

1 August 12

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Dear Sir

New Local Plan

I would like to comment on the NLP proposals as follows:

- 1 Growth Level** - Last year WDC consulted on the levels of growth, offering 3 possible scenarios. 58% of respondents opted for the "low" level (NB not zero!) which would lead to 250 new houses pa. That is ca 5200 over the period of the NLP. This response should be the key fact underpinning the whole Plan. To ignore the outcome discredits WDC and risks undermining the integrity of the Plan itself.
- 2 Housing** - it is good to see that the land south of Harbury Lane between Warwick Gates and the village of Bishops Tachbrook has been retained as agricultural land. BUT overall the NLP proposes green land be released for 3150 homes to be built south of Warwick/Leamington. This is excessive given that Warwick Gates and the Tachbrook Industrial Estate have urbanised huge swathes of this area in the last 15 years. Enough is enough.
- 3 Development Sites** - *Woodside Farm (Site 11) is on a prominent slope and building on it would represent a significant and very visible southern extension of the Whitnash/Leamington urban area. It would add further to the congestion experienced on Tachbrook Road and represent a serious loss of amenity to residents of Warwick Gates and Whitnash.
*Asps and Gallows Hill (Site 3) would involve the loss of 95Ha of Grade 2 agricultural land. People living there would be remote from existing amenities in Warwick and Leamington requiring them to make daily journeys by car for almost everything they need. This cuts across the aims set out under Climate Change. I note that in

their 2009 review of the RSS planners rejected these sites as "unsuitable".

*Europa Way (site 2) in the existing Local Plan is identified as providing a key green gap maintaining the separation of Warwick and Leamington - a sort of mini Greenbelt! As such it has ensured an attractive approach for visitors to Leamington. For both these reasons the land west of Europa Way should be subject to only limited development - say 20% of what is proposed.

4 **Dispersal** - the map on pp 5 and 6 shows that the bulk of new development is to be around Warwick and Leamington. Very little is to the north, west or east of the District. This imbalance should be corrected. Here are some suggestions:-

*Make more effort to use brownfield sites. WDC's own report (para 7.10) says that land for 1320 dwellings is available but only 480 have been allocated in the NLP. But we should go much further with a proactive regeneration policy - the land on Queensway and between the canal and the railway in Leamington could readily yield 400 homes. The Chandos St site should be used for housing. Developers should be advised that regeneration projects are a priority for the District as recommended by the NPPF.

*Identify sites near Coventry Gateway. That is where the new jobs are to be created.

*Encourage villages to include a bit more housing in their Neighbourhood Plans. The prescriptive 3 Categories should be ditched (an echo of the Limited Growth Villages policy in out-going Local Plan). An averages of 50 in 20 villages yields 1000 new homes. Some will be able and want to can take more than 50, some less. But all will benefit by finding their communities more sustainable as a result of having new residents.

5 **Supermarkets** - PO9 makes the right point. But all the signs are that the planners are selling the pass. Morrisons on the Ford site is a fact, but we hear of Aldi on Queensday, Waitrose on the fire station site, and a new ASDA. These developments will erode trade in the town centres. As important, such sites should be rezoned for housing - because of their proximity, the new residents would bring more turnover to existing shops.

6 **Congestion** - 3150 house @2.33 represents ca 7100 new residents and probably 5000 cars with them! There is no provision in the Plan to relieve the existing pinch points over the Avon bridge into Warwick, the Princes Road railway bridge, and the railway bridge by Leamington station into Leamington. This is not in itself a criticism

because given the constraints at these 3 locations it's not easy to envisage an affordable engineering solution. But what it means is that the development proposals south of Warwick/ Leamington will make it much worse.

- 7 **Transport Infrastructure Map 5**- the proposals to "upgrade" the A452 either side of the Greys Mallory RA and to dual carriageway Europa Way are negative both in terms of the loss of green land and the traffic it will attract from the M40 which will further exacerbate the congestion caused by vehicles attempting to get into Warwick and Leamington. It is also questionable how these works could be funded.

- 8 **Park and Ride** - elsewhere these have proved uneconomic and an on-going burden on the local authority. The suggestion at one of the Forums that a supermarket group might fund building the one pencilled in for Europa Way would be a monstrous distortion of the planning process. Likewise the second P'nR at Blackdown is inappropriate because it too would require massive road development. If P'nR is to be adopted at all, then a single location adjacent to Warwick Parkway would be optimum. It would permit a tramway link into Warwick and Leamington possibly following the existing railway line.

- 9 **Warwick University** - I can find no reference to the intentions of the University to provide for its student population. The large number of houses in S Leamington occupied by students has the effect of reducing the housing stock available to families to rent and to first time buyers. There is also the paradox of sites being allocated to student accommodation which could be used for housing. The University should be advised to expand its on-campus halls of residents to accommodate a much greater proportion of its student population. This should be quantified and incorporated in the Preferred Options. The aim should be to release at least 300 dwellings in S Leamington.

I trust you will take account of these comments as you refine the Plan

