

26th June 2013

P-07-289/PB/Warwick

Development Policy Manager
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By email to: newlocalplan@warwickdc.gov.uk

Dear Sir

PLANNING & COMPULSORY PURCHASE ACT 2004
Warwick Local Plan - Revised Development Strategy Consultation June 2013

1. Introduction & Background

We act as planning consultants for Barclays Bank plc ("the Bank") in respect of the Local Plan for the District and this letter forms the Bank's response to the above consultation. As a long-established business, the Bank has made a substantial contribution to the vitality and viability of the District's town centres over the years that it has traded and as a significant stakeholder it is therefore concerned that development plan policies should not fetter the important contribution that it makes to the vitality and viability of those town centres.

We made detailed representations on behalf of the Bank in June 2012 to the consultation on the Local Plan Preferred Options, reminding the Council that through high attraction of footfall, financial services retailers generally (and the Bank in particular) play a key role in promoting town centre health and as a result, the provision of financial services should be allowed to improve and evolve alongside the improvements to shopping provision envisaged over the proposed plan period. We emphasised that Banks should not be subject to outmoded restrictive controls on their location, particularly as this is not supported by Government policy or by any evidence, so there is therefore a need to review existing policies that restrict such A2 uses in designated frontages or the Council will risk the plan being found unsound. The current stage of consultation has ignored the opportunity to address these matters.

2. Representations on the current consultation

In line with the Strategic Vision in the Council's Corporate Development Strategy, the Local Plan contains a commitment to maintain and promote thriving town centres. The Introduction to the current consultation document states that it is important that the Local Plan helps to deliver the Council's Vision for the District and *"that it is also strongly based on evidence and takes account of representations made by interested individuals and organisations"* (paragraph 1.2). Paragraph 1.3 further emphasises the importance of the evidence base. In paragraph 1.4 the Council recognises that *"the Revised Development Strategy set out in this document could impact on issues that are outside the scope of this document"* and that account will be taken of representations on other matters that are relevant to the Local Plan. These revisions to the Development Strategy are primarily concerned with meeting an increase in the Housing Requirement and the evidence base for that, but the current consultation should also have addressed the consequences for other matters such as the economy and the vitality and viability of town centres, together with the evidence on these matters provided in response to the Preferred Options consultation 12 months ago.

Our detailed representations on behalf of the Bank in June 2012 (**further copy attached**) included evidence (**copies also attached**) on how it increases vitality and viability in primary frontages, showing that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages. That investment fosters very significant footfall and pedestrian activity and attracts investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. The Council's acknowledgement of the need for significant private sector investment in the town centres means that policies in the Local Plan must give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. Restrictive planning policies designed to keep significant generators of footfall such as the Bank out of primary shopping areas will actively work against the achievement of the Council's objectives and is inconsistent with National Policy.

To be Justified and Consistent with National Policy the emerging Local Plan must review existing out of date policies that restrict the presence of financial service retailers such as the Bank in designated frontages. If this is not done, the Council will risk the DPD being found unsound. **Policy wording should make it clear that uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of town centres will be encouraged and that such active ground floor uses will be appropriate in all designated retail frontages without restriction.**

Despite the stated intention to take account of representations and evidence in Paragraph 1.2, this current consultation is a missed opportunity to do so however the Bank's representations and evidence (**copies attached**) must be used to redress this matter at the next stage of consultation.

In view of the requirement for improved provision of banking services in Warwick District the Bank confirms its continued interest in the Local Plan process and we shall be grateful if the Council will continue to notify us of the progress of this document as well as details of any other emerging LDDs.

Yours faithfully



On behalf of BARCLAYS BANK PLC