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Planning Policy Manager  
Warwick District Council  
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CV32 5HZ

24707/A3/VL/RC/lfw

21<sup>st</sup> April 2016

Dear Mr Barber

## REPRESENTATIONS TO WARWICK DISTRICT DRAFT LOCAL PLAN (PART 1) MAIN MODIFICATIONS: LAND NORTH OF MILVERTON

We write on behalf of Taylor Wimpey UK Ltd in respect of their land interests on land north of Milverton. A site location plan is enclosed with these representations at **Appendix 1** alongside a leaflet detailing the development proposals for the Site at **Appendix 2**.

Whilst the site is partially allocated (Site H44) for 250 dwellings and partially safeguarded (Site S2) for a further 1,065 dwellings, our development proposals show how the whole site could be delivered over time.

The full area is in the control of Taylor Wimpey and, whilst the 250 dwelling area could be delivered in isolation during this Plan period, given the position set out below, we are of the view that the above allocation is the minimum level of release on the land north of Milverton that should be enabled within the Plan period. We are supportive of the release of the Site given its sustainable location to the north of Leamington Spa and east of Old Milverton.

Indeed, we consider that in responding appropriately to our representations below, the Council should consider allocating the whole of the Site for development at this time. Such an approach would not undermine the overall strategy of the Plan and is consistent with the spatial distribution principles.

We comment on the proposed modifications in relation to this Site as follows:

### Mod 4 – Policy DS6

Whilst we are generally supportive of the Council's approach to increasing the housing target, taking account of unmet needs to assist the HMA in meeting the requirements of the NPPF and satisfying the Duty-to-Cooperate, we remain concerned that the level of uplift at the HMA and District levels is insufficient.

We enclose at **Appendix 3** a critique of the Council's position on meeting housing needs across the HMA.

At this time, we are of the view that the housing requirement for the HMA over the period (2011-2031) should be a minimum of 100,200 dwellings (5,010 dpa), with our updated and preferred methodology increasing this to 126,000 dwellings (6,300 dpa).

For Warwick District we consider that the OAN is a minimum of 20,800 dwellings (1,040 dpa), with our updated and preferred methodology increasing this to 23,400 dwellings (1,170 dpa).

The figures for Warwick do not take account of any need to redistribute housing within the HMA based on the Duty-to-Cooperate and Local Authorities, such as Coventry City, being unable to meet their own housing needs.

#### Mod 6 – Policy DS7

Notwithstanding our response to Mod 4, and the contention that the housing requirement should be increased further to 23,400 dwellings (1,170 dpa) for Warwick District over the period 2011-2031 (not accounting for unmet needs within the Coventry HMA), we wish to comment on the amended Policy DS7, which sets out how the housing requirement will be met.

The Council has proposed to allow for the delivery of an additional 811 dwellings over and above the proposed requirement of 16,766 dwellings for the Plan period (2011-2029). Regardless of any changes to the housing requirement, we support the approach of the Council in seeking to allocate additional land; as such an approach adds significantly to the soundness of the Council's approach by providing a positively prepared Plan that will be more effective in delivering the minimum housing needs of the area, and is flexible to changing demands over the Plan period.

The inclusion of safeguarded land will also play a key role in achieving these outcomes, which is supported in the NPPF at paragraph 14 - where Councils are asked to provide sufficient flexibility to adapt to rapid change in meeting OAN.

The proposed approach to allocations and safeguarding land will also assist the Council in demonstrating that they have been both aspirational and realistic in progressing the Plan in accordance with paragraph 154 of the NPPF; with the slight overprovision allowing for any slippages in the delivery of the strategic sites within the District – which may be particularly helpful given the proximity of a number of allocations to the south of Warwick/Leamington Spa – and maximising the chance of a five year housing land supply being demonstrable over the Plan period.

#### Mod 7 – Para's 2.21 to 2.24

Further to our suggestion for the provision of appropriate flexibility in the Plan, we note the housing trajectory that sits behind Policy DS7, which depicts the timeline for the delivery of housing over the Plan period.

The trajectory is seeking a sharp increase, from circa 850 forecast completions in 2015/16 to a minimum of circa 1,400 dpa over the period 2017/18 – 2022/23.

Such an increase is considerable, and to maximise the chances of this being delivered then the Council will require as many deliverable sites as possible to come forward to help meet this need.

We are therefore supportive of the land at Milverton being allocated for residential development and on this basis, as set out above, support an increased allocation for further delivery within the Plan period.

#### Mod 9 – Para's 2.37 and 2.38

We have no specific comments to make, other than to agree with the justification for releasing sites from the Green Belt to meet the needs of the Housing Market Area.

Furthermore, we note that the NPPF requires at paragraph 47 for the needs of the HMA to be met, however, how this is distributed across the District is a matter of planning

judgement for the Council taking account of a number of considerations. As an example, elsewhere in the HMA it can be seen that North Warwickshire has adopted a Sound Plan in accordance with the NPPF that includes within it 500 dwellings to meet the needs of Tamworth without any sites immediately adjacent to the urban area from which unmet needs are originating.

Consequently, we consider that paragraph 2.38 should be amended to simply state:

*'In selecting sites on the edge of urban areas, non-Green Belt sites are favoured over Green Belt sites where possible. However, 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 which will help to meet the needs of the Housing Market Area. ~~This applies to land to meet the needs of Coventry, Leamington, Kenilworth, some of the villages and land on the edge of Lillington to assist in the regeneration of the area.~~' (added / deleted)*

#### Mods 10 and 11 – Policy DS11 and Para's 2.41 to 2.53

We agree in principle with the proposed allocation of Site H44 for residential development. However, given it offers a sustainable and logical extension to the north of Leamington Spa we consider that a larger allocation could be delivered on the proposed safeguarded area of the Site within the Plan period – with the whole Site being under the control of Taylor Wimpey.

With regards to Site H44, we note that there are a number of aspirations for various infrastructure requirements, including the provision of: employment land; a new primary school; community facilities; medical centre; a park and ride facility and a new railway station (subject to viability).

Whilst the principle of the provision of or contribution towards these requirements is not disputed, we consider that further detailed discussions are required - particularly over the proposed location and operation of the park and ride facility. Initial discussions have been held with Stagecoach in relation to the park and ride facility and these will be formalised over the summer of 2016, with agreement in place that this provides an optimal location for such a facility to the north of the town.

Clearly, as acknowledged by the Council, in relation to the new railway station we are of the opinion that further analysis and discussion are required to determine both the need and feasibility of such a facility.

As part of considering the sustainability of the Site, Taylor Wimpey have advanced technical work in relation to: Ecology, Archaeology and Agriculture (**Appendix 4**); Highways, Drainage, Noise, Air Quality, Land Contamination and Utilities (**Appendix 5**); and Economic Benefits (**Appendix 6**).

These demonstrate that this is a sustainable and appropriate location for growth, which is capable of expeditious delivery.

#### Mod 14 – Policy DS15 – Comprehensive Development of Strategic Sites

Firstly, in the list provided, we would suggest that Land north of Milverton this be amended to state *'(including land identified as safeguarded beyond the current plan period)'* in order to ensure consistency with the sites at Westwood Heath and Kings Hill.

Furthermore, in the text following the list of sites it would be helpful for the Council to clarify what is meant by, *'Proposals for the allocated strategic sites will be approved where they represent a comprehensive development scheme for the whole site'* in the context of the sites which feature safeguarded areas.

Depending on the Council's intentions, it may be appropriate to simply add *'excluding/including any safeguarded areas.'*

Mod 16 – Para 2.81

We support the release of the land to the north of Milverton from the Green Belt, which will be essential to the delivery of a sustainable residential development on this land.

We draw attention to the Council's evidence base, with the 2009 Joint Green Belt Review highlighting that an area covering this allocation – and an additional area to the north of Sandy Lane – formed one of the 'Least Constrained Parcels' (Parcel Ref: WL6a).

More recently, in 2015 the Council carried out a further review of the same area (Parcel Ref: RL1). The parcel scored 16/20 in this assessment. However, we have prepared our own Landscape and Visual Appraisal of the Site – which respects the boundaries of the proposed release.

This is enclosed at **Appendix 7** and summarises that: *“The overall contribution the Site makes to Green Belt is ‘Some to Limited’. Subject to the proposed landscape measures including the reinforcement of Site boundaries; the creation of a landscape buffer along the northern boundary; the retention of a break between proposed development on the Site and the southern edge of Blackdown; and the retention of a break between proposed development on the Site and the railway corridor/Old Milverton, the Site has capacity to accommodate built form whilst not undermining the purposes of the Green Belt in this area.”*

Mod 20 – Policy DS NEW 1 Directions for Growth South of Coventry

In relation to this Policy, we wish to support the Council in their approach to capping of the assumed delivery of the Westwood Heath and Kings Hill sites due to infrastructure and delivery rates respectively.

It is important in meeting the needs of the HMA that the Council are realistic in this regard in order to ensure that the Plan is effective and deliverable by 2029.

Given the timescales for adoption of the Plan and progressing a site of the scale of Kings Hill, 1,800 dwellings by 2029 should be considered aspirational – and in order to ensure that the Plan remains realistic, consider that no uplift to this figure is appropriate. Indeed, the Council should ensure that they are fully confident of the build rates suggested being delivered before progressing the Plan.

Mod 22 – Policy DSNEW2

The new policy is consistent with national policy, as it has been prepared in accordance with paragraph 85 of the NPPF which sets out that:

*“When defining boundaries, local planning authorities should:*

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

We consider that – given the challenging nature of the delivery rates within the trajectory - the Council should add a criteria that, if the dwelling requirement is not being met on the allocated sites, the Council will work with the promoters of safeguarded land to facilitate delivery where it is appropriate to do so.

Mod 23 – Para's New 2.1 to New 2.3

We agree in principle to the wording of the supporting text to Policy NEW2 and that the Council acknowledge that there is a limited amount of suitable land currently available outside of the Green Belt within the District to meet long-term development needs of the HMA.

We do however consider the supporting text at paragraph 'New 2.2' to need strengthening where it states that safeguarded land "*may assist in meeting the long-term development needs...*" The land that is safeguarded is proposed from the Green Belt to be released due to; the limited non-Green Belt opportunities for longer-term growth, the appropriateness and sustainability of the specific locations and the need to comply with the NPPF. Consequently, we consider that it the word '*may*' should be changed to '*enables the Council to*' or simply '*will*'.

Furthermore, as per our representations to Mod 22, we consider it prudent to include wording within Policy NEW2 to allow for the release of safeguarded land for development to meet the needs of the HMA should the Council fail to sustain the delivery of a five-year housing land supply.

**Conclusion**

We trust that you will take these comments are helpful in progressing the Plan. Should you require any further information, do not hesitate to contact me as per the details on this letter.

Yours sincerely



**RUSSELL CROW**  
Associate