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Dear Sir / Madam

## **LAND AT KENILWORTH GOLF CLUB, CREWE LANE, KENILWORTH**

### **NEW LOCAL PLAN REVISED DEVELOPMENT STRATEGY PUBLIC CONSULTATION**

We write on behalf of Kenilworth Golf Club and Lands Improvement Holdings (LIH) in respect of Warwick District Council's (WDC) New Local Plan Revised Development Strategy consultation.

We welcome the opportunity to comment upon the policies and allocations set out in the New Local Plan. In particular, Kenilworth Golf Club and LIH are keen to ensure that the policies and allocations contained in the document are flexible and realistic to assist in meeting the needs of Kenilworth and the wider District.

This letter should be read in conjunction with the completed Revised Development Strategy Response Form which is also enclosed.

### **New Local Plan Revised Development Strategy Consultation (June 2013)**

The Revised Development Strategy (RDS) sets out WDC's proposed development strategy and site allocations for the New Local Plan. The document sets out WDC's housing requirements for the District and identifies the sites that it proposes to allocate to meet the identified housing targets. This includes the release of selected sites from the Green Belt to bring forward for development.

### **The Requirements of the National Planning Policy Framework**

The National Planning Policy Framework (NPPF) sets out clear advice on how Local Plans should be prepared. The following key statements from the NPPF provide the framework for how Council's should approach the preparation of Local Plans, particularly with reference to housing targets:

- Paragraph 47 confirms the need for local planning authorities to boost

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significantly the supply of housing by using 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, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

- Paragraph 151 states that Local Plans: “must be prepared with the objective of contributing to the achievement of sustainable development”. This includes ensuring that the Local Plan has a presumption in favour of sustainable development.
- Paragraph 154 identifies that Local Plans should be aspirational but realistic, and should set out opportunities for development.
- Paragraph 156 states that strategic priorities and policies within Local Plans should deliver the homes and jobs needed in an area.
- Paragraph 157 states that Local Plans should plan positively for the development and infrastructure required in an area.
- Paragraph 159 states that LPAs should ‘prepare a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA) to identify and meet the housing need over the plan period’.

It is clear that the NPPF promotes the preparation of flexible and positive Local Plans, which respond to the needs of the particular area and which are based on a robust evidence bases.

In this regard, we have a number of concerns with the policies included within the current draft RDS. The fundamental issue relates to the ability of the RDS and by consequence, the New Local Plan, to meet the full, objectively assessed needs for market and affordable housing within Kenilworth and the wider district. Further, the allocation of the sites identified (comprising a single site within Kenilworth) is insufficient to provide the flexibility required in the Local Plan to adapt to rapid change throughout its lifetime.

Our key concerns with the RDS and our suggested amendments are outlined below.

### **The Evidence Base**

As noted above at Paragraph 47, the NPPF confirms that LPAs must base their Local Plan requirements on their evidence base. WDC’s evidence base, in respect of housing requirements, is set out in the Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA).

WDC is currently preparing a Joint SHMA (see below), but it’s latest (and current) SHMA (March 2012) identified that between 11,300 and 14,300 new homes will be required between 2011 and 2031 (between 565 and 715 dwellings per annum), depending on whether existing levels of out-commuting continue.

Table 7.17 of the SHMA (March 2012) sets out a summary of the housing needs situation in Warwick District as a whole, and provides a breakdown of the need for the individual towns such as Kenilworth. Our summary of Table 7.17 is provided below.

**Table 1: Indigo Summary of SHMA Housing Need**

Location	2011 - 2031			2011 -2029		
	Annual	Total	% of Total	Annual	Total	% of Total
Kenilworth	115	2,300	16.5	115	2,070	16.5
Leamington / Warwick / Whitnash	528	10,560	75.6	528	9,504	75.6
Rural	55	1,100	7.9	55	990	7.9
<b>Warwick District</b>	<b>698</b>	<b>13,960</b>	<b>100</b>	<b>698</b>	<b>12,564</b>	<b>100</b>

Source: Table 7.17 of WDC's SHMA, March 2012

Based on housing need alone, the Council's SHMA identifies that a base total of 12,564 dwellings will be required in the District during the plan period 2011 to 2029. This includes 2,070 dwellings in Kenilworth.

However, paragraph 2.56, amongst others, of the SHMA (March 2012) states that forecast employment growth in the District is for 11,860 jobs over the plan period. Paragraph 2.57 thus states that if an adequate number of new homes are to be provided to accommodate the additional employees within the District, then 14,300 new homes would be required to 2031 (taking account of changes in the age structure of the population). This would equate to 12,870 new homes at 2029.

It is acknowledged that the District currently has a high level of out-commuting in that its residents travel elsewhere for work. Planning for a higher number of jobs / employment opportunities in the District, coupled with a higher level of housing growth, would go some way in reducing the level of out-commuting which will have obvious sustainability benefits.

In respect of Kenilworth, the SHMA goes on to conclude that, based on current needs and future population trends, 19% of the new housing within the District should be directed towards Kenilworth. This, therefore, suggests an additional need for new housing allocations in Kenilworth.

The table below clarifies the need identified in the SHMA under various scenarios in the 15 year period to 2029.

**Table 2: Assessment of Housing Need to 2029**

Source	District Housing Need Figure	Kenilworth Need @ 16.5% <sup>1</sup> of Total	Kenilworth Need @ 19% <sup>2</sup> of Total
RDS Figure	12,300	2,030	2,337
SHMA Base Figure	12,564	2,070	2,387
SHMA Figure, including employment provision	12,870	2,124	2,445

<sup>1</sup> Existing need as established in Table 7.17 of the SHMA and Table 1 of Indigo representations

<sup>2</sup> Projected housing need as identified in Council's 2012 SHMA

In summary, to meet the need identified in the SMHA, between 2,337 and 2,445 new units should be provided in Kenilworth. Notwithstanding this, and whatever way it is looked at, the Council's currently proposed allocation of 700 dwellings to Kenilworth is significantly short of the required level.

Moving forward, we note that WDC is working with other Councils in Coventry and Warwickshire to provide a Joint SHMA. The final allocations will need to reflect the Joint SHMA figures when they are made available.

### **Housing Allocations in the RDS**

The RDS at Policy RDS1 states that WDC is adopting an interim level of growth of 12,300 homes between 2011 and 2029, an average of approximately 684 homes per annum. It is important to note that, even at this level, this is an increase of 1,500 units from the previous draft of the Development Strategy (May 2012), which set out a requirement for 10,800 units over the plan period at an average of 600 units per annum. However, the Council has not allocated any additional sites to meet this increase with windfall sites and committed housing sites primarily identified to accommodate this increase in figures. This is a significant reliance on windfall sites.

Policy RDS4 identifies the broad location of housing development. It allocates 700 dwellings to the Thickthorn allocation on the edge of Kenilworth.

This level of housing growth for Kenilworth (700 dwellings) falls significantly short of the 2,070 dwellings identified in the SHMA (March 2012) that are needed to meet the objectively assessed need in the town. This shortfall of a minimum of 1,370 dwellings will be exacerbated if the need for additional homes is increased to accommodate additional employees in order to address out-commuting.

Indeed, if the 19% target for provision of housing in Kenilworth is to be achieved (of the base figure or higher figure to account for increased employment), the shortfall is even greater.

In summary, given that the housing target has not been set to meet objectively assessed need and demand, the New Local Plan cannot be considered sound in respect of housing land supply and the housing requirement for the District should be increased. Furthermore, the housing allocation for Kenilworth should also be increased to meet this objectively assessed need.

Moreover, this current target may be revised pending the completion of the Joint SHMA. The first stage of the Joint SHMA is likely to be reported in August 2013 and this needs to inform the preparation of the new Warwick District Local Plan.

### **Preferred Options for Broad Locations of Development**

Given the need for housing identified in the SHMA (March 2012) is significantly greater than the Council is currently planning for, it is clear that there is a requirement to revisit the housing targets and distribution for the District and following on from this, it will be necessary to consider and identify suitable locations for development.

In line with the need to plan positively and for the needs of the area, the Council should be aiming to accommodate the higher growth scenarios identified within the SHMA (March 2012). For this to happen:

- The Council needs to allocate further sites to accommodate the need that has been identified within the SHMA. Furthermore, this should be a flexible target to meet the higher growth scenario based on employment growth.
- In addition, Kenilworth needs to accommodate a higher proportion of housing to meet the identified need for housing in the town. The current proposed quantum of housing is significantly less than the level that the SHMA assesses is necessary for the town. In line with the need to plan positively and in accordance with the evidence base, Kenilworth needs to accommodate additional growth to respond to this identified demand.

The SHMA identifies demand to accommodate 19% of the District's new housing within the town of Kenilworth. As shown above, this equates to accommodating 2,445 new homes over the period from 2011 to 2029. This takes into account the higher requirement identified in the SHMA (March 2012) that will be required to accommodate additional employees.

This is the correct housing target for Kenilworth, but even if the Council were to be conservative and ignore the employment objective and continued to apply the 12,300 figure, Kenilworth should still be accommodating a minimum of 2,337 (19% of the District's need) new homes, rather than the 700 identified. The current allocation, therefore, falls significantly short of the identified need.

The proposed focus of new housing allocations at land south of Warwick and south of Leamington Spa will not adequately meet the identified need for future housing growth in Kenilworth and is not considered to be a sustainable distribution of development.

In short, the distribution of housing should to be revised in line with the available evidence base. Failure to address this point, by effectively ignoring the evidence base, fundamentally undermines the process and will lead to unsound plan-making.

### **Sites on Edge of Kenilworth and Housing Allocations**

Based on the evidence, it is clear that Kenilworth should be accommodating a much higher proportion of housing. Instead of the current figure of 700, the town should be accommodating between 2,337 and 2,445 new dwellings.

The Council is currently intending to allocate a site to the south east of the town, Thickthorn, as the sole site to accommodate housing growth of 700 units in Kenilworth.

On the basis that the town should, and needs to, accommodate at least 1,600 extra new homes, we consider that other suitable sites need to be allocated in or around the town.

Paragraph 5.4.22 of the current RDS notes that: “there are limited sites within the built-up area of Kenilworth in which to meet the housing and employment needs of Kenilworth”. On this basis, and given the shortfall in housing, other suitable sites need to be considered and which are not necessarily located within the built-up area.

The Council has identified that the Thickthorn site is a suitable location for the proposed housing growth. We have concerns about the deliverability, suitability and achievability of this site. In addition, the Council accept that the other potential locations are less suitable for housing development to accommodate the objectively assessed housing growth requirement for Kenilworth.

In this respect, the Kenilworth Golf Club site has already been identified by the Council as a potentially suitable site to accommodate housing growth for the town. The 2012 Strategic Housing Land Availability Assessment identifies that the site is potentially suitable for housing growth. It categorised the Golf Club as being as suitable as the currently proposed allocation at Thickthorn. This assessment was carried forward into the previous draft of the Development Strategy, identifying the land to the east of the town between the Thickthorn and Golf Club sites as the only potentially suitable location for new growth in Kenilworth.

In short, the Council accepts that the Golf Club site is, in principle, a suitable location for new housing development, and has previously identified it as having potential to meet Kenilworth’s housing needs.

The eastern fringe of Kenilworth has been identified as the most appropriate direction for housing development and this, together with the adjacent HS2 proposals, will change this part of Kenilworth to such a degree that the character of the natural and physical environment will be fundamentally altered. With this in mind, Kenilworth Golf Club will explore suitable sites for relocation of the club.

### **High Speed 2 (HS2)**

The RDS and other earlier Council documents do not mention the route of High Speed 2 (HS2), which passes north east of Kenilworth. Presumably, the acknowledgment of the suitability of the Golf Club site for housing in the SHLAA and the previous draft of the RDS was not predicated on HS2 coming forward. We now know the proposed route of HS2 will run directly north of the Golf Club site. As such, the route of the HS2 is a significant consideration in the Council's plan-making process. In preparing a coherent and logical long-term strategy for the town of Kenilworth, the route of the HS2 needs to be addressed by the Council. A key aspect of this is that the route of HS2 will provide a clear and defensible barrier to the town. This is in addition to the barrier that will be provided by the existing A46 to the east of the site. In effect, the combination of the HS2 and the A46 at this location will perform a similar, if not better, role to that of the A46 for the Thickthorn site by providing a physical barrier demarcating the urban area from the wider countryside.

HS2 will undoubtedly alter the character and landscape of north-east of the town around the Golf Club. This reinforces the site's suitability for development for housing and as an allocated development site for the town.

### **The Allocation of the Golf Club Site**

In order to address the shortfall in housing provision in Kenilworth, the Golf Club site should be allocated for housing. It can comfortably accommodate 750 to 1,250 units, together with other related uses. Given the topography, shape and ownership, it affords the opportunity to provide a well-planned, attractive and sustainable extension to Kenilworth. It can be comprehensively planned and managed such that it will integrate into the existing town and also provide new services and facilities to ensure the long-term sustainability of the new community.

As mentioned previously, we have concerns about the deliverability, suitability and achievability of the Thickthorn site while other potential housing sites are identified by the Council to be less suitable.

However, given the housing need in Kenilworth, we do not necessarily consider that the Golf Club site should come forward instead of the Thickthorn site. Indeed, both sites have very similar SHLAA Site Assessments. Both sites are easily accessible to the strategic transport network and both sites have, or will have, easily defensible barriers.

As such, both sites can come forward as part of a cohesive and planned

strategy for the town which will adequately meet housing demand. This solution would at the same time address any concerns regarding deliverability and more appropriately address the objectively assessed need for housing in Kenilworth. Both sites should be allocated in the RDS.

At the very least, even if the Golf Club site is not allocated now, the site should be released from the Green Belt and safeguarded for future housing development.

The Golf Club site currently serves a limited Green Belt function or purpose within the context of paragraph 80 of the NPPF. This limited function will be further eroded by the route of HS2. It will no longer form a cohesive part of the wider Green Belt or the countryside area.

It, therefore, offers a sensible and defensible location to meet the growth needs of the town. This will allow the Council flexibility and the ability to proactively manage housing growth in the town and the District.

### **Employment Land**

We note that the Thickthorn site will provide 8ha of employment land. We agree that this is a good location for an element of new employment land. However, given the suitability of the Golf Club site for new growth and to ensure that it provides a sustainable location in terms of contributing to the aim of retaining workers within the District, the Golf Club site would provide a suitable location for employment provision, particularly as a potential buffer zone to the HS2 route as part of a comprehensive masterplan. We consider that, with the housing growth, the site will have the critical mass to sustain employment uses and this will be in accordance with the Government's aim of promoting a balance of land uses within areas to minimise transport movement.

### **Summary**

The Council's current draft Development Strategy does not adequately meet the housing needs of the District, and is not based on the Council's own SHMA evidence base. As such, in its current format, the Local Plan cannot be considered sound.

For the document to be made sound, the Council needs to plan to accommodate 12,870 new homes in the District to 2029. This is a flexible and positive figure which allows the Council to marry its housing targets with its employment growth targets. With this change, this would provide for a coherent, and ultimately sound, document.

Further to this, the town of Kenilworth needs to accommodate a much greater quantum of housing than currently planned for. The SHMA confirms that the Council needs to be directing at the very least approximately 2,000, and as much as 2,445, new homes to Kenilworth. The Council is currently a long way short of this provision and, thus, is currently not allowing for a sustainable distribution of housing growth. For the document to be justified and consistent,



and ultimately sound, Kenilworth needs to accommodate a much greater level of housing.

To achieve this, there is a need to allocate additional sites in Kenilworth to accommodate the housing growth. The Kenilworth Golf Club site has already been identified as a potentially suitable location for housing growth in the Council's SHLAA. It has a similar level of suitability as the allocated Thickthorn site. The Golf Club site can accommodate much, if not all, of the additional housing need in Kenilworth together with employment land and, given its size, the site could be comprehensively planned to ensure it is delivered as a sustainable extension to the existing urban area.

The suitability of the site is reinforced by the route of the HS2, which will run directly to the north of the Golf Club. There is no doubt but that the impact of the HS2 will be significant. The character of the countryside in and around the Golf Club will be altered and the site will be severed from the wider countryside and its Green Belt function further eroded. The HS2 route will offer a defensible barrier to urban development in this area, allowing development to be controlled and managed effectively.

In summary, there is a clear and identifiable need for additional housing to be accommodated in Kenilworth to meet the growth requirements of the town and the wider District. Together with the Thickthorn site, the Kenilworth Golf Club sites are the most suitable locations in Kenilworth to accommodate this new housing growth.

The Golf Club site should be allocated for housing development in order to make the Local Plan sound. If it is not allocated at this stage, at the very least, it should be removed from the Green Belt so that it can come forward easily and without requiring a review of the Green Belt, when the Local Plan is reviewed going forward.

We trust that the representations outlined above will be taken into consideration by the Council. If you wish to discuss any of the comments made in further detail please do not hesitate to contact Ben Frodsham or me.

Yours faithfully



Sean McGrath

Enc: Completed Forms