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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 Revised Development Strategy Consultation

Thank you for the opportunity to contribute to this consultation.

Strategic Vision (section 3)

As we have previously stated, we are concerned that development proposals in the district are based on a supposed need for economic growth (paragraph 3.5). Growth per se is unnecessary and unsustainable for a stable economy. We also object to the proposals for 'garden towns' because of the densities of development proposed. However we support all the other strategic principles outlined in this section.

Level of Growth (section 4)

As in previous stages of the consultation, we remain concerned about the proposed levels of growth in the District, as we believe that development and investment should be concentrated on the regeneration of the major urban centres of the region, such as Coventry, Birmingham and Stoke on Trent. Development in Warwick district should be minimised to allow this to happen. Continued population growth and expansion of the smaller urban areas is not sustainable in the long term and expansion should be minimised to retain the countryside for future generations and maintain the country's future food security. 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.

We would be grateful if, when the results of the pending Joint Housing Market Assessment are known, the numbers of homes required in the district could be stated more clearly. At present the figures in the consultation document are confusing. Paragraph 4.1.1 states '*... the Council is adopting an interim level of growth of 12,300 homes...*' However paragraph

4.1.5 then goes on to say '*...the 2008 - based SNPP, this would indicate a need for 11,500 homes between 2011 and 2029. The interim 2011 - based household projections showed an increase of 6,248 households between 2011 and 2021...*'

Section 4.1.8 shows that housing numbers are very dependent on employment forecasts which are at best very variable. Section 4.1.9 specifically highlights '*...the sensitivity of employment-led population projections particularly in terms of economic forecasts and the way that they impact upon migration....*' We understand the logic explained in paragraph 4.1.10 which explains the way that the interim level of growth of 12,300 homes has been calculated. However our belief that development and investment should be concentrated in the major urban centres of the region leads us to argue that the local growth rate for the District should be much **lower**, not higher, than that of the forecast growth rate for the region.

Densities of Housing

We continue to be concerned about the very low densities of housing proposed. We believe that the proposals for 'Garden Suburbs' would in fact increase sprawl around the towns, and in fact destroy the 'rural character' of the district rather than preserve it. Low density suburbia, no matter how well designed, can never be a good replacement for real countryside.

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 studies have shown 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 over 100 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. At the very least the District should provide more explanation of why these low figures are being used.

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.

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.*'

We note that in the specific site allocations (such as paragraph 5.1.4), the Revised Strategy includes the requirement for '*Homes for Older People: Adequate provision, close to local facilities, should be made for Extra Care Homes*'. It should be noted that the majority of older people do not in fact require care provision. The most popular form of housing is usually 'category 2' sheltered apartments. The most successful retirement schemes are the closest ones to town centres – it is generally accepted that suburban and edge-of-town sites are not usually appropriate locations for retirement housing.

Distribution of Sites for Development (section 4.3)

We generally support the Council's Preferred Option (RDS3) in terms of the strategy for locating sites for development.

As we have stated previously, in our view the choice of sites for housing (and any other development) should be determined primarily 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).

We are pleased to note that the current proposals have removed previous plans for using Green Belt land north of Leamington and Warwick. We generally support the current site allocations, subject to the mitigation measures outlined in the consultation document, as they appear to follow recommendations in a number of landscape character studies. We also note that most of the allocations are close to employment areas therefore potentially minimising travel to work distances and

One exception is the allocation for Red House Farm, Lillington. We oppose the proposals for this site as it is within the Green Belt and as the site is on top of a hill we remain to be convinced that the development proposals will not harm the views of the wider landscape.

We support the proposed development at Thickthorn, Kenilworth, as long as a significant proportion of the site is allocated for employment uses. We believe that by providing more employment this will 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. The subsequent reduction in associated CO₂ emissions will go some way in mitigating the loss of a greenfield site. It will be particularly important to retain the existing woodland, trees and hedgerows within this site in their entirety, including all of Glasshouse Spinney, where extensive conservation work has been carried out in recent years by the Warwickshire Wildlife Trust. This may mean that the land north and east of Glasshouse Spinney may only be able to be accessed from the existing access points off Birches Lane. It will also be essential that the development includes cycle and footpath links to the centre of the town and the proposed railway station.

We support paragraphs 4.4.4 to 4.4.7 (development in villages) and particularly the statement *'It is important that rural housing projects respond positively to the uniqueness and quality of the local environment..'*

Employment Land (section 4.5)

As we have previously noted, studies of the demand for employment land have shown 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 studies have suggested that there is little need to allocate more land for employment purposes.

The current consultation proposals have in part been superceded by the recent decision to grant planning consent for the Coventry Gateway site. We have objected separately to that development and it is not necessary to repeat those details here. However because of the allocation of land in this location, as well as the proposed allocation at Thickthorn,

Kenilworth, we believe that only a very small land allocation will be needed elsewhere in the district.

We are concerned that the calculations in Table 4 (paragraph 4.5.7 of the consultation document) include an extra 21.5 hectares simply to provide a 'flexibility of supply'. This is significant because without the 'flexibility' it would change the employment land requirement from 22.5 hectares to just one hectare. At the very least, there needs to be more justification for this very generous 'flexibility' allowance.

In Table 5: Demand for Employment Floor space, there seems to be no allowance for the fact that B1 (generally office use) will often be provided by buildings of two or three stories in height, whereas B8 warehouse use is generally single storey. The table shows B1 use provided at a rate of 3250m² per hectare, but B8 use provided at a rate of 5000m² per hectare, which does not appear to be correct. Clarification is required.

Strategic Development Sites (section 5)

As already stated, we generally support the principles for the current site allocations, subject to the mitigation measures outlined in the consultation document. We are concerned about the low densities of development proposed and we would encourage the Council to consider higher densities of development, particularly in the development areas closest to the existing town centres (such as near Myton Road). If higher densities are encouraged, the land supply will last longer and there will be less need for proposals for other green field development sites at a later date.

Paragraph 5.1.7 includes the sentence '*...If this area was accessed separately from Gallows Hill, the ability to market the area as part of the Technology Park would be diminished...*' We object to this proposal. Marketing of any site should not be allowed to influence strategic planning policy.

We welcome the proposals for Green Infrastructure in all new developments, and in particular a country park along the Tach Brook and nature reserve at Whitnash Brook. We strongly support proposals to retain/ replace hedgerows (such as in para. 5.2.16) which are essential for every new development. However we feel that there should also be a strategic landscape corridor along the route of Europa Way and other main distributor roads 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.

The reference to Leamington Football Club's proposals in paragraph 5.1.12 is not clear. Whereas we agree that the club's current site is not well related to the current urban area, we would not support the redevelopment of the site for any other use, apart from farmland.

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.

As already mentioned, Map 6 (Thickthorn) needs to clearly show that Thickthorn Wood and Glasshouse Spinney and hedgerows would be retained in their entirety. Paragraph 5.4.12 mentions the footpaths which cross the potential development site – Rocky Lane and

the footpath leading to Stoneleigh Abbey. We propose that both of these routes should be upgraded to dual use cycleways and footpaths. The northern path would form a very useful cycle and pedestrian commuter route to the existing and new employment sites at Stoneleigh Park and should be funded by the developers of that site.

If the sports clubs presently in the Thickthorn area relocate from the proposed development site (paragraph 5.4.24), any new sports facilities should be carefully located and designed so as to minimise their impact on the landscape. In particular, they should not include floodlighting. Floodlighting can significantly detract from the character of a landscape and have impact on wildlife both during the daytime and particularly at night / evening.

Transport (section 5.6)

As we have previously stated, and is outlined in the National Planning Policy Framework, policies should concentrate on reducing the need to travel, reducing use of the private car and maximising the opportunities for use of public transport. We are pleased that generally speaking the current proposals do follow these principles, and clearly significant thought has been put in to this section of the consultation document. We are particularly pleased that previous proposals for a 'northern relief road' have been dropped for this stage of the consultation.

We strongly support the improvements to the cycle network which are proposed in the consultation document. Generous provision for walking, cycling and public transport access from all new development sites to their local town centres will be essential. A network of generously sized off-road cycle paths throughout new developments will be desirable.

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