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**Communities**

PO Box 43  
Shire Hall  
Warwick  
CV34 4SX

DX 723360 WARWICK 5

**Tel: (01926) 412**

Fax: (01926) 412270

@warwickshire.gov.uk

[www.warwickshire.gov.uk](http://www.warwickshire.gov.uk)

Mrs Tracy Darke  
Head of Development Service  
Warwick District Council  
Riverside House  
Milverton Hill, Leamington Spa  
CV32 5QH

**FAO: Dave Barber**

22<sup>nd</sup> April 2016

Dear Mr Barber,

**Warwick District Local Plan 2011 – 2029 Proposed Modifications to the Submission Plan**

The Proposed Modifications of the new Warwick Local Plan will provide for increased new housing in order to meet an identified unmet need in Coventry.

The new Local Plan will now provide for 17,577 homes between 2011 and 2029. The District Council's approach to identifying land for housing as set out in the Spatial Strategy and SHLAA work is supported and these additional comments relate to the proposed modifications.

The County Council has had extensive involvement in assessment of new Local Plan and transport impacts and identification of transport infrastructure mitigation requirements through the life development of the Plan. We assume that the Draft Infrastructure Plan will be modified to reflect these changes

**Transport matters**

The transport evidence base developed by the County to support the WDC Local Plan comprises a series of Strategic Transport Assessments (STA)<sup>1</sup> and accompanying technical notes. The latest phase of this work, based on the Local Plan Modifications,

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<sup>1</sup> STAs available at [http://www.warwickdc.gov.uk/downloads/20410/new\\_local\\_plan](http://www.warwickdc.gov.uk/downloads/20410/new_local_plan).

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forms the basis for this consultation response. The most recent STA was submitted to Warwick District Council on 3<sup>rd</sup> March 2016.

On the basis of the STA work and additional analysis to assess modifications to the allocation options, we would support the inclusion of the proposed modifications to the allocations in principle.

In response to the Inspectors comments, the Duty to Co-operate and Secretary of State appeal decisions, the modifications identify a need to accommodate substantially more housing within the District. The changes to planned housing allocations (12,860 increasing to 17,577 dwellings) will have an impact on the transport network and mitigation requirements. The following sections provide an overview of the transport work by area.

### **South Warwick and Leamington**

Approximately 6,000 houses are now proposed to be allocated in south Warwick and Leamington. The addition of 1,350 houses to be delivered at the Asps and Gallows Hill Development sites has focussed further development in this area.

The STA results reveal that a number of corridor/area strategies are required to mitigate the impacts of development, these are summarised in the latest revision of the STA. A key focus of these strategies is the A452 Europa Way corridor area, where significant infrastructure requirements are required including the upgrade to a dual carriageway. The modification to the allocations in this area has also triggered the need for further improvements on Gallows Hill.

In the majority of instances the scheme proposals lie within one or more of the areas identified within the Transport Corridor Strategy<sup>2</sup> which is documented within the draft IDP. It is recommended that the new and revised schemes are incorporated within the Transport Corridor Strategy document at an appropriate time and should align with the Warwick and Leamington Spa Transport Strategy<sup>3</sup> which focuses on how targeted sustainable transport measures, when incorporated within the corridor strategies, can reduce the impact of travel on the network. The STA notes that, post adoption of the Plan, further detailed work to enable a more thorough strategy to be determined which maximises opportunities for sustainable transport measures and reduced car based trips across all corridors and town centres will be required.

It is considered pertinent to highlight the critical role, of strategic and local importance that the A46 and M40 play in accommodating traffic flows. Further investigation of scheme proposals along both the A46 and the M40 will be critical to ensuring the overall resilience of the transport network is maintained. The latest STA section 4.53 notes that *“There could, justification for seeking to improve the operational capacity of the SRN in Warwick and Stratford districts sooner than the modelling indicates, on the basis that the current modelling does not account for events such as incidents and*

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<sup>2</sup> Draft Infrastructure Delivery Plan, January 2015, Appendix A.

[http://www.warwickdc.gov.uk/downloads/file/2235/in03\\_-\\_draft\\_infrastructure\\_delivery\\_plan\\_-\\_jan\\_2015](http://www.warwickdc.gov.uk/downloads/file/2235/in03_-_draft_infrastructure_delivery_plan_-_jan_2015)

<sup>3</sup> Warwick and Leamington Spa Transport Strategy, Review of Sustainable Alternatives, January 2015.

[http://www.warwickdc.gov.uk/downloads/download/655/transport\\_assessments](http://www.warwickdc.gov.uk/downloads/download/655/transport_assessments)

*other operational issues that occur outside of the issues induced by general traffic growth”.*

### **Sites East of Kenilworth**

Local Plan modifications include additional housing allocations east of Kenilworth equating to 740 dwellings, this is approximately 50% increase in the housing allocation for the town.

The addition of these sites, combined with the cumulative impact of proposed allocations and proposed modifications, triggers the need for additional mitigation in the area.

Improvements at A452/A46 Thickthorn Roundabout and associated dualling to A452 Bericote roundabout will now become an essential element of the mitigation strategy and the IDP should be updated to reflect this. Additional mitigation is also identified within the town.

### **Sites at Kings Hill and Westwood Heath**

Modifications to the Plan include development at Kings Hill (1,800 dwellings) and Westwood Heath (425 dwellings), south of Coventry. Analysis of the impact of development of this scale, in this location, has been considered within the latest STA. Previous STAs did not cover this area, as such alternative methodologies had to be adopted to analyse the impact of development.

The STA revealed that a cap should be placed on development at Westwood Heath of approximately 425 dwellings, based on link capacity assessments on Gibbet Hill and Crackley Lane. If a wider mitigation strategy which improves links to the A46 is identified, the cap on development in this area can be reconsidered.

In addition to the allocated housing at Westwood Heath it is also understood that there are emerging plans for the University of Warwick and Westwood Business Park to grow whilst other employment sites may also come forward within the area. The area has also been identified in the Coventry Local Plan highlighting the existing constraints posed by the A45, particularly in the area of the Kenilworth Road junction.

The impact of 1,800 dwellings at Kings Hill, and the cumulative impact of Local Plan growth and general traffic growth trigger the need for a major junction improvement at A46/Stoneleigh Rd and Stoneleigh Rd/Dalehouse Lane.

It is recommended that the junction proposals for the Stoneleigh Road/A46 junction be seen as the starting point for delivering a wider strategy for improving connectivity between the A46, North Kenilworth, Warwick University and the Tile Hill/Westwood Heath housing areas south of Coventry. This could be in the form of capacity enhancements applied to the existing road network or, alternatively and longer term, provision of additional capacity in the form of a new link road which can connect some or all of the areas identified earlier.

It should be noted that the STA has established a need for a number of new mitigation strategies and has altered mitigation previously identified; these changes should now

be reflected in an update to the IDP. Additionally, in some cases the status of the requirement for these schemes has altered to “essential” as a result of the increase in demands on the network.

The STA work does not identify, at this stage, smaller, localised impacts that are not identifiable either due to the strategic focus of the work to date or the coverage of the models. These impacts and the site specific mitigation details will be agreed at application stage or through the development of the strategic schemes by WCC and funded through pooled S106 contributions and CIL.

For further details on the highway impact and mitigation strategies associated with the Local Plan, reference should be made to the transport evidence base located at [http://www.warwickdc.gov.uk/info/20416/evidence\\_base](http://www.warwickdc.gov.uk/info/20416/evidence_base) and the latest STA submission.

The County Councils Sustainable transport policies are contained in the Warwickshire Local Transport Plan (<https://apps.warwickshire.gov.uk/api/documents/WCCC-630-116>).

## **Education provision and growth**

We refer to our recent discussions about provision for schools and we request that the following changes to be made. For ease these suggested changes are highlighted in blue.

Amend Policy DS12 to read:

### **DS12 Allocation of Land for Education**

#### **Planning Policy DS12 Allocation of Land for Education**

Land at Southcrest Farm, Kenilworth (ED2) and land at Myton (ED1), as shown on the Policies Map, is allocated for educational uses and other compatible uses (see policy HS5). This includes, on each site, the provision of a secondary school, 6th form centre and, **if deemed the most appropriate location**, a primary school.

**In the case of Southcrest Farm the whole area of the site is unlikely to be required for educational purposes. Any land within this site that is surplus to the educational requirement is therefore allocated for housing (see Policy DS11)**

Amend para 2.56 Kenilworth Secondary School and 6th Form: the existing school sites are allocated for housing within Policy DS11. The school is seeking to locate all its facilities onto a single site. Further, the additional housing proposed in the Kenilworth priority area means that the town needs additional school places. If the current secondary school is to continue to **offer the educational choice it currently provides and providing the educational needs of the Town and surrounding area**. For these reasons, a new site for a secondary school in Kenilworth is preferred. In addition, the additional housing allocated in the Kenilworth area requires the provision of a new primary school. Over and above the educational **land requirement, the site has capacity for housing, as set out in Policy DS11**. The land at Southcrest Farm, as shown on the Policies Map, is therefore

allocated primarily for educational purposes and other compatible uses as defined by policy HS5, and for housing where there is surplus land over and above the educational requirement.

Amend para 2.56 as to follows:

2.56 Kenilworth Secondary School and 6th Form: Kenilworth School is not capable of being expanded on its current sites to meet the likely demand for school places generated by additional housing within the Kenilworth area. The school is therefore seeking to relocate all of its facilities on to a single new site.

A new site for secondary school provision in Kenilworth Town is therefore preferred

Land at Southcrest Farm (ED2), as shown on the Policies Map, has been allocated (DS12) primarily for educational purposes and other compatible uses as defined by policy HS5 and for housing where there is surplus land over and above the educational requirement.

The existing Kenilworth school sites are allocated for housing within Policy DS11.

In addition, new primary Schools will be required to meet demand in the Kenilworth area.

***(Explanation: the school cannot be expanded to meet demand; the school must relocate if the demand is to be met; the plan anticipates the relocation of the school by allocating the existing school sites for housing; Southcrest Farm is allocated for secondary school provision in policy DS12; any surplus land at Southcrest farm will be available for housing)***

There are some inconsistent descriptions and references to schools provision and we ask you to make these changes for clarification. The Inconsistencies are noted below and we would ask that you amend these paragraphs to include provision of a new secondary school and primary schools to serve the development.

#### **Policy DS15 (p 9 &10)**

Land at Kings Hill Potential for some employment land; potentially land for secondary school provision; new primary schools (*plural*) local centre and community facilities; health centre; new rail station (no secondary school)

#### **Mod 21 (p 22)**

New para 1.8 At Kings Hill an area of c269ha has been identified for a residential-led, mixed-use development (see Policy map). The site has an overall capacity of c. 4,000 dwellings, with c. 1,800 dwellings being deliverable by the end of the current plan period. The mixed use development will also include the potential to provide

employment land. Land will need to be provided for open space, leisure and amenity uses and will form part of a green infrastructure network linking to the wider countryside and north to the conurbation. A local centre will be provided at an appropriate scale, incorporating a range of local community facilities and services including meeting space / community buildings, emergency services infrastructure, youth facilities / play areas and local retail provision for convenience shopping. **A new primary school (singular)** will be required to serve the development, which may need to be expanded as the site develops over time. **(no reference to a secondary school stated)**

### **P33 refers**

H43 Kings Hill Lane\*\* 1800

(Total capacity up to 4000 with the balance to come forward beyond the end of the plan period). Potential for some employment land; potentially **land for secondary school provision**; ***(not in previous paragraphs)*** new primary schools; ***(plural)*** local centre and community facilities; health centre; new rail station

### **Greenfield sites para 2.55 p37 refers**

2.55 At Kings Hill an area of 269ha has been identified for a residential-led, mixed-use development. The site has an overall capacity of c. 4,000 dwellings, with c. 1,800 dwellings being deliverable by the end of the current plan period. The mixed use development will also deliver opportunities for employment provision. Land will be made available for open space, leisure and amenity uses and a green infrastructure network will link to the wider countryside and north to the conurbation. A local centre will be provided at an appropriate scale, incorporating a range of local community facilities and services including meeting space / community buildings, emergency services infrastructure, youth facilities / play areas and local retail provision for convenience shopping. **A new primary school (singular)** Will be required to serve the development, which may need to be expanded as the site develops over time. **(no reference to secondary school stated)**

We request that any reference to schools should also identify the need for land for an additional secondary school and primary schools.

We will continue to work with you to the progress of the new Local Plan and should you wish to discuss any of the above matters further please contact Mark Ryder on [01926 412811](tel:01926412811).

Yours sincerely

Monica Fogarty  
Strategic Director for Communities

