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## Warwick District Council Local Plan Preferred Option 9 – Loes Farm (Objection)

WDC PLANNING
Ref
Officer
- 6 AUG 2012
SCANNED
CC CR PD MA
PRE GEN DIS

I wish to object to the proposal to build 180 houses on the Loes Farm site, for the following reasons:

### Lack of Strategic Vision

Any plan should set the scene, explain what Warwick District is about and what it wants to achieve in the next 15 years. It should protect and enhance the character of the District's landscape, which has evolved over the centuries building on its strengths and assets, and augment its identity so people (living in, and visiting the District) know what Warwick District is about.

There is no reference to this. Instead - to anyone picking up the Local Plan, it paints a picture of a County town and other towns which are little more than a District of housing estates and supermarkets.

Housing estates built in Warwick District in recent years, may be functional, but they do little to promote the towns in which they are. Loes Farm provides visual protection. Building 180 houses on the top of a hill will, therefore, have a negative effect.

### Number of Houses Proposed

Having ignored the consultation results when residents were asked for their opinion of how many houses were need, the work undertaken by the independent consultants suggest a lack of understanding and some very speculative assumptions:

- Warwick District had a 78% over-provision of residential development against the projected target (ref: WDC Planning) and before the LP was produced. Why has this been ignored?
- a high percentage of students have been included spiking the figures
- a peak figure for migration has been used ... a figure which has reduced by 300 every year since this peak
- it is based on economic model pre-recession. The economic forecast is for a much gentler rate of growth for the economy and population.
- that many existing retail and manufacturing businesses are already lying empty
- the housing trajectory doesn't follow any logical path with national population growth over same area.
- that the number of cars using the roads is increasing instead of decreasing
- that many public buildings e.g. schools, offices, hospitals continue to contribute to our increasing carbon footprint
- that planning applications from supermarkets still continue to be granted, deterring people from shopping at small local shops and limiting the skill base still further

The proposed number of house is, therefore, at best unsubstantiated, and more likely - over-stated.

More houses mean more people. The model becomes self fulfilling, but at a considerable cost to both existing and new residents.

Stratford District is much larger than Warwick District, but is comfortable that a lower number (8000) is appropriate to their needs.

## Basis for Allocation of Houses

The NPPF is very clear about Greenbelt development. It is only permissible in 'exceptional circumstances'. WDC point to the fact that exceptional circumstances can include the need to accommodate housing, which is fair enough, but they then fall short by ignoring the qualification that this is only applicable where brown or white field sites are not available.

WDC's own SFSPWD says that the LP should distribute houses evenly across the District, with priority given to Brownfield sites. Fairness, in itself, is not justification for building on the Greenbelt, under the NPPF. Either way, the allocation is anything but fair. If it was, all parts of the District should be sharing the loss of Greenbelt evenly.

The SHLAA identifies other brown field sites, but these appear to have been discounted. Other documents produced for the RSS have also been ignored – possibly where they would contradict the Preferred Options. At the same time, there is occasional reference to the Joint Greenbelt Study – where it can be cited to justify a particular section of the plan.

Surely any research done in the past 18 months ago is still valid.

The word 'sustainable' appears regularly in the plan, but it is difficult to ascertain the context in which this plan is sustainable? It seems this is another word is now over-used and with little meaning anymore.

## Process

WDC Councilors have commented that there wasn't much of a response last time, but this merely emphasizes the lack of communication by local councilors. People only respond to consultations if they know about it and if it affects them. Warwick Town Council took out a front page article in Courier for a future Town Centre plan, but nothing for a plan which will affect much larger swathes of the community.

The process seems to be being rushed through, and might well be perceived as a reactive rather than proactive process.

Certainly the consultation process has left many residents wondering why they only found out about the plan in the last weeks of the consultation, and why we sought an extension to the deadline for responses.

The Plan repeatedly uses words such as "advantages", "benefits", "greater choice" etc. but I could not find any specific evidence to demonstrate how these will be achieved either on the website or in the Plan. The Plan refers to 'Brownfield sites' but the 'Greenbelt' options are not described as such, but 'Sites on edge of Warwick, Leamington' etc.

All plans have assumptions. Assumptions are fine, but there must be some basis and subsequent analysis to support them. This is the test of evidence. Instead the plan just appears to be based on growth for the sake of growth, not on the District's future needs for growth.

It has been suggested that - having decided unreservedly to build on greenbelt, WDC is now frantically trying to justify its decision. This is not planning.

Why were some options dismissed before the LP was published, when WDC admitted that it has only done minimal research on any of the options, in order not to waste tax payers' money? Surely this is not a proper evaluation of the options.

Local councilors have referred to other developments in less than glowing terms, suggesting that we still have lessons to learn about planning. In recent years, these have included:

Chase Meadow (half empty / unfinished)

Potter tons (half empty / unfinished, floods)

Morrisons (a great site for housing, but WDC failed to take advantage)

Developments South of Leamington with acres of uninteresting houses which lack any green relief.

Warwick Town Centre Traffic Plan (an accident waiting to happen and still needing residual repairs)

There is very little substance to the Draft Infrastructure Plan, just lots of general – positive assessments. Hence, there is much work still to be done. WDC / WCC say they have little money to spend on infrastructure ... and are, by default, relying on Developers. This is a high risk approach to take.

## **Green Belt**

The Green Belt serves five purposes:

To check the unrestricted sprawl of large built up areas

To prevent neighboring towns merging into one another

To assist in safeguarding the countryside from encroachment

To preserve the setting and special character of historic towns

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land (Section 9, Para 80)

One might argue that Loes Farm is the personification of these purposes. Hence, the proposal to build on Loes Farm will result in the unnecessary and intentional destruction of a valuable part of the Green belt (in common with other preferred sites).

The NPPF allows local authorities to develop the Greenbelt where there are 'exceptional circumstances'. WDC is selective in its interpretation of the text, pointing to the fact that 'exceptional circumstances' can include the need to accommodate housing, but fails to point out that this only applies where brown or white field sites are not available.

There is no doubt that Greenbelt is naturally more attractive to a developer as housing on the Greenbelt commands a premium. The Local Plan tries to suggest that small green wedges are an adequate replacement for greenbelt. This is clearly not the case. No amount of Green Wedges can fulfill the same role as that performed by Loes Farm .

## **Historical & Economic Considerations**

To put these two issues together may seem unusual, but History is the main business of Warwick. It brings in tourists, provides jobs and offers leisure facilities for its residents.

Guy's Cliffe is steeped in history and for that reason has been identified by English Heritage as a Historic Park & Garden and a site of Special Historical interest. This also includes the area of Loes Farm adjacent to the Coventry Road. Guy's Cliffe House and Hintons Nursery are both Grade 2 listed.

The NPPF requires that any Local Plan must protect historic and environmental assets (4.6). Building 180 houses on the edge of a historical asset would seem at odds with this.

Woodloes Lane and Loes Farm form an important landscape feature of the Millennium Way – advertised as a scenic path through the Heart of England countryside. People are unlikely to enjoy the same experience walking through the middle of an extended housing estate.

Many residents regularly use Woodloes with family and friends. They would lose this valuable asset should it be crossed by a major road and completely surrounded by houses.

To put our economic mainstay at risk by turning Warwick into a Castle surrounded by housing estates is difficult to understand.

Loes Farm borders Hintons Nursery (of which Guy's Cliffe Walled Garden is a part) on two sides, and which could arguably benefit from the potential customer of another 180 houses. However, Hintons' customers have regularly expressed the fact that as one of the ever decreasing number of independent nurseries, one of the aspects they most enjoy is that the nursery is in a rural location and that it provides specialist knowledge about plants.

For this reason Hintons have deliberately avoided the normal business model of the garden centre, choosing instead to work with residents and WDC to create a business which specialises in growing its own stock and offering as many traditional services as one would find in a rural location.

This gives residents a choice between going to a garden centre or DIY store which offer clothing, furniture, home wares, a smaller selection of plants and by default a correspondingly limited knowledge of horticulture, or a nursery which grows its own plants, vegetables, produce etc. and is able to focus its expertise for the benefit of its customers.

Guy's Cliffe Walled Garden Trust has now started to renovate the Walled Garden behind Hintons Nursery. This facility will, in time, be returned as a fully operational Victorian Kitchen Garden, providing a valuable educational facility for local schools as well as a new historical asset for the public.

Pollution, in particular, will have an adverse effect on all the historic assets in Guy's Cliffe including both Hintons Nursery and the Walled Garden, as both will be used to grow plants, which will not develop as well in an area of poor air quality.

Hence, both of these facilities may need to change their business models – potentially to the detriment of their customers.

## **Bio-Diversity Considerations**

Loes Farm is the home of 13 significant trees - of which at least 3 are 100 years + old, and a line of hedgerows, which date back to the 1700s. Central Government launched The Big Tree Plant last year to start replacing many of the mature and important trees which have been lost in the past century through unrestrained economic development and ill-conceived housing schemes.

The benefits of trees are well known and many fold. Their contribution to controlling our ever increasing carbon footprint in Warwick should not under-estimated, when there are no other proposals in the Local Plan to do so.

It would be fool hardy at best to risk damaging - or worse -to condemn these trees. WDC's efforts to protect and plant new trees in other development have met with very little success. Equipment damages trees, and new trees are of little interest to a developer. WDC do not have the resources to enforce any planning conditions associated with trees.

The potential loss of local biodiversity, as identified in the County Museum Habitat Biodiversity Assessment of 2008, has been ignored. Loes Farm was identified as being 'unfavourable for development' in comparison with other sites on the basis of the ridge and furrow and grass species rich meadow habitat.

There is a huge range of Butterflies, Moths, Bats and Newts on the site - some of which are extremely rare... one originally thought to be extinct.

The NPPF states that land of lower biodiversity value should be used ahead of land of higher biodiversity. This has again been ignored.

While WDC's own Green Space Strategy highlights the need to positively contribute to conservation of habitat and species, but then specifically excludes agricultural land where this is easiest to achieve. It also stipulates that Local Plans should enhance these habitats - including those identified in the Habitat Diversity report, of which Loes Farm is by far the most prestigious

## **Urban Sprawl**

With the majority of the proposed housing crammed into any pocket immediately outside the urban parts of Warwick District - instead of taking more evenly distributed percentages of greenbelt from a wider area - it is inevitable that urban sprawl will flourish.

Furthermore, as the proposed development is on a prominent hilltop site and with so much land already given over to housing estates which have little or no aesthetic environment, building on Loes farm would have an adverse impact on the only remaining rural entrance to the County Town of Warwick. This is significant from a commercial and historical perspective.

Leek Wotton would almost certainly lose its identity and, - as 180 houses will not be able to take on

their own character - they will just become in effect, an extension of the Woodloes Estate, which already lacks a real sense of community and its own identity.

WDC's SFSPWD says that the LP should distribute housing evenly across district - with priority given to Brown-field sites and ensure that development does not encourage coalescence of settlements. WDC is contradicting its own objectives.

Loes Farm is a natural infill intended to prevent urban sprawl.

## **Hydrology Considerations**

Flooding has always been an issue where I live and at Hintons Nursery. This proposal will, therefore, only exacerbate these problems, which were originally caused by changes in hydrology and drainage when the Woodloes was built in the 1970s.

Water runs from Loes Farm through Cambria & The Cottage in Woodloes lane, flooding Liberty Cottage (which has a permanent 60cm of water in the cellar), Hintons Nursery and Guys Cliffe Walled Garden – all of which have standing water when ever it rains.

The water table is less than 30cm below the surface and higher in places. Efforts to mitigate this have failed and Loes Farm itself is frequently flooded near the Coventry Road entrance. Adding 180 houses will only make this worse.

## **Impact on Carbon Economy**

There is a general consensus and some specific government targets / objectives promoting a low carbon, mixed economy, which helps mitigate climate change.

Indeed, Central Government has specified a 20% reduction in carbon emissions. There is no reference to this in the plan (other than some very general statements). Having asked several times about what modeling has been done to assess the impact of building on Preferred Options in the Greenbelt, and how this will be achieved, I have had no response.

The more houses we build – the greater the impact on our carbon reduction targets. Developers are largely unwilling to spend the additional money required for carbon neutral housing – particularly in the current economic climate.

The Plan shows no evidence of how it will increase the number of people who use public transport, walk or cycle. Surely, the plan needs to demonstrate how it would reduce the dependency on cars and alleviate health problems associated with congestion and pollution.

## **Employment Considerations**

Having chosen to plan housing before employment and without any obvious reference to existing employers, there is a higher than average risk that the two may not come together at all.

Existing employers want houses near them, but WDC seem unwilling to support this. Eagle Engineering were expecting affordable Housing near them. Developers were already lined up, but

WDC seems to have changed its mind (Chris Elliott's email to Eagle Engineering confirmed this); The argument being that developing land south of Gallows Hill would lead to 'coalescence'. This makes no sense at all, as this site is further away from Bishops Tachbrook than many of the other sites now being proposed by the Council. Coalescence of the Greenbelt sites seems to be less of an issue.

WDC have advised that there is significant employment potential at Stoneleigh, Coventry Airport/Coventry Gateway. This was deemed to provide a rationale for placing more housing north of the river / canal system. However current employment opportunities are largely situated south of the river. Why is there not a single house planned for the area around Coventry, e.g. Baginton or Westwood Heath?

Warwick University is a big employer, but, again there is little planned development around there.

Surely development in these places would have a much lower impact in terms of existing green space.

There is also potential for further employment opportunity south of the river should the economic situation dictate that the many empty premises in the Heathcote, Sydenham and Tachbrook commercial development areas again become productive. So, why have previous proposals for housing development south of the river have been shelved?

The LP talks about the "possibility" of employment. The sounds very speculative. What happens if the employment doesn't materialize. Do we move the houses?

On a related note there has been substantial employment development at Gaydon, but no corresponding housing.

Would it not make sense for WCC/WDC to a). be looking at employment opportunities first and b). also working with these other areas where employment already exists or is likely to exist?

## **Infrastructure Considerations**

There is no doubt that any new houses must put increased pressure on the local road network, including Primrose Hill (from which access is assumed) and the Coventry Road which will not be mitigated by the proposed northern bypass.

WDC has acknowledged that there has been no test or proper analysis of what this will do to existing infrastructure. Warwick Station (nearest to Loes Farm) is under-served by Chiltern Railways, while surgeries, schools & the local hospital – all within walking distance - are already at full capacity and will be difficult to expand.

This will result in people driving elsewhere. Transport requirements should be achieved sustainably, not increase car use. Would it not be better to build new housing in areas where appropriate facilities and infrastructure can be delivered at the same time .

Coventry Road and Primrose Hill have had many accidents, and there is the question of what additional housing will do to the long queues on the Coventry Road and the air quality of the

Woodloes. There is no evidence of any modeling having been done. Increasing carbon emissions to an unacceptably high level in an already house rich area would be problematic for all residents.

The LP talks about mitigating traffic impact, but as no assessment has been done, it is not possible to guarantee mitigation at this stage.

## Other Factors to Consider

The Current owner of Loes farm has chosen not to invest in the land, declaring it 'non-viable' (they'd already sold most of it in the 1970s for the Woodloes). The land is rich and ideal for agricultural development – production of locally grown food being one central government's own stated aims.

How we will 'feed' an increasing population? Are we just going to rely on the supermarkets to import more food from other countries increasing our carbon footprint?

Converting land which could be used to grow food – whether as farms, allotments or small holdings – to residential housing doesn't make sense.

As only part of the land is being proposed on Loes Farm, this will make the farm even less viable and place greater pressure to release the remainder of the land for development. (The Council has already confirmed it is happy to move & remove greenbelt boundaries.)

## Alternative Sites

One of the requirements of any response was for residents to identify alternate sites. All the groups of objectors are aware that this is tantamount to asking groups of objectors to pitch their group against others. This is neither democratic nor ethical. It is for WDC to do the work properly and not rely on other groups to do their jobs.

However, on the assumption that my response will only be considered if I undertake my own assessment, I have spent considerable times researching possible options. This is not intended to be a recommendation, merely a list of findings:

- The area South of Warwick could provide enough brown/white field land for over 7000 houses (Gallows Hill + Europa Way & Harbury Lane).
- The NPPF proposed sustainable development where it enhances rural locations, i.e. villages.
- This is reinforced by SHLAA which also identifies strong demand for housing in these villages.
- The SHLAA highlights several sites which would be equally suitable:
  - Radford Semele. Development around here would be unlikely to alter the character of the Radford Semele itself and would not lead to urban sprawl
  - Barford – since the relief road was built has become a non-entity.
  - Bishops Tachbrook – particularly suitable from a transport perspective

None of these are in the Greenbelt, but each offers the same opportunities for development

as Greenbelt sites in Warwick and other locations, providing enough land for up to another 1000 houses. Why have they been dismissed?

- Many villages may actually be more sustainable and develop a critical mass, if they had additional housing.
- Coventry gateway is likely to be a major employer in the future.
- WDC's arguments for not building in the South, i.e.
  1. Impact on infrastructure, town centres & the M40,
  2. continued southerly spread / coalescence between towns (but less so than the Preferred Options) and
  3. the ability of the markets to deliver this level of development, seem to be based on certain councilors' opinions (no evidence found to support these statements). Indeed some Developers have already confirmed they would be quite happy to deliver larger developments. Why is this being ignored?

## Conclusion

The LP lacks a cohesive structure and set of arguments for developing large parts of the Green belt and, in particular, Loes Farm. It breaches many of the requirements of the NPPF. There is no Strategic vision and, if pursued, the Plan as it stands, could adversely affect the quality of life for current and future generations.

We all have a role to play in helping others and making the most of the environment over which we have some influence. This is an opportunity for WDC to make Warwick a better place. I would, therefore, ask that they reconsider their Preferred Options, and in particular the Loes Farm option.

*Sarah Ridgeway,*

Resident,

Business Owner,

Chair of the Warwick Tree Wardens,

Director / Trustee of Guy's Cliffe Walled Garden

## References & Legend

LP:	WDC Local Plan – Preferred Options (WDC May 2012)
LPRPC:	Local Plan Report of Public Consultation (March 2012)
NPPF:	National Planning Framework Policy Framework (Dept for Communities & Local Government, March 2012)
DIP:	Draft Infrastructure Policy (WDC)
HBAR:	Habitat Bio-diversity Assessment Report (Warwickshire, 2008)
WSHMA:	WDC Strategic Housing Market Assessment (GL Hearn, JG Consulting March 2012)
SHLAA:	Strategic Housing Land Availability Assessment (May 2012)
SFSPWD:	Strategy for the Future and Sustainable Prosperity of Warwick District (Dec 2011)
GTVS:	Garden, Towns, Villages & Suburbs – A prospectus for WDC (May 2012)