

# Warwick District Council

## Representations to Local Plan Preferred Options

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**Appendix 1: Completed Representation Form**



## 1.0 Introduction

- 1.1 Broadway Malyan, on behalf of Commercial Estates Group (CEG) and the landowner, the McGregor family, is submitting representations to the Warwick District Council, Local Development Framework (LDF) Preferred Options Local Plan, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 Our client's site measures approximately 66 hectares and is included within the Council's Strategic Housing Land Availability Assessment (SHLAA) as *Site Ref: L48 Land at Blackdown, Leamington Spa*.
- 1.3 No set questions have been provided as part of the consultation process. However, the consultation form seeks views on a chapter, policy, paragraph, map or other basis. These representations therefore accordingly follow this format. For the avoidance of doubt we have completed the representation form (**Appendix 1**) albeit, our written responses are detailed within this document. The remainder of these representations clarifies our view in more detail, addressing the 'Preferred Option' policy headings as set out in the Core Strategy.

**Section 2** – PO1: Preferred Level of Growth

**Section 3** - PO3: Broad Locations for Growth & PO4: Distribution of Sites for Housing

**Section 4** – PO8: Economy

**Section 5** - PO16: Green Belt

**Section 6** – Map 5: Possible Transport Infrastructure

**Section 7** – Conclusions

- 1.4 By way of summary, we outline below whether we support or object to the policies we have made representations to in this document:

PO1: Preferred Level of Growth - **Object**

PO3: Broad Locations for Growth – **Support**

PO4: Distribution of Sites for Housing – **Support**

PO8: Economy - Support

PO16: Green Belt – **Support**

Map 5: Possible Transport Infrastructure – **Support**

## 2.0 PO1: Preferred Level of Growth

2.1 The Government has published (27 March 2012) the National Planning Policy Framework (NPPF), covering all forms of development. The NPPF streamlines previous national planning policy contained within Planning Policy Statements, Planning Policy Guidance notes and other statements of Government policy, such as the 'Chief Planner' letters.

2.2 A key priority for the Government is to support sustainable economic growth and recovery. Following the Budget 2011, the Minister of State for Decentralisation, Greg Clark MP laid a Written Ministerial Statement on 23 March 2011 highlighting the important role planning has in supporting economic growth and recovery. The Written Ministerial Statement is a material planning consideration and states:

*“Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth [own emphasis], taking full account of relevant economic signals such as land prices.”*

2.3 The Government through the national Growth Review has committed to ensuring the planning system does everything it can to support economic growth and recovery. In support of the commitment, the NPPF introduces a new test of soundness to ensure local plans are positively prepared. The NPPF states (paragraph 182) that:

*“The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements [own emphasis], including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development”.*

2.4 The NPPF is very clear that at the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through both local plan making and decision taking. Local planning authorities are asked to plan positively for new development. Paragraph 14 of the NPPF states that for plan-making this means that:

- *“local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development should be restricted.”*



2.5 Specifically in relation to housing, paragraph 47 of the NPPF states:

*“To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period...”*

2.6 The NPPF states in paragraph 159 that local planning authorities should have a clear understanding of housing requirements in their areas. They should:

- *Prepare a Strategic Housing Market Assessment to assess their full housing requirements, working with neighbouring authorities where housing market areas cross administrative boundaries [own emphasis]. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to require over the plan period which:*
  - *meets household and population projections, taking account of migration and demographic change*
  - *addresses the needs for all types of housing, including affordable housing and the needs of different groups in the community such as families with children, older people, disabled people, service families and people who wish to build their own homes; and*
  - *caters for housing demand and the scale of housing supply necessary to meet this demand.*
- *Prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.*

2.7 Similarly for business requirements the NPPF (paragraph 160) states local planning authorities should have a clear undertaking of business needs within the economic markets operating in and across their area. To achieve this they should work closely with county and neighbouring authorities and with local enterprise partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.

2.8 Having reviewed The Warwick District Council Strategic Housing Market Assessment (March 2012) (SHMA), it is our view that the housing figure within PO1: Preferred Level of Growth is significantly too low. We therefore **object** to this policy and outline below, having regard to the available evidence and the NPPF, why we have come to this conclusion.

2.9 The SHMA is clear at Paragraph at 10.11 explaining that:

*“Forecast employment growth in the District is for 11,860 jobs over this period. Should the District wish to support this level of economic and employment growth, the projections indicate that*

*provision of 14,300 homes would be required (2011-31), equivalent to 715 per annum. This level of housing development could potentially support a reduction in levels of in-commuting to Warwick District (based on matching growth in the employment in the District with growth in its resident population). It could potentially support more local living and working. However it is for the Council to define its economic strategy through the Local Plan.”*

- 2.10 We support the level of housing growth based on employment growth as set out in the SHMA. This projected level of growth meets the objectively assessed requirements as required by the NPPF. Having regard to PO1: Preferred Level of Growth; it is our view that the wording of the policy should be re-worded as follows:

***Our preferred option for the level of growth between 2011 and 2029 is 14,400 dwellings, an annual average of 800 new homes each year.***

- 2.11 Our proposed wording is in line with Scenario 3 as set out in Paragraph 5.6 of the Local Plan. Scenario 3 suggested level of growth is in line with NPPF of encouraging local authorities to embrace growth and that housing growth would in turn support economic growth. The inclusion of such wording, as outlined above, will ensure there is sufficient housing within the District over the plan period to accommodate the forecast employment growth. Moreover, providing 14,400 dwellings over the plan period will reduce the need to travel to work within the district and thus reduce travel-to-work areas. Such reductions are in accordance with the presumption in favour of sustainable development, which is the ‘golden thread’ that runs through the NPPF.
- 2.12 Furthermore, going with the higher housing growth option will ensure that the Local Plan can be found ‘sound’ by an Inspector; as it will have been based on a strategy, which seeks to meet objectively assessed development requirements.



### 3.0 PO3: Broad Locations for Growth & PO4: Distribution of Sites for Housing

- 3.1 We **support** Policy PO3 as currently written and the Council's four preferred objectives for broad locations of growth. We strongly agree that that the Council should *"concentrate growth within, and on the edge of, the existing urban area."* This is especially important where there is an acknowledged limited supply of urban brownfield land (Paragraph 7.10 of the Local Plan). Locating broad locations of growth on the edge of urban areas is a sustainable solution for directing future housing growth.
- 3.2 Moreover, it is crucial that future broad locations for growth are distributed across the District, as directed by the policy objective of Policy PO3. The NPPF at Paragraph 47 explains that it is important to ensure 'choice' and 'competition' in the housing market. Elements of 'choice' and 'competition' mean that it is important to provide housing across the District and not just focus development in one area.
- 3.3 Land at Blackdown is fully in accordance with the relevant policy objectives of where the broad locations of growth should be directed. We demonstrate below how our client's site accords with the policy.
- Land at Blackdown, which lies to the north of Royal Leamington Spa adjoining the urban area and complies with policy objective of concentrating growth on the edge of the existing urban area.
  - Land at Blackdown complies with the second policy objective of Policy PO3 in that it will avoid coalescence with other settlements. Furthermore, development at Blackdown is naturally restricted from sprawling by defensible barriers in the form of road infrastructure.
  - Land at Blackdown complies with the third policy objective of PO3 in that it ensures distribution growth across the District. Having reviewed Map 3: Development Sites – Preferred Option (whole District) as set out in the Local Plan, it is apparent that there are limited options for development north of Warwick and Royal Leamington Spa. Therefore, Land at Blackdown makes a significant and important contribution to the future growth of the northern Warwick and Royal Leamington Spa urban area and provides the necessary competition and choice in the housing market to ensure delivery of housing, which is a fundamental Government objective.
- 3.4 We **support** Policy PO4: Distribution of Sites for Housing. We also **support** Land at Blackdown as an allocation for 1,170 dwellings and employment over the plan period. Given the size of the site, we support its inclusion within Phase II and III in terms of its deliverability. It is a realistic prospect that the first dwellings will be delivered on site in 2019/20; although this trajectory could be expedited should the housing requirement require a greater short term five year land supply.
- 3.5 We also share the Council's concerns about focusing 6,000 new dwellings to the south and east of the built up areas of Warwick, Royal Leamington Spa and Whitnash (Paragraph 7.30). As identified in the Draft Infrastructure Plan (May 2012) there is clear evidence that such a provision of housing to the south would impact on infrastructure, particularly the junctions onto the M40. In addition, the concentration of all growth in a single location could seriously prejudice timely delivery – especially within the context of potentially complicated infrastructure delivery.
- 3.6 On the back of this we support the Council's views that there are advantages to locating some development

to the north of the urban areas of Warwick and Royal Leamington Spa (Paragraph 7.31). The Council's point here reiterates our point made in Paragraph 3.2 (above) explaining that choice and competition is important to the housing market. Locating development to the north of the Warwick and Royal Leamington Spa urban area allows for the development of some employment areas and more importantly contributes to a greater choice of location of new homes.



#### **4.0 PO8: Economy**

- 4.1 We **support** Policy PO8, particularly the allocation of Land North of Leamington at North Milverton and Blackdown as a strategic site for employment use. The NPPF is clear that significant weight should be placed on the need to support economic growth through the plan-led system.
- 4.2 Land at Blackdown is an appropriate employment location adjacent to the A452 – Kenilworth Road, which links to the wider road network. Allocating part of land at Blackdown for employment use ensures that Warwick District is meeting the development needs of businesses. Moreover, providing for employment land north of Royal Leamington Spa will address an existing deficit in provision and have the potential to reduce the need to travel across the District.
- 4.3 Providing employment along with a Park and Ride facility and residential development at Blackdown will contribute towards the creation of sustainable and mixed communities as set out within the NPPF.

**5.0 PO16: Green Belt**

5.1 Paragraph 83 of the NPPF states that: “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” As set out in Section Two, it is our view that the Council need to deliver 14,400 dwellings over the plan period. As such, it is necessary to review and redefine Green Belt boundaries at this time.

5.2 We **support** Policy PO16, particularly altering the Green Belt boundary to the north of Warwick and Leamington Spa in order to accommodate development. At Paragraph 7.32 the Local Plan states:

*“Assessment of Green Belt land to the north of Warwick and Leamington in the Joint Green Belt Study concluded that the land bounded by the A46 in the west, the River Avon to the north and Sandy Lane to the east was worthy of further study. This was largely because there were no other towns to the north, from which the Green Belt would provide protection from encroachment, but also because there were other physical barriers to the wider open countryside. The Green Belt assessment suggested that the land at Blackdown was not suitable for further study. However, the land has similar characteristics to land to the west in that there are no towns to the north, from which the Green Belt would provide protection from encroachment, and there are clear boundaries to the site to protect the open countryside beyond.” [Own emphasis].*

5.3 We fully agree with the Council’s assessment of land at Blackdown. It has similar characteristics to the land to the west; moreover it is contained to the north-east by Westhill Road and to the north by Stoneleigh Road. The NPPF is clear at Paragraph 85 that when defining Green Belt boundaries, local planning authorities should: “Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” Westhill Road and Stoneleigh Road provide distinctive defensible boundaries to the open countryside beyond and would thus contain development.

5.4 Removing land at Blackdown from the Green Belt is in accordance with the criteria for defining Green Belt boundaries as set out in Paragraph 85 of the NPPF and will ensure that the Council goes some way of meeting their identified housing requirement over the plan period.

5.5 Notwithstanding this, housing delivery is a key Government policy objective. A strategy to ensure timely housing delivery, such as allocating a variety of sites within different geographical locations must be a fundamental principle in this Local Plan. Allowing a Green Belt review to facilitate such delivery accords fully with the NPPF policy objectives.



## **6.0 Map 5: Possible Transport Infrastructure**

- 6.1 We **support** the proposed Park and Ride in the broad location of Blackdown as illustrated on Map 5 – Possible Transport Infrastructure of the Local Plan. Our client's site is an appropriate location, adjacent to the A452 – Kenilworth Road to facilitate such a scheme.
- 6.2 Importantly the location of the proposed Park and Ride at Blackdown is within the Coventry north-south corridor and would contribute to a wider Sustainable Transport System. It is acknowledged within the Draft Infrastructure Plan (May 2012) (Paragraph 3.1.6) that there are a number of issues and constraints which tend to be the cause of the majority of congestion problems across the transport network within Warwick District. Locating a Park and Ride at Blackdown would go some way in alleviating these issues as part of a wider Sustainable Transport System.
- 6.3 Providing a Park and Ride at Blackdown is wholly in accordance with the policy objectives set out within the NPPF relating to promoting sustainable transport. It will ensure people have a choice of travel options and will reduce greenhouse gases and congestion. Moreover, should land at Blackdown be allocated for 1,170 dwellings and employment this would go some way to ensuring its long term viability, through the population associated with development.

## 7.0 Conclusions

- 7.1 We **support** the Council's allocation of land at Blackdown for residential and employment development and realigning the Green Belt boundary accordingly. Allocating this site through the Core Strategy will significantly boost the supply of housing and employment in the District over the plan period and make an important contribution to the overall housing and employment quantum.
- 7.2 Land at Blackdown is deliverable in that it is available now and is in a suitable location for development. The landowner is working with a developer, ensuring that the site is developable and viable over the plan period.
- 7.3 Importantly, the developer and landowner are fully committed to the garden suburb principles of housing and urban design, and wish to deliver high quality place-making through partnership working with the Council, the local community and stakeholders.
- 7.4 Allocating land at Blackdown will ensure that a wide choice of high quality homes and employment is available over the plan period. Developing the site will also contribute to the creation of sustainable and mixed communities as set out within the NPPF.



**Appendix 1: Completed Representation Form**

## 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](http://www.warwickdc.gov.uk/newlocalplan)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
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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	Male	
Ethnic Origin	White British	
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input checked="" type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <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)

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

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).

See separate sheet

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Ref:

Rep. Ref.