

WDC PLANNING
Ref
Officer
25 JUL 2012
SCANNED
CC CR PD MA
PRE GEN DIS

Mrs L Hunt

24th July 2012

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

6959

Dear Sir/Madam

I am writing in connection with the New Local Plan. I have completed one copy of the form and set out my specific comments about the various parts of the New Local Plan below.

Vision; Spatial Portrait, Issues and Objectives – Support

Comments:

The Key Principles as set out at 2.5 and Objectives as set out at 4.10 for the Economy are supported.

We recognise that Warwick District is an attractive place to live, work and visit. We also accept that there are a lot of people who need and cannot afford to buy a new home in the District, and that the population is likely to grow over the next 20 years. It therefore follows that new housing in the District is required. The amount that has been identified appears to be based on a credible evidence base, although we are not experts. We therefore generally support the principles and objectives relating to the amount of housing.

However, the need to provide new housing needs to be balanced very carefully against environmental considerations and in particular the Green Belt, and the purposes of including land within the Green Belt i.e. avoid coalescence, which is one of the stated principles under the Environment.

We therefore also strongly support the objective of ensuring that development is located in the right place to minimise environmental impact and address climate change by reducing carbon emissions.

We support the need to provide a mix of housing and that new developments should be well designed and sustainable.

We also support the principle and objective of ensuring that the District has the sufficient infrastructure i.e. transport, schools, health services, parks, etc to meet current needs and support future growth. This is absolutely critical and central to the delivery of the overall vision. Any new development must provide the necessary infrastructure to mitigate the impact that will be generated by it. It would be wholly unsustainable and inappropriate for new housing development to be allowed if it doesn't meet the infrastructure needs generated by the development and places an additional strain on the existing infrastructure to the detriment of existing residents. The quality of life enjoyed by existing residents should not suffer from new development and the needs of new residents should not be ignored or taken lightly by anyone.

PO1 - Object

Comment:

We object to the proposed level of housing. It does seem a large number and we would question whether it is really needed, whether it can be accommodated without significant environmental impact, and whether it is a realistic amount given current economic conditions and the poor state of the housing market.

PO2 - Support

Comment:

From what we understand about it, we generally support the proposal to develop a CIL scheme as a means of securing the necessary funding from new development to deliver the infrastructure needed to serve it.

PO3 - Support

Comment:

As desirable as it would be, we recognise that it would not be possible to build all of the District's housing requirements within our towns and villages and that it will be necessary to develop on the edge of our towns and villages.

However, we strongly object to development in locations which would lead to the coalescence of settlements.

PO4 - Object

Comment:

Following on from our response to PO3, we strongly object to the proposed inclusion of the sites at North Milverton and Blackdown for the following reasons:

- The sites are located within the Green Belt.
- The development of these sites together or in isolation, will have a significant impact on the openness of the Green Belt.

- It would constitute urban sprawl and lead to encroachment in to the countryside, which would be contrary to the aim and purposes set out in the National Planning Policy Framework.
- Together with the proposed development at Thickthorn in Kenilworth, which is probably the only site in Kenilworth capable of accommodating the required level of housing, it would bring the urban areas of Kenilworth and Leamington much closer together, which would go against the purpose of preventing coalescence as set out in the National Planning Policy Framework and the objectives set out in the Local Plan. At the moment, the gap between the built up urban areas of Kenilworth and Leamington is just under 4 kilometres at its narrowest point. That gap would be reduced to approximately 2 kilometres if the Thickthorn and Blackdown proposals go ahead.
- Exceptional circumstances have to be demonstrated to justify the development of Green Belt land and there are parts of the District which are not Green Belt. So what are the exceptional circumstances justifying the release of Green Belt land?
- We note at 7.22 that the Plan has identified more land than is required to meet the housing numbers by circa 1,370 houses. This is unnecessary and inappropriate, particularly when it involves removing land from the Green Belt, and will only serve to encourage more housing to be developed than is required. Arguably, the land north of Milverton and at Blackdown will be the most attractive locations to developers, and so there will be pressure to develop these sites before other, non-Green Belt sites.
- In the case of Leamington, we recognise that it would not be practical or sustainable to put all of the housing to the south of the town, but there is scope to reduce the amount being proposed to the north of Leamington, given a) the over-provision that has been made, and b) that there is still land elsewhere in the town in non Green Belt locations e.g. to the south of Harbury Lane, which would be a logical extension to Warwick Gates.
- The sites to the north of Leamington will increase the traffic congestion coming in to and going out of Leamington in the peak hours as people travel to and from the town centre and to the south of the town, where most of the town's employment base is located. The A452 specifically is already very congested. Whilst a good idea in theory, a Park and Ride to the north of the town will not be effective in significantly reducing traffic coming in to the town because a) it takes years to change people's travel patterns and b) people will not use it unless it saves them time and money, which is unlikely to be the case if the bus has to sit in the same queue going in to Leamington. What is more likely to happen if the congestion in to Leamington gets worse is people will find alternative routes to get to where they want to be. We have noticed that the traffic along Sandy Lane and using Stoneleigh Road, Westhill Road, Leicester Lane, Lillington Road has gradually increased over the years as people use that route to bypass a long stretch of the A452 Kenilworth Road.
- The quality of the countryside and landscape of the Blackdown site in particular is quite spectacular with long distance views of Warwick Castle and Coventry. It is a very popular area which a lot of local people use for passive recreation.
- The primary schools in the area are already at capacity and I have grave concerns that the new schools that will supposedly be built as part of these developments, will not be

developed earlier enough for the new children to go straight in to. This is likely to make competition for existing school places in the area even greater, resulting in children having to travel further to get a place.

In light of the concerns raised above, we request that:

- The proposed development of the site at Blackdown be deleted in any event.
- The proposed development of the land to the North of Milverton be deleted or at least reduced.

PO5 – Support

There is a clear need to deliver more affordable housing in the area to meet the needs of the younger and older population in particular who often cannot afford a quality home.

However, a lot (not all) of people in need of 'affordable' housing would prefer to own their property as opposed to rent it from a housing association. I have members of my family and know of plenty of other people who are privately renting at the moment because they cannot afford to buy, but would love to own their own home. We should meet the needs of these people as well as the needs of those who are unfortunately not able to afford to own their own home and are forced to rent.

However affordable housing is delivered, it should be delivered and managed to the highest standards to create and maintain high quality environments and strong communities.

PO6 – Support

PO8 – Support

Comment:

We support the need for a strong and competitive economy, but for the reasons set out under PO4 i.e. impact on Green Belt and traffic, we object to the allocation of land at North Milverton and Blackdown.

We understand what the Council is aiming to achieve at 8.30, but we are concerned that all that will happen is more people will travel from outside and from the south of the town to the north of the town, which will increase the existing traffic problems.

The employment base to south of the town is very established and should be further strengthened through the development of land around Warwick Technology Park and to the south of Harbury Lane. There also appears to be an opportunity to deliver something between the A46 and A429 to the north of Warwick, on what is a well contained site, which has equally good access to the A46.

PO9 – Support

Comment:

The strength and quality of the District's town centres is one of the very reasons that makes the District a great place to live and visit. Every effort should be made to ensure our town centres remain attractive and competitive places to shop and visit both during the day and night.

PO10 – Support

PO11 – Support

PO12 – Support

PO13 – Support

PO14 – Support

Comment:

We agree with the stance and approach that the Council is taking in respect of HS2. Like the Council and so many other people across the country, we object to HS2.

We support the strategy to minimise the need to travel and promote sustainable forms of travel.

Leamington has good road and rail links to Birmingham and London, and there is a lot of out-commuting to places of work. New housing development should therefore be directed to locations with accessibility to the District's railway stations.

We support the proposal to open the station at Kenilworth.

It is a great idea in theory, but we have reservations whether the proposed Park and Ride sites will a) be delivered at all given the costs of constructing the facilities and maintaining a regular bus service and b) be effective without fiscal measures to discourage people from using their car. How much time will P&R users really save after they have parked up, waited for the bus to arrive/fill up/depart only for the bus to sit in the same queue as the cars? The proposed park and ride sites are after all only a couple of miles from the town centre. If these fail (and they will), then the traffic impact is likely to be significant and add to the already terrible congestion that exists in the morning and afternoon peak hours on most approaches in to and out of Leamington.

We appreciate that there has to be some effort made to reduce traffic congestion and support the intention to achieve that, but allocating sites like Blackdown, which is as far away from the town centre, large foodstores, railway station, and the main employment area as you can get, will only encourage more car journeys to be made.

PO15 – Support

Comment:

While we support this policy, we think there is a conflict between PO15 and PO7 and PO8.

Some of the sites that have been identified for development are already regarded as important parts of the Green Infrastructure. The sites at Blackdown and North Milverton offer good access to the countryside, provide a high quality landscape and have ecological issues. This is even acknowledged in the Council's own Sustainability Appraisal.

PO16 – Object

Comment:

We object to this policy and in particular the proposals to redefine the boundaries to the north of Leamington and east of Kenilworth. Development in this location will unquestionably result in urban sprawl and reduce the gap between Leamington and Kenilworth.

The site at Thickthorn is probably the only logical site where a significant amount of new housing can be developed in Kenilworth, but this is well contained by the A46. The site at Blackdown should be deleted to maintain the widest possible gap between Kenilworth and Leamington. The deletion of this site alone will not require other sites to be allocated instead as the Plan already over-allocates land to meet the needs.

I trust you will take my comments in to consideration.

Yours sincerely

Mrs L Hunt

Preferred Options Response Form

2012

For Official Use Only

Ref:

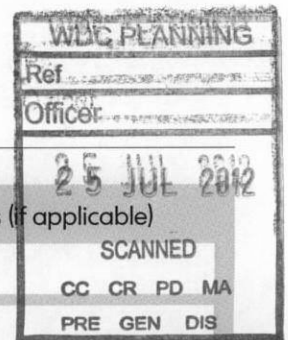
Rep. Ref.

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available for members of the public. You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details



	1. Personal Details	2. Agent's Details (if applicable)
Title	MRS	
First Name	LYNN	
Last Name	MUNT	
Job Title (where relevant)	DRS RECEPTIONIST	
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
Would you like to be made aware of future consultations on the new Local Plan?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
About You: Gender	[REDACTED]	
Ethnic Origin	[REDACTED]	
Age	[REDACTED]	

Part B - Commenting on the Preferred Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which document are you responding to?

e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Preferred Options booklet

Which part of the document are you responding to?

Preferred Option Box (e.g. PO1)

PO4

Paragraph number / Heading / Subheading (if relevant)

⑤ Blackdown

Map (e.g. Preferred Development Sites - Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Total objection to proposed development of 1170 houses - See attached objection letter.

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Ref:

Rep. Ref.

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If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which document are you responding to?

e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Which part of the document are you responding to?

Preferred Option Box (e.g. PO1)

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

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Ref:

Rep. Ref.

Guidance on Making Representations

- Please use the attached response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/newlocalplan
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing.
- All forms should be received by **4.45pm on Friday 27th July 2012.**
- Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.
- To return this form please drop off at one of the locations below, or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH** or email: newlocalplan@warwickdc.gov.uk

Where to See Copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations.

Location	Opening Times	
Warwick District Council Offices Riverside House, Milverton Hill, Royal Leamington Spa	Mon – Thurs Fri	8.45am – 5.15pm 8.45am – 4.45pm
Leamington Town Hall Parade, Royal Leamington Spa	Mon – Thurs Fri	8.45am – 5.15pm 8.45am – 4.45pm
Warwickshire Direct Whitnash Whitnash Library, Franklin Road, Whitnash	Mon – Weds Thurs Fri Sat	10.30am – 5.00pm Closed 10.30am – 4.00pm 10.30am – 1.30pm
Leamington Spa Library The Pump Rooms, Parade, Royal Leamington Spa	Mon – Weds Thurs Fri Sat Sun	9.30am – 6.00pm 10.00am – 7.00pm 9.30am – 6.00pm 9.30am – 4.30pm 12.00am – 4.00pm
Warwickshire Direct Warwick Shire Hall, Market Square, Warwick	Mon to Thurs Fri Sat	8.00am – 5.30pm 8.00am – 5.00pm 9.00am – 4.00pm
Warwickshire Direct Kenilworth Kenilworth Library, Smalley Place, Kenilworth	Mon and Tues Wed Thurs and Fri Sat	9.00am – 5.30pm 10.30am – 5.30pm 9.00am – 5.30pm 9.00am – 1.00pm
Warwickshire Direct Lillington Lillington Library, Valley Road, Royal Leamington Spa	Mon Tues and Fri Weds Thurs Sat	9.30am – 12.30pm & 1.30pm – 6.00pm 9.30am – 12.30pm & 1.30pm – 5.30pm Closed 9.30am – 12.30pm & 1.30pm – 7.00pm 9.30am – 12.30pm
Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa	Mon - Thurs Fri	9.00am – 5.00pm 9.00am – 4.30pm
Finham Community Library Finham Green Rd, Finham, Coventry, CV3 6EP	Mon Tues, Thurs and Fri Sat	1.00pm – 7.00pm 9.00am – 7.00pm 9.00am – 4.00pm

Warwick District Council strives to ensure that all people regardless of ethnic origin or disability can access its services. Where possible, information can be made available in other formats, including large print, cassette tape, CD & other languages if required. Telephone 01926 450000.