?	?	?	?	?
8. To protect and enhance the historic environment	=	=	=/-	=	=	=	=
9. To maintain and improve good quality air, water and soils	-	-	-	-	-	-	-
10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources	?	?	?	?	?	?	?
11. To adapt to the predicted impacts of climate change including flood risk	?	?	?/-	?	?	?	?
12. To meet the housing needs of the whole community	++	++	++	+	++	++	++
13. To protect, enhance and improve accessibility to local services and community facilities	+	+	++	+	++	+	++
14. To improve health and well being	=	=	+	=	+	=	+
15. To reduce poverty and social exclusion	=	=	=	=	=	=	=
16. To reduce crime, fear of crime and antisocial behaviour	=	=	=	=	=	=	=
TOTAL SCORE	1	2	1.5	2	8	5	5

Scoring: ++ strong positive (2)+ positive (1)= neutral (0)- negative (-1)-- strong negative (-2)? unknown (0)=/+ neutral/positive (0.5)=/- neutral/negative (-0.5)

Local Plan – Preferred Options May 2012

Clearly the Local Plan Preferred Options Consultation document itself contains statements and comments which provide evidence. Key items relevant to the Headline Message our Key Supporting Points and which informed our Assessment are provided below in the order they appear.

The two tables below provide details of (a) the aggregate amount of housing development deemed necessary by WDC's own detailed assessment conducted under the SHMA; and (b) the aggregate amount of housing that the Local Plan current contains – highlighting an excess of >1300 houses proposed for the period 2014-2029.

TABLE 7.1 Housing to be Allocated in the Plan

	Dwellings
Housing Requirement	10,800
LESS:	
Committed Housing Sites	1,224
Small urban SHLAA Sites	290
Other Windfall Housing Sites	2,300
Total	3,814
Balance to be Allocated in Plan	6,986

TABLE 7.2 Distribution of Housing Site Type and Location Dwellings

Site Type and Location	Dwellings
Urban Brownfield Sites	480
Sites on Edge of Warwick, Leamington & Whitnash	6,250
Sites on the Edge of Kenilworth	770
Village Development	830
TOTAL	8,360

We note the total in Table 7.2 is actually incorrect and should be 8,330

7.22 The sites/ locations which have been identified would allow for the development of 8,360 new dwellings. This is over and above the balance of the requirement of 6,986 so would give an element of flexibility of about 1,370 dwellings. This flexibility allows for two potential courses of action:

- To enable some sites to be removed from the allocation proposed in the draft Plan depending on consultation and any further evidence that is provided, and/or
- To provide housing to support a Regional Investment Site in the vicinity of the A45/A46 Junction close to Coventry Airport (the Coventry and Warwickshire Gateway) if further research demonstrates that this is a suitable location (see section 8).

[We note our preference is the first of the two options presented under Para 7.22]

7.27 Exceptional circumstances can include the need to accommodate housing and employment growth to meet the needs of a community where there are insufficient suitable and available sites outside of the Green Belt.

7.28 In the case of meeting the housing needs of Kenilworth, there are limited sites within the built up area of the town and therefore there are no alternatives other than to review the Green Belt Boundary. The Green Belt Study identified the area between the east of the town and the A46 as suitable for further study in terms of development potential. This was largely because the A46 provided a physical barrier to the wider countryside. *[which is compliant with NPPF requirement]*

7.29 In the case of meeting the housing needs of Warwick, Leamington and Whitnash, the SHLAA identifies a potential capacity within the urban area of 650 dwellings on sites of 50 or more. Outside of the built up area, and outside of the Green Belt, the SHLAA identified a capacity of 7,200

dwelling. These sites are concentrated in the area around Europa Way, Gallows Hill and Harbury Lane as well as to the south and east of Whitnash.

[There is no evidence presented to justify the lower development of "white belt" land at the expense of building on Green Belt. Thus "exceptional circumstances" is not proven]

7.39 in general the model concluded that there was little difference between the options in terms of the improvements following mitigation.

[In other words there is no preferred option from a cost of transport infrastructure perspective]

PO15 (Development areas) "Development will only be permitted which protects and enhances important green infrastructure assets and positively contributes to the character and quality of its natural and historic environment through good habitat/landscape design and management." Green Belt is the most important Green Infrastructure".

[Thus development of Green Belt must by definition conflict with this preference and thus must be avoided as a priority where development is not justified by exceptional circumstances]

16.3 Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term so that they should be capable of enduring beyond the plan period.

[Thus once not included in LP in principle should remain Green Belt and not materially developed upon]

PO18 – "New development will take place on sites outside flood risk zones as far as Practicable"

[thus if alternatives should not (a) develop on Milverton site nor (b) construct NRR]