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Dear Sirs

WARWICK LOCAL PLAN PREFERRED OPTIONS DOCUMENT MAY 2012 LAND AT GOLF LANE/FIELDGATE LANE, WHITNASH

On behalf of our client, Richborough Estates Ltd, we thank you for the opportunity to submit representations to the Local Plan 'Preferred Options' consultation document (May 2012). Richborough Estates are promoting a 4 hectare site at Golf Lane/Fieldgate Lane to the south of Whitnash on the periphery of the urban area (refer to site plan enclosed).

For the avoidance of doubt, our comments are made on the assumption that the options set out within the Preferred Options document are statements of 'policy intent' and that the precise policy wording will be refined following this consultation exercise.

Site Characteristics

The Golf Lane/Fieldgate Lane site is a greenfield parcel of land measuring 4 hectares in size. The site is located to the south of Whitnash and is accessed from Fieldgate Lane. The site slopes gently uphill from north to south and is bounded by a railway line to the west, Leamington County Golf club to the east and existing housing stock to the north (refer to plan enclosed).

Preferred Options Strategic Objectives

In response to the strategic objectives set out within the consultation document, we support the inclusion of paragraph 2.5 and the overarching commitment to deliver a range of new housing in sustainable locations across the District. We also wish to highlight that housing plays an important role in underpinning new economic development and also in supporting existing services and facilities. Overall, this strategic objective is considered to be consistent with paragraph 50 of the National Planning Policy Framework (NPPF) document which highlights a need to deliver a wide choice of high quality homes and widen opportunities for home ownership.

Housing Growth & Location

Paragraph 47 of the NPPF requires local authorities to effectively assess the full needs for housing in the Housing Market Area (HMA). The District Council appears to have prepared a Strategic Housing Market Assessment (SHMA) that considers the needs of the District only. This is a fundamental flaw in the Council's approach, which could raise issues about the soundness of the plan. This needs to be rectified prior to producing the Submission version.

On this basis, we therefore neither support nor object to the proposed level of growth proposed in PO1 since the evidence is lacking. We do however note that the level of growth proposed is broadly in line with the recommendations of the West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel (2009) and welcome the Council's commitment to work with neighbouring authorities to ensure that the plan is found to be sound. As the Council will be aware, the duty to co-operate is a fundamental requirement of the NPPF.

In terms of the location of future development, we support PO3 '*Broad Location of Growth*' and in particular the reference made to concentrating growth within, and on the edge of, the existing urban areas. Furthermore, paragraph 7.10 rightly identifies that there is limited availability of brownfield land in the District and acknowledges that greenfield land will be required to meet housing needs.

On the assumption that the figure of 10,800 new homes is correct (and we are not saying that it is), allowing for commitments and windfall sites, we acknowledge that the balance to be allocated in the plan is 6,986 new homes. We also note that the housing capacity of the sites identified in PO4 (8,360 new homes) is some 1,374 homes greater than the actual requirement over the plan period (8,360 – 6,986). In the context of paragraph 183 of the NPPF, which outlines the role of Neighbourhood Plans, the overall target for the delivery of new homes should be expressed as minimum figure rather than an absolute target, therefore providing a greater degree of flexibility for the Council.

Notwithstanding the above, we welcome the inclusion of the Golf Lane/Fieldgate Lane site as an allocated housing site as set out by PO4. It will play a key role in achieving the plan's objectives, being significant in size but small enough to be delivered without the need for costly infrastructure works. It should, however, be noted that the site is 4 hectares in size, is unconstrained and is therefore more likely to have a development capacity in the region of 100-110 units (allowing for some on-site public open space and landscaping) rather than 90 units as set out in the associated table. We do however agree that this is a phase 1 site which is available and could be delivered immediately.

In terms of the wider portfolio of sites identified for development in PO4, we note that over 60% of the housing required on the edge of Warwick, Leamington and Whitnash areas has been identified on just three sites. Whilst we have no specific objection to the inclusion of these sites, it does seem to us that there is an over-reliance on a small number of sites to meet the requisite number of homes over the plan period.

In view of the above, the continued inclusion of smaller deliverable sites in sustainable locations such as the Golf Lane/Fieldgate Lane site is of strategic importance if housing needs are to be met within

the plan period. The housing trajectory figures as set out in table 7.1 further illustrate this point, demonstrating how the smaller deliverable sites are likely to come forward in the early years, with the larger sites making up the deficit towards the middle/end of the plan period.

With regard to the structure of PO4, the relationship between points A (allocated sites) and C (development on Brownfield land) needs to be clarified, as it appears to suggest that the Council will be looking to introduce a policy that promotes the development of brownfield sites before the allocated sites. Paragraph 17 of the NPPF promotes the effective use of land by reusing land that has previously been developed, but does not go as far as suggesting that brownfield sites should be prioritised over the release of greenfield. In determining an appeal for residential development in Worsley (appeal reference APP/U4230/A/11/2157433), the Secretary of State confirmed the approach set out in paragraph 17 of the NPPF and stressed the importance of achieving sustainable development to meet identified needs rather than a sequential approach to land use.

In terms of previous site assessments, the 2011 Strategic Housing Land Availability Assessment (SHLAA) recognised the development potential of the site, subject to assessment/mitigation of transport safety concerns. To address these concerns, Richborough Estates has commissioned a further assessment, which was undertaken by 'PTB Transport' in July 2012. The assessment concluded there have been just three slight injury accidents at the Whitnash Road/Golf Lane junction in the last 6 years, which is regarded to be low. To supplement this information, an Automated Traffic Counter (ATC) speed survey was undertaken which shows that 85th percentile traffic speeds along Whitnash Road are 29.81mph Northbound and 28.15mph Southbound, which again suggests that the road is safe. With regard to visibility splay requirements, the calculation indicates that the required visibility distance along Whitnash Road is 39.8 metres to the south and 36.5 metres to the north, for northbound and southbound traffic respectively. The desired splay requirement is easily achievable at the Whitnash Road/Golf Lane junction within the existing highway. This further serves to demonstrate the deliverability of the site from a highway perspective and reaffirms the continued inclusion of the site under PO4 '*Distribution of Sites for Housing*'.

In addition to the above, a Landscape Review was undertaken by 'One Creative Environments Ltd' in 2011. This assessment concludes that subject to careful consideration to the design and layout of the site, there were no other landscape and visual constraints to development. Overall, the site is considered to be a well defined and contained parcel of land, directly associated visually to the existing residential development adjacent. More importantly, it was concluded that development would not lead to an ongoing gradual creep of urbanisation in a southerly direction.

Affordable Housing

With regard to PO5 '*Affordable Housing*' we support the flexible approach and in particular the need to take into consideration the different nature of development sites and locations within the district. This approach is consistent with paragraph 50 of the NPPF, which highlights that affordable housing policies should be sufficiently flexible to take account of changing market conditions over time.

Conclusion

As set out above, the site is sustainable, available and deliverable and could be developed without detriment to highway safety or the character of the area. The site, albeit small in comparison to the strategic housing sites within the District, will play an important role in delivering the much needed housing in the early years of the plan period should continue to be allocated for housing in the emerging plan.

We trust you find the above representations helpful and look forward to receiving confirmation that they have been considered. If you require any further information, then please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'S Louth', written in a cursive style.

Steve Louth
Associate Director

CC: Paul Campbell – Richborough Estates Ltd