



Walton and Wellesbourne Way Neighbourhood Plan

Representation Submitted by Star Planning and Development on Behalf of The Richborough Estates Partnership LLP

1. The Richborough Estates Partnership LLP support, in principle, the preparation of the Walton and Wellesbourne Way Neighbourhood Plan.
2. This representation does include some, hopefully, constructive comments which ought to improve the Neighbourhood Plan before it is the subject of further scrutiny. As a general comment, where the policies replicate the Stratford on Avon District Core Strategy without any bespoke changes for either Wellesbourne or Walton, then there needs to be consideration whether such policies add anything to the Neighbourhood Plan. There is little merit in including policies that just represent unnecessary duplication of the approved Core Strategy.
3. As the promoter of the land for residential development, Richborough Estates support the allocation of Area 1 – ‘Potential Areas for Housing in North and East of Wellesbourne’ (page 60) and Policy WW7.
4. The locational merits and reasons for the choice of Area 1 are articulated in the Neighbourhood Plan and include matters such as: a local choice for any housing to be to the north and east of Wellesbourne; a location adjacent to the built-up area of the settlement and the future residents being able to access by non-car modes of travel the facilities and service available within the village centre. Further, the extent of the proposed allocation is outside the floodplain associated with Newbold Brook.
5. In addition to the work undertaken by those preparing the Neighbourhood Plan, Richborough Estates has undertaken its own assessments to determine whether there are any constraints to the residential development of Area 1. The outcome of the initial assessments is provided as part of these representations. They give comfort as to the ability for Area 1 to come forward for housing purposes during the plan period for a cross section of housing, including affordable homes.



6. Tyler Grange have assessed the ability of Area 1 to accommodate housing development from a landscape and visual perspective. Residential development would be visually consistent with the existing housing fronting Warwick Road, Hammonds Green, Daniell Road and Hopkins Way. The proposed new homes would be within a site that is well contained by vegetation and sits at a lower topographical level with the adjacent housing providing a background when viewed from the surrounding area. In addition to the proposed new homes, there is the potential for open space uses to occur within the land between built development and Newbold Brook.
7. The flooding issues have been considered by BWB Consulting. New homes can be kept out of the floodplain on the higher ground. Although more detailed hydraulic modelling would be undertaken, there is an opportunity in any proposals to undertake improvement works to Newbold Brook and its immediate corridor. Such improvements would present opportunities both in terms of biodiversity but also in improving channel capacity and rationalising any flood extents to a more defined corridor. The modelling may also indicate that the extent of the housing area could be greater than the 2-hectares indicated in the Neighbourhood Plan. By reason of the detailed flood modelling, the estimated capacity of the slight may well be greater than currently assumed in table contained on page 61 (i.e. or than 2 hectares or 50 dwellings. Although Policy WW7 does not need to be amended, a footnote to the page 61 table stating that the estimated site area and dwelling capacity are both 'indicative' would be prudent to allow for some flexibility.
8. PTB Transport Planning has advised on access to the site. Warwick Road has a carriageway width of some 7.5 metres, with footways both sides of between 1.8 to 2.0 metres in width. The design of the carriageway and footways provides sufficient capacity to accommodate existing traffic and any traffic generated by housing on Area 1.
9. PTB concur with the comments in the Neighbourhood Plan that there are good pedestrian connections to local facilities within Wellesbourne, including the bus services.
10. Initial ecological and heritage assessments do not indicate any matters which would preclude the development of Area 1 for housing purposes.
11. Against the context of the assessment work undertaken to date, Richborough Estates can confirm that Area 1 as a housing allocation is both deliverable and viable. Further, the



detailed hydraulic modelling may well demonstrate that the capacity of Area 1 is greater than the 50 dwellings currently assumed albeit the number of dwellings would be influenced by other factors such as layout and integration into the landscape.

12. Richborough Estates does, however, question whether there is a need now to determine where post 2031 growth ought to occur as part of this Neighbourhood Plan. At the current time the need for such a commitment has not been established and the Neighbourhood Plan is pre-empting future decisions about the scale and location of growth across Stratford on Avon District. For the scale of growth proposed it would be prudent to undertake more detailed assessments and analysis to demonstrate that any new housing would be deliverable and viable.

13. Although Area 2 has been indicated for potential development post 2031, there remains merit in undertaking a fuller consideration of all the potential alternative locations for growth and the benefits they could deliver to the wider community. Land to the north of Wellesbourne outside the floodplain of Newbold Brook is suitable and available for housing development and should therefore be considered as a possible reserve site. This land is indicated in 'blue' below and has been assessed by Richborough Estates' consultant team as being capable of being developed for residential purpose. There are no technical or environmental constraints to built development occurring outside the floodplain, including any adverse impacts on the landscape, floodplain and highway network.





14. A potential benefit of development occurring at north Wellesbourne is the possible improvement of the floodplain to provide additional storage capacity. This additional capacity would improve the current situation for residents of Wellesbourne who live downstream of the site and whose properties are currently susceptible to flooding. Greater storage of floodwater upstream would reduce the risk of these properties flooding.
15. Richborough Estates would welcome the opportunity of working within the authors of the Neighbourhood Plan and the Parish Council to discuss the potential of this alternative area of land coming forward for housing development, including the possible increase in the capacity of the floodplain. However, as has already been noted, this may not necessarily require a formal allocation in this Neighbourhood Plan. Instead there are two potential options which could be adopted in this Neighbourhood Plan. The first option is not to identify possible sites for housing post 2031 at this stage. The second approach is to identify 2 potential directions for growth (i.e. to the north of Wellesbourne and in general location of Area 2) which would provide some clarity for the community about future intentions. Whichever of these options is adopted would enable a more considered and assessed proposal for a possible site in a review of the Neighbourhood Plan that could also be capable of taking into account any future housing requirement established via a review of the Core Strategy/Local Plan.
16. One other observation concern Policy WW13 where it currently states that '*No new development will be supported within 8 metres from the edge of the River Dene and Newbold Brook flood plain as designated by the Environment Agency as the extent of flood zones 2 and 3*'. There is no explanation concerning why this approach is being adopted. National policy and guidance is already clear what can or cannot be developed within any floodplain and this does not extend to include further constraints on land adjacent to flood zones 2 and 3. Accordingly Policy WW13 is inconsistent with national policy and guidance.
17. Further, it should be noted that with more detailed hydraulic modelling the extent of flood zones 2 and 3 can vary (usually becoming tighter to the watercourse) when compared to the course modelling assumptions which underpin the Environment Agency's maps included on the website. As the Environment Agency would advise in respect of any planning application close to a watercourse, reliance should not be placed on the maps to define a boundary from which a further 8 metre buffer would be applied.



18. The application of a policy which seeks to limit new development adjacent to watercourses by up-to 8 metres would make greater sense and reflect the approach of the Environment Agency. Such a corridor is necessary to enable access to the watercourse for maintenance purposes. This may be what Policy WW13 is seeking to achieve and it would be more appropriate to draft the policy as: *'No new development will be supported within 8 metres either side of edge of the River Dene and Newbold Brook. Any development within the floodplain of these watercourses shall accord with national policy and guidance.'*

5 August 2016