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Development Policy Manager,
Development Services
Warwick District Council

28th July 2013

Dear Sir,

We wish to object to the RDS on the following grounds; we will then follow with some positive suggestions which we trust will enable WDC to find a way forward that fully reflects local needs and the wishes of existing residents of the District.

1.Housing Growth

The RDS is deeply flawed because it fails to set out the case for 12,300 new houses – the number in the Preferred Options consultation was 10,800. I seems that the additional 1,500 has been plucked out of the air.

Para4.1.3 states that “the scale of housing should meet household and population projections”. By using figures derived from the ONS and reflecting the latest census, we calculate that ca 6,000 new houses would meet this requirement. It is relevant here that in the “Issues and Options” consultation 58% of respondents voted for scenario 1 (low growth) at 250 houses per annum.

2. Brownfield Sites and Regeneration

Paras 4.2.2 and 4.2.4 refer to Small Urban Sites and Consolidation of existing Employment Areas, but the number of houses in these categories only totals 750. WDC should be pursuing a pro-active strategy to create significant numbers, upward of 1,500, on sites within the existing urban boundary.

A major opportunity was missed in allowing the Ford Foundary sit to be assigned to retail rather than housing but major opportunities do still exist: for example, on Queensway, on land adjacent to Trident College and Wolseley Group, on Chandos Street, and on land between the canal and railway in Leamington.

Building houses in such spaces would be good for the economy of Leamington; residents would be near existing amenities, potential car travel would be reduced and the need to invest heavily in infrastructure would be avoided.

Use of these sites would crucially reduce the pressure to build on green field sites. This will not suit large developers but WDC should take the initiative and create its own development agency, encouraging the support of small/medium sized building firms which to come forward with proposals. As major retailers scale down their supermarket programmes in favour of smaller convenience stores they too will want to participate in these initiatives.

3. Destruction of high quality landscape

Para 4.3 should not state unequivocally that “green belt should be protected” and therefore infer that green fields elsewhere should not be protected. Green fields to the south of Leamington and Warwick are just as important to local residents as green fields are to the residents to the north of Leamington and Warwick

Para 3.5 states as a “specific principle” that sustainable development requires as a “key element” that “high quality landscapes should be protected”. I agree with this completely so sites south of Harbury lane at Woodside Farm should be removed from the plan – just as in Para 4.3.8 the quality of the landscape at The Asps has now been recognised.

The promise of a Country Park in 5.1.10 has little merit; on account of the lie of the land the housing south of Harbury Lane will be on the upper flanks of the Tachbrook valley while the Country Park will be out of sight down in the valley. Looking from both Warwick Gates and Bishops Tachbrook the view will be of one uninterrupted built up area

4. Low Carbon environment and the use of the car

WDC Strategic Vision states in Para 3.4 that “strategy seeks to provide the basis for low carbon environmental sustainability”. However 4,500 houses in “garden suburb” layouts along Europa Way, Tachbrook Road and Harbury Lane will generate about 9,000 additional cars. Residents will use their cars for shopping at retail parks (free parking), to go to work and to take children to school as well as accessing recreational facilities. Bus services will make little impact: we know from current usage that less than 10% of people use buses to get to work. We also know from experience that private bus companies are reluctant to provide high frequency services and with subsidies being withdrawn this is unlikely to change. The promises set out in Para 5.6.3 are not credible.

5. Distribution of New Housing across the District/Hierarchy of Villages (RDS 5)

All communities can benefit from a measured amount of new housing spread over time. However large scale estates plonked on green fields create problems of social integration and make massive demands for infrastructure expenditure. It is not just unfair to propose that 70% of all new housing be created in one confined part of the District it also denies other communities the opportunity to grow organically. We completely reject therefore the Draft Settlement Hierarchy Report with its arbitrary allocation of houses in rural areas.

The wiser alternative is to state that all rural communities, whether in Green Belt or not, will be encouraged to consider growth of up to 5% of their housing stock over the planned period and that this will be achieved by small scale developments (around 20 houses) on infill sites or adjacent to the village envelopes. Local builders should be invited to come forward in conjunction with landowners, the whole development being achieved in close consultation with Parish Councils and Neighbourhood Plan Teams.

6. Infrastructure

It is not clearly set out how roads, schools, medical facilities etc will be funded. Figures have been bandied about e.g. £35-39M for mitigating road works, £5M for each primary school, £25M for each secondary school etc. However by this stage WDC should have produced, for all to see and evaluate, a clear business case showing the total costs envisaged (plus contingency) against possible resources from C.I.L. In the absence of this information we doubt whether the infrastructure can be provided and therefore the "sustainability" of the plan is highly suspect.

Overall this is a very poor plan, full of inconsistencies and lack of logic. This has caused whole swathes of the population to lose confidence in the consultation process and the competence of WDC to organise a New Local Plan.

We would suggest the following plan of action:-

A. Housing growth: re-examine the numbers, make sure they reflect the latest trends (available since the report was drafted) notably Hearn's PRO5

B. Brown Field/Regeneration: Initiate a pro-active study of sites in each of the 3 urban areas, engage local builders and property owners in the process and incorporate this as the key element in the Strategic Vision. Tell all developers that no Greenfield sites will be considered until the potential of brownfield sites has been fully realised.

C. Villages - Ditch the "Heirarchy" and affirm that the terms of Para 4.3.14 will apply to all rural settlements. By close consultation and technical support encourage development of small sites across the District

D. Infrastructure Costs: Publish a detailed statement showing how C.I.L will fund necessary infrastructure across all services and show timing of implementation.

Yours Faithfully,

A solid black rectangular box redacting the signature of the sender.

Graham and Vera Leeke