



**WARWICK LOCAL PLAN
PREFERRED OPTIONS**

**REPRESENTATIONS ON BEHALF OF
LENCO INVESTMENTS**

JULY 2012

18 July 2012

Our Ref: JBB7597.C0414

RPS Planning & Development

Highfield House
5 Ridgeway
Quinton Business Park
Birmingham
B32 1AF

Tel: 0121 213 5500

Fax: 0121 213 5502

QUALITY MANAGEMENT

Prepared by:	Gemma Jenkinson/Anna Bend
Authorised by:	Paul Hill
Date:	18 July 2012
Project Number/Document Reference:	JBB7597.C0414

COPYRIGHT © RPS

The material presented in this report is confidential. This report has been prepared for the exclusive use of Lenco Investments and shall not be distributed or made available to any other company or person without the knowledge and written consent of RPS.

CONTENTS

1	INTRODUCTION	4
2	LAND SOUTH OF BAGINTON.....	5
3	RESPONSES	8
4	CONCLUSION	9
	APPENDIX 1 – SITE LOCATION PLAN.....	10
	APPENDIX 2 – COVENTRY AND WARWICKSHIRE GATEWAY PROPOSALS.....	11
	APPENDIX 3 – LOCATION OF GATEWAY SCHEME PROPOSALS.....	12

1 INTRODUCTION

- 1.1 RPS Planning and Development (RPS) has been instructed by Lenco Investments (Lenco) to prepare representations to the Warwick District Council New Local Plan Preferred Options consultation document, in respect of their land interests at Baginton.
- 1.2 Warwick District Council (the Council) has proposed their Preferred Options in terms of housing and economic growth and their vision for the district generally over the plan period to 2029. These are currently being consulted upon until 27 July 2012.
- 1.3 RPS has made representations on behalf of Lenco to the previous stages of both the Warwick Local Development Framework and the Coventry Core Strategy, to ensure a suitable approach is taken to cross boundary development led growth.
- 1.4 Lenco's land interests at Baginton relate to a site which lies to the south of Baginton village situated within the Green Belt, as shown at Appendix 1. It is important to note that Lenco has the controlling interest in the majority of this land.
- 1.5 The site Lenco has interests in lies to the south of Baginton village, and. The site extends to approximately 50ha and is in a sustainable location within easy access to Coventry City Centre, close to the perimeter edge of the airport, with excellent cycle, pedestrian access to the surrounding areas, and vehicular access to major transport links such as the A45 and A46.
- 1.6 Whilst the site falls within the local authority area of Warwick District it remains very close to Coventry's administrative boundary, as well as the major sub regional employment base centred on Coventry Airport. RPS is aware of the current proposals to expand Coventry Airport, and a housing development at Baginton would support these expansion plans.
- 1.7 The representations, therefore, address the need for housing growth within Warwick administrative boundary and suggest that large-scale growth should be situated within close proximity of employment development to ensure that people can live and work in close proximity. Such proposals will support the Government's objectives to encourage economic growth in order to revive the economy. Furthermore, these representations address the need for cross-boundary growth and for full and proper cross-boundary working to be established between, Warwick, Coventry and Nuneaton and Bedworth Boroughs as required by the Localism Act and NPPF.
- 1.8 The following chapter provides details about the site at Baginton, and our comments in response to the Preferred Options document are provided in Chapter 3 and are set out in the same format as the Council's response forms.
- 1.9 RPS are willing to meet with Planning Officers from Warwick District Council again concerning Lenco's land interests and the New Local Plan process to discuss the potential of the site in meeting local housing needs.

2 LAND SOUTH OF BAGINTON

- 2.1 The site Lenco has interests in extends to approximately 50ha and lies to the south of Baginton village. The site is in a sustainable location close to Coventry City's boundary and the urban area, and within easy access to the City Centre, and major transport links such as the A45 and A46. The site, being close to the perimeter edge of the airport, with excellent cycle, pedestrian and vehicular access, provides an exceptional opportunity for the provision of balanced housing growth in the most sustainable manner.

Planning Policy

- 2.2 The Local Plan Preferred Options promotes 10,800 new dwellings within Warwick District for the plan period up to 2029, at an annual delivery rate of 600 dwellings a year.
- 2.3 Evidence advanced by the West Midlands regional assembly for the West Midlands 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 at a rate of 910 dwellings/year. Whilst the RSS is not longer in place, the evidence base is still to be taken into account by Local Planning Authorities in preparing development plan documents.
- 2.4 The 2012 Strategic Housing Market Assessment indicates a requirement of 698 dwellings a year to meet the affordable housing needs of the District in addition to market housing needs, which is significantly higher than the level of housing currently being proposed by the Council.
- 2.5 The 2008 ONS Household Projections predicted an increase of 17,000 households between 2008 and 2028, at a rate of 850 dwellings a year. This represents an additional 150 dwellings a year than is currently proposed through the Local Plan, which clearly will not meet the District's identified need for new homes.
- 2.6 RPS is also aware that the 2012 SHLAA indicates that the District has a supply of deliverable sites to provide 13,385 dwellings between 2014 and 2029, excluding windfalls, which is greater than the numbers proposed within the Local Plan. Therefore the Council has identified the ability to deliver housing sites at a higher annual rate than is currently proposed through the Preferred Option.
- 2.7 RPS, on behalf of Lenco, therefore believes that the proposed figure of 10,800 new dwellings is insufficient and that a higher level of growth would better reflect the projected population increase and ensure that identified housing needs can be met, as suggested within the evidence base. The Council cannot meet a higher target without locating housing on greenfield of Green Belt land, and therefore should consider sustainable locations outside of the urban areas to ensure housing needs can be appropriately met.

Cross-boundary Growth

- 2.8 The NPPF states that Local Planning Authorities have a '**duty to co-operate**' on cross-boundary planning issues, in particular for strategic priorities including housing, to meet development needs which cannot be met solely within their own administrative boundaries.

2.9 It has been recognised in Coventry's SHLAA assessment that the Council cannot meet their housing targets on land within their administrative boundary alone. It is considered, therefore, that Green Belt locations on the periphery of the urban area should be recognised as appropriate locations for accommodating future growth.

2.10 The Green Belt south of Coventry was recognised through the Warwick Core Strategy process as being an appropriate location for accommodating future growth of the City. Although the site is within Warwick District it lies close to Coventry's administrative boundary, as well as the major sub regional employment base centred on Coventry Airport.

Coventry Airport

2.11 Whilst both Coventry Airport's major sub regional employment base and Baginton village are located outside of Coventry's local authority boundary, they are socially and economically associated and physically adjoin the Coventry urban area. Residential development in this location at Baginton could balance the existing significant employment base on the southern side of Coventry, such as those around the airport at Stonebridge Trading Estate and Middlemarch Business Park, both of which are within a very short distance of the site, as well as the air freight and terminal employment opportunities.

2.12 RPS is also aware of the current Coventry and Warwickshire Gateway Scheme proposals (Appendix 2) to expand Coventry Airport, and a housing development at Baginton would support these expansion plans. RPS recommends that housing supply is focused in those areas where there are important benefits to be gained where future economic growth is planned.

Site at Baginton

2.13 A residential-led mixed use development at Baginton could contribute sustainably to cross-boundary growth as required by the NPPF, and to meeting both Warwick District and Coventry City's housing needs by delivering approximately 1,000 new homes either in isolation or as part of the wider regeneration proposals for the area. The location of the site in relation to the Gateway proposals is shown at Appendix 3.

2.14 Development at this location would also allow for new facilities and services to be provided, making the best use of existing and proposed infrastructure. The site can be appropriately phased over the Local Plan period to develop an available, suitable and deliverable urban extension proposal.

2.15 The promotional document 'Land south of Baginton: A Sustainable Urban Extension' prepared in 2008 has previously been submitted to the Council and provides further details of how the site could be sustainably developed.

2.16 In addition to this, extensive technical surveys in relation to flood risk, noise, ecology, conservation and heritage, landscape, and highways have been undertaken of the site and submitted to the Council, to demonstrate the site's suitability for a significant residential-led development either in isolation or in connection with proposals for the wider area. An Air Quality Assessment will also be undertaken to demonstrate the site's suitability for development.

2.17 RPS, therefore, considers that to help deliver greater sustainable development opportunities, it is important that sufficient housing land comes forward in areas of proven market demand, such as

on this Green Belt site to the south of Baginton, to contribute towards delivery of additional dwellings and higher levels of growth to meet the needs of both Councils.

2.18 Responses to individual policies and topics within the Preferred Options consultation document are included in the following chapter.

3 RESPONSES

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

Part A - Personal Details

	1. Personal Details	2. Agent's Details
Title		Mrs
First Name		Gemma
Surname		Jenkinson
Job Title		Associate
Organisation	Lenco Investments	RPS Planning & Development
Address Line 1	c/o Agent	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		gemma.jenkinson@rpsgroup.com

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

Part B – Commenting on the Preferred Options

Sheet 1 of 9

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?	X 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 Options consultation document states 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, 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 Lenco disagrees with this figure 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 West Midlands 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 at a rate of 910 dwellings/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 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. RPS considers that it is important to provide large-scale sustainable development in locations where people can live and work in close proximity, such as at the Lenco's site at Baginton which is adjacent to the Coventry Airport expansion proposals. The site is also within commuting distance to employment opportunities within Warwick Town Centre and other surrounding towns and cities such as Coventry and Birmingham. Therefore, it is suggested that the Local Plan should allocate a greater number of houses for the District to meet future housing needs that will increase with the economic growth proposed in accordance with Government policy. This can evidently be accommodated on sustainable sites such as Baginton.

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, a greater number of dwellings can be delivered within the District to contribute towards housing needs of Warwick than the 10,800 target proposed in the Local Plan.

The NPPF also requires cross-boundary cooperation between Local Planning Authorities to ensure housing needs are met, in particular for those which cannot meet their needs within their own administrative boundaries, such as Coventry City Council.

For Official Use Only

Ref:

Rep. Ref.

Part B – Commenting on the Preferred Options

Therefore, RPS is of the opinion that the Council should recognise that greenfield and Green Belt land in sustainable locations, adjacent to the urban areas, is required to ensure that housing needs of the District and adjacent authorities are appropriately met, ensuring compliance with the NPPF. The Council's housing targets should therefore be increased to reflect this and the predicted levels of growth as identified through the evidence base.

Part B – Commenting on the Preferred Options

Sheet 2 of 9

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 development a Community Infrastructure Levy is supported. There will need to be clarification about what is to be covered by CIL throughout the consultation process.

CIL requirements need to give consideration to viability to ensure that they are not detrimental to the facilitation of development stifling economic growth.

A comprehensive consultation process will need to be completed in the publication of the Council's CIL programme.

Part B – Commenting on the Preferred Options

Sheet 3 of 9

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)	PO3: Broad Location of Growth
Paragraph number / Heading / Subheading (if relevant)	7.7
Map (e.g. Preferred Development Sites – Whole District)	
What is the nature of your representation?	<input checked="" type="checkbox"/> Support <input type="checkbox"/> 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 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, particularly the acknowledgement of a need for housing in rural areas. The Council recognises that there is a shortage of suitable urban brownfield sites available, and RPS considers that strategic rural Green Belt sites are considered to ensure that housing can be delivered to meet the proposed increase in households for the plan period.

The NPPF also requires cross-boundary cooperation between Local Planning Authorities to ensure housing needs are met, in particular for those which cannot meet their needs within their own administrative boundaries, such as Coventry City Council. Therefore, it is important for the Local Plan to comply with the NPPF cross-boundary locations should be identified to meeting housing growth for the Council and assist in adjacent authorities in meeting their housing needs.

The site owned by Lenco at Baginton lies adjacent to Baginton Village and Coventry Airport, and is very close to the Coventry urban area providing a sustainable location for development with good access into Coventry City Centre, nearby Business Parks, and major road links of the A45 and A46 leading further afield.

With the current expansion proposals for a Gateway Scheme at land around Coventry Airport where significant investment of £250 million is to take place to create 14,000 jobs and improved infrastructure, RPS considers Lenco's site at Baginton to be a sustainable location which could provide housing to support these future employment opportunities at the Airport, which will be required in addition to existing housing needs.

The infrastructure improvements proposed for the Gateway Scheme, will provide better access into the Airport site and improve junctions including the A45/A46 roundabout. It is considered that these improvements will also be able to provide better access to Lenco's site to the east, and these new roads and links would assist residential development at this location as they would be able to accommodate large vehicles going to the logistics park and adjacent uses, and therefore they would be able to accommodate the traffic associated with a large housing development of approximately 1,000 dwellings in this location.

RPS therefore considers that the Council should recognise that this Green Belt site at Baginton is an appropriate location to deliver much needed housing and community facilities to contribute towards both Warwick and Coventry's requirements either in isolation or in conjunction with the wider expansion proposals for the area.

For Official Use Only

Ref:

Rep. Ref.

Part B – Commenting on the Preferred Options

Sheet 4 of 9

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

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.

Policy PO4 indicates a number of allocated sites on the edge of Warwick, Leamington Spa and Whitnash 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 ONS 2008 Household Projections, and is less than what the SHLAA has identified can be accommodated on suitable sites within the District.

RPS considers that sites on the edge of Coventry in Warwick's administrative boundary, such as Lenco's site at Baginton, should be allocated for housing growth. No sites within this area have been allocated for residential development.

Of the sites to be allocated, Land North of Milverton is a Green Belt site, and the 2012 SHLAA assessment indicates that development of this site would require significant contributions towards infrastructure and services, and may also require employment uses to support such a large amount of housing.

The site at Blackdown is also within the Green Belt and development in this location would also require significant contributions towards infrastructure and services, and the inclusion of employment to support the number of houses proposed. It is also within an area of water source protection and ground water vulnerability.

Land at Thickthorn is a Green Belt site which was identified in the SHLAA as potentially suitable for housing, but the site possibly has surface water drainage problems in the eastern part, and is subject to noise and air pollution from the A46.

The site at Europa Way is currently within an Area of Restraint with part of the site being a Minerals Consultation Area.

The Myton Garden Suburb site is within an area of open countryside with high landscape value, and is adjacent to Warwick Castle, and any development would need to be sympathetic to this setting. A small part of the site to the south is within Flood Zones 2 and 3A, and due to the landfill to the south remediation work would probably be required. It is therefore questionable as to whether many of these sites are viable and suitable for the residential development proposed.

RPS considers that Lenco's site at Baginton is a more sustainable location for a residential-led mixed use development than these Green Belt sites due to its proximity to the Coventry urban area, and the Gateway Scheme regeneration proposals around Coventry Airport, which will significantly improve infrastructure and employment opportunities within the area.

The site was identified in the 2012 SHLAA, ref. C10, but was discounted as being unsuitable for a residential development due to landscape impact, noise and air pollution from the airport, and air pollution from the sewage works.

For Official Use Only

Ref:

Rep. Ref.

Part B – Commenting on the Preferred Options

Extensive technical assessments have been undertaken for the site in relation to flood risk, noise, ecology, conservation and heritage, landscape, which have previously been submitted to the Council. These reports demonstrate that the site is suitable for a significant residential-led development either in isolation or in connection with proposals for the wider area. An Air Quality Assessment is also to be undertaken to demonstrate the site's suitability for development.

The policy includes Baginton as a Category 3 village, where development is only permitted within the settlement boundary.

The Green Belt location south of Coventry was previously recognised by the Councils as being an appropriate location for providing cross-boundary development to contribute towards Coventry's housing needs. It is considered that this site could also contribute towards Warwick's housing needs and support the Coventry Airport expansion proposals. It is important to provide large-scale sustainable development through proposals where people can live and work in close proximity. The site at Baginton is more appropriate in these terms than other sites identified in the SHLAA which do not have large employment facilities in close proximity such as the land at Baginton.

The site has been promoted through all previous stages of both the Warwick and Coventry Local Development Framework processes as an appropriate site for a Sustainable Urban Extension.

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

Part B – Commenting on the Preferred Options

Sheet 5 of 9

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 refused planning permission if they can sustainably contribute towards meeting the market housing needs of the District.

The Council will need to be realistic in considering affordable housing requirements alongside the publication of CIL to ensure that schemes are viable and that Local Authority requirements do not stifle economic growth.

Part B – Commenting on the Preferred Options

Sheet 6 of 9

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 PO16 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

Sheet 7 of 9

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)

PO8: Economy

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 Council's priorities to ensure availability of a wide range of employment land, and the recognition of the importance of working with Coventry and Warwickshire sub-region in respect of the Gateway Scheme at Coventry Airport as a location of importance for employment and regeneration.

The Local Plan policy should also include reference to the need to deliver appropriate housing and facilities in this location to compliment this growth to the south of Coventry and support the increase in population locating to the area for the employment opportunities which will be provided.

Additional housing development also provides jobs during construction, contributing to economic growth. This is another reason for the Council to increase housing delivery in accordance with the ONS Household Projections for the District.

Therefore, Lenco's site at Baginton is a sustainable location for growth, adjacent to the proposed Airport expansion, and can accommodate up to 1,000 dwellings to assist in the regeneration of the area.

Part B – Commenting on the Preferred Options

Sheet 8 of 9

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)

PO10: Built Environment

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 accepts Policy PO10 and the Council's priorities of delivering sustainable development in terms of protection of the environment, high quality design, and incorporation of sustainability and renewable energy measures.

However, it is important that these measures are only incorporated into developments where it is viable to do so. The Council should be flexible to enable smaller developments to be delivered where these measures cannot be included within the scheme to contribute towards meeting the proposed housing targets up to 2029.

RPS also considers that it is important for the Council not to reject housing proposals on larger sites which would not meet all of the aims of this policy, in terms of sustainable measures and environmental protection. This is because it is evident that the Council has proposed to deliver 10,800 dwellings at a rate of 600 dwellings/year to 2029, which is far below the anticipated increase in population and future needs identified in the evidence base documents and ONS 2008 Household Projections.

RPS therefore considers that the Council should be flexible to ensure that a higher level of housing is delivered in line with these projections, potentially on less sustainable sites.

The NPPF promotes sustainable development and economic growth. Whilst it is important to protect the local environment and enhance local vernacular, there is a presumption in favour of development and economic growth over other planning matters, to accord with national planning policy.

Part B – Commenting on the Preferred Options

Sheet 9 of 9

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

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.

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.

In addition to this, the NPPF requires cross-boundary working between neighbouring authorities to accommodate housing growth which cannot be accommodated with the authority's own administrative boundary. As it is understood that Coventry City cannot meet their housing needs within their boundary, cross-boundary locations need to be identified to locate this additional housing. The Green Belt south of Coventry, including Lenco's site at Baginton, was considered by Coventry City Council as a sustainable location to meeting this growth.

RPS considers that Lenco's site at Baginton is a more sustainable location for a residential-led mixed use development than other Green Belt sites to be allocated for large-scale development, such as land North of Milverton and land at Blackdown, which both require significant contributions towards infrastructure and services, and the inclusion of employment to support the number of houses proposed. In addition, the Green Belt site at Thickthorn has surface water drainage problems in the eastern part, and is subject to noise and air pollution from the A46.

The promoted site at Baginton is within close proximity to the Coventry urban area, and the Gateway Scheme regeneration proposals around Coventry Airport, which will significantly improve infrastructure and employment opportunities within the area which could be complimented and supported by a residential-led mixed use scheme.

Policy PO16 does not include any references to boundary alterations around Coventry, within Warwick District's authority area, to accommodate development to support either Warwick's housing targets or Coventry's housing targets.

RPS considers that this policy is revised to include alterations of the Green Belt boundary south of Coventry. As previously stated, this is a sustainable location and a residential-led development at this location would be highly appropriate in supporting the regeneration and employment development around Coventry Airport as part of the Gateway Scheme proposals.

For Official Use Only

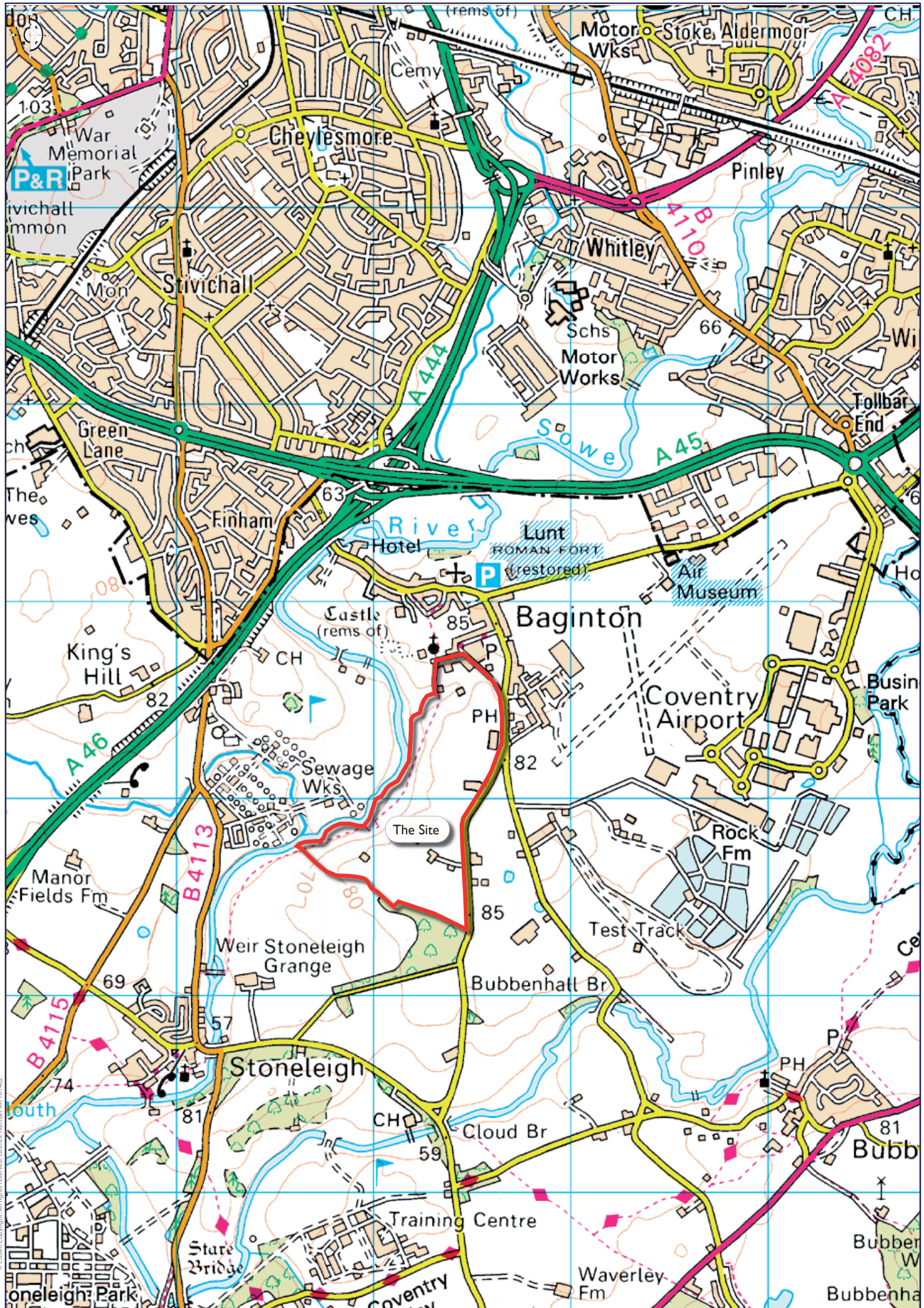
Ref:

Rep. Ref.

4 CONCLUSION

- 4.1 The Warwick New Local Plan Preferred Options consultation document proposes 10,800 new homes to be delivered within Warwick District between 2011 and 2029. However, it is evident that this figure is less than the projected increase of households for this period as indicated in the evidence base documents and ONS Household Projections for 2008.
- 4.2 Therefore, RPS, on behalf of Lenco, considers that the Council should propose a greater number of dwellings in the Local Plan, and seek to include additional Lenco's site at Baginton to contribute to a greater number of houses, in a highly sustainable location, adjacent to existing and future employment opportunities and the regeneration proposals of the Warwickshire Gateway Scheme. Housing on the site could contribute towards meeting the housing needs of Warwick District, and also the needs of Coventry City Council which cannot meet their housing needs within their own administrative boundary.
- 4.3 RPS, therefore, requests that these representations are taken into account in the preparation of the Local Plan, and that the Council considers the suitability of this site at Baginton for a large-scale residential development.

APPENDIX 1 – SITE LOCATION PLAN



SCALE: 1:20,000 @ A3

© Crown Copyright. All rights reserved. Licence number AB161462.

REF: JBB7597	CHECKED BY: PH
CLIENT: Mr. T Roberts	DATE CHECKED: 09/07/07
DATE: July 07	REVISION: 02
STATUS: Final	PREPARED BY: JP





APPENDIX 2 – COVENTRY AND WARWICKSHIRE GATEWAY PROPOSALS

Illustrative Masterplan



APPENDIX 3 – LOCATION OF GATEWAY SCHEME PROPOSALS

 Site at Baginton

 Location of Gateway Scheme Proposals

