

Representations on behalf of

Federal Mogul

on

Warwick District Council Village Housing Options and Settlement Boundaries Consultation

January 2014

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Comments on the Village Housing Options (January 2014)

prepared by Pro Vision Planning & Design

on behalf of

Federal Mogul

- 1.1 Our client OBJECTS to the Council's Preferred Option for the development of land to the east of Church Lane.
- 1.2 Our client's land ownership extends to approximately 30 hectares of farmland between Radford Semele and Sydenham.
- 1.3 It is considered that a 3 hectare parcel of our clients land adjoining the south-west edge of the existing settlement boundary of Radford Semele (identifiable as Discounted Option 4) represents a sustainable and appropriate location for new housing with good, safe and convenient access on foot to existing facilities and services in the village. Land to the east of Church Lane requires pedestrians to cross a busy main road to access local facilities on foot, including the Primary School.
- 1.4 Church Lane is currently unsuitable for a substantial increase in traffic which would potentially be generated from a development of this scale. A new vehicular access to the land east of Church Lane from Southam Road is less appropriate than an existing access. A new access to the land east of Church Lane from Offchurch Lane may have an adverse impact on the safety of the existing junction at Southam Road and Offchurch Lane.
- 1.5 Delivery of land to the east of Church Lane is reliant on a variety of measures that would need to be implemented before development could be considered acceptable.
- 1.6 Whilst further highways assessment is understood to be ongoing, there is no 'in principle' objection to the development of land south-west of Radford Semele in highways terms.
- 1.7 It is considered that the existing junction at Southam Road / School Lane has capacity for additional movements without adversely affecting highways safety. Further, there are multiple points of potential access to the land south-west of the village, off Spring Lane, Hamilton Road and Slade Meadow.
- 1.8 Land to the south-west of the village represents a logical rounding off of the existing urban area and <u>would not reduce the existing physical gap with Sydenham</u>. This is supported by the landscape capacity study prepared by Richard Morrish Associates (November 2012) which states that "*Smaller land parcels are suggested for possible development where there would seem to be potential to retain the separate identity of*

Radford" (paragraph 8.9). Figure B2 of the RMA study illustrates how development could be accommodated at Radford without compromising the settlement gap.

- 1.9 The gap between Radford Semele and Sydenham is an area of open countryside with natural features including a stream, hedgerows and tree belts. A public footpath crosses the land linking the village with Sydenham urban area.
- 1.10 To ensure the continued separation of Radford Semele from Sydenham/Leamington Spa, our clients remaining 27 hectares could be made available as open space that should be permanently managed and maintained to fulfil its role as a settlement gap. This potential area of open space could be delivered to provide a valuable part of the Council's proposed green infrastructure. Hence the gap would be protected, not threatened by the allocation of our clients land for residential development.
- 1.11 The Councils Site Appraisal (Appendix 6) identifies an existing 'abrupt' settlement edge in this location. Development of land to the south-west of the village provides an opportunity to reinforce the rural edge to the settlement, whilst preserving the gap between Radford Semele and Sydenham, and enhancing the landscape character of the area.
- 1.12 Notwithstanding the above, the suggested capacity of the Council's Preferred Option is not consistent with the Settlement Hierarchy (May 2013) which states a range of 100 150 dwellings should be developed in Radford Semele. Even if land to the east of Church Lane is allocated for 100 units, there is still capacity for additional development. Further, given the pressures faced by the District regarding the provision of new housing in a District which contains a large amount of Green Belt, it makes sense to develop additional housing in Radford Semele as it is not within the Green Belt and is acknowledged as being in a sustainable location.
- 1.13 Our client continues to support the inclusion of Radford Semele as a Primary Service Village in the settlement hierarchy.
- 1.14 Our client supports the Councils strategy set out in the previous consultation which stated that it is the Council's preference to:
 - Protect the Green Belt from development where alternative non-Green Belt sites are suitable and available;
 - Distribute growth across the District, including within and/or on the edge of some villages; and
 - Allow for a higher level of growth in larger, more sustainable villages with a reasonable level of services
- 1.15 Previous consultations highlighted considerable opposition to development in the Green Belt especially where alternative locations south of Warwick and Learnington Spa, which are outside of the Green Belt, are available. This is consistent with the NPPF (paragraphs 79-89).

- 1.16 Since the 2012 Consultation, further research relating to landscape, transport and employment has been carried out which supports the potential for concentrating more development in areas outside of the Green Belt.
- 1.17 This is welcomed, yet, on behalf of our client, we question the balance of development between that proposed to the north of Warwick and Leamington Spa, which is also located within the Green Belt, and that proposed to the south of these settlements, which is located outside of the Green Belt.
- 1.18 We consider that <u>less</u> development should be allocated to the more sensitive parts of the District, such as the Primary Service Centres at Cubbington, Hampton Magna, and Lapworth. The allocation of new housing to all Secondary Service Centres in the Green Belt such as Hatton Park, Leek Wootton and Bagington should also be removed or significantly reduced.
- 1.19 It follows that more development should be allocated to the Primary Service Centres outside the Green Belt such as Radford Semele.
- 1.20 In this respect the land to the south-west of Radford Semele scores highly. It is:
 - not in the Green Belt;
 - relatively unconstrained;
 - well served by local facilities and services (including a Primary School and recreation ground);
 - does not require pedestrians to cross a main road to access said local facilities and services;
 - has a range of existing employment opportunities;
 - is in a sustainable location close to public transport links;
 - could deliver large areas of public open space which would permanently protect the 'gap' between Radford and Sydenham.
- 1.21 Accordingly, we suggest that the allocation of proposed new housing in Radford Semele should be increased to approximately 200 250.