

C/o 43 Arthur Street,  
Kenilworth,  
Warwickshire  
CV8 2HF

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

Dear Sirs,

### **Warwick District New Local Plan Preferred Options Consultation**

Thank you for the opportunity to contribute to this consultation.

#### **Preferred Level of Growth (PO1)**

We do not support this Preferred Option, as we believe that development and investment should be concentrated on the regeneration of the major urban centres of the region. Development in Warwick district should be minimised to allow this to happen. It should also be clear that continued population growth and expansion of the urban areas is not sustainable in the long term and expansion should be minimised to retain the countryside for future generations. The Council should be aware that by continuing to promote development on greenfield land, it risks destroying the quality of the environment that presently makes the District such an attractive place to live.

A very significant **58%** of the respondents to the 2011 consultation wanted the minimum level of growth in the District. The 2012 consultation seems to ignore these responses. This is surprising especially as it the 2012 consultation confirms in paragraph 5.12 that it is *'for each local authority to determine its own level of growth in line with the National Planning Policy Framework.'*, and the NPPF itself says that planning should *'be genuinely plan-led, empowering local people to shape their surroundings,'*

The statements in the Consultation paper that *'Option 1 would create better opportunities to protect and enhance the natural and built environment and maintain and improve the quality of air, water and soils. Option 1 was also considered to be a better option in terms of enabling a better range of transport options since new development was likely to better related to the towns.'*

and

*‘the development of all potentially suitable sites would lead to a significant impact on the natural environment through the loss of large areas of open countryside’*

highlight the fact that development should be minimised to minimise the impact on the environment for future generations.

Paragraph 5.15 of the consultation states *‘Three projections from the SHMA are considered to be worthy of further consideration...’* There are 13 alternative projections in the SHMA, which does not specifically recommend any of them. We are very concerned that only three have been chosen, apparently arbitrarily, for further consideration. It is clear that this is critical for the future of the District, and there is no justification given for the selection of the projections chosen.

It should be noted that housing **growth** is not essential for a healthy economy. Many facts in previous consultation documents have suggested that strong housing demand in the district is not directly connected with economic activity in the district, but is more likely to be connected with the fact that the District is a very pleasant place to live.

### **Community Infrastructure Levy (PO2)**

We support this Preferred Option.

### **Broad Location of Growth (PO3)**

We generally support this Preferred Option, but not all its supporting notes or locations of growth.

For example, paragraph 7.10 says *‘...there is limited availability of urban brownfield land in the District – a capacity of approximately 1,320 dwellings or 11% of the total SHLAA capacity.’* We argue that these figures are debatable – they are based on very low densities as discussed elsewhere in this submission. We believe that this capacity could easily be at least doubled with an increase in density without any loss of design quality.

Paragraph 7.14 says *‘...Many felt that increasing sprawl around the existing towns would damage the rural setting of the towns to the detriment of both their economies and their environment. The Council will require new development to follow the emerging garden suburbs principles in order to overcome this loss of rural character.’*

This note is fundamentally flawed, in that the proposals for ‘Garden Suburbs’ would in fact increase sprawl around the towns, and in fact destroy the ‘rural character’ rather than preserve it. Low density suburbia, no matter how well designed, can never be a good replacement for real countryside.

### **Density and type of housing**

The SLHAA Methodology says:

*‘4.23 Policy DP5 (Density) requires development to make best use of land and to achieve net densities of no less than 50 dwellings per hectare in town centres (as well as near to public transport interchanges) and no less than 30 dwellings per hectare elsewhere.’*

and

*‘4.25 The DC Guidance on Achieving a Mix of Housing sets out the recommended mix of house types on large, medium and small developments in order to meet the specific housing*

*needs of the District. The policy will impact on development densities as it will ensure that a mix of houses and flats are provided and that the mix includes **predominantly houses where practicable.***

We are very disappointed that the District is still using a figure of 30 dwellings per hectare to estimate land needs for housing, and it is assuming that predominantly houses will be needed when it is clear that the majority of new households over the plan period are likely to be single-person households. There are many recent residential schemes for one and two-person households where 100 to 200 dwellings per hectare are quite common. It is possible to achieve such densities with the benefit of good design without compromising the character of our towns and the quality of public open spaces. As household size is getting smaller, this in turn allows higher densities, and means that there is considerably less need for green field sites to be used. The NPPF says LPA's should '*set out their own approach to housing density to reflect local circumstances.*', and we suggest this density should be much higher than presently used.

The SHMA report says

*'9.24 The table below shows that older person only households are slightly more likely than non-older person households to be living in one and two bedroom properties. However, the results also show that nearly two thirds of all older person households are in three or four bedroom dwellings. Given that previous information has shown that all older person only households are comprised of only one or two persons, this finding suggests that **there could be potential scope to free up larger units for younger families if the older households chose to move into suitable smaller units.***

This suggests that the District should make a concerted effort to create 'suitable smaller units' of housing, not concentrate on the provision of family houses. This could be a significant number of dwellings. Paragraph 9.28 of the SHMA report states:

*'...if occupancy patterns stay as they are in 2011 then levels of under-occupancy across the District are expected to rise from 40.9% of all households to 42.2% - this is an increase of about 5,700 under-occupying households.'*

Note that this is 5,700 households who could relocate into one or two bedroom accommodation from 3 or 4 bed properties, providing appropriate accommodation is available. This is approximately 50% of all total projected new households from this sector of the population alone.

It would be possible to increase densities on some or all of the sites earmarked for development. There also seems to be some confusion about densities allowed for in the housing figures proposed for some of the sites.

For example, at the Leamington Fire Station site the SLHAA indicates the site is suitable for 26 dwellings at 50 dwellings per hectare. However 50 dwellings are allowed for on this site in the table in PO4– this is in fact a more realistic 100 dwellings per hectare which we would support.

By contrast 1,170 dwellings are allocated at Blackdown – this would be at a very low density of 35 to the hectare, which we could not support.

### **Distribution of Sites for Housing (PO4)**

In our view the choice of sites for housing (and any other development) should be determined by the quality of the proposed land in both Landscape Value and Agricultural

Quality terms. This is very much the thinking in the National Planning Policy Framework (NPPF).

As the NPPF says:

*'The planning system should contribute to and enhance the natural and local environment by: **'protecting and enhancing valued landscapes'***

and

*'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, **local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'***

and

*'Allocations of land for development should prefer land of lesser environmental value'*

We also believe that, subject to the above, if allocations need to be made, that they should first take place in locations outside the Green Belt rather than in it.

For these reasons, we firstly support the development of sites within the existing built-up area such as at Montague Road (W18).

If greenfield allocations need to be made, we support the allocation of land 'West of Europa Way (W08/ W21), and suggest this should be allocated first, as this is of low to medium landscape value and it is close to employment areas therefore potentially minimising travel to work distances and associated CO<sub>2</sub> emissions.

If further allocations are to be made, we support the allocation of land of Medium Landscape Value at Champion School /Whitnash East /South Sydenham (L10/L39); Golf Lane, Whitnash (L11); and Woodside Farm, Whitnash (L14).

We do not support the development of land at Guys' Cliffe (W28) or Blackdown (L48) as both of these sites are in areas of High Landscape Value and within the Green Belt; or at Gallows Hill/ The Asps (W10/ W26/ W27) as this is an area of High Landscape Value; or at Northumberland Road & North of Milverton (L03/L07) and Red House Farm, Lillington (L23). as these sites are within the Green Belt.

We note in paragraph 7.32 the wording *'The Green Belt assessment suggested that the land at Blackdown was not suitable for further study. However, the land has similar characteristics to land to the west in that there are no towns to the north, from which the Green Belt would provide protection from encroachment, and there are clear boundaries to the site to protect the open countryside beyond.'*

However the land at Blackdown is clearly noted as an area of High Landscape Value and is on a hilltop so is much more prominent in the wider landscape than the other sites.

Also the Draft Infrastructure Plan says: *'Initial assessment has identified potential sewer capacity issues at Land north of Milverton, Blackdown and Whitnash East.'* Also *'Significant (drainage) network capacity constraints were highlighted in the WCS downstream of land at South Sydenham and East of Whitnash, Land at Red House Farm, Champion Hills and Land North of Milverton.'*

We believe the land at Warwick Gates (W20) should be retained as an employment allocation, unless it can be shown that there are more suitable sites for employment available, as clearly there will be some demand for employment land up to 2026.

If it is necessary to include development in the Kenilworth area, we support the Preferred Option of development at Thickthorn, Kenilworth (K01), as long as a significant proportion of the site is allocated for employment uses. Although it is Grade 1 agricultural land and within the Green Belt, it is of low landscape value and could, by providing more employment, reduce the significant out-commuting which the town experiences at the moment, with minimal impact on the character of the town and its surrounding landscape.

We disagree with some of the notes in the Preferred Options for Leamington and Warwick. The report states in paragraphs 7.30 and 7.31 that there are '*concerns about focussing around 6,000 new homes in such a concentrated area.*' (south of Leamington /Warwick).

As mentioned elsewhere, policies should concentrate on reducing the need to travel, reducing use of the private car and maximising the opportunities for use of public transport. The NPPF says planning should '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling*'. As is noted in paragraph 7.31, land to the south of Leamington Spa and Warwick is generally closer to existing employment areas and transport links than the areas to the north of the towns, so '*cross town trips*' (para.7.31) would be minimised by allocating land in the south.

The NPPF does not say that authorities have to provide a '*choice of location*' (para 7.31) for new homes, nor is it for the authority to decide whether the market or the developer can deliver the level of development required in the plan period – experience elsewhere shows that if they need to, they will achieve the numbers required.

As also mentioned elsewhere, we have concern about a '*northern relief road*' suggestion (para 7.31) – to encourage this would not be a sustainable policy as it would lead to more use of the private car at the expense of more sustainable forms of transport. It would be contradictory to other policies in the Local Plan.

If there is concern about development in the south of the District '*closing the gap between Warwick/Whitnash and Bishops Tachbrook*'(para 7.30), surely the same situation applies to potential development on the north side of the town between Leamington/Warwick and Milverton/Leek Wootton/Hill Wootton/Kenilworth ?

The proposed policy wording also says '*Development on garden land will not normally be permitted unless the development reinforces, or harmonises with, the established character of the street and/or locality and respects surrounding buildings in terms of scale, height, form and massing.*' This wording is possibly unnecessary. The new NPPF stresses how good design is essential, so any development, whatever its location, should meet the above criteria anyway if it is to obtain consent. Well designed development on garden land can contribute to future housing requirements and minimise use of greenfield land without harming the character of a neighbourhood.

## **Affordable Housing (PO5)**

We strongly support the policy that affordable housing is retained as such in perpetuity, and for people with a local connection in rural areas. This is important if sites are to be justified in rural areas. The affordable housing policies seem to be well thought out and reasoned.

## **Economy (PO8)**

We are concerned that all the development in the district is based on a supposed need for economic growth. Growth per se is unnecessary and unsustainable for a stable economy.

Background Technical Paper Appendix 2: Issues p73 (from the 2011 round of consultation) stated that *'past rates of employment development for the last 10 years have been low, with the average amount of land developed being approximately 4 hectares. A number of employment land allocations from the 1995 Local Plan and other committed sites have as a consequence remained undeveloped for many years'*. It is clear that changes in types of work from industrial to more office-based professions have meant that less land is needed to provide similar numbers of jobs than before. The figures suggest that there is little need to allocate more land for employment purposes – at least in the short term.

There appears to be a discrepancy in the GVA report – it states that there will be a reduction in demand for floorspace for B2 (industrial) and B8 (storage) uses, yet the report proposes a land allocation for these uses. The predicted increase in demand is primarily for B1a (office) use. It should be noted that this use requires a much smaller floor to ceiling height than B2 and B8 uses, so it is often possible to accommodate twice the floor area in the same volume of building. It is not clear whether this has been allowed for in the report.

Because of these potential discrepancies, we support the Preferred Options statement (paragraph 8.21) that *'further work is needed to clarify this figure in relation to more up to date economic and demographic projections and to examine the impact of potential development at the Coventry and Warwickshire Gateway site'*

Regarding the Gateway site, we believe that development and investment should be concentrated on the regeneration of the major urban centres of the region, and if this is to be in part in the Coventry area, there are suitable brownfield sites in the area where development could be located rather in the Green Belt.

## **Retailing and Town Centres (PO9)**

It is of some concern that the Retail & Leisure Study that the consultation is based on was produced in May 2009 so is already 2 years out of date. It should be noted that the Study itself says (in paragraph 1.5) that *'forecasts beyond a five-year period should be interpreted with caution.'*, i.e the Study cannot be relied upon for the years after 2014. The demand figures also assume there will be a growth in population, which is difficult to predict.

It should also be noted that the Study is based on the superceded requirements of the former Regional Spatial Strategy and has not been updated to take into account the National Planning Policy Framework. The NPPF does **not** mention any need for local authorities to plan for retail **growth**, only saying that *'It is important that needs for retail, leisure, office and other main town centre uses are met in full'*.

We support the statements in the proposed policy to ‘*Apply the ‘town centres first’’*’ principle and to ‘*Strongly resist out-of-centre retail development*’.

We do not support the proposal for ‘*the addition of a major retail –led development scheme in Leamington Town Centre*’, as we do not believe that there needs to be an increase in retail property in Leamington. One worry is that the Study itself says (para 4.3) ‘*a significant improvement in one centre holds the threat /promise of drawing trade from others*’. The proposals for an increase in retail floorspace in Leamington seem to be based on the premise of encouraging more people from outside the district to shop in the town, and this is neither sustainable or environmentally-sensitive. In fact it seems contradictory to the proposed transport policy of reducing the need to travel. It does not seem to take into account the fact that as fuel and other transport costs continue to rise, as inevitably they will in the future due to the rising cost of oil, the prospect of travelling long distances for shopping purposes will become less attractive. There is also a concern that the proposed scheme, being at the northern end of the town centre, will be to the detriment of trade in the Old Town to the south.

### **Built Environment (PO10)**

We are concerned that the ‘Garden Suburbs’ proposals may involve large areas of low-density housing which inevitably would use more acreage of green field land than if the area was planned to a higher density. It is vital that we minimise the land take of new developments to retain as much existing countryside as possible. It is possible to plan an area to incorporate high quality design and spacious landscaping in the ‘public realm’ but also allow high density housing within the housing plots themselves.

The ‘Garden Towns, Villages and Suburbs Prospectus’ seems rather idealistic and provides little guidance on how this might be incorporated into and around the existing settlements in the District. The densities quoted are very low compared to current housing practice – for example the density quoted in the ‘district or local centre’ section is 35-40 dwellings per hectare, whereas we would have expected this to be around 100 dwellings per hectare which is common with many apartment schemes nowadays, though it is accepted that some commercial space has also to be provided. Essentially what is proposed is conventional suburbia with an extravagant use of space.

Many of the claimed ‘benefits’ of ‘Garden Suburbs’ can be achieved in conventional developments at higher densities – they are simply examples of good design which the NPPF cites as being essential anyway.

We note the comment ‘*We need to find new ways of creating high quality and sustainable homes at a price people can afford*’. It is unlikely that this will be achieved by a low density development such as that proposed. The easiest way of providing affordable homes is to provide more smaller homes and increase the density of them. One very good example of this is the development Redrow built in Rugby several years ago, which is cited as a good example by Warwickshire County Council:

[http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/9344681FA6CE381980257304005BB2F9/\\$file/Redrow+Homes+-+Debut+Rugby.pdf](http://www.warwickshire.gov.uk/Web/corporate/pages.nsf/Links/9344681FA6CE381980257304005BB2F9/$file/Redrow+Homes+-+Debut+Rugby.pdf)) This was achieved by carefully designing stylish small units at a high density which brought prices down low so that when they went on the market there were long queues to buy them. Note that this was

high quality design – it was the highest scoring residential development in the country within the Eco-Homes rating system in 2006.

Generally the ‘Garden Suburb’ proposals of low-density family housing are in sharp contrast with the type of housing which is likely to be most in demand over the next few decades – single person housing, mainly for the over 65’s – as stated in the consultation paper’s paragraph 4.3 which says *‘The highest rate of projected population growth in the future is expected to (be) amongst those aged 65 and over.’*

Please note that although the idea of Garden Cities is mentioned in the NPPF , it also says *‘Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.’* In many instances the Garden City ideal may not be the most appropriate solution to issues in a District.

We also urge a more proactive policy stance in regard to the reuse of vacant properties and the promotion of ‘homes above shops’ as part of a comprehensive package to revitalise the urban areas of the district. In particular there is at present a large amount of vacant accommodation above shops in Leamington town centre – which again could be ideal for the extra single-person households the district has to accommodate.

#### **Historic Environment (PO11)**

We support this Preferred Option.

#### **Climate Change (PO12)**

We support this Preferred Option, and indeed are pleased how it has developed from the draft policy in the previous round of consultations.

However we believe two statements in PO10 need clarification:

*‘To adopt a requirement that seeks a 20% reduction in carbon emissions’*

20% from what baseline figure ?

And

*‘to require new residential development to meet standards set out in the Code for Sustainable Homes’*

Which Code standard is to apply ?

Clearly it is very difficult to reduce the District’s CO<sub>2</sub> emissions if an increase in population is being proposed. This is why development needs to be minimised and locations for any development are very carefully selected to minimise the need to travel, especially by private car. Any development which has a major negative impact on CO<sub>2</sub> emissions should be actively restricted.

#### **Transport (PO14)**

We support this proposed policy especially regarding minimising the need to travel. The SHMA shows that a significant proportion of the district’s residents out-commute to work at present, but it is likely that in the future as fuel prices rise, it will become less desirable and feasible for people to commute long distances, and there will both be less



people commuting in to the district and out of it for these reasons – local people will be more likely to take local jobs.

We strongly support the proposals in the Draft Infrastructure Plan for Sustainable Travel Infrastructure. We support the suggestion of bus lanes and bus priority schemes to encourage modal shift between Kenilworth and Leamington and encourage this to be also considered on other routes. The primary aim of any transport improvements should be to minimise the use of the private car and maximising the opportunities for use of public transport, cycling and walking.

We do not support a proposed Leamington Northern Relief Road as we believe it has potential to encourage more private car movements rather than reducing the need to travel or encouraging more sustainable forms of transport. It seems contradictory to other proposed sustainable travel improvements.

### **Green Infrastructure (PO15)**

We support this proposed policy and would encourage the Council to continue to use studies of the landscape character and biodiversity value to inform the location of potential development sites – it is important that areas of high landscape value are conserved for the future.

### **Green Belt (PO16)**

We do not support the Preferred Option.

The NPPF says :

*‘Once established, Green Belt boundaries **should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.** At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’*

We believe the Preferred Option does not give enough regard to the existing Green Belt designation. For many years people have regarded the Green Belt as ‘sacrosanct’, and it is an area which is of utmost strategic importance. Although we accept there may be justification for development on a small area of the Green Belt, the extent of the development proposed has not been sufficiently justified in our opinion.

The NPPF says : *‘When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.’*

We support limited development at Thickthorn, Kenilworth, primarily to provide more employment land to minimise out-commuting from the town.

As regards Leamington and Warwick, we believe new housing development, if necessary, would be more sustainable if concentrated on the southern side of the towns closer to the majority of the existing employment sites.

The NPPF also says *‘When defining boundaries, local planning authorities should:*

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*

- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

We do not believe the Preferred Option meets these requirements.

### **Tourism (PO17)**

We support this Preferred Option, particularly the wording '*the development of new buildings for visitor accommodation will be considered favourably in locations which are accessible to visitors by means **other than the private car** and can be developed sensitively in the rural area. Outside of these locations, new visitor accommodation will not be permitted,*'

### **Flooding & Water (PO18)**

We support this Preferred Option.

We look forward to receiving a response to this letter and being involved in future stages of the Local Plan consultation.

Yours faithfully

John Brightley BA DipArch RIBA

On behalf of Leamington & Warwick Friends of the Earth