

11th March 2019

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

By email only: planningpolicy@warwickdc.gov.uk

Dear Sir/Madam,

**Public Open Space Supplementary Planning Document – Consultation Draft January 2019
Former Sewage Works, Harbury Lane, Leamington Spa
Northern Trust**

Introduction

On behalf of our client, Northern Trust, we hereby formally submit representations to the Public Open Space (POS) Supplementary Planning Document (SPD). Northern Trust would like to provide some general comments, having a particular interest with the land which is being promoted to the south of Harbury Lane, Leamington Spa.

Northern Trust are working on behalf of MLPL Ltd in delivering residential development on the former sewage works site to the south of Harbury Lane.

Work is underway to bring forward residential development on this site and both Northern Trust and MLPL are working closely with the Council to ensure that this site is delivered.

The Site

The site comprises 13.2 hectares of previously developed land (see Figure 1) associated with the former sewage works. The site has since become overgrown but there is still clear evidence on the surface of the former use of the site.

The site is allocated in the adopted Local Plan under Policy H02: Land to the south of Harbury Lane for residential development. This allocation, as a whole, will deliver over 1,800 new residential dwellings for Leamington Spa. This site is also referred to in Policy DS11 Allocated Housing Sites as an Urban Brownfield Site. The policy lists the infrastructure required for this site and for sewage works site, land towards the Tachbrook Country Park will be required to be delivered. The Country Park is also referenced under Policy DS13.

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Figure 1 – Red Line Plan of the Site



Comments on the draft Public Open Space Supplementary Planning Document

The following provides comment on the draft POS SPD which is currently out for public consultation. Firstly, Northern Trust would like to set out their support of the SPD. This draft POS provides up-to-date clarification as to what POS is required to guide new development, which Northern Trust welcome and support. However, Northern Trust have a few specific comments to make with regards to the draft POS SPD which are detailed below.

Flexibility of POS typologies

Northern Trust welcome the Council’s flexibility with regards to the POS typologies that can come forward as part of developments within the District. However, it is considered that there needs to be a greater degree of flexibility in the cases of large strategic sites (such as this one) which forms part of allocation H02 South of Harbury Lane. The draft SPD suggests that ‘a degree of flexibility’ will be appropriate with regards to the individual types of space however in the case of large strategic sites of this nature, a greater level of flexibility should be permitted which is agreed on a site-specific basis.

Allocation H02: Land at Harbury Lane, is being delivered in individual phases and being developed by a range of different developers/housebuilders. In light of this, to ensure that an appropriate site wide public open space strategy/solution is delivered, there needs to be more flexibility for large sites. This allocation will deliver over 1,800 dwellings and as such it is considered necessary for each development phase to provide a mix of open space typologies that reflects the overall public open space strategy for the wider site and that complements the surrounding phases, rather than just repeating the same type and level of POS across each phase. This would ensure that the POS provided, addresses the particular development’s requirements rather than filling a pre-determined requirement that may not be wholly appropriate at that time or in that location.

Distance of off-site Provision

Northern Trust have some concerns with regards to the suggested distances set in the draft SPD to access off-site POS. The draft SPD suggests that where POS is provided off-site, an appropriate walking distance to access this POS is 480m. It is considered that the walking distance to off-site provision should depend upon the type of open space that is being provided as opposed to setting a specific distance.

In some cases, a greater distance may be more appropriate given that the POS provided is a higher quality. Take for example the provision of allotments; if a scheme is providing an off-site provision of this typology, it would be appropriate for these allotments to be located further than 480m from the site given that people would generally be willing to travel further for such facilities and recognising the need to cluster facilities together to provide an appropriate concentration of such uses. The draft should be amended to state that an appropriate walking distance to off-site POS will depend on the typology or open space and the nature of the proposed development as agreed with the local planning authority.

Phased Development

Northern Trust welcomes the recognition of having a different approach for phased development as set out in the Design Guidance at Appendix 2 however it is considered that this should be replicated within the main body of the SPD to ensure that the SPD is clear that phased developments should be considered differently to standalone single phase development sites.

Northern Trust have some concerns with regards to the need to provide detailed Public Open Space design at the outset of a development. As stated in the document;

'If a site is likely to be developed in phases and, or by more than one developer, a detailed site wide POS design is required for approval at the outset. This is to ensure a well-designed, joined up and cohesive POS offering'.

Northern Trust disagree with this as it sometimes not possible or appropriate to prepare a detailed design for a development, particularly a large-scale development, where other phases or parcels have not well progressed or limited work has been carried out regarding their potential scope to deliver new homes. Nevertheless, Northern Trust recognise the importance of having an agreed open space approach at the outset when delivering a strategic site and therefore it is recommended that this text is amended to require an open space framework to be prepared at the outset (as opposed to a detailed design). This framework should be developed and discussed with all willing landowners and developers to ensure that it can be delivered/brought forward.

Hubs for Sports Pitches

Northern Trust welcome and support the creation of hubs for sports pitches rather than piecemeal delivery. Individual sports pitches result in the inefficient uses of POS and the under-use of sports pitches as well as management difficulties/issues. By creating a hub, the sports pitches will be more successful and it is agreed that they are more successful when clustered together.

We trust the above representations are clear but should you have any questions, please do not hesitate to contact me. Otherwise, please keep us informed of any further consultations using the contact details below.



Yours sincerely



Kate Lowe
Senior Planner

