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Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

Robert Linnell
E: rlinnell@savills.com
DL: +44 (0) 1865 269042
F: +44 (0) 1865 269001

Wytham Court
11 West Way
Oxford OX2 0QL
DX 96205 - Oxford West
T: +44 (0) 1865 269 000
savills.com

Dear Sir/Madam

**Local Plan - Preferred Options Consultation
Representations on behalf of Gleeson Developments Ltd and The Sundial Group Ltd**

Savills is instructed by Gleeson Developments Ltd (Gleeson) and the Sundial Group Ltd (Sundial) to submit the following representations in relation to the above consultation.

Background:

Gleeson and Sundial control the land at Southcrest Farm (K17) and Woodside Training Centre (AS 1b), to the east of Kenilworth. Representations have previously been submitted to the Council highlighting the lack of constraints on this land, its suitability for development and its deliverability. We attach a copy of the Growth at Kenilworth brochure that was circulated to officers and Members in April this year. This highlights many of the issues referred to below and includes plans of the land.

These representations maintain our view that a wider, long term, approach to development at Kenilworth should be taken, including the land at Thickthorn and K17/AS1b. This will enable a comprehensive approach that will meet the aims and objectives of Garden Suburbs. It will provide better linkages into the town, provide improved services and maintain the existing playing fields/sporting facilities in the area.

As a minimum, the whole area of land should be taken out of the Green Belt and safeguarded in accordance with the advice in the National Planning Policy Framework.

The comments that are set out below specifically relate to Kenilworth and are informed by in depth technical work that has been undertaken on sites K17 and AS1b.

Comments on the Preferred Options Document (full version), May 2012

Paragraph 4.12 – point 15 - Support

Gleeson and Sundial support the objective to enable the “*maintenance and improvement of the quality of sporting and leisure facilities...including a flexible supply of land and buildings for sport and recreation that is the right quality and in the right location, and can meet people’s current and future needs and support healthy lifestyles.*”

This objective is in line with advice produced by the Government and Sport England to improve the general health of communities through improvements to sport and recreation facilities and protecting playing fields. It is also supported in the Preferred Options document under PO13.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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PO1 – Preferred Level of Growth - Object

Housing Figure:

Whilst the Council has undertaken a consultation and review of various growth scenarios such an exercise pre-dated the publication of the National Planning Policy Framework (NPPF) in March 2012. The NPPF states at paragraph 47:

“To boost significantly the supply of housing, local planning authorities should:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in this Framework...”*

Paragraph 156 of the NPPF also states that policies should deliver:

“the homes and jobs needed in the area.”

The 10,800 dwellings figure set out at PO1 does not meet the need for housing in the District as identified in the Council’s Strategic Housing Market Assessment (SHMA), May 2012. The SHMA concludes that:

“Forecast employment growth in the District is for 11,860 jobs over this period. Should the District wish to support this level of economic and employment growth, the projections indicate that provision of 14,300 homes would be required (2011-31), equivalent to 715 per annum.”

The SHMA also indicates a need for an annual supply of 698 affordable housing dwellings over the plan period. Whilst it is accepted that affordable housing can be addressed through increased private sector accommodation, it will still have a significant impact on housing provision in the district.

The above approach is re-iterated at paragraph 7.4 of the Preferred Options document which states that the *“most important housing issues for the Local Plan to address”* is *“the need to provide more housing to ensure that the needs of current and future residents are addressed”* [our emphasis].

To make the Local Plan sound it must be in conformity with the NPPF. PO1 does not meet the full, objectively assessed needs for market or affordable housing in the District and is therefore, unsound.

Plan Period:

The plan period in the SHMA refers to a 20 year period (2011 – 2031), however the Preferred Options document refers to a period of 18 years (2011-2029). The NPPF (paragraph 157) refers to a need for plans to be drawn up over an appropriate timescale *“preferably a 15 year time horizon”* and also to *“take account of longer term requirements.”* This approach is supported by the evidence in the SHMA that refers to evidence of growth over the longer time period up to and post 2031.

The housing figure in PO1 should be increased by a further two years to reflect the above comments.

Changes proposed to address the objection to PO1:

- The Option 2 housing figure of 700 new homes a year should be used.
- The Plan period should be increased to 20 years.
- The housing figure should be proportionally increased to reflect the increased plan period.

PO3: Broad Location of Growth - Support

Gleeson and Sundial support the Council's Preferred Option as set out in draft Policy PO3 which includes the distribution of housing growth across the District, including concentrating growth within, and on the edge of, the existing urban areas.

The approach is sound and entirely in conformity with the NPPF in setting out a sustainable approach to development.

Table 7.2 Distribution of Housing - Object

The distribution of housing set out at table 7.2 does not accord with the objectively assessed need evidence set out in the SHMA, May 2012 document. Table 1 below, sets out the need/demand distribution from the SHMA compared to the Preferred Options table 7.2:

Location	SHMA (%)	Preferred Options (%)
Warwick, Leamington & Whitnash	63%	74%
Kenilworth	19%	9%
Rural Settlements	18%	10%

The Plan does not set out a spatial strategy which accords with the locational demand for housing in the district. This is proportionally disadvantages Kenilworth. In addition, the SHMA concludes that there is a need/demand for 111 dwellings a year at Kenilworth (78 market and 22 affordable). The strategy, set out in the Preferred Options document, results in only 42 dwellings per year at Kenilworth, significantly under the identified need. This is unsound.

Changes proposed to address the objection to Table 7.2:

- Amend distribution to reflect the findings of the SHMA and as more appropriately set out under Option 3 in table 7.3 of the Preferred Options document, ie 1,260 dwellings to Kenilworth.

PO4: Distribution of Sites for Housing – Support/Object

Gleeson and Sundial support the principle of the distribution of housing to the east of Kenilworth. This in part reflects the need/demand findings of the SHMA. It also accords with the “golden thread” of sustainable development set out in the NPPF.

However, Gleeson and Sundial object to the proposed allocation of land at Thickthorn, Kenilworth and also to the 770 dwellings proposed. This objection is based on a number of reasons that have been set out in previous representations submitted to the Council and are summarised below:

Housing Number:

For the reasons set out under our objection to Table 7.2 (above) we object to the number of 770 dwellings to Kenilworth. For this reason alone, the site area should be increased to include land at Southcrest Farm and Woodside Training Centre.

Capacity at Thickthorn:

The land at Thickthorn is constrained by a number of factors including:

- the need for noise bunding due to proximity of the A46;
- ancient woodland;
- two large areas of playing fields/sports grounds;
- proximity to existing housing; and,

- the presence of two local wildlife sites.

In addition, the Preferred Options document and Draft Infrastructure Plan, May 2012, identifies the need for a one form entry primary school, employment and local convenience facility on the site.

The above, coupled with the density guidelines set out in the Garden Towns, Villages and Suburbs document will result in the proposed site being unable to accommodate 770 dwellings (notwithstanding our comments on the overall housing number above).

Playing Field/Sports Pitches:

The proposed allocated site currently accommodates three playing fields/sports pitches used by local sports clubs.

Standing advice from Sport England is to object to the loss of such facilities unless suitable and convenient replacement facilities can be provided. Sport England requires Local Plans to be justified with appropriate evidence. This would be in the form of an up-to-date Playing Fields Strategy. No such strategy exists to inform the loss of the playing fields at Thickthorn. We are aware that work on a Playing Field Strategy has recently begun but no timetable is in place for its conclusion. No informed decision can be taken on whether to include the playing fields until such a Strategy has been prepared and/or replacement facilities are provided in close proximity to meet the Sport England tests. This is reiterated at PO13 in the Preferred Options document – such a contradiction exists in this strategy that should be addressed.

The land where the playing fields are currently located is the narrowest part of the Thickthorn land. This has the potential to be the most affected by noise and fumes from traffic on the A46. The playing field use is the most appropriate for such a location.

Encouragement for Sports Facilities

The Preferred Options document and the Garden Suburbs prospectus encourage sports pitches/playing fields as part of a well planned, integrated, mixed use urban extension (PO13). It seems illogical to therefore move established facilities that are both convenient for local residents and ideally located to help plan a sustainable urban extension for Kenilworth.

Sustainability Assessment

The Initial Sustainability Appraisal, May 2012 has appraised the two options of Thickthorn and land off Glasshouse Lane/Crew Lane. The results come out with a score of 3 and 2, respectively. However, when the matrix is examined in more detail, the land at Thickthorn has more negative impacts (5) compared to Glasshouse Lane/Crew Lane (3). The only criteria which differentiates the two sites, is that it shows that Glasshouse Lane/Crew Lane site scores one + in response to being able to meet the needs of the whole community compared to two + with Thickthorn. This is purely a function of its limited site area and could be easily addressed by assessing a wider development area, including all or part of Thickthorn.

It is therefore the case that development at Southcrest Farm and Woodside Training Centre has fewer constraints to development than land at Thickthorn and should therefore be a first phase in any development on the edge of Kenilworth.

Deliverability

The Thickthorn land is owned by several different landowners. There is no certainty that the land will come forward for development as a collective whole. Such an approach is required in order to deliver the well planned and phased approach to development that is supported in the Preferred Options document.

For the above reasons policy we consider PO4 as it relates to Thickthorn is unsound.

Changes proposed to address the objection to PO4:

It is proposed that rather than looking at land at Southcrest and Woodside Training centre as different to Thickthorn, a comprehensive approach to the future growth at Kenilworth should be taken including all of the land to the east of the town. This will enable the principle of a Garden Suburb to be advanced. It will provide for retention and enhancement of the playing fields and provide expansion for employment uses closer to the A46 junction. This approach will also enable greater mitigation in terms of noise and buffers around the ancient woodland.

The above stance accords with the aims and objectives of sustainable development set out in the NPPF, that encourage longer term planning and the Garden City approach to development. The increased area of land would also enable an increase in housing to be provided. These changes would result in a sound strategy for development at Kenilworth.

PO6: Mixed Communities & Wide Choice of Housing – Support/Object

Gleeson and Sundial support the principle of mixed communities and a wide choice of housing. However, it objects to the following aspects of this policy:

A – General Market Housing – the wording is too rigid in that it requires house sizes and type meet the need identified in the SHMA. The wording should be amended to be in “*general conformity with*” the SHMA.

C. Homes for Older People – the need to provide more housing for the growing elderly population in the District is acknowledged. However, the policy is too prescriptive in requiring Extra Care Housing only. There are other ways to provide homes to meet the needs of the elderly population and this should be allowed for in the policy.

PO8: Economy – Support/Object

Gleeson and Sundial support the principle of allocating part of the land at Kenilworth for employment uses. The land closest to the A46 junction is the most suitable location for such development, to benefit from the locational advantage and reduce traffic flows through the town.

However, Gleeson and Sundial object to the narrow view taken of growth at Kenilworth. The land surrounding Woodside Training Centre could accommodate additional B1 uses based around a campus style development. Such uses can be located away from road junctions and have a lower level of traffic generation.

Such an approach is encouraged in the NPPF in that it supports sustainable economic growth.

Changes proposed to address the objection to PO8:

It is proposed that rather than looking at land at Southcrest and Woodside Training centre as different to Thickthorn, a comprehensive approach to employment uses at Kenilworth should be taken including all of the land to the east of the town. This will link in with our proposed changes to PO4, above.

PO10: Built Environment – Support

Gleeson and Sundial support the approach to high quality design set out in PO10. Utilising the principles of sustainable Garden Suburbs as set out in the Council’s Prospectus is supported by the NPPF.

PO13: Inclusive, Safe & Healthy Communities – Support

Gleeson and Sundial support the approach set out in PO13 to enable inclusive, safe and healthy communities. This recognises the fundamental need to provide, and the benefits of open space, provisions for sport and other outdoor facilities.

Paragraph 13.10 of the Preferred Options document (fourth bullet point) confirms that existing sports land and playing fields should *“not be built on unless an assessment has been undertaken which has clearly shown the land...to be surplus to requirements... or the loss...would be replaced by equivalent or better provision in terms of quantity and quality in a sustainable location.”*

Please refer to our objection to PO4 that proposes development on a significant area of playing fields at Thicketthorn, Kenilworth – no such assessment or replacement facility has been set out.

PO16: Green Belt – Support

Gleeson and Sundial support the preferred option for Green Belts set out under PO16, especially in relation to altering the Green Belt boundary to the east of Kenilworth to accommodate development.

Paragraph 16.5 of the Preferred Options document refers to the review of Green Belt boundaries as per the advice in the NPPF to meet the longer term needs for development beyond the plan period. The Development Policy Manager gave a commitment to Members that a study would be produced to assess the scope for reviewing the Green Belt in this regard. It is understood that such a review has not yet been carried out and no timetable is in place for the work.

81% of the District is designated as Green Belt, including wrapping around the majority of the principle settlements. It is, therefore, necessary to safeguard land around the principle, sustainable, settlements for development beyond the plan period. Failure to do so will increase the pressure on non Green Belt land to the south of the District. Kenilworth is identified in the SHMA for growth up to and beyond 2031. For this reason it is appropriate to safeguard land at Kenilworth.

Given the above, Gleeson and Sundial request that a review of the Green Belt to the east of Kenilworth, in line with the findings of the Joint Green Belt Review, 2009 should be undertaken. The Joint Green Belt Review identified the least constrained parcels of land that contributed the least to the aims and objectives of Green Belts. The land at Southcrest and Woodside Training Centre are included in this category. As a minimum, the land should be safeguarded for future development at Kenilworth in line with the requirements of the NPPF.

Plan 4 – Development Sites

If our arguments set out above in relation to Kenilworth are accepted Plan 4 should be amended accordingly.

Conclusions

The Preferred Options document in general sets out a coherent approach to development in the District. Our comments are made to assist delivery of a sound strategy. We urge the Council to look at a wider, long term, approach to development at Kenilworth, including all of the land to the east of the town. This will enable a comprehensive approach that will meet the aims and objectives of Garden Suburbs. It will provide better linkages into the town, provide improved services and maintain the sporting facilities.

As a minimum land to the east of Kenilworth should be safeguarded for the future expansion of the town and removed from the Green Belt in accordance with the findings of the Joint Green Belt Review and SHMA.



We would welcome the opportunity of discussing the above issues with you in more detail. Should you have any questions please contact Robert Linnell at the above address.

Yours faithfully

A handwritten signature in black ink that reads "Savills". The letters are cursive and connected, with a long horizontal stroke at the end of the word.

Savills

Enc