Development Policy Manager Development Services Warwick District Council Riverside House Milverton Hill Leamington Spa CV32 5QH



Objections to Proposals for building on Greenbelt

We are writing as residents of north Leamington to raise our concerns and objections to the current proposals for new building of homes and offices on Greenbelt land.

It seems to us that the reasoning for building on greenbelt land is inherently flawed in the first instance, for the following reasons:

- 1) Building on greenbelt land should only take place in 'exceptional circumstances' the council has not demonstrated why the current circumstances are exceptional; in fact the council has itself previously identified non-greenbelt land available east of Europa Way and south of Heathcote, but has failed to include these in the latest Preferred Options sites. We would suggest that as alternative options are available there are no 'exceptional' circumstances, therefore these proposals are invalid.
- 2) In arriving at the number of houses that are apparently required a number of key points are not clarified
 - i) The projected figures are based on previous years of exceptional population expansion. Yet the local economies are no longer expanding at the same rate therefore it is beholden on the council to re-examine these projections.
 - ii) The figures do not distinguish between numbers of 'houses' or 'households' in terms of land required this is a fundamental point, because of the nature of home that is required by different households. The population of Warwickshire is not growing substantially in terms of young families, whilst the number of elderly two or single person households is projected to expand. Elderly people require apartments or single storey houses with easily maintained or communal gardens, in developments in or near town centres that provide additional support while remaining part of the wider community and with easy access for non-car drivers to shopping facilities this is unlikely to be achieved by suburban expansion.
- 3) The proposal for North Leamington states that 40% of the proposed housing will be 'affordable' this is the nub of the whole argument. There is a healthy turnover of privately owned property of all levels on the open market which does not suggest a requirement for large numbers of housing on the open market. The key requirement is therefore for affordable housing. In large-scale housing developments this aspect is inevitably squeezed by developers to take up the smallest percentage both in terms of number and land you have only to look at a development such as Emscote Lawn to see that the residents of the affordable housing got significantly smaller properties with a less attractive outlook, largely built around the periphery of the site.
- 4) We would like to highlight some alternative proposals. A radically different albeit small-scale approach has been for councils to allow non-profit organisations to offer tenders to build sustainable low-cost housing on smaller plots that are less economically viable for large scale developers who rely on economies of scale. This results in far more attractive and imaginative affordable housing on brownfield sites.

There are a number of precedents for this approach:

a) Cohousing movement - http://www.cohousing.org.uk/groups

This is a small but steadily growing group of associations of people looking to move towards a more community based approach both to building and living, combining private accommodation with shared community facilities. Examples of recent developments include:

http://www.cohousing.org.uk/springhill-cohousing - this cohousing community in Stroud, Gloc has built 34 housing units ranging from 1-bed flats to 5-bed houses – this development has since won a number of awards for sustainable development.

http://www.coflats.com/ - also in Stroud, has converted a redundant church into 14 apartments

http://www.bathselfbuild.co.uk a group of self-builders in the West Country who are actively plot-searching and lobbying councils for tenders to build non-profit housing

Ashley Vale Action Group http://wildgoosespace.org.uk – this group was formed to prevent the unimaginative development of a small brownfield site by a large profit-making company who planned to build 35 houses. The subsequent development resulted in 41 homes being built, housing >100 residents, plus a large community space for hire and 3 work units supporting local small enterprises. This development has been highlighted in the national press and commended by the government.

Lancaster cohousing http://www.lancastercohousing.org.uk/Project/Homes is similarly in the process of building eco standard new homes whilst converting a redundant mill into communal living and working space.

The National Selfbuild Association quotes the <u>Government's Housing Strategy</u> published in November 2011. This report requires all local authorities to assess the demand for self-build in their areas and, where appropriate, to develop policies to encourage more plots for self-builders. There does not appear to have been any such attempt by Warwick District council prior to drawing up such plans. Yet only 6 years ago, the council applied a moratorium to all applications for small-scale development such as garden plots.

b) Alternative sites for employment facilities.

The greenbelt proposals include new-build employment facilities. Yet there are potential brownfield development sites all over the Warwick and Leamington district, both in terms of redundant housing, unlet shops and empty offices. Some of these are approaching a state of dereliction, others are newlybuilt. If the council really believes that new offices are required as part of a new development on Greenbelt land, we would like to draw their attention to the following vacant sites that should be filled first:

- Tournament Fields still has unlet office premises some 12 years after it was built
- Portobello office development next to the Portobello bridge remains empty ever since it was built on the former Potterton site
- North Lodge (part of a complex of offices on the Kenilworth Road) remains empty.
- Bath Place (owned by Warwickshire College) is largely unused yet those organisations who could
 make best use of it can make no long-term plans because its future has not been decided, whilst
 an area of green space within the main Warwickshire college Leamington campus has been
 identified as a new site for housing.
- The Council's own offices would surely be a cheaper proposition to leave as offices than to redevelop as housing, if offices are required.
- Office buildings in Holly Walk remain empty
- · Office buildings on Dale Street are available to let

There are numerous other examples of buildings that have been empty in the long term that
appear to have had little effort expended to find appropriate tenants or uses. E.g. the art deco
style former cinema on Clarendon Street.

Meanwhile a prime brownfield site, that of the former Ford Foundry, is being developed by what appears to be yet another supermarket chain, with two other supermarkets within 300 yds. This site would have provided enough space for a large imaginative housing development with existing transport links, access to schools and town facilities.

In addition to such large scale sites, there are numerous smaller sites that could be built upon. It is simply lazy of the council to look to greenbelt development when there are numerous alternative options.

- 5) The proposals themselves are also lazily presented to suggest that new housing would be based on a model such as Hampstead Garden Suburb in London, built in the early 20th century as affordable housing (and which happens to be where one of us grew up) but now the province of the very rich with its housing valued at >£1 million shows a lack of any substantial research. Meanwhile the council brochure, in seeking to illustrate what the new development might resemble as a so-called garden community, has used photos of Northumberland Road, one of the most desirable and least affordable roads in Leamington. This is breathtakingly cynical.
- 6) Finally there is the use of the greenbelt itself. It is not just there to provide a gap between areas of urban development, which seems to be the main argument of the proposals. It is there to enhance the environment of the existing communities. The areas to the north of Milverton and Blackdown, which are already constrained by the existence of the A46, provide a sliver of countryside that is greatly valued as an amenity for local walkers, (individuals, families and dogowners) and runners, not just a view. If building is taken out towards the A46 there will no effective green space left for such use a small strip between Old Milverton and the proposed housing does not preserve the countryside in any meaningful way. In addition, the new development is said to require the additional development of a North-South relief road surely that is the purpose of the A46 linking up to the M40? The council state that new offices in the development would reduce the need for North-South traffic yet still want to destroy further countryside. We would contend that at present much of the travel in North Leamington is actually north to the A46 as a high proportion of north Leamington residents travel out of Leamington towards Coventry, not south. Hence a new development would necessitate a relief road which is not currently required.

Considering the history of Leamington and Warwick it is striking that some of the most attractive and highly valued small public amenity areas (e.g. The Dell in Leamington, Hill Close Gardens in Warwick) were all earmarked at some point by the council for either house or road-building, and were only saved by the efforts of local community groups or a change in government policy – it is sad that our council planners seem to have learnt so little in the intervening years.

In conclusion, we believe that the council is seeking a quick fix to a problem that will be highly detrimental to Learnington instead of looking for more imaginative and sustainable solutions that could enhance it.

Yours faithfully,