

LOCALPLAN

helpingshapethedistrict



Preferred Options Response Form

2012



For Official Use Only
Ref: 5093
Rep. Ref.

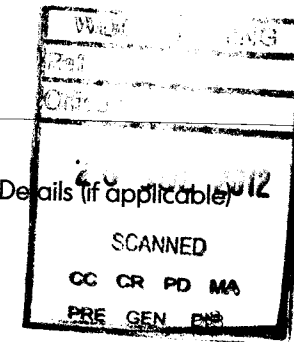
Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

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	MR	
First Name	K	
Last Name	DORSETT	
Job Title (where relevant)	MNG. DIR.	
Organisation (where relevant)		
Address Line 1	4 LARCH GROVE	
Address Line 2	WARWICK	



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 1 of 1

Which document are you responding to?
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

P.O. BOOKLET

Which part of the document are you responding to?
Preferred Option Box (e.g. PO1)

PO 4

Paragraph number / Heading / Subheading (if relevant)

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

LOES FARM (9)

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).

Official Use Only

Rep. Ref.

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 1 of 1

Which document are you responding to?
e.g. Preferred Options (Booklet) Preferred Options (Full Version)

P.O. BOOKLET

Which part of the document are you responding to?
Preferred Option Box (e.g. PO1)

PO 7

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).

For Official Use Only

Ref.

Rep. Ref.

Warwick District Habitat Assessment

**Habitat Biodiversity Audit
Partnership for
Warwickshire, Coventry and Solihull
C/o Warwickshire Museum Field Services
The Butts, Warwick, CV34 4SS
August – October 2008**

Project Partners:

*Warwickshire: Wildlife Trust, Warwickshire County Council, Coventry City Council, North
Warwickshire District Council, Nuneaton & Bedworth Borough Council, Solihull Metropolitan
Borough Council, Stratford-upon-Avon District Council, Natural England, Environment Agency*

3.22 Map 22 Woodloes Park/Hintons Nursery

Area: 33.5ha

Overview

This small parcel of land that is between two major roads is primarily poor semi improved grassland, improved grassland, continuous scrub and mature trees. Dissecting the Northern section is a strip of mixed plantation woodland that is a pLWS/SINC Woodloes Farm SP26Y2. The woodland contains veteran oaks and a watercourse. The grasslands have numerous mature yellow meadow anthills.

Key features

Veteran oaks within plantation woodland pLWS/SINC Woodloes Farm SP26Y2
Mature species rich hedgerow
Anthills for yellow meadow ants
Ponds
Mature trees
Wooded belt
Continuous scrub

Habitat description

This triangular parcel of land is fairly isolated due to the major trunk roads running parallel either side however there are some areas of ecological significance. The majority of the habitat is poor semi improved sheep grazed grassland with some areas showing faint ridge and furrow (ID#13,18). Although the grassland is floristically poor it has more value due to the frequency of mature ant hills (ID#4,13,2) occupied by yellow meadow ants (*Lasis flavus*). The presence of ant hills results in a greater diversity of wildlife within the grassland. Several insect eating birds will feed on the ants such as green woodpeckers and the ants can constitute up to eighty percent of the woodpeckers winter diet. The mounds make suitable basking sites for butterflies and reptiles. The ant hills have a different micro-climate and soil composition compared with the surrounding grassland so they can have different species of grasses, mosses and flowering plants colonising the surfaces and the majority of flowering plants within the grasslands were indeed found on the anthills. It is increasingly hard to find meadows with large numbers of well-developed mounds, because of modern farming methods and they are vulnerable to disturbance. Therefore these areas of grassland are valuable for a range of wildlife. A small area of ungrazed poor semi improved grassland with overgrown hedgerows and tall ruderal is undisturbed and therefore provides suitable habitat for reptiles and small mammals. This smaller field (ID#24) also has numerous ant hills that have been hidden by the tall grasses and therefore may now be vacant.

There are many mature trees in a range of species including some very large oaks. These trees are valuable habitat for many species and have the potential for roosting bats. There is a stretch of mature species rich hedgerow (ID#17) alongside a Public Right of Way although it is very overgrown it

I also draw attention to the following current town plan data.....

TABLE 7.1 Housing to be Allocated 2011-2029 in the Plan

	Dwellings
Housing Requirement	10,800
Less:	
Committed Housing Sites	1,224
Small urban SHLAA Sites	290
Other Windfall Housing Sites	2,300
Total	3,814
Balance to be Allocated in Plan	6,986

On page 7 of the booklet The PO4 total number of houses on the 14 sites totals 8350 but the housing balance requirement shown on the point 7.22 online version is only 6986. This is a difference of 1364 homes and again I stress Loes Farm should be in the following category of Point 7.22 This flexibility allows for two potential courses of action, one being = To enable some sites to be removed from the allocation proposed in the draft Plan depending on consultation and any further evidence that is provided. Loes Farm once discounted from any previous plan should never be reinstated.

FLOOD PO18

The site south of the A46 is prone to flooding. The land slopes towards (A429) and if built upon the rain off would increase flooding that occurs between Woodloes roundabout/A46 roundabout. The run-off from the fields at Woodloes Farm has only just been contained, having caused problems to properties to the West of the A429 and some flooding to the Saxon Mill. When the Woodloes estate was built pumps ran for 24 hrs a day for months, this suggests an historic flood issue.

Lastly please go back and revisit the Reports of the Public Consultations regarding the Core Strategy Preferred Options dated January 2009 and February 2010. The findings from these reports are still valid today and valuable lessons can be learnt by the Council officers.

An excerpt from the 2010 report shows below the extraordinary level of public objection raised about many areas that are still extremely important today. Do not ignore people's justifiable concerns from these past surveys and subsequent petitions as they are based on similar facts and questions that you are asking us now in 2012 so the responses are still very relevant.

Vision and Strategy

Do you agree with the Preferred Vision for Warwick District to 2026?

Total No. of Responses	904
Total No. of 'Yes' Responses	87
Total No. of 'No' Responses	794
Total No. of Comments	23

Do you agree with the Preferred Growth Strategy for Warwick District to 2026?

Total No. of Responses	727
Total No. of 'Yes' Responses	69
Total No. of 'No' Responses	640
Total No. of Comments	18

Some of the comments made in relation to the Preferred Growth Strategy were:

- No evidence/solid argument for need for all the new houses and development. Development will result in urban sprawl, result in destruction of historic and natural heritage, loss of quality/standard of life, loss of wildlife corridors, increase in run-off and flooding, lack of infrastructure, additional traffic and increasing pollution. Need land for future food production;

- Brown field/regeneration sites should be developed instead of green field sites and green belt e.g. Airport, Ryton plant, Ford foundry, Stoneleigh centre;
- Development should be in a new town;
- Development along Leamington-Coventry rail corridor would encourage new station development and better services;
- Development should take place to south of Coventry. South of the District has seen all major growth in recent years. Developing to south of the District encourages car use and saturates area;
- Development should take place to south of District where access good to road network. Priority must be to develop south of Leamington/Warwick to preserve green belt;
- Development should take place throughout the District and not concentrated in one area;
- Agree that housing figures should be met; increasing population supports economic growth and wealth for the district; and,
- Agree with directing development at urban areas and limited development in villages to meet local need and support commitment to rural area with enabling development

Housing

Do you agree that the Council has identified all reasonable options for the location of new housing?

Total No. of Responses 2129

Total No. of 'Yes' Responses 40

Total No. of 'No' Responses 2024

Total No. of Comments 65

Infrastructure

Do you agree that the Council has identified all reasonable options?

Total No. of Responses 1596

Total No. of 'Yes' Responses 38

Total No. of 'No' Responses 1,525

Total No. of Comments 33

Natural Environment

Do you agree that the Council has identified all reasonable options?

Total No. of Responses 1398

Total No. of 'Yes' Responses 45

Total No. of 'No' Responses 1,323

Total No. of Comments 30

Thank you.

I strongly object to development at the Loes Farm site.

It is greenbelt land and the Coventry Road approach to Warwick benefits from rolling fields and an historic landscape that sets the tone for the town. The land to the north of Warwick is unique and special areas do not come two-a-penny and I believe it would ruin a valuable, historic piece of interesting countryside forever.

Building here would also be another step towards linking Kenilworth to Warwick, and would blur the boundary with the lovely village of Leek Wootton which deserves it's own protection. In the 1970's The Woodloes Housing Estate originally had planning for fixed number of homes, the final total built far exceeded this as is evident by it's size today. We need to control urban encroachment into greenbelt and the countryside now

Please see my comments below in relation to other areas of concern on which a development at Loes Farm would have an extremely negative effect.

Transport/Traffic PO14

The traffic flows at peak hours cannot accommodate existing traffic so would not be able to accommodate the increased traffic. Traffic can be grid locked as far as St. John's crossroads and also creates difficulties along Primrose Hill in both directions of Coventry Road and IBM roundabout. Any development on this land will only exacerbate this traffic situation. The A429 is a fast road and recently had speed limit changes imposed. Extra housing will increase traffic and make it more dangerous. There is no infrastructure in place for a new proposed settlement and access onto the Coventry Road or Primrose Hill would compound the existing problems. There are other development areas where existing road infrastructure would cope with more traffic or require much less alteration than the Loes Farm site.

I have read the followingWarwick District Council Strategic Transport Assessment Modelling PARAMICS Testing & Results Report Job No. MID3347 Date 31 March 2012

GREENBELT PO16/PO15

The development extends almost to the boundary of Leek Wootton which goes against the Council's existing policy of keeping the large villages distinctive. Woodloes Lane and the A46 form a very clearly defined edge to the north of the town, breaching these would set a precedent for further urban sprawl. Woodloes Park is already large enough. This proposed area of development will destroy designated Green Belt and lead to Warwick losing it's identity.

There should be no development of greenbelt sites, where better alternatives exist, as greenbelt is supposed to be a buffer zone to protect such areas from excessive housing. The strategy already has enough locations for housing taking into account the regional (i.e. growth of Coventry South) district.

There is a very rich range of wildlife and biodiversity in this area which would be devastated if development was allowed here. RE PO15 – the booklet states...."new developments are expected to avoid impacts on existing biodiversity and make a positive contribution to the quality of the natural and historic "environment". If the Loes Farm development goes ahead this statement is worthless and having read the Warwick GI final Report 2012 it is a mockery and waste of tax-payers money to totally ignore the findings. Any development also goes against the findings of The Warwick District Habitat Assessment of 2008. This audit, see attached copy, concluded that the site was not favorable in 2008/9 for development as the area has a high ecological significance. So exactly what has changed in three years to invalidate this in depth report.

Greenbelt Planning Policy Guidance 2...The five purposes of Green Belts. The five purposes are all of equal importance and are considered to be the most important element of this national policy:

- to check unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

As well as the five key purposes, how the use of land within Green Belts has a positive role to play in achieving the following objectives:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses.

Also applicable from past study regarding biodiversity

<http://www.warwickdc.gov.uk/NR/rdonlyres/BA1D5E77-770C-4AF5-B164-4628B6A5A814/0/RegionalBiodiveristyStrategy.pdf>

HISTORIC ENVIRONMENT PO11

The farmland is ancient grazed grassland and has outlines of possible medieval buildings. The area is very important for a number of species some of which are scheduled (newts, badgers and bats). The value of the mature trees over 100 years old to the environment is very important. I am particularly worried about the trees and hedgerows on this site protected by the 1997 Hedgerow Regulations. Any development also goes against the findings of The Warwick District Habitat Assessment of 2008. This audit, see attached copy, concluded that the site was not favorable in 2008/9 for development as the area has a high ecological significance. So exactly what has changed in three years to invalidate this in depth report. The nearby protected listed monument to Piers Gaveston called Gaveston's Cross (Listing NGR: SP2890867534/English Heritage # 308063) is extremely important and at the moment both monument and surrounding land is shielded from the prospect of disturbance and possible vandalism which may change if the Loes Farm development goes ahead. Gaveston Wood and Blacklow Hill also warrant protection against intrusion. See for more information <http://www.leekwoottonandguyscliffe.org.uk/page26.htm>. The proposed site is on green belt land which allows nearby residents access to rural open spaces and lovely public footpaths. Warwick must be able to preserve it's historic appeal or it will lose everything and deter tourists and visitors....given that both the Woodloes Estate and the Percy Estate are each bigger than Warwick Town center itself I believe more development will make Warwick a place for visitors to avoid.

CLIMATE CHANGE PO12

The PO booklet states you want to reduce carbon emissions so why get rid of existing greenbelt land with mature trees and replace with more housing developments, which will inevitably lead to a rise in emissions, when there are already countless other more suitable brownfield sites, empty houses, unsold new houses, derelict pubs, office buildings and factories etc crying out for redevelopment. Warwickshire Police Headquarters, the former Police station in the town center, Warwick Fire Station, Wellesbourne Airfield, Wellesbourne Research Facility and the many empty Council buildings on the Butts and North Gate Street being six sites not mentioned. The site of Warwickshire Police Headquarters at Woodcote could be a very nice planned small development provided done sympathetically with all woodland areas preserved and the homes not visible from surrounding areas as is the case with the majority of existing police buildings and Woodcote Hall. This historic building and grounds, dating back to before 1800, deserves to be treated with respect by future developers and be an advantage to the local area not just another overcrowded estate built with too many houses. Preserve the green belt sites and existing landscaping on others to make a real difference. Local authorities have now been given more powers to decide the future of their districts so they need to do what's right and best for the environment and listen to their constituents concerns.

INFRASTRUCTURE

The general infrastructure beyond transport links ie; school/shops/hospital/doctors/dentists cannot sustain any more houses as our services are already overstretched. More housing inevitably means more facilities are needed and impacts on local infrastructure. There is precious little green space left in and around the town as it is. It also seems the Local Residents Survey of Sept 2011 has largely been ignored with the Option 1 for building numbers being quashed in favor of Option 2. What was the point of doing all this and ignoring the outcome of the people. The people voiced their concerns and the local authority has now been given the power to make more decisions in the local interest but they are seemingly unwilling to do this. A lot of the projected figures for housing numbers were amassed several years ago in a very different economic climate. Given the overall downturn in population growth, housing needs and numbers of jobs Option 1 figures will certainly be sufficient if not excessive for our district. I have read the March 2011 Sustainability Appraisal Scoping Report & Background Technical Papers.

LEVEL OF GROWTH PO1/SITE DISTRIBUTION PO4

The Loes Farm site was apparently put forward for development consideration previously in a town plan and subsequently found to be unsuitable under the Red/Amber/Green protocol using the following criteria. It is therefore not shown on Plan 5 as the attached copy shows. So exactly what has changed in recent times to invalidate this in depth report carried out for the previous strategy?

A number of sites were discounted at this stage as they were not considered suitable for housing development. This was for reasons such as:

- inadequate means of vehicular access;
- site has important historic, landscape or ecological value;
- site within an area at risk of flooding;
- poor site configuration or topography;
- site is high value agricultural land;
- unsatisfactory environment due to noise and pollution from nearby uses; and,
- remote from urban area and not capable of contributing towards sustainable communities.

Fundamentally I object to any district having to provide free sites including infrastructure and facilities for gypsies and travellers wanting permanent housing.

Once a person, family or social group of people decide they want to stay in one place and utilise the local amenities such as schools, hospitals, dentists, doctors, rubbish collections etc they have chosen to become part of the mainstream population.

They should therefore follow the same guidelines and regulations the rest of the population do. Either rent or buy a property or become eligible for council housing in the normal manner.

If they feel the need to travel for a month or two then they should pay to store their caravans at sites as general citizens do who own such vehicles.

The PO Booklet states that not providing sites increases the risk of unauthorised occupation of sites. This risk would be heavily minimised if the authorities took firm and swift action to remove unauthorised encampments as soon as they occur and not let the illegal occupation go beyond 24/48hrs. Greater support for the unfortunate innocent landowner is needed. Once this became the known procedure that councils will follow less unauthorised occupations would occur. The gypsies should not be given years to continually appeal, stall proceedings and remain on the site. ie : the illegal gypsy encampment at Kites Nest Lane, Beausale which has an closure date of September 1st 2012 after more than a two year illegal occupation which started May 2010. For the gypsy landowner who develops a site illegally severe penalties should be imposed.

PO7 ALSO IMPACTS IN A NEGATIVE WAY ON

PO11 – HISTORICAL ENVIRONMENT....Warwickshire is not a traditional Romany/Gypsy/traveller county.

PO14 – TRANSPORT....not only caravans but other vehicles accessing any proposed site.

PO15/PO16 – GREEN INFRASTRUCTURE.... The idea being for any future developments to avoid biodiversity impacts and make a positive contribution to quality of the environment. Gypsy sites certainly do not comply with this statement.

Also whilst researching I came across this interesting article published date : 5 January 2012. I think £60m and 71 projects already allocated negates any need for Warwick District involvement .

The Homes & Communities Agency Announces Traveller Pitch Funding allocations to 2015

Thirty-three housing associations, local authorities and other providers are set to deliver around 600 new traveller pitches, as the Homes and Communities Agency (HCA) confirmed successful organisations for Traveller Pitch Funding today.

A total of £47m funding will be allocated to 71 projects around the country, and will support the provision of new traveller sites and new pitches on existing sites, as well as the improvement of existing pitches.

A further £13m remains available from the Traveller Pitch Funding Programme for additional allocations where schemes are progressed and are able to deliver, and provide good value for money. These will be operated on a rolling basis under which offers will be considered for their value for money, deliverability and meeting local need, as they are developed. Interested providers should contact their local HCA area office to discuss their proposals. Deputy Chief Executive of the HCA, Richard Hill