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Planning Policy Manager  
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Dear Sirs,

### **Warwick District New Local Plan Publication Draft Consultation**

Thank you for the opportunity to contribute to this consultation.

#### **Local Plan Objectives: Sustainable Levels of Growth**

As we have previously stated, growth per se is not sustainable. However we do realise that national policies require local authorities to plan for growth and development. We support the statements in paragraphs 1.45 and 1.46 that economic growth will be balanced with housing growth. We support paragraphs 1.48 to 1.54 which outline how new developments will be planned to respect environmental needs.

#### **Proposed policies DS1 to DS5 (Strategic Policy)**

We support these proposed policies. We make the following comments:

Paragraph 2.8 - a definition of 'high quality' will be needed – it is not clear at the moment. It may be most appropriate to provide this in a separate Supplementary Planning Document.

Paragraph 2.11 – It should be noted that it will not be appropriate for all new developments to be designed on 'garden city' principles. Therefore we suggest that the text in this paragraph should read '...delivering new strategic development sites **some of which may be** based on the principles of garden towns...' The text of the policy (in paragraph 2.8 a) already includes the words 'where appropriate' and this is acceptable.

### **Proposed policies DS6 and DS7 (Level of Housing Growth)**

We object to these proposed policies because of the figures of new homes proposed. The proposals need to be revised to take into account the ONS '2012-based Subnational Population Projections for England' which were released on 29 May 2014.

### **Proposed policies DS8 /9 (Employment)**

We do not support the current proposals for the sub-regional employment site at Coventry Airport. However we do support the rest of the proposed policies in this section.

### **Proposed policies DS10/11 (Location of Allocated Housing Sites)**

We support the Council's Site Selection Methodology but do not support the overall numbers as they are clearly linked to proposed policy DS6.

We still believe that the average housing densities on new development sites can be increased significantly without a reduction in design quality. Paragraph 47 of the NPPF clearly says 'local planning authorities should... set their own approach to housing density to reflect local circumstances'. In our view, Warwick District Council has not yet explained their 'approach to housing density'.

### **Proposed policy DS12 (Allocation of Land for Education)**

We object to the allocation of land for education at Southcrest Farm, Kenilworth. We are very concerned about this proposal which has been introduced for the first time in this late stage of the Local Plan consultation process. Any relocation of the School to the edge of the town is likely to have serious negative sustainability effects.

The Site Selection Methodology states 'No additional traffic impacts if school moves to Southcrest Farm.' And 'Location at edge of urban (area) means alternative transport modes are possible.' We believe this is factually inaccurate. At present many of the pupils of Kenilworth School walk or cycle to the school. If the school is moved further away from the centre of the town fewer pupils are likely to walk or cycle from their homes to the school and more car journeys are likely to take place. The Southcrest Farm site is not currently served by public transport and therefore 'alternative transport modes' are not currently available. If the school is relocated to Southcrest Farm additional bus services will be required.

It is also particularly relevant and important that the Southcrest Farm site has already been assessed and rejected when 'considered against strict Green Belt criteria' (see also below). If it is not acceptable for housing purposes, it is equally unacceptable for a new school development.

### **Proposed policies DS13 (Allocation of land for a Country Park), DS14 (Allocation of land for a Community Hub) and DS15 (Comprehensive development of Strategic Sites)**

We support the proposed policies.

However we feel that there should also be a strategic landscape corridor along the route of Europa Way as this will a) to some extent mitigate the loss of green fields in this area, b) secure a wildlife corridor linking the Tach Brook with the River Leam and Grand Union Canal, and c) provide an attractive route into Leamington from the south – a route which will most likely serve as the main road entry point into the town for the foreseeable future.

With regards to infrastructure requirements for shops/ local centres / community facilities, conditions on any planning consent should ensure this provision is constructed and open at an early stage of any development.

### **Proposed policy DS16 (Sub Regional employment site)**

We do not support the current proposals for development at Coventry Airport. However the results of a planning enquiry are currently awaited. If the development does go ahead, we support the proposal for a masterplan to be prepared. In particular, we support the proposals in paragraph 2.75.

### **Proposed policies DS17 (Canalside Regeneration) , DS18 (Lillington regeneration), and DS20 (Accommodating housing need arising from outside the District)**

We support these policies.

### **Proposed policy DS19 (Green Belt)**

We object to the proposals in this policy to remove land from the Green Belt at Southcrest Farm, Kenilworth, and in the vicinity of Coventry Airport.

We support the methods used to select sites and in particular the high importance given to the study of the landscape qualities of each area, and the consequent avoidance of allocations of land with high landscape value. Generally the site selection methodology seems to be thorough and robust.

However Warwick District Council does still need to determine ‘robust criteria’ for each site it proposes to remove from the Green Belt. We note that in Appendix 9 -Green Belt Critical Review, the reviewer stresses that the ‘fundamental aim and five purposes of Green Belt’ are still important (page 19) and ‘robust criteria’ in the form of ‘Sustainable Development Constraints’ will need to be established ‘ to ensure that any land proposed for release from Green Belt status for potential development can be achieved in a way that:

- does not damage land with important landscape or nature conservation value;
- does not damage land which performs an important floodplain function; and
- is readily accessible to and from existing, or easily extended, facilities or services’.

Also, the reviewer states (on page 23 )’There should not be a ‘call for sites’ exercise, as this could imply that the Assessment is ‘developer-led’, rather than being an appropriate assessment considered against strict Green Belt criteria and based on proportionate evidence.’ This is particularly relevant in the case of the Kings Hill site which has been suggested again recently by Coventry City Council. This site was considered early on in the Local Plan review process and rejected when ‘considered against strict Green Belt criteria’. It is also relevant to the proposed relocation of Kenilworth School at Southcrest Farm - the proposed site has already been rejected when ‘considered against strict Green Belt criteria’.

### **Proposed policy PC0 (Prosperous Communities)**

We support this policy as long as a balance of housing growth and employment land is maintained.

### **Proposed policies EC1 -EC3 (Employment)**

We support these proposals, with the exception of the proposals at the ‘allocated sub regional employment site’ (Coventry Airport), and the notes below.

EC1 (Rural Areas –d) refers to ‘DC13’. We believe this should read ‘DS16’.

We object to the last sentence in proposed policy EC3 “this policy does not apply to land which provides for sub regional employment needs”. It is very important that if land in the Coventry Airport area is allocated for employment use, that it remains in that use in perpetuity, and is not converted to housing use, for example.

More emphasis should be given to the need for high quality sustainable transport links to all employment sites, including facilities for public transport, walking and cycling. More detail in this section may be required to explain how this will be achieved.

### **Proposed policies TC1-18 (Town Centres)**

We support these proposals. However, especially with regard to the proposals outlined in TC4 and TC5, additional wording should be added to ensure that any new development proposals give regard to the historic nature of our town centres, including the historic street pattern, grain, form and massing of the surrounding buildings.

### **Proposed policies CT1-7 (Culture Leisure & Tourism)**

We support these proposals.

### **Proposed policies MS1 and MS2 (Major Sites)**

We support these policies, subject to new or revised Masterplans or Development Briefs being subject to full public consultation.

### **Proposed policies H0 – H14 (Housing)**

We support these proposals, subject to the overall housing requirement figures being revised downwards to take account of the latest ONS ‘2012-based Subnational Population Projections for England’ which were released on 29 May 2014. The Joint Strategic Housing Market Assessment figures will need to be updated (downwards) to take into account these latest ONS predictions.

We also make the following comment: Proposed policy H3 c) 1 – the phrase “where possible” should be omitted for clarity. It is actually clarified by part III of this proposed policy.

## **Proposed policy SC0 -Sustainable Communities**

We support this proposed policy.

## **Proposed policies BE1-BE5 (Built Environment)**

We support these proposals.

We suggest Paragraph 5.11 (bullet point 3) should not say ‘taking into account the Garden Towns prospectus’ as this suggests that only Garden Town type layouts will be given consent. We suggest the wording might be: ‘identify design principles for the development proposed taking account of any supplementary planning guidance produced by the District Council’. Similarly, the wording in BE2 (d) (and 5.13) which says ‘design principles, taking account of the Garden Towns, Villages and Suburbs Prospectus and Buildings for Life 12;’ should instead read ‘ design principles, taking account of any supplementary planning guidance produced by the District Council’

We support paragraph 5.18 which acknowledges that high density housing may be appropriate for town centre or similar sites.

## **Proposed Policies TR1 – TR6 (Transport)**

We support these proposals. However we do have some comments:

We support the proposals in the Sustainable Transport Technical Note (Appendix D of the Strategic Transport Assessment Stage 4), particularly the mention of the proposed Kenilworth to Leamington cycle route (K2L), though we do not agree that ‘the cycle network within the Warwick and Leamington area is reasonably well developed’ – we believe that it could be considerably improved. There should be the aim to provide exemplary cycle and walking routes within and near to all new developments in order to maximise cycling and walking in those areas. Links to all town centres and railway stations are particularly important.

We support the proposal that the southern Park and Ride will serve both Warwick and Leamington. However we suggest that the detailed design will be very important, so that the facility does not have a major effect on the openness of the countryside, and should not include floodlighting (see also below). The proposed northern park and ride could be more controversial – there are very few, if any, locations where it would not have a serious impact on the landscape quality of the area. We would suggest that the provision of such a northern park and ride should be postponed until after the completion of K2L as this cycle route has the potential to significantly reduce the number of vehicle movements between Kenilworth and Leamington.

## **Proposed Policies HS1 – HS8 (Healthy Communities)**

We support these proposals. However we suggest HS2 and HS5 need to be refined to ensure that when new sports or community facilities are proposed on green field sites, planning consent is not granted for floodlighting, and that new facilities are not granted consent in ‘areas of tranquility’.

Floodlighting can have a major effect on the openness of the countryside, both during the day and at night. Light pollution from floodlighting at existing facilities is a serious problem already in the district and it can for example have serious effects on wildlife and ecology, as well as affecting the quality of life for people who live nearby. We would refer you to the CPRE's 'Dark Skies' campaign, the fact that light pollution can be a statutory nuisance under the Clean Neighbourhoods and Environment Act (2005), and particularly that the National Planning Policy Framework (NPPF) Planning Practice Guidance (paragraph 125) says: 'By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

NPPF Planning Practice Guidance (paragraph 123) also says: 'Planning policies and decisions should aim to: .. identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.'

### **Proposed Policies CC1 –CC3 (Climate Change)**

We support these proposals, except for the financial viability proposals in proposed policy CC3. There should be no need to include this viability clause – such clauses do not normally exist in considerations of Code or Building Regulations compliance.

Paragraph 5.114 first sentence – we suggest the wording should read 'on all residential developments'. Many of the supporting paragraphs in this section would be better located in Supplementary Planning Guidance as national guidance on the subject is in the process of change at present.

### **Proposed Policies FW1 –FW4 (Flooding and Water)**

We support these proposals.

Proposed Policy FW3 – we suggest should be omitted as it duplicates proposed policy CC1 (c). Alternatively the words 'encourage' and 'one dwelling or more' should be omitted to avoid ambiguity and increase clarity.

### **Proposed Policies HE1 –HE6 (Historic Environment)**

We support these proposals.

We suggest the wording of HE1 could be simplified and reduced as it duplicates existing listed building legislation. We also suggest that some of the supporting paragraphs in this section could be omitted or transferred to supplementary planning guidance as much of the information is already available elsewhere. The lists of conservation areas and listed gardens could be omitted as the information is available elsewhere and the lists may become out of date during the lifetime of the plan.

### **Proposed Policies NE1 –NE7 (Natural Environment)**

We support these proposals.

We suggest that policy NE4 should also say ‘new development will not be permitted where it harms landscape character’. In paragraph 5.192 ‘appropriate cases’ needs to be defined. In policy NE5 it should be highlighted that light pollution is a potentially serious problem which can have effects on wildlife and ecology.

We are particularly grateful that proposed policy NE5 (d) (Agricultural Land), plus the explanatory paragraph 5.198, is included. However we suggest the wording of paragraph 5.198 does need refinement . We suggest that the words ‘Development affecting the best and most versatile agricultural land will be permitted providing that there is an overriding demonstrable need...’ should be replaced by ‘‘Development affecting the best and most versatile agricultural land will not be permitted unless it is proved that there is an overriding demonstrable need...’

### **Proposed Policies NP1 &2 (Neighbourhood Planning) and W1 & W2 (Waste)**

We support these proposals.

We suggest that the wording of W1 (second paragraph) should say ‘The Council will require a Waste Management Plan for any residential or commercial proposal. ‘

Paragraph 5.212 is confusing – the sentence ‘As small scale waste sites are to be directed to settlements within 5km of Coventry, it is not envisaged that any new facilities will be located within the plan period in Warwick District’ needs explanation. Is a waste site is planned or not ? If so, why should it be within 5km of Coventry?

### **Policies DM1 and DM2 (Delivery and Monitoring)**

We support the comprehensive proposals in this section, especially the plan review procedure and the preparation of development briefs for the large new sites which are proposed.

### **Thickthorn, Kenilworth**

We strongly support the notes in the Site Selection Methodology for this site that cycle and footpath links to the town centre will be required. However it is equally as important that provision be given to cycle and footpath links to Leamington and Stoneleigh as these are major employment locations. We suggest that it is entirely appropriate for the developers of the Thickthorn site to contribute section 106 or CIL payments towards provision of the proposed Kenilworth to Leamington cycleway, and the upgrading of Rocky Lane to serve as a link to Stoneleigh.

We strongly support the Habitat Assessment notes within the Site Selection Methodology in that ‘the ancient woodlands of Glasshouse Wood and Thickthorn Wood would need to be retained, as well as the implementation of a buffer zone of 50m width around the site. All species-rich hedgerows (will be) retained. Mature trees within the parcel should be retained, with each tree having a buffer zone to protect its roots from development’.

Thought should also be given to public transport routes through the new development – Leamington Road is served by a good bus service but this may need to be diverted through the new development or a new service provided.

We are surprised that the access proposed to the Thickethorne development has been moved (in Strategic Transport Assessment 4 – April 2014) from the A46/ A452 roundabout to a point north of this on Leamington Road. There seems to be no reason for this stated in any of the reports. It would appear to be illogical, as at peak hours there is presently a long queue of traffic from the A46/ A452 roundabout back to Kenilworth town centre – the proposed arrangement could conflict with this and potentially make the situation worse. Any new roads should provide for a new quick route for traffic from Glasshouse Lane directly to the A46 roundabout.

We look forward to receiving a response to this letter. We do not wish to take part in any public hearing that may take place.

Yours faithfully

John Brightley BA DipArch RIBA

On behalf of Leamington & Warwick Friends of the Earth