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Planning Policy
Warwick District Council
Riverside House
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Leamington Spa
CV32 5HZ

20th April 2016

Representation to the consultation on the Warwick District Local Plan Schedule of Proposed Modifications

These representations have been prepared by Hunter Page Planning on behalf of our client Bellway Homes (West Midlands) Ltd in relation to the Proposed Modifications (February 2016) to the Emerging Local Plan. Bellway Homes have a legal interest in the Allotment Land, Rugby Road (H25) Land opposite Willow Sheet Meadow (H26) and Land East of Cubbington (H50) and these representations principally relate to their land interests at Cubbington.

In December 2014, representations were submitted on behalf of Bellway Homes which identified uncertainty over the housing land supply position and, as a result, concluded that the draft Warwick District Local Plan (WDLP) was unsound. We also identified our support for the release of sites H25 and H26 from the Green Belt in Cubbington in order to support the Council's ability to meet an appropriate housing requirement. Bellway Homes would like to reiterate their support for the release of these sites from the Green Belt and their allocation for residential development.

This letter comments on the most recent changes set out in the Schedule of Proposed Modifications dated February 2016 but will draw on the Inspectors initial findings as reported on 1 June 2015. This letter provides further detail on Bellway Homes support for the proposed modifications relating to Green Belt release and Housing Delivery.

Proposed Modifications

Bellway Homes support the fact that land should be released from the Green Belt in sustainable locations to meet development needs to 2031. It is considered that the release of these Green Belt sites is consistent with the emerging local plan's strategic objectives for the provision of housing and will allow the Council to meet its objectively assessed housing needs.

Bellway support modification 3 which revises the wording to state that sites for housing should generally be located on the 'edge of built up areas' in sustainable locations.

Furthermore, as a result of the Inspector's report, additional site allocations have been proposed to address the Inspector's concerns over the reliance on windfall sites and the need to provide for an adequate housing land supply with a degree of flexibility as well as the requirement to accommodate a proportion of unmet needs from Coventry and to put forward additional site allocations or broad locations for growth.

Paragraph 83 of the National Planning Policy Framework (the Framework) advises local authorities that they should review their green belts as an integral part of the Local Plan process. Bellway agrees with the Council's approach to the review of green belt boundaries in order to ensure that settlements can grow appropriately in sustainable areas. Paragraph 84 of the Framework also requires sustainable development considerations to be taken into account when considering Green Belt matters. Bellway consider that the Green Belt should also not be treated as a near absolute constraint, and reiterate that it is a planning policy tool which can and should be varied in order to meet development needs.

In accordance with the above, the proposed modifications have included the release of further sites from the Green Belt. Map extracts within the Proposed Modifications to the Policies Map document (Mod PM13) have also been updated. Bellway support the modifications made and in particular supports the addition of Policies Map 13 and its identification of the Land East of Cubbington (H50) as a new housing allocation including its removal from the Green Belt. The removal of the site from the Green Belt and its allocation for residential development will assist the Council in meeting its housing need in sustainable locations on the edge of built up areas and ensuring an adequate supply of housing land.

Cubbington is identified as a Category 2 village where some development is required to support existing services and encourage new services. Land East of Cubbington is a highly sustainable and logical location for contributing to meeting the identified growth needs of the District, and its inclusion under Policy DS11 as an allocated housing site is fully supported. Bellway consider that the allocation of just 95 dwellings on a site that is 11.76ha in area is too low, and that this should be seen as a minimum until detailed technical work to establish the capacity of the site has been completed. This is essential to ensure the best and most efficient use of land being taken out of the Green Belt.

In summary, Bellway consider that exceptional circumstances exist to justify the release of land from the Green Belt. As acknowledged by the Council these circumstances relate to the need for housing and affordable housing, the lack of availability of non-Green Belt land¹ and the Council's spatial strategy over the plan period. We also note and support the amendment made to paragraph 2.37 and 2.38 which states that where there are no suitable non-Green Belt alternatives to meet an identified need, sites are removed from the Green Belt to enable development to take place.

Developable and Deliverable

The National Planning Policy Framework states that for sites to be considered 'developable' they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

¹ As the emerging Local Plan identifies, the vast majority of the District's rural area is located within the West Midlands Green Belt, with only the area to the south of Warwick, Whitnash and Royal Leamington Spa lying outside the Green Belt.

To be considered 'deliverable' the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, that development of the site is viable. In respect of sites H25, H26 and H50 those tests are addressed as follows.

Suitable

The sites are not subject to any special landscape designations and are relatively free from physical constraints. The sites are all located in Flood Zone 1 (lowest risk). The sites are also not subject to any special wildlife or nature conservation designations.

The village is located about 1.6 miles to the east of Leamington Spa. It is well served by public transport and community facilities (including a shop, post office, public houses, primary school, nursery and a church).

Site H50 is located adjacent to the Local Shopping Centre at Rugby Road, Cubbington. The site is located around 500m from the nearest school (Cubbington C Of E Primary School) and around 1.8km from a GP (Cubbington Road Surgery). It is also acknowledged that the route of HS2 lies only one field beyond the H50 site boundary. This therefore limits the weight that can be applied to the role site H50 plays in safeguarding countryside from encroachment.

The development of sites H25, H26 and H50 in Cubbington will provide benefits to the wider community through the injection of new investment into the local area as well as supporting the existing community facilities.

Available and Achievable

As identified earlier, Bellway has a legal interest in sites H25, H26 and H50 and there are no overriding constraints that would delay commencement of development on the sites. Development of the sites is viable and achievable, with a realistic prospect that housing will be delivered on these sites within five years.

Conclusions

A number of the proposed modifications seek to address the Council's lack of 5 year land supply and address the issues raised by the Inspector in his initial findings. In summary, Bellway Homes fully support the Council's proposed modifications with specific regard to the release of Green Belt sites through the Local Plan and in particular the proposed allocation of the site referred to as H50 for residential development purposes, although we would question the relatively low number of dwellings allocated to this site and would request that this is viewed as a minimum until further technical work has been completed to assess its capacity. It has been demonstrated that sites H50, H25 and H26 are suitable, available and achievable for residential development. The proposed modifications are supported and considered to be legally compliant and sound.