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RPS

**WARWICK LOCAL PLAN  
PREFERRED OPTIONS**

**REPRESENTATIONS ON BEHALF OF  
MR RICHARD ARMITAGE AND  
MRS SARA GRIMES**

**JULY 2012**

26 July 2012

**Our Ref: JBB8066.C0414**

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## QUALITY MANAGEMENT

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Authorised by:	
Date:	<b>26 July 2012</b>
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# 1 INTRODUCTION

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- 1.1 RPS Planning & Development Ltd is instructed to submit representations to the Warwick District Local Plan Preferred Options DPD May 2012 (“the Preferred Options”) on behalf of Mr Richard Armitage and Mrs Sara Grimes, joint co-owners of the two parcels of land being the site identified as K25 “East of Warwick Road, Kenilworth (“the Site)”. The representations demonstrated that the site is suitable and available for residential development and that the overall housing requirement proposed for Warwick District is not sufficient to meet housing needs in the area and a great proportion should be directed to Kenilworth.
- 1.2 The Site was put forward in the May 2012 SHLAA, having not been previously promoted for inclusion in the 2009 SHLAA.
- 1.3 Section 2 of this report considers the suitability and availability of the site for residential development in response to the SHLAA report. Section 3 looks at the benefits of the sites development for residential use, Section 4 looks at our response to the preferred options and overall housing allocation and level of growth. Section 5 looks in detail at Landscape. Section 6 sets out our conclusions in respect of the suitability of the site for residential allocation and development.

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## 2 WARWICK DISTRICT COUNCIL SHLAA ASSESSMENT – SITE

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- 2.1 The Site is identified in the SHLAA 2012 as Kenilworth Site, K25, East of Warwick Road as being 5.68ha. This excludes a small parcel of land between the site and cricket club car park which needs to be included and increases the site area to 5.76ha. It is confirmed that both landowners are willing to release the site for residential development. The site is not being promoted as part of any larger adjoining area. The site is said to be located at the edge of the Kenilworth urban area within the Green Belt.
- 2.2 Physical constraints are said, in the SHLAA, to be that a “potential” Local Wildlife Site straddles the railway embankment. Potential impacts are identified as the operation of the adjacent cricket club, impact on an area of landscape value, the impact on the existing soft boundary of the built up area of the town which compromises Bullimore Wood to the east of the railway line/embankment, the cricket ground, Wootton Grange Farm, and Kenilworth School to the west and impact on the gap between Kenilworth and Leek Wootton.
- 2.3 The SHLAA identifies the environmental conditions to be considered are noise from the railway and impact of the operation of the cricket club.
- 2.4 In terms of overall suitability the Council’s SHLAA considers the Site is not suitable due to impact on the existing soft boundary to the town and on areas of high landscape value. All of these indicated constraints and impacts are addressed below together with the benefits and advantages of developing the site for housing.
- 2.5 On the Adopted Local Plan Proposals Map the site is identified as being within the Green Belt but with no other designations. There are no areas of safeguarded land at Kenilworth and all peripheral land is within the Green Belt. Bullimore Woods are identified as Ancient Woodland. Elsewhere the Proposals Map shows SSSI and other environmental designations none of which are shown on the Site.

### **Local Wildlife Site**

- 2.6 Provision for protecting wildlife associated with the railway embankment corridor can be made within development proposals for the site as part of the planned Green Infrastructure. The site’s ecological potential overall can be enhanced through development compared with intensive agricultural use.

### **Cricket Club**

- 2.7 The Cricket Club sits in the northwest quadrant of the wider area, adjacent to the site with the pavilion on the northern edge accessed from Warwick Road on the west close to existing residential development. There is existing residential development north of the cricket club and west of the cricket club beyond the Warwick Road. Were the Site to be developed for residential use it would be designed to take into account any particular operational issues of the cricket club. The location of the cricket club within a built up area is not an untypical situation, with many similar sized clubs around the country operating successfully as part of the local neighbourhood.

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2.8 The new development would not suffer to any greater extent from the operation of the cricket club than existing residential development to the north. The nearest existing residential property is some 20m from the pavilion. The Site boundary is itself 7metres from the pavilion such that any dwellings would be at least further from the pavilion and any potential nuisance than existing dwellings. The pavilion car park which is triangular in shape sits between the pavilion, agricultural buildings within the Site and residential boundaries to the north. The site would be less affected by car park activity than existing residential areas.

2.9 It is not considered there would be any adverse impact on the operation of the cricket club or from the operation of the cricket club to further residential development. The owners would seek to liaise with the cricket club in respect of detailed design to accommodate any particular design issues which may be identified.

#### **Area of Landscape Value**

2.10 The SHLAA refers to the site being in an area of High Landscape Value. RPS understand this is based on the findings of the Coventry Joint Green Belt Study 2009. The Joint Green Belt Study was prepared on behalf of Warwick, Coventry, Rugby and Nuneaton & Bedworth Councils to consider strategic sites not small sites such as K25. In respect of the Landscape Value Assessment Schedules the study included Study Area 6.

2.11 Study Area 6 is generally the whole of the land between Kenilworth and Leek Wootton, in effect this is the combination of SHLAA sites R64(1), R63, R64 (2) as well as the K25 site.

2.12 The landscape value element of the assessment was been undertaken by Richard Moorish Associates and David Brown Landscape Design. The value of the landscape within each of the strategic parcels was considered in relation to the contribution it makes to the Green Belt. The methodology for assessing the value of the landscape in relation to the Green Belt was undertaken in line with "Guidelines for Landscape and Visual Impact Assessment" (2nd Edition 2002).

2.13 The assessment of the value of the landscape to the Green Belt referenced previous landscape studies of the area, including the Countryside Agency Landscape Character Map of Britain (1999) and the Warwickshire Landscapes Guidelines (1993).

2.14 The results of the landscape value assessment contribute to identifying parcels where there may be potential for the release of land for future development and where further, more detailed examination would be appropriate. Following the desk study and field analysis of the value that the landscape within the parcels contributes to the Green Belt, each parcel was determined as being either of higher, medium or lower landscape value to the Green Belt. Small individual sites such as K25 were not separately assessed

2.15 Higher Value parcels are considered to have high value for Green Belt function and for the objectives of land defined by Green Belt policy. Removing these areas from the Green Belt or allowing major development within them would diminish the setting and character of existing settlement. Minor landscape enhancements such as new hedge and tree planting or improvements to footpath networks might further enhance the value of the landscape to the Green Belt function.

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2.16 The “Warwickshire Landscape Guidelines” is a series of documents which collectively aims to identify and understand what makes the area distinctive. The Warwickshire Landscape Guidelines include:

- Arden Landscape Guidelines;
- Avon Landscape Guidelines; and
- Dunsmore Landscape Guidelines.

2.17 Kenilworth falls within the Arden area. The Landscape Guidelines documents provide a comprehensive assessment of the Warwickshire Landscape, based upon a detailed study of existing written and mapped information as well as a valuation of recent changes which have affected the landscape as well as current issues which are likely to influence change in the future. They provide landscape management information as well as guidance on how development and modern land management practices can best be integrated into the landscape. Whilst they also identify areas of strong landscape character and those areas where enhancement is required, the overall aim of the Landscape Guidelines is to ensure the diversity of the landscapes are conserved for present and future generations to enjoy.

2.18 The land between Kenilworth (including the cricket ground) and Leek Wootton is characterised as Arden Parklands being an enclosed gently rolling landscape defined by woodland edges, parkland and belts of trees. The assessment picks up the woodland of Bullimore Wood and that to the north west of Leek Wootton. No other features are identified.

2.19 A fuller analysis of the specific landscape characteristics and visual impact carried out by RPS is contained in Section 5.

#### **Boundary of Built Up Area**

2.20 The Wootton Grange Farm buildings have been redeveloped for residential use. These buildings extend further south than the existing strong field boundary of the Site with their curtilages forming a continuation of the built up area. Essentially the Sites southern boundary would be retained and reinforced which, together with agricultural land to the south, would maintain a soft and attractive boundary to the built up area.

2.21 The description of the existing soft boundary consisting of Bullimore Wood, the cricket ground, Wootton Grange Farm and Kenilworth School is no basis for resisting any change. These may be urban fringe uses but there is no real environmental need to retain a “transitional zone” particularly as a substantial and effective buffer can be created as part of a well designed development to the south of Kenilworth.

2.22 As stated below, the gap between Kenilworth and Leek Wootton can be maintained and secured in conjunction with the development of site K25.

#### **Kenilworth – Leek Wootton Gap**

2.23 To the west of Warwick Road, the collection of separate dwellings at Wootton Grange extends the built up area further south towards Leek Wootton than the southern boundary of the Site. The gap between the edge of the built up area of Kenilworth and Leek Wootton is around 1.2km. Development of the Site will narrow part of this gap east of Warwick Road by around 150m.

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There will still be a substantial gap of agricultural land with full Green Belt protection including Cattle Brook following development of the site.

2.24 The gap is not identified within policy as requiring particular protection in contrast with other areas which have been suggested in the Preferred Options Local Plan as “Areas of Search for Green Networks and Wedges” or “Strategic Green Improvement Areas” on Map 6 Possible Green Infrastructure.

2.25 The landowner controls the land between the Warwick Road and Bypass between Kenilworth and Leek Wootton giving scope for long term protection as part of any allocation and future development of the Site.

#### **Noise From Railway**

2.26 As with other potential environmental impacts it is relatively straightforward to address railway noise with standard design measures. The railway line runs through the centre of Kenilworth and mostly through residential areas. Some properties immediately north of the Site, on Swift Close, are less than a metre from the railway embankment.

2.27 It will clearly be possible to mitigate any potential nuisance from rail traffic in detailed design and layout of any future development.

#### **Conclusion on SHLAA Assessment**

2.28 Overall the SHLAA has considered the Site is not suitable due to impact on the existing soft boundary to the town and on areas of high landscape value. Whilst the other constraints and impacts are not identified in terms of suitability these are addressed above.

2.29 It has been demonstrated that the Site can be developed without unacceptable adverse impact on an area of high landscape value and that an attractive urban edge can be delivered through appropriate development of the site. In respect of other sites found suitable or potentially suitable within the SHLAA also within Areas of High Landscape Value it is noted this was not an insurmountable constraint which can be overcome with appropriate mitigation in such locations.

2.30 The urban area will inevitably need to be extended resulting in loss of existing boundary uses. The Site offers the ability for a new soft edge to be created while maintaining the existing cricket ground.



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## 3 BENEFITS AND ADVANTAGES

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### Context

- 3.31 Kenilworth is divided east and west by the Coventry to Leamington railway line although there is no station in Kenilworth. The railway line has 5 road crossings within the town and a further 3 pedestrian only crossings. The K25 Site is located on the west side of the railway line; the Council's preferred Thickthorn site is located on the east side.
- 3.32 A footpath runs along the east side of Warwick Road from the southern boundary of the site into the town centre. This is the point where there is a formal farm access to the field. South of the site the footpath runs along the western side of Warwick Road into Leek Wootton.
- 3.33 Whilst the southerly field is actively farmed the northern field, in separate ownership, is currently an area of scrub land and not actively farmed, the right of way to this field is through the cricket club car park. There are clearly conflicts with the use of the car park and the right of way.

### Proximity to Services

- 3.34 Kenilworth Town Centre, on the western side of town, is located on the northern end of Warwick Road. Within the town there are four other local shopping centres Albion Street, High Street, Leyes Lane and The Oaks Precinct. The Sainsbury supermarket in the Town Centre is around 1.2km from the site.
- 3.35 The Castle and Abbey Medical centre is located on the edge of the Town Centre at the rear of the new Waitrose store.

### Access to Schools

- 3.36 It is understood that there are currently some limited surplus places in Kenilworth primary schools, concentrated on the west side of the town. St Johns Primary School is around 900m from the site. At the secondary school phase, Kenilworth School is the only secondary school serving the town. The Castle Sixth Form Centre entrance is around 850m from the site via Warwick Road and Rouncil Lane.

### Public Transport

- 3.37 The No16 bus route between Warwick/Stratford and Warwick University/Coventry passes the site and connects with the Town Centre on Warwick Road where further connections can be made. This is an hourly/90 minute service Monday to Friday and hourly on Saturdays.

### Landscape

- 3.38 In respect of landscape, soft edge of urban area and coalescence of settlements it is relevant that the landowners promoting the sites allocation also owns all of that land between Kenilworth and Leek Wootton this will allow the existing field line marking the southern extent of the proposed site to be further reinforced as part of any future planning application to implement the allocation. This would enable the new Green Belt boundary to be clearly defined, using physical features that are readily recognisable and likely to be permanent in accordance with NPPF requirements.

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**Flood Risk**

3.39 The site does not suffer from flooding issues as identified on the Environment Agency map.

**Access**



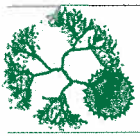



3.40 The site can take vehicle access from Warwick Road as well as linking with development to the north.

3.41 Overall, it is considered the Site lies in a sustainable location on the edge of the built up area of Kenilworth.

## 4 OUTLINE LANDSCAPE ANALYSIS AND PRINCIPLES ASSESSMENT

4.1 In this section we look at the existing landscape features and consider some of the design principles that would be influenced by these landscape features.

Existing and Proposed Landscape Key:

-  Existing large boundary vegetation typically consisting of overgrown hedge species and specimen trees.
-  Existing low level boundary vegetation consisting mainly of shrubs to a general 1-2m height.
-  Existing notable tree locations.
-  Locations recommended for extensive shrub/tree buffer planting to strengthen poor existing boundaries.
-  Locations recommended for shrub/tree buffer planting to enhance strong existing boundaries.
-  Locations of existing gaps in boundary planting recommended for infilling.



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**1. Development entrance to be located along western boundary of the lower field; location and angle to be designed to minimise impact upon rural character of Warwick Road.**

**Photo: facing south on Warwick Rd**



**2. Western boundary of lower field adjoining Warwick Road to be carefully considered to ensure the rural character of the road is maintained: existing boundary planting to be strengthened and development should be set back from boundary providing an informal 'spatial' buffer of front gardens and drives.**

**Photo: facing north on Warwick Rd**



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3. The boundary between the lower field and the cricket club is currently delineated by a timber post and rail fence - the boundary should be screened through buffer planting of trees and shrubs, with the development layout designed to offer natural 'spatial' offset by introduction of an access road to houses and then front gardens: this mitigation will ensure the Club maintains it's rural character and feel.



4. The existing boundary between the upper field and the Cricket Club is mostly made up of a thin row of Silver Birch trees, it would be suitable to strengthen this boundary with tree and shrub planting which will screen and soften the development.



5. Indicative location of existing right of way linking the Cricket Club car park and the upper field.

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6. The existing boundary between the upper field and the car park of the Cricket Club and the housing development to the north consists of a number of existing trees and shrubs providing a partial view - this should be strengthened with tree and shrub planting, with a natural 'spatial' barrier of rear gardens running along these sections of the site boundary.



7. Potential access link from Swift Close into the upper field.

8. The existing eastern boundary between the upper field and the railway line is currently a low-level (1-2m) shrub buffer allowing views of rail traffic. It would be suitable to strengthen this boundary with tree and shrub planting which would enhance the ecological value of the 'green corridor' of the railway embankment, compliment Bullimore Wood to the north-east and provide a softened screen for future residents.



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9. This eastern boundary between the lower field and the railway line is currently well developed consisting of a large (6+m) Hawthorn hedge with specimen trees, fully screening the rail traffic. To maintain the rural character along the train route and to minimise the potential impact for future residents, we propose the introduction of a tree and shrub buffer with rear gardens offsetting the development: allowing a 'spatial' barrier whilst enhancing the ecological value of the 'green corridor' of the railway embankment.



10. The south-east corner of the lower field is open, with a gap between any boundary planting, this area should be secured and planting of trees and shrubs to complement the existing boundaries should be introduced.



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11. The southern boundary of the lower field consists of a large overgrown hedge consisting of many species and a number of specimen trees. This boundary separates the development and the green belt rural countryside: important consideration should be taken to ensure that the boundary between the proposed development and the green belt is clearly defined as a recognisable feature. It would be beneficial to strengthen the boundary planting to create an effective buffer, introduce larger rear gardens along the southern boundary and to offset the housing to further within the site - these proposals all would help to create a recognisable boundary, whilst minimising the impact on views for those approaching along the Warwick Road and ensuring that the rural character is maintained.



12. Approximate location of existing mature Oak tree; this is a key feature and should be integrated into the design allowing space for it to grow and thrive: a possibility could be to incorporate the tree into a 'village green' type open space offering an informal area for residents to meet, relax and enjoy the outdoor space, this would complement the rural setting and create a focal point for the development.





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13. The south-west corner of the lower field is open, with a gap (currently used as access to the lower field) between any boundary planting, this area should be secured and planting of trees and shrubs to complement the existing boundaries will be introduced - the location of a specimen focal tree might be suitable, highlighting to the users of Warwick Road that they are passing into a semi-rural section of the road.



14. Note: local topography and that of the site is generally even and due to woodland planting, field boundaries and the development to the north, the site cannot be seen from a distance.

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## 5 LOCAL PLAN PREFERRED OPTIONS

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### Background

- 5.1 In November In November 2007 Warwick District Council published a Key Issues Document for public consultation. The responses to the Issues Document informed the Options Report which was published for consultation in May 2008.
- 5.2 The Options Report builds upon the objectives outlined within the Issues Paper and includes protecting and enhancing green spaces as well as the natural environment. The report states that this is considered to be one of the three top priorities for the district, and that 55% of people consider it would be acceptable to allocate some greenfield land on the edge of towns for development to meet growing needs.
- 5.3 It is outlined within the Options Report that of the 10,800 dwellings required within the district between 2006 and 2026, 2,650 dwellings are accounted for, resulting in the need to identify land for a further 8,150 dwellings.
- 5.4 It is assumed within the Options Report that there will be capacity within the towns to accommodate some of the growth but that some greenfield development will be inevitable. Green Belt land has not been excluded from consideration, but where it is considered, the aim will be to maintain proper separation between the towns and to avoid coalescence.
- 5.5 Within the report, five options for the distribution of the required housing are identified.
- Option 1 Focus growth in and around Warwick, Leamington and Whitnash
  - Option 2 Focus growth along the A46 corridor
  - Option 3 Balance growth in and around the four towns (which would include Kenilworth)
  - Option 4 Disperse growth across the district including within villages
  - Option 5 Direct growth immediately to the south of Coventry (with Kenilworth as the next preferred location)
- 5.6 All five options identify that greenfield urban extensions would allow for new facilities and services and that they would make the best use of existing public transport and infrastructure where appropriate. At the same time, all five options also identify that development on greenfield sites will be inevitable and that there may be the need to amend the current Green Belt boundaries.
- 5.7 The Options Paper also identifies possible directions of growth to the towns; the possible directions of growth are the following.
1. Land north of Milverton, Leamington Spa
  2. Land north of Lillington, Leamington Spa
  3. Land east of Lillington (Campion Hills area), Leamington Spa
  4. Land east of Sydenham, Leamington Spa and west of Radford Semele
  5. Land south of Whitnash
  6. Land south of Warwick Gates, Warwick
  7. Land west of Europa Way (including land south of Gallows Hill), Warwick
  8. Land east of Stratford Road, Warwick
  9. Land west and north west of Warwick

10. Land north east of Kenilworth
11. Land south east of Kenilworth (Thickthorn)
12. Land south of Kenilworth
13. Land south of Coventry – Kirby Corner
14. Land south of Coventry – Finham
15. Land south of Coventry – Baginton

## **Preferred Options May 2012**

### Overall Level of Growth

- 5.8 The Preferred Options proposes a level of growth of 10,800 dwellings between 2011 and 2029 which is an average of 600 dwellings per year.
- 5.9 The Preferred Options consultation document refers to the March 2011 'Helping Shape the District' consultation, which provided three scenarios for growth; 250 dwellings/year, 500 dwellings a year, 800 dwellings/year.
- 5.10 The report indicates that following this consultation, two options for growth have been considered; Option 1 providing 600 dwellings/year and Option 2 providing 700 dwellings a year. The Council has decided to work towards the delivery of 600 dwellings/year providing a total of 10,800 new homes between 2011 and 2029, considering this to be the more sustainable option.
- 5.11 RPS on behalf of Mr Richard Armitage and Mrs Sara Grimes disagrees with this growth option as it does not provide appropriate levels of growth in line with the evidence base for the Local Plan.
- 5.12 Evidence advanced by the West Midlands regional assembly for the RSS Examination in July 2009 from the Cambridge Centre for Housing and Planning Research, based on 2006 ONS Household Projections and allowing for the economic downturn, concluded that Warwick District's housing requirement between 2006 and 2026 was 18,200 dwellings (910 per year).
- 5.13 The 2008 ONS Household Projections estimates an increase of 17,000 households between 2008 and 2028, at a rate of 850 dwellings/year. The 2012 Strategic Housing Market Assessment indicates a requirement of 698 dwellings/year to meet affordable housing needs of the District, in addition to market housing needs. Therefore it is evident that the Council's proposed 10,800 dwellings for the Local Plan period is insufficient and significantly below the predicted number of new homes required.
- 5.14 In respect of Options 1 and 2, the Preferred Options report refers strongly to a link between employment growth and level of housing required. Whilst RPS considers it important for housing to be located in areas of proposed significant employment development to accommodate this growth, the Preferred Options report fails to recognise that Warwick District is easily accessible for people to live within this District, and commute to employment in the surrounding towns and cities such as Coventry and Birmingham where for example in Birmingham there is expected to be significant under provision of required new homes over the next 20 years. Therefore, RPS contends that this must be recognised in the Local Plan and the housing requirement in relation to employment provision is more flexible.
- 5.15 The 2012 Strategic Housing Land Availability Assessment indicates a supply of housing between 2014 and 2029 of 13,385 on deliverable sites, excluding windfall sites. Therefore, the Council's own evidence shows that a greater number of dwellings can be delivered within the District to

contribute towards housing needs of Warwick District than the 10,800 target proposed in the Local Plan.

Broad Location of Growth

5.16 In respect of the broad location of this growth the preferred option is to;

- Concentrate growth within, and on the edge of, the existing urban areas.
- Avoid development in locations which could potentially lead to the coalescence of settlements.
- Distribute growth across the District, including within and/or on the edge of some villages.
- Allow for a hierarchy of growth in the rural area to include:
  - a higher level of growth in those villages with a broad range of services and public transport to the towns, and
  - a lower level of growth in some smaller villages in order to meet local need and help support existing services

5.17 The proposed Site at Warwick Road meets these criteria for the preferred broad location of growth.

5.18 The requirement for allocated sites is proposed at 6,896 dwellings;

Housing Requirement	10,800
Less:	
Committed Housing Sites	1,224
Small urban SHLAA Sites	290
Other Windfall Housing Sites	2,300
Total	3,814
<b>Balance to be Allocated in Plan</b>	<b>6,986</b>

5.19 As it is appropriate to incorporate a degree of flexibility the Preferred Option to the location of growth proposes the following distribution;

Urban Brownfield Sites	480
Sites on Edge of Warwick, Leamington & Whitnash	6,250
Sites on the Edge of Kenilworth	770
Village Development	830
<b>TOTAL</b>	<b>8,360</b>

5.20 A greater proportion of the proposed growth should be directed to Kenilworth. According to the SHMA 2011 Kenilworth contains 17% of households in the district however only 9% of the currently proposed growth is directed to Kenilworth. Whilst RPS believes the overall growth option to be too low such that if the current proportions are maintained further growth in Kenilworth will need to be identified, it is also our view that Kenilworth must absorb a greater proportion of that total level of growth.

5.21 The SHMA also identifies the level of housing need in the district based on the number of households across the district. Housing need in Kenilworth is 1.2%, the district average. The SHMA also shows a slightly higher affordable housing requirement as a percentage of households in Kenilworth compared to other areas of the district. The SHMA analysis, which integrates an understanding of demographics identifies that 63% of need/demand within the

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District arises in the Warwick, Leamington and Whitnash Community Forum areas, 19% in Kenilworth and 18% in the rural Community Forum areas. By contrast Warwick, Leamington and Whitnash is proposed to receive 75% of new dwellings and Kenilworth 9%.

- 5.22 The disproportionate levels of growth across the district will not provide the levels of affordable housing required to meet the needs of Kenilworth.

#### Specific Sites

- 5.23 The locations which are identified as the preferred options for growth would allow for the development of 8,360 new dwellings. This is over and above the balance of the requirement of 6,986 so would give an element of flexibility of about 1,370 dwellings. This flexibility allows for two potential courses of action:

- to enable some sites to be removed from the allocation proposed in the draft Plan depending on consultation and any further evidence that is provided, and/or
- to provide housing to support a Regional Investment Site in the vicinity of the A45/A46 Junction close to Coventry Airport (the Coventry and Warwickshire Gateway) if further research demonstrates that this is a suitable location.

- 5.24 To meet the Kenilworth preferred option location one site, at Thickthorn, for 770 dwellings is identified to be delivered in two phases (2011-2019 and 2019-2024). The Thickthorn site is all of the land east of Kenilworth upto the A46 from Leamington Road to Dalehouse Lane and covering SHLAA sites K01, 5, 6, 7, 9, 17, 18, 19 and 20 which includes Kenilworth Rugby Club, Kenilworth Golf Club, farmland and other uses.

- 5.25 Our response is that a number of sites need to be identified to ensure delivery. Site's in multiple ownership, such as the Thickthorn site, present difficulties in terms of collaboration and achieving an agreed strategy for delivery with all essential land owners.

- 5.26 There may also be physical difficulties in delivery of sites and a strategy relying on a single site risks the ability to meet the supply requirements. In particular the Thickthorn site will require the replacement of existing uses, including the sports facilities prior to them being brought forward. Other issues, such as access etc have been raised by objectors which may at least delay delivery of the site.

- 5.27 Allocating additional sites, in particular K25, would mean existing sports pitches at Thickthorn could be retained.

- 5.28 It is also important to provide a variety of sites to provide choice and diversity. As such the Site at Warwick Road, K25, should be allocated at PO4 for upto 150 dwellings.

#### Green Belt

- 5.29 In respect of the Green Belt clearly to accommodate the levels of growth required the boundaries will need to be altered. The preferred option is to alter the existing boundary to accommodate the preferred option locations. In respect of the Green Belt around Kenilworth the preferred option is to alter the existing boundary to the east of Kenilworth to accommodate the preferred option of meeting all growth in one location at Thickthorn.

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5.30 Clearly, RPS contends that the settlement and Green Belt boundary should be altered to run along the southern boundary of Site K25. The landowners own all of that land between Kenilworth and Leek Wootton in which it is evidently achievable to provide a clearly defined recognisable boundary and also provide long term protection to the extensive retained Green Belt gap.

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**6    RESPONSES**

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# Preferred Options Response Form 2012

For Official Use Only
Ref:
Rep. ref:

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

**If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.**

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available for members of the public. You can also respond online using the LDF Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

## Part A - Personal Details

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	1. Personal Details		2. Agent's Details
Title	Mr	Mrs	Mr
First Name	Richard	Sara	Tim
Surname	Armitage	Grimes	Partridge
Job Title	c/o Agent		Operational Director
Organisation			RPS Planning & Development
Address Line 1			Highfield House
Address Line 2			5 Ridgeway
Address Line 3			Quinton Business Park
Address Line 4			Birmingham
Postcode			B32 1AF
Telephone Number			0121 213 5500
Email Address			<a href="mailto:tim.partridge@rpsgroup.com">tim.partridge@rpsgroup.com</a>

Would you like to be made aware of further consultation stages of the new Local Plan?      Yes



## Part B – Commenting on the Preferred Options

### ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 1 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO1: Preferred level of growth.**

Paragraph number / Heading / Subheading (if relevant)

**5.5**

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

**X** Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Options consultation document refers to the March 2011 'Helping Shape the District' consultation, which provided three scenarios for growth; 250 dwellings/year, 500 dwellings/year, 800 dwellings/year.

The report indicates that following this consultation, two options for growth have been considered; Option 1 providing 600 dwellings/year and Option 2 providing 700 dwellings a year. The Council has decided to work towards the delivery of 600 dwellings/year providing a total of 10,800 new homes between 2011 and 2029, considering this to be the more sustainable option.

RPS on behalf of Mr Richard Armitage and Mrs Sara Grimes disagrees with this growth option as it does not provide appropriate levels of growth in line with the evidence base for the Local Plan.

Evidence advanced by the West Midlands regional assembly for the RSS Examination in July 2009 from the Cambridge Centre for Housing and Planning Research, based on 2006 ONS Household Projections and allowing for the economic downturn, concluded that Warwick District's housing requirement between 2006 and 2026 was 18,200 dwellings (910 per year).

The 2008 ONS Household Projections estimates an increase of 17,000 households between 2008 and 2028, at a rate of 850 dwellings/year. The 2012 Strategic Housing Market Assessment indicates a requirement of 698 dwellings/year to meet affordable housing needs of the District, in addition to market housing needs. Therefore it is evident that the Council's proposed 10,800 dwellings for the Local Plan period is insufficient and significantly below the predicted number of new homes required.

In respect of Options 1 and 2, the Preferred Options report refers strongly to a link between employment growth and level of housing required. Whilst RPS considers it important for housing to be located in areas of proposed significant employment development to accommodate this growth, the Preferred Options report fails to recognise that Warwick District is easily accessible for people to live within this District, and commute to employment in the surrounding towns and cities such as Coventry and Birmingham where for example in Birmingham there is expected to be significant under provision of required new homes over the next 20 years. Therefore, RPS contends that this must be recognised in the Local Plan and the housing requirement in relation to employment provision is more flexible.

The 2012 Strategic Housing Land Availability Assessment indicates a supply of housing between 2014 and 2029 of 13,385 on deliverable sites, excluding windfall sites. Therefore, the Council's own evidence shows that a greater number of dwellings can be delivered within the District to contribute towards housing needs of Warwick District than the 10,800 target proposed in the Local Plan.

## Part B – Commenting on the Preferred Options

ON BEHALF OF **MR RICHARD ARMITAGE AND MRS SARA GRIMES**  
**REGARDING LAND OFF WARWICK ROAD SITE - K25**

Sheet 2 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO2: Community Infrastructure Levy**

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Option of developing a Community Infrastructure Levy is supported. However, the Council needs to ensure that CIL payments do not overlap with S106 developer contributions. There will need to be clarification about what is to be covered by CIL once this has been determined.

## Part B – Commenting on the Preferred Options

### ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 3 of 7

Which document are you responding to? e.g. Preferred Options (Booklet) Preferred Options (Full Version)	<b>Preferred Options (Full Version)</b>	
Which part of the document are you responding to? Preferred Option Box (e.g. PO1)	<b>PO3: Broad Location of Growth</b>	
Paragraph number / Heading / Subheading (if relevant)	<b>7.7</b>	
Map (e.g. Preferred Development Sites – Whole District)		
What is the nature of your representation?	<b>X Support</b>	<b>Object</b>

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

The Preferred Option to concentrate growth within or on the edge of existing urban areas, including some growth adjacent to villages, is supported by RPS. It is also agreed that development should be in sustainable locations avoiding the coalescence of settlements, and development within the rural areas should be higher in the larger villages where services are more accessible.

RPS supports the Council's reference to the NPPF and importance of the presumption in favour of sustainable development. The option to concentrate growth within, and on the edge of, the existing urban areas is supported.

However, a greater proportion of the proposed growth should be directed Kenilworth. According to the SHMA 2011 Kenilworth contains 17% of households in the district however only 9% of the currently proposed growth is directed to Kenilworth. Whilst RPS believe the overall growth option to be too low such that if the current proportions are maintained further growth in Kenilworth will need to be identified, it is also our view that Kenilworth must absorb a greater proportion of that total level of growth.

The SHMA also identifies the level of housing need in the district based on the number of households across the district. Housing need in Kenilworth is 1.2%, the district average. The SHMA also shows a slightly higher affordable housing requirement as a percentage of households in Kenilworth compared to other areas of the district. The SHMA analysis, which integrates an understanding of demographics identifies that 63% of need/demand within the District arises in the Warwick, Leamington and Whitnash Community Forum areas, 19% in Kenilworth and 18% in the rural Community Forum areas. By contrast Warwick, Leamington and Whitnash is proposed to receive 75% of new dwellings and Kenilworth 9%.

The disproportionate levels of growth across the district will not provide the levels of affordable housing required to meet the needs of Kenilworth.

## Part B – Commenting on the Preferred Options

### ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 4 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO4: Distribution of Sites for Housing**

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Policy PO4 shows the proposed sites to contribute towards delivery of the 10,800 new homes the Council is requiring up to 2029. RPS considers this figure to be significantly lower than what should be delivered to meet the projected increase in population as indicated within the SHMA and ONS2008 Household Projections, and is less than what the SHLAA has identified can be accommodated on suitable sites within the District.

In line with the principles of the preferred approach to the location of growth, the Council has identified a number of sites in locations within and around the four towns and with 2 categories of villages. The sites are dispersed including "Sites on the Edge of Kenilworth". However only one site is identified on the edge of Kenilworth.

Further sites, in particular Site K25, are suitable and available to meet the preferred approach. RPS objects to the preferred option for the distribution of sites for housing due to the reliance on one site in Kenilworth and the failure to identify Site K25 as an allocated site.

Development of the Site, K25 does not represent development in a location which could potentially lead to the coalescence of settlements. The site does not extend further south towards Leek Wootton than existing development and the intervening land is in the ownership of the K25 site promoter allowing further control and protection through development management controls. The option distributes growth across the District, including within and/or on the edge of some villages to allow for a hierarchy of growth in the rural area is supported to provide a range of options and choice.

The site owned by Mr Richard Armitage and Mrs Sara Grimes lies adjacent to Kenilworth Town providing a sustainable location for development with good access into Kenilworth Town Centre, local schools and facilities with public transport links to Warwick and Coventry passing the site

Therefore, RPS recommends that this site is included in the Local Plan and allocated for residential development to assist in meeting future housing needs.

## Part B – Commenting on the Preferred Options

### ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 5 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO5: Affordable Housing**

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Policy PO5 is considered to be acceptable, requiring 40% affordable housing on development of 10 or more houses in urban areas, and 5 or more houses in rural areas. The inclusion within the policy that the Council will be flexible in respect of the viability of developments to be able to provide this 40% affordable housing is supported.

RPS considers that this is important as some small sites may not be able to viably contribute towards the Council's affordable housing targets. However, this should not be a reason for these sites to be rejected planning permission if they can sustainably contribute towards meeting the market housing needs of the District.

## Part B – Commenting on the Preferred Options

ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES  
REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 6 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO6: Mixed Communities and Wide Choice of Housing**

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

RPS supports the general approach to Policy PO6 that developments should support the creation of mixed communities and delivery of a wide choice of housing.

However, in relation to the inclusion of extra care housing on all strategic sites, this is not considered to be appropriate. This should only be a requirement where it is viable to provide extra care housing, and should reflect current market conditions and local needs. RPS recommends that the policy is revised to include this.

## Part B – Commenting on the Preferred Options

### ON BEHALF OF MR RICHARD ARMITAGE AND MRS SARA GRIMES REGARDING LAND OFF WARWICK ROAD SITE - K25

Sheet 7 of 7

Which document are you responding to?  
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

**Preferred Options (Full Version)**

Which part of the document are you responding to?  
Preferred Option Box (e.g. PO1)

**PO16: Green Belt**

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection.

Whilst it is agreed that the Green Belt around Warwick District should be retained where possible, it is important to recognise that housing targets for Warwick District cannot be provided solely within urban areas. The Council also is proposing a housing target for the plan period which is less than the need identified within the evidence base for the Local Plan.

PO16 sets out the preferred options for amending Green Belt boundaries to accommodate preferred options for development.

In order to allow Site K25 to come forward for residential development the Green Belt boundary will need to be altered in this location in order to accommodate development.

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## 7 CONCLUSION

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- 7.1 The 2012 SHLAA incorrectly excludes the site as an option on the basis of impact on the soft boundary and area of high landscape value.
- 7.2 All of the constraints identified can be overcome and a substantial and effective buffer with the Green Belt gap created.
- 7.3 The landscape value is that of the whole gap between Kenilworth and Leek Wootton with the K25 site itself not having a high value.
- 7.4 The site is in a highly sustainable location being located close to the town centre containing main shops and services.
- 7.5 The site is connected to the town centre by a bus service with nearby stops. The service runs between Coventry and Warwick and provides connections to the wider public transport network.
- 7.6 The number of new dwellings the Core Strategy is aiming to provide is insufficient and significantly below the predicted number of new homes required.
- 7.7 A greater proportion should be provided at Kenilworth.
- 7.8 Additional sites, including the K25 site, should be identified at Kenilworth rather than relying on delivery from a single location.
- 7.9 Green Belt boundaries will need to be amended to meet any housing provision in Kenilworth.