

NPB/kg/GC.353

By E-mail only:

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29 July 2013

Development Policy Manager
Development Services
Warwick District Council
Riverside House
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CV32 5QH

Dear Sirs

**WARWICK DISTRICT COUNCIL - LOCAL PLAN
LOES FARM GUYS CLIFFE WARWICK CV34 5YB**

The above site was not allocated within the Local Plan Final Interim SA Report and, therefore, we are objecting on behalf of our clients on the following basis.

1. The land is suitable and available.
2. A transport assessment has been previously provided which indicates that two accesses are available.
3. A Phase 1 Habitat Assessment undertaken by Middlemarch Environmental has been previously provided to you which concluded that there were no wildlife concerns or protected species likely to be affected by development.
4. A landscape assessment by Pleydell Smithyman Limited, Landscape Assessors, has been previously provided to your Authority which contradicts that provided by the Council from Richard Morrish & Associates. It concluded that:-

Para 8.2 "Based upon Landscape Character, Visual and the protection of existing Heritage Assets and Setting we recommend that the whole of the Loes Farm Site would be suitable for appropriately designed residential land allocation and that no significant impacts on Heritage Assets would occur"; and

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Para 8.3 "We also recommend that the Site setting has significant potential for landscape, visual, biodiversity and public access mitigation and enhancement and that these topics should be fully investigated in any further design of the Site in respect of residential allocation".

5. In the Council's own words, in the Final Interim SA Report, "the allocation has the potential to provide housing which will have a major long term positive effect on sustainability objectives relating to housing. In addition, there will be indirect positive effects on the economy, local community services, health and well being and poverty and social exclusion."
6. The Council's Final Interim SA Report states "the site currently does not have access to public transport (despite being close to a GP surgery and schools (within 1.5 miles))". This is not accurate and the attached printout indicates that the G1 service in Woodloes is regular, running at least every 8-9 minutes. It would therefore be possible to promote a G1A service (say 1 in every 3 buses initially) which would use a new route through the site as pictured. The G16 runs up the Coventry Road and as there are not only existing services, but potential to improve service to the Woodloes and Percy Estates, sustainability would be improved.

The SA identifies that "there is the potential for short to long term negative effects on SA objective 2 (sustainable transport) through increased levels of traffic on the surrounding network. However, the Local Plan will include policies "to ensure that traffic and transport issues are identified and that appropriate mitigation is implemented as well as introduce requirements for developers to contribute towards transport infrastructure improvements".

7. The SA identifies the A46 on the western boundary of the site as a "potential nuisance source for new development". However, it goes on to state that this can be addressed by "suitable mitigation". We believe that mounding along the A46 suitably planted would significantly aid this.
8. Our proposal in the previously submitted papers, identifies significant positive benefits in providing public open space on the land fronting the Coventry Road. Not only would it aid this development, but it would aid the surrounding area which is otherwise relatively poorly provided. This is a significant positive benefit. The site has no current footpaths and so public access would be significantly improved.

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9. It is accepted that the site is Green Belt but it is fully contained. The NPPF, in paragraph 80, identifies 5 purposes of Green Belt namely:
- a) to check the unrestricted sprawl of large built up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

In terms of these five purposes, the proposed allocation of this land would not conflict with a, b, d and e. This is because the proposed site is enclosed and bounded on roads on three sides and there is no ability to expand beyond the current boundaries. Its allocation would have no effect on the merging of towns for the same reason as above.

The land does not contribute to the setting or special character of the historic town of Warwick and (e) the Council has already indicated that there is insufficient brown field and other land available in any event. It is accepted that there would be some encroachment on the countryside but so will the allocation of all the other areas identified by the Council which are Green Field or Green Belt. We submit that this is a much better site than many others proposed by the Council for the principle reasons of:

- a) that it is enclosed and the ability for further development beyond is none;
- b) the proposed allocation south of Warwick is such a significant encroachment into Green Field land in relatively undefined areas and is far more damaging than a precise and enclosed and contained development on the Loes Farm site;
- c) it provides an opportunity to improve the allocation of public open space and access to the countryside on parts of the site which would not be developed and to improve public transport in this area;
- d) the landscape appraisal submitted by Pleydell Smithyman Limited on the 13th May 2013 clearly indicates that there are not adverse landscape issues and indeed there will be positive benefits; and

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- e) the Summary of Traffic and Transport Matters submitted by Banners Gate Highways and Transportation on the 16th August 2012 also indicates that the site is readily accessible in two locations. In contradiction to the significant allocation on the south of Warwick, this relatively small allocation would not have an adverse affect on infrastructure and sustainability.

We submit that the Draft Local Plan is incorrect and the allocation on Loes Farm should be reinstated.

Yours faithfully

BARLOW ASSOCIATES LIMITED



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