



WHITNASH TOWN COUNCIL

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Development Policy Manager
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Dear Sir

RESPONSE TO WARWICK LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Whitnash Town Council respond to each of the Preferred Options in turn, and make comments in respect of the Vision and Objectives.

Vision and Objectives

We broadly support the Vision and Objectives for the Local Plan, but reserve our position on the level of housing supply, for the reasons set out in our response to PO1 below.

PO1 – Level of Growth

In principle we agree that sufficient housing should be provided across the District to meet future housing needs. However, we are unable to comment on the proposed level of an average provision on 555 per annum on allocated sites, plus windfalls, as housing numbers are an immensely technical issue.

Notwithstanding this, we are very concerned that Warwick District and Coventry City Councils are failing to exercise their statutory Duty to Co-operate under the Localism Act 2011 by not addressing the important matter of cross-boundary housing need.

We are concerned that, in its current state, the proposed strategy will be found to be “unsound” by the Inspector at the eventual Examination. This could well result in additional housing provision having to be made, and this would have clear implications for non-Green Belt areas, such as those surrounding Whitnash.

We therefore urge the District Council to effectively exercise the Duty to Co-operate with Coventry in respect of cross-boundary housing provision at this

stage, therefore preventing the danger of the Local Plan being found “unsound” in the future and the Council having to consequently revise its strategy and land allocations.

PO2 – Community Infrastructure Levy

We fully support the District Council in seeking to introduce a CIL scheme as the Town Council considers it vital that full and appropriate infrastructure provision is made, in advance of development wherever possible. It is essential, however, that the funds raised are used to develop infrastructure in the areas where the impacts will be felt, irrespective of Town and Parish administrative boundaries.

We look forward to seeing and commenting upon the Infrastructure Delivery Plan in due course.

PO3 – Broad Location of Growth

We support the strategy to make Green Belt releases to the north of Leamington. For the first time in many years, this will allow a spatial rebalancing of the urban form and provide for significant development in areas away from the southern edge of the Warwick/Leamington/Whitnash urban area.

Apart from relieving some of the development pressure on the south, it also represents sensible planning practice by creating a more rounded and balanced urban area, enabling greater accessibility, especially for the town centres, and should enable more effective transport planning through maintaining a more compact urban form with Leamington and Warwick Town Centres as two central hubs.

Past development allocations had resulted in Leamington Town Centre becoming increasingly less “central” to the urban area as development extended to the south. The proposed strategy ends this practice and is therefore welcome.

PO4 – Distribution of Sites for Housing

At this Preferred Option stage, we do not have detailed proposals for any of the sites covering, for example, access arrangements, amounts of employment land, types and forms of community facilities to be provided, and such like.

Therefore, we wholly reserve our position in respect of objection to, or support for, any of the sites and we will make strong representations in this respect at the Draft Local Plan stage.

However, we have a number of concerns in respect of several of the sites. We draw these to the District Council’s attention at this stage so they can be addressed in formulating detailed proposals.

Education Provision

A general comment we wish to make is that it is critical that detailed consideration is given, up front, to the level and location of future school provision, both Primary and Secondary.

In Whitnash we have suffered from the lack of provision of a Primary School at Warwick Gates. The draft Development Brief included a school, but this was subsequently deleted as the County Council, as LEA, took the view that a better option was the expansion of the existing three schools in Whitnash. As this was, in planning terms, “policy neutral”, the District Council amended the Development Brief accordingly and deleted the school site.

This has led to problems for the residents of Warwick Gates and we would seek to ensure that such a situation does not arise again through this Local Plan process.

Our comments on education more specifically related to individual sites as follows.

Sites 2 and 3 – if these sites progress, these should be seen as incorporating a possible location for a Secondary School.

Site 6 (Whitnash East) – we understand that access could only be achieved through the Champion School site. We are concerned that the school should remain viable and continue to be located where it is.

Site 10 (Warwick Gates Employment Land) – consideration should be given to siting a Secondary School on this land, given its advantages in terms of accessibility from across the south of the urban area. The opportunity should also be taken to explore the siting of a Primary School on the site, to meet the needs both of existing Warwick Gates residents and also the needs arising from any additional housing, on the site itself or in the vicinity.

Site 2 – Myton Garden Suburb

Our concern in respect of this proposed allocation is that its development will result in the coalescence of the three components of the urban area, Warwick, Leamington and Whitnash. We consider that this will result in a loss of individual identity for the three towns.

Site 3 – South of Gallows Hill

We raise the following concerns in relation to this site:

- The land is extremely prominent in the landscape and will be highly visible when entering the urban area from the south
- The site does not represent a logical extension of the current urban form. It is in no way “rounding off” and would constitute a “peninsula” of development extending to the south

- It would have a negative impact upon the setting of Warwick Castle Park

Site 6 – Whitnash East

We raise the following concerns in respect of this site:

- We are not convinced that access to the site is feasible. Our understanding is that the South Sydenham development constituted the maximum number of dwellings that could be accommodated off a cul-de-sac. Given that access to the site via Church Lane or Fieldgate Lane is clearly not feasible, access would have to be achieved via land within Campion School. As this would involve relocation of school buildings, we are sceptical that the number of houses proposed could fund the necessary works required to achieve this solution
- Given the above issue, and our earlier comments on the wider subject of education provision, we do not wish to see the future location of Campion School prejudiced by this development
- There are, in the immediate vicinity of the proposed site, substantial areas of both historical and nature conservation interest. Any development must not have an adverse impact on any of these cultural, historic and natural heritage resources
- In the event that the site is developed, we would wish to ensure that sufficient community facilities are provided within the development and also that adequate footpath and cycleway links are provided between the development and the existing community of Whitnash

Site 10 – Warwick Gates Employment Land

We raise the following concerns in respect of this site:

- The site appears to be proposed for development at an extremely low density. We make this observation elsewhere in respect of other proposed allocations. We are concerned that, to accommodate the projected housing need, land is allocated at appropriately high density, thus reducing the overall level of new land that is needed
- This site is currently a high quality employment land allocation and we understand that a reason the land has not been developed is landowner aspirations, rather than demand for such a site. It is essential that the Local Plan provides a balanced supply of employment land to meet all sectors of demand, if economic growth and prosperity is to be fostered. There is currently no other site in the urban area that offers this amount of land area in such an accessible location. We are therefore concerned at its proposed reallocation from employment to housing

Site 11 – Woodside Farm

We raise the following concerns in respect of this site:

- We fail to see how two access points could effectively be achieved to this site. We do not consider access from Harbury Lane to be feasible due to the existing road alignment. We doubt whether access could be achieved from Tachbrook Road due to the proximity of the Ashford Road and Harbury Lane junctions to the north and south of the site respectively. Construction of a roundabout at the Tachbrook Road/Harbury lane junction would offer potential for one access point, but we are concerned about the impact of such construction on the important oak trees in the vicinity
- We also doubt whether the development could carry the cost of such highways works. The option of gaining access via Landor Road is utterly unacceptable due to the road alignment and lack of vehicle capacity. Furthermore, it appears that physical access could only be gained through demolition of existing buildings
- In the event that a single access point was sought, we consider that this has the potential to isolate the housing from the existing community and also lead to unnecessary and unsustainable vehicle movements
- The site would be highly prominent in the landscape – there is therefore a concern about visual impact
- The presence of underground High Voltage electricity cables will limit the site layout
- There is considerable local opposition to the proposed allocation of the site. It is our duty as a Town Council to inform you of this high level of opposition

Site 12 – Fieldgate Lane/Golf Lane

The raise the following concerns regarding this site:

- We consider there to be fundamental access problems and have concerns about the capacity of the Coppice Road/Morris Drive and Whitnash Road/Golf Lane junctions to accommodate the additional movements generated by the development, especially at peak periods
- We are concerned that, at a proposed level of 90 dwellings, the site density is too high. This would be a prestigious site and the proposed density should reflect this. Our argument does not run contrary to that made in respect of other sites, where we consider the density to be too low, as provision needs to be made at varying densities to reflect different sectors of the housing market. This includes provision of sheltered housing and single-storey dwellings on appropriate sites. This may or may not be the case at

Fieldgate Lane, but should certainly be considered across the portfolio of proposed housing allocations

PO5 - Affordable Housing

We support the provision of appropriate levels of affordable housing but would seek this to be distributed across all sites to ensure the development of socially balanced communities

PO6 – Mixed Communities and a Wide Choice of Homes

We support the Preferred Option PO6.

PO7 – Gypsies and Travellers

Given that Whitnash has experienced particular problems through unlawful traveller encampments in recent years, we support the principle of the Preferred Option of proper site provision

PO8 – Economy

We support the principles of PO8. However, we reiterate our concern that appropriate levels of employment land should be provided, in the right places, and this should constitute a balanced portfolio of sites to meet as wide a variety of needs and demands as possible

PO9 – Retailing and Town Centres

We support the principles set out in PO9

PO10 – Built Environment

We support the principles set out in PO10

PO11 – Historic Environment

We support the principles set out in PO11

PO12 – Climate Change

We support the principles set out in PO12

We will seek to ensure that any future development in Whitnash seeks to reduce the Town's overall carbon footprint through the application of sustainable development and design principles

PO13 – Inclusive, Safe and Healthy Communities

We support the principles set out in PO13

PO14 – Transport

We support the principles set out in PO14 with the exception of the section relating to High Speed 2.

Whitnash Town Council neither objects to nor supports HS2

We urge the District Council to ensure that the final Infrastructure Delivery Plan takes full account of public transport needs and the principles and policies set out in Warwickshire County Council’s Local Transport Plan 3

PO15 – Green Infrastructure

We support the principles set out in PO15

PO16 – Green Belt

We support the limited release of Green Belt sites as set out in PO16 as this will create a more balanced and sustainable urban area and urban form

PO17 – Culture and Tourism

We support the principles set out in PO17

PO18 – Flooding and Water

We support the principles set out in PO18

Yours sincerely

Jenny Mason
TOWN CLERK