



hancocktownplanning

Our ref: HTP484le6

Head of Development Services
Warwick District Council
P.O. Box 2178
Riverside House
Milverton Hill
Leamington Spa
Warwickshire
CV32 5QH

Hancock Town Planning Ltd
Hope Cottage The Green Claverdon
Warwickshire CV35 8LL

Tel: 01926 843101

23rd June 2014

Dear Sirs,

Local Plan – Publication Draft

Development at Leek Wootton - land at The Warwickshire Golf and Country Club, Leek Wootton, CV35 7QT

Hancock Town Planning Ltd acts for The Club Company Ltd which owns The Warwickshire Golf and Country Club at Leek Wootton.

This letter accompanies the formal Representation Form which is enclosed and sets out in greater detail why we consider the Publication Draft Local Plan as failing to meet the test of “*soundness*”, as required by the relevant legislation.

In order to pass the test of soundness, paragraph 182 of the NPPF requires the Plan to be “*positively prepared, justified, effective and consistent with national policy*”. The NPPF states that in order to be “*justified*” the Plan should be “*the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*”. However, whilst we strongly support proposed allocation DS 11 H37, The Club Company does not consider the proposed strategy to be the most appropriate as it:

- “under allocates” housing to the village of Leek Wootton which is a sustainable location for future growth; and
- the methodology on which the proposed residential allocations at Leek Wootton are based, is insufficiently detailed and site-specific to be considered as proportionate and robust.

Under-allocation

Both the Revised Development Strategy and Village Options consultations proposed a total of 1,000 new dwellings within the rural area of the District. The level of provision within the rural area proposed in the Publication Draft has now fallen to 763 dwellings, equivalent to only 12.3% of the total identified requirement of 6,188 dwellings. The proposed strategy is therefore overwhelmingly urban focused and takes insufficient account of the housing need within the rural areas.

In particular, the village of Leek Wootton is proposed to receive a level of new housing provision which is significantly lower than other similar villages. For example, assuming a typical household occupancy rate of 2.4 persons per household, then the 150 additional houses proposed at Bishops Tachbrook is equivalent to a 14% increase in the village's 2011 population of 2,558. On the same basis, the additional housing at Radford Semele is equivalent to a 11.5% increase in population and that proposed at Radford Semele is equivalent to a 11.7% increase. The 45 homes proposed in the Plan at Leek Wootton is equivalent to a much lower 8.8% increase.

The question is therefore whether there is a robust reason for a lower level of housing provision at Leek Wootton.

Methodology for allocating sites at Leek Wootton

The justification for not allocating additional housing at Leek Wootton would appear to be based on the conclusions of the Landscape Sensitivity and Ecological and Geological Study, including the Update Report of April 2014. However, the Landscape Study which accompanied the Village Housing Options consultation of December 2013 stated in relation to landscape area LW 07 – which includes my client's land at The Warwickshire – that:

“Due to the use of this area as a golf course and the distance away from the main settlement the majority of this zone is not considered suitable for development. A small amount of linear development could be accommodated along the Warwick Road adjacent to the golf club entrance but this should not extend further west than the current building line of properties along the Warwick Road.”

The Landscape Study therefore previously indicated that small-scale development within the vicinity of the entrance could be acceptable in terms of landscape impact. As a result, The Club Company submitted representations showing how a modest development of 15 houses set much further into the site would have a much lower landscape impact than the frontage development which the Study had already indicated might be acceptable. A copy of the representation and the accompanying illustrative layout plan is attached at Appendix A for ease of reference.

However, the April 2014 Update of the Landscape Study which accompanies the Publication Draft Plan has now deleted the reference to possible frontage development within LW 07. **No reason is given for the revision.** The Study also does not contain any reference whatsoever to the landscape impact of the small development area at The Warwickshire which my client proposed for modest housing. The Landscape Assessment merely refers to the whole landscape appraisal area 'LW 07' being of high landscape value. For ease of reference, the report's plan of Landscape Area LW 07 is enclosed at Appendix B. The plan shows that LW 07 extends across a vast area, wrapping round two sides of the village and extending some distance into open countryside. Consideration of the potential for development within this extensive area is far too 'broad brush' to assess the site-specific landscape impact and appropriateness of the small-scale development proposed at The Warwickshire.

The conclusions of the Landscape Study that all land within LW 07 is of high landscape value has fed into all related reports, such as the Council's Sustainability Report, meaning that there has been no detailed site-specific consideration of my client's representation and the appropriateness of modest development of part of its land.

We also highlight that the Sustainability Report considers only the parcel of land previously put forward as part of the SHLAA process (site R127). This area of land extends to 5.12 ha and includes higher more prominent land within the northern part of the site. As with the Landscape Study, the Sustainability Appraisal includes no consideration of the specific proposal as indicated on the enclosed plan.

The Council has not therefore provided any written evidence that it has considered in proportionate detail the "reasonable alternative" to the strategy for development at Leek Wootton as set out in the Publication Draft Local Plan. As such, there is therefore no analysis of what we consider to be the advantages of the development of a small part of LW 07 which include:

- Access to the site would be easy and safe, provided via a junction off Deansway (the internal drive into the Club).
- A development of up to 15 dwellings could be set back into the site to ensure that The Warwickshire's undeveloped frontage is maintained.
- Any small-scale development within the site would be on the lowest lying part of the site, so ensuring limited visual intrusion.
- Selective tree planting could be implemented to enhance the landscape character of the surrounding land.
- The land is very well located in relation to the A46 which would be likely to be the focus of the majority of work-related traffic movements to and from any new housing at Leek Wootton.
- This part of the Warwick Road frontage already benefits from street lighting and a footpath.
- Bus services pass directly outside the site.
- The land has no agricultural or other purpose and so its development would not result in the loss of productive farm land.
- Development would be very well related to the key element of village community infrastructure, the All Saints' Church of England Primary School which lies opposite the site.
- By contrast, the proposed housing sites H35 The Paddock and H36 Former Tennis Courts at Leek Wootton rely on using Woodcote Drive which would have to be widened in places and currently does not have a footway running along its length. Moreover, visibility at the junction with Warwick Road is poor and we note the conclusions of the Leek Wootton Parish Plan which specifically highlights the need for improved safety at this junction. These concerns are exacerbated by the uncertainty over the future of the Police HQ building as a more intensive form of commercial occupation of this building is entirely possible.

The impact of vehicle movements associated with any new housing in the vicinity must therefore be considered alongside the possibility of an intensified form of occupation of the Police HQ. Loading a large number of vehicle movements onto this junction is not appropriate when there is alternative suitable land available at The Warwickshire which offers excellent vehicular access.

We therefore consider that the methodology on which the site selection for proposed housing at Leek Wootton is based is flawed and inadequately justified.

In making our representations against the soundness of the Plan, The Club Company wishes to express its strong **SUPPORT** for the principle of Proposed Housing Site DS11 H37, Car Park East of The Hayes. The Club Company confirms that it has no operational need for this car park. Whilst the car park is used on a casual basis by dog walkers, this is on a permissive basis by the company with no established use rights.

We therefore request that our views be taken into account when preparing the Submission version of the Local Plan.

Yours faithfully,

A handwritten signature in black ink that reads "J. Hancock". The signature is written in a cursive style and is underlined.

Joel Hancock BSc (Hons) MSc MRTPI



hancocktownplanning

Our ref: HTP484le4

Head of Development Services
Warwick District Council
P.O. Box 2178
Riverside House
Milverton Hill
Leamington Spa
Warwickshire
CV32 5QH

Hancock Town Planning Ltd
Hope Cottage The Green Claverdon
Warwickshire CV35 8LL

Tel: 01926 843101

FAO Stephen Hay

4th February 2014

Dear Sirs,

Village Housing Options Consultation

Development at Leek Wootton - land at The Warwickshire Golf and Country Club, Leek Wootton, CV35 7QT

Hancock Town Planning Ltd acts for The Club Company Ltd which owns The Warwickshire Golf and Country Club at Leek Wootton.

We have previously submitted representations in response to the Council's Preferred Options for Leek Wootton (see HTP letter HTP484le4 dated 19th December 2013). Our representations expressed:

- support for Preferred Option 5, "*informal car park*", at The Warwickshire (labelled Site B on the enclosed plan), and
- objection to the non-allocation of part of Discounted Option 7 for modest residential development (labelled Site A on the enclosed plan).

Our representation advised that The Club Company was in the process of preparing a draft indicative layout showing how land at The Warwickshire could be sensitively developed. We now have pleasure in enclosing a draft layout for 19 houses at the site, comprising 4 on the car park site and 15 on land to the north of Deansway (the site access). A copy of the plan has also been sent to Leek Wootton Parish Council for information and comment.

In preparing the layout for your consideration, we have paid particular attention to:

- Avoiding an over-intensive development of the car park site that might detrimentally affect the approach to the Club, as well as the amenity of adjacent occupiers.
- Keeping the front part of the Club's land free from development, so maintaining an open frontage to the Warwick Road and the approach to the village.

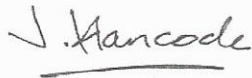
- Avoiding, as far as possible, development on the higher ground to the north.
- Judicious use of tree planting and landscaping to soften the appearance of the new development when viewed from the Warwick Road and other locations.
- Provision of a number of parking spaces that could be made available for public use (dog walkers, visitors to the school etc.).
- Maintenance of the alignment of the public footpath running north from Deansway to the village.

The plan is submitted to inform the debate about the most appropriate location for new development, and to re-assure both the District and Parish Councils that development within this area need not be damaging to the landscape or visually oppressive.

We would therefore be grateful if you could please consider the enclosed plan in your preparation of the Submission version of the Local Plan.

Please do not hesitate to contact me should you require any additional information or would like to discuss our proposals in greater discussion.

Yours faithfully,


J. Hancock

Joel Hancock BSc (Hons) MSc MRTPI



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revisions

project: THE WARWICKSHIRE GOLF AND COUNTRY CLUB
 PROPOSAL FOR 19 HOUSES - FOR DISCUSSION ONLY
 client: THE CLUB COMPANY (UK) LTD
 drawing title: LOCATION PLAN

date: 22.01.2014
 scale: 1:1250@A3
 drawing no.: 350/01.3



hancocktownplanning
 Hope Cottage The Green Claverdon Warwickshire CV35 8LL
 Tel: 01926 843101 Mobile: 07881 818621
 joel@hancocktownplanning.co.uk

Our ref: HTP484le4

Head of Development Services
Warwick District Council
P.O. Box 2178
Riverside House
Milverton Hill
Leamington Spa
Warwickshire
CV32 5QH

19th December 2013

Dear Sirs,

Village Housing Options and Settlement Boundaries Consultation

Development at Leek Wootton - land at The Warwickshire Golf and Country Club, Leek Wootton, CV35 7QT

Hancock Town Planning Ltd acts for The Club Company Ltd which owns The Warwickshire Golf and Country Club at Leek Wootton.

Leek Wootton Preferred Option 5, The Warwickshire Golf and Country Club

The Club Company wishes to express its strong **SUPPORT** for the principle of Preferred Option 5, "*informal car park*" at The Warwickshire Golf and Country Club.

If the allocation is confirmed, The Club Company anticipates the development of approximately five high quality detached homes on the site. Care would be taken to ensure the design of the properties reflects the local vernacular and palette of materials.

We note that the detailed appraisal of the land set out in Appendix 6 to the Consultation Document states that TPOs are "*near the rear of the site*". However, this relates to the area of land known as the 1926 Arboretum to the south which, at its nearest point, is almost 20 m from the car park site. Therefore, given this distance and the fact that the southern part of any development of the car park site would be likely to be laid out as garden, there is no reason why the Arboretum area should pose any significant constraint to development.

We also note that the site appraisal notes that this site is a "*well used car park*". For clarity, the Club Company confirms that it has no operational need for this car park. Whilst the car park is used on a casual basis by dog walkers, this is on a permissive basis by the company with no established use rights.

The Company is currently commissioning a draft indicative layout showing how the car park site could be developed and hopes to submit this to the Council for discussion shortly.

Non-allocation of part of Discounted Option 7 - land north of site entrance at The Warwickshire

The Club Company wishes to **OBJECT** to the non-allocation of part of Discounted Option 7 for modest residential development.

Having reviewed the supporting information to the Consultation, we note that concern has been expressed regarding the potential landscape impact of development of this site, particularly on the elevated section to the north. However, consideration needs to be given to smaller-scale development which would maintain a sense of openness along the frontage. We note the summary of the landscape character assessment which states:

“Due to the use of this area as a golf course and the distance away from the main settlement the majority of this zone is not considered suitable for development. A small amount of linear development could be accommodated along the Warwick Road adjacent to the golf club entrance but this should not extend further west than the current building line of properties along the Warwick Road.”

The Council’s own landscape assessment has there indicated that small-scale development within the vicinity of the entrance could be acceptable in terms of landscape impact. Such a scheme might be for between only 5-15 dwellings. In urging the Council to support such an approach, we highlight that the development of a small area of Discounted Option Site 7 would have the following advantages:

- Access to the site would be easy and safe, provided via a junction off Deansway (the internal drive into the Club).
- A development of 5-15 dwellings could be set back into the site to ensure that The Warwickshire’s undeveloped frontage is maintained.
- Any small-scale development within the site would be on the lowest lying part of the site, so ensuring limited visual intrusion.
- Selective tree planting could be implemented to enhance the landscape character of the surrounding land.
- The land is very well located in relation to the A46 which would be likely to be the focus of the majority of work-related traffic movements to and from any new housing at Leek Wootton.
- This part of the Warwick Road frontage already benefits from street lighting and a footpath.
- Bus services pass directly outside the site.
- The land has no agricultural or other purpose and so its development would not result in the loss of productive farm land.
- Development would be very well related to the key element of village community infrastructure, the All Saints’ Church of England Primary School which lies opposite the site.

We also highlight our concern that the advantages of the site are not adequately reflected in the Sustainability Appraisal as set out in Appendix 6 of the Consultation Documents. In particular, we note that the Preferred Option Sites 1-4 are more distant from the core of the village, bus services and the village school. The sites are also served by a constrained access and no footways. These sites, however, have the same sustainability score on "*Sustainable Transport / Reduce the Need to Travel / Local Services and Community Facilities*" as the Club Company's land which has excellent access and is adjacent to a bus stop and the village school. We therefore respectfully ask that this scoring be reviewed.

Leek Wootton Preferred Options 1-4, Woodcote Drive

The Club Company wishes to **OBJECT** to Preferred Options 1-4 for the reasons set out below.

The individual site appraisal for Preferred Option 1 as set out in Appendix 6 of the Consultation confirms that an access onto Woodcote Lane cannot be achieved due to inadequate visibility splays. This means that a combined total of 80 dwellings would have to be accessed via Woodcote Drive. As acknowledged in the report, Woodcote Drive would have to be widened in places and has no footway. Given the distance of the sites from the village core, the lack of a footway means that any new development would be poorly integrated with the village. However, if it were possible to provide a footway, this would have a significantly urbanising impact on the rural character and the approach to an important listed building (Woodcote House).

Assuming an average trip generation of 7 movements per dwelling, the provision of 80 dwellings in these locations would result in around 560 movements using the Woodcote Lane / Warwick Road junction. Visibility at this junction is poor and we note the conclusions of the recently published Parish Plan which specifically highlights the need for improved safety at this junction. Loading a large number of vehicle movements, including large construction vehicles, onto this junction is not appropriate when there is alternative suitable land available at The Warwickshire which offers excellent vehicular access.

Whilst re-use of the main Woodcote House building seems sensible, Preferred Option 4 proposes 12 new-build units within the grounds of the House. This new-build element is inappropriate given the site's distance from the main village envelope. We highlight that Woodcote House is more distant than the village than Discounted Option 6 which was not pursued due to its remoteness from the village. Preferred Option 4 should therefore be amended to exclude any new-build development.

Preferred Option 1, land south of Hill Wootton Road, Hill Wootton

The Club Company wishes to **OBJECT** to this Preferred Option as it is a greenfield site in a highly unsustainable location. Hill Wootton has no facilities whatsoever, no public transport and is one mile distant from Leek Wootton with the roads having no footways. Therefore, any future occupants of the site would be totally car dependant, contrary to the core objective of the NPPF.

The housing need at Leek Wootton should be met by sites within or on the edge of the village where future occupants can access its facilities by foot and where there is access to regular bus services.

We therefore request that our views be taken into account when preparing the Submission version of the Village Options Document.

Please do not hesitate to contact me should you require any additional information or would like to discuss our proposals in greater detail.

Yours faithfully,

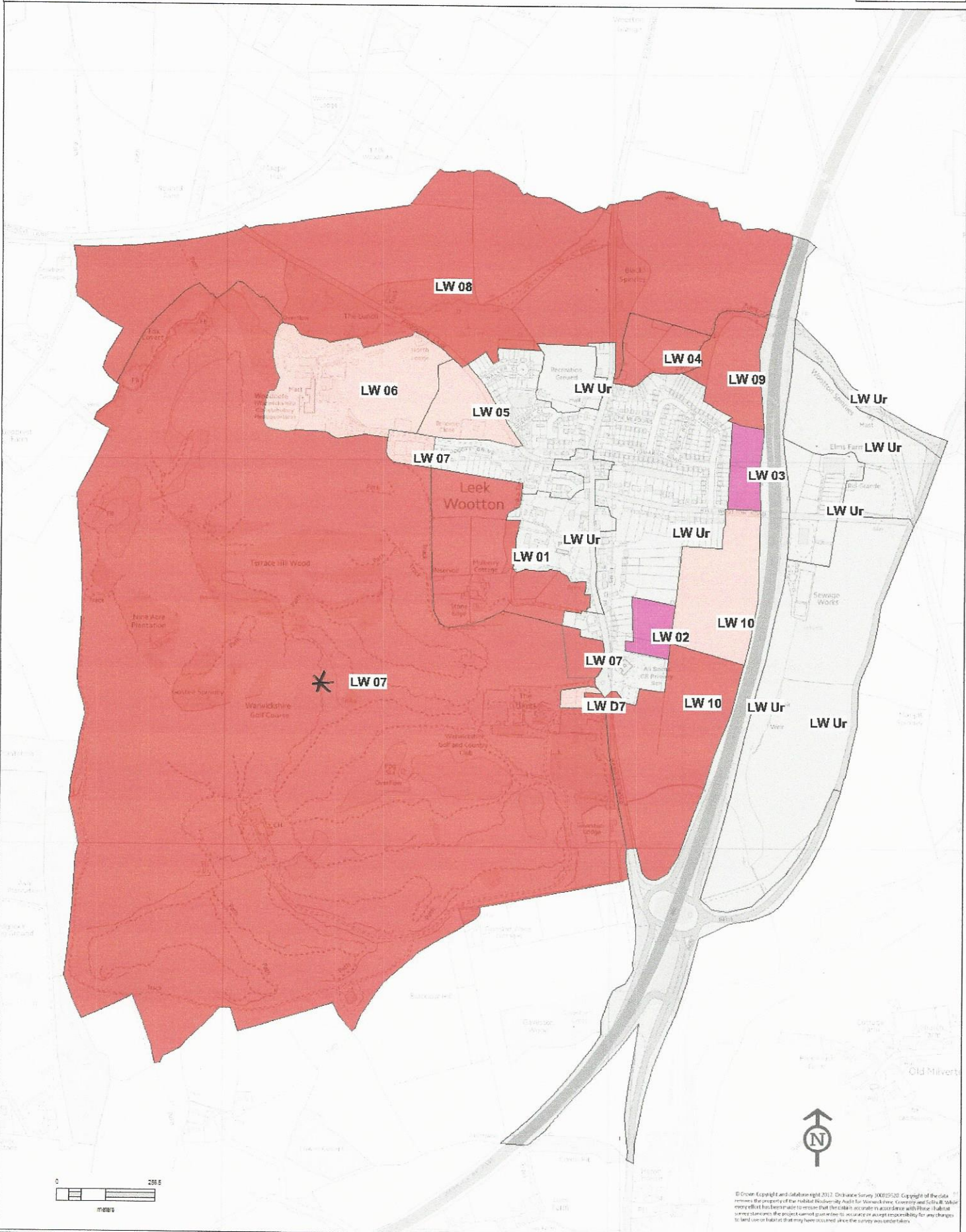
J. Hancock

Joel Hancock BSc (Hons) MSc MRTPI



HABITAT BIODIVERSITY AUDIT
Warwickshire Historic and Natural Environment
Barrack Street
Warwick
CV34 4TH
Tel: 01926 412 197
Email: hba@warwickshire.gov.uk

LEEK WOOTTON LANDSCAPE SENSITIVITY TO HOUSING DEVELOPMENT



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Sensitivity to Housing Development

- High
- High/Medium
- Medium
- Medium/Low
- Low
- Not recorded

LCP

- Zone