

Warwick District Local Plan - response of Warwickshire County Council

Transport matters

There are on-going discussions regarding various scenarios and transport modelling and growth options for development.

To date the proposed draft schedule would generate around £60M – this is £15M less than the total funding that the principal infrastructure providers (including the County Council as Highway Authority) have highlighted will be necessary to support the delivery of the Local Plan.

The highways contribution required to mitigate the impact of the Local Plan growth has been identified to be approx 40m. Assuming that the shortfall is applied proportionally across infrastructure providers, this would result in an £8m funding gap in the transport infrastructure requirements identified within the Strategic Transport Assessment (STA) undertaken by the County Council on behalf of WDC. This is a serious concern and the County Council will not be able to provide any assurance that the Local Plan growth can be mitigated to the extent demonstrated within the STA with such a significant shortfall in funding.

The County Council is extremely concerned however that these are exactly the sites which we are dependent on to provide a significant proportion of the costs for the transport mitigation works identified in the STA. These sites are the main contributors to the key transport impacts and are located on the main strategic corridors; as such we believe they should be making contributions to reflect this impact. Although the District Council is concerned regarding viability of the strategic sites does not concur with the discussions with the site promoters, Gallaghers, the Europa Way Consortium and Hallam Land that the County Council and the County Council. These principal promoters for the strategic sites south of Warwick/Leamington Spa have all expressed a strong indication that they are willing to deliver the major highway improvement works which the County Council identified in the STA as part of their transport mitigation proposals, and have not highlighted significant concerns regarding viability or the level of contribution stated within the STA. The logic of seeking less CIL from the main strategic development sites is justified as necessary to ensure they will still be viable, on the basis they will have higher site specific costs to absorb

In light of the significant funding gap and our on-going discussions with a number of key developers regarding transport infrastructure provision, our recommendation would be that WDC reconsiders its proposed approach as set out within the Preliminary Draft Charging Schedule.

Schools a provision

The provision of Education facilities will be dependent of the scenario of developments eventually chosen and we note the District Council is working with the County Council on these matters. Therefore, a separate response will be provided.

Heritage and Culture

HCW have no comment on the charging schedule directly but wish to flag that CIL contributions for the biodiversity elements of Green Infrastructure (GI) are being considered within the Green Infrastructure CSWAPO (Coventry Solihull and Warwickshire Association of Planning Officers) sub-group. This sub-group also covers Biodiversity Offsetting, which is an additional mechanism to deliver GI within the sub-region. WCC's Principal Ecologist (David Lowe) chairs the sub-group and is prepared to advise WDC on the ecological elements of CIL and the Infrastructure Delivery Plan.

Alongside ecological and archaeological services Heritage and Culture Warwickshire is responsible for the provision of museums and archive services and provides a strategic lead for arts in the county. Standard charges for these services were calculated by Arts Council England (ACE) and Museums, Libraries and Archives Council (MLA) in 2010. Heritage and Culture Warwickshire services do not currently appear in Warwick District Council's Draft Infrastructure Plan also circulated with this consultation. Therefore it seems appropriate to flag these standard charges and infrastructure requirements for HCW which fit within the period of WDC's Infrastructure Plan.

This information has been taken from the MLA and ACE standard charges reports for Arts, Museums and Archives published in 2010.

Archives

Local authorities are required by The Local Government Act 1972 (s. 224) to make proper arrangements for any documents that belong to or are in the custody of the council. The Public Record Act 1958 places additional responsibilities for safe keeping upon local authorities who act as 'Places of Deposit' for records covered by the Act. Other requirements with regard to access to information in records and archives have been placed on public bodies through the Data Protection Act 1998 and the Freedom of Information Act 2000 which came into force in 2005.

The benchmark of provision recommended by MLA is 6 sq metres of new or refurbished archive space per 1000 population with a construction and initial equipment cost of £3600 per sq metre. A calculation using the benchmark figure above gives (6 x £3600) =£21,600 per 1000 people or £21.60 per person.

Taking each new home to have an average occupancy of 2.4 people the infrastructure plan will add 29,520 people to Warwick District Council's population from 2011 to 2029. This works out as a calculated maximum contribution of £637,632 to meet demand from residents to access and preserve Warwickshire's public records over the next 16 years.

Warwickshire County Record Office has identified an infrastructure investment of £500,000 (index linked from July 2013) from CIL to contribute to the cost of extending the strongrooms to provide a further 25 years of collections. This extension will be required in 2022.

Arts

The County Arts Service does not undertake direct service delivery but plays a strategic role by influencing quality, leadership, innovation, access and growth in the Arts and creative industries throughout Warwickshire. It commissions a portfolio of professional arts organisations (“Key Arts Clients”) to develop and deliver high quality arts activities and performances across the county, with a particular focus on providing access for those communities with poor access to arts facilities or activities. The Service initiates programmes of work with regional and sub-regional partners with the aim of supporting the creative economy and ensuring its long term growth.

The benchmark of provision recommended by ACE is 45 sq metres per 1000 people at an average cost for arts spaces such as galleries, rehearsal spaces and multi use venues of £141 per person.

Taking each new home to have an average occupancy of 2.4 people the infrastructure plan will add 29,520 people to Warwick District Council's population from 2011 to 2029. This works out as a calculated maximum contribution of £4,162,320 to meet demand from residents to arts facilities within the District over the next 16 years.

The County Arts Service has identified the need for a better broadband network and investment in activity programmes and equipment for existing venues as the priority for Warwickshire.

Museums

Heritage and Culture operate two museums in Warwickshire. St Johns and Market Hall Museums preserve and showcase examples of Warwickshire's natural and human history collections and provide insights for visitors into the lives of local communities. Heritage Education and the Learning and Community Engagement teams engage residents and school children with the exhibits and through volunteering programmes help residents develop new skills.

The benchmark of provision recommended by MLA is 28 sq metres per 1000 population with a construction and fit out cost of £3250 per sq metre. A calculation using the benchmark figure above gives a cost of £91000 (28 x £3250 per 1000 people or £91 per person in new housing).

Taking each home to have an average occupancy of 2.4 people Warwick District Council's Infrastructure Plan will add 29520 people to the population from 2011 to 2029. This works out as a calculated maximum contribution of £2,686,320 over the next 16 years to meet demand from residents for museum services.

Warwickshire Museum Service has identified an infrastructure investment of £300,000 (plus inflation) from CIL to contribute to the cost of Museum storage facilities. This development will be required in 2018.

Archaeology and Ecology

Archaeology and Ecology have service level agreements with District and Borough Councils. These service level agreements provide for site specific advice in response

to planning applications to ensure that planning authorities comply with the National Planning Policy Framework's requirements to achieve sustainable development.

Library

We are pleased that the Library Service has been recognised in section 4.5 of the WDC Infrastructure plan, as in need of the developer contributions, should the schemes go ahead, in order to meet future demands of the service.

Planning for an ageing population- caring for those with needs - Adult Care

1. Prelim charging schedule:

2.2 - A reference to Social Care (Adults and Children) would be helpful

2. Item 3 Appdx 2

4.4. - more and more Extra Care Housing is being referred to as Housing with Care. There are a large number of ECH references throughout the whole paragraph (rather than Housing with Care) - and no mention of Supported Living, which tends to be the term for Housing with Care for Adults with Disabilities.

4.4.6 - this needs to be widened to include housing with care models for Adults with Learning and/or Physical Disabilities, and/or Sensory Impairment and/or Mental Health Issues rather than maintaining focus on Older People.

4.4.12 - we are currently updating/refining IPC model and can provide new figures if required.

4.4.13 - this is only reference to Disabilities. The profile does need to be higher - again I can provide figures for number of customers for each client group that we are currently providing services to if it helps.

Public Health

The purpose of this paper is to respond to Warwick District Council (WDC) in relation to the Revised Development Consultation paper. Whilst this consultation is focusing on the site allocations for the new Local Plan, Public Health recognises planning as an emerging priority where value can be added in terms of benefits to health and wellbeing.

A paper on Primary Care requirements will be submitted directly to WDC from NHS England and NHS Property Services.

There are some boarder headlines that planning colleagues should consider during any stage of the planning process:

- The Health and Wellbeing Board should be considered/consulted in the early stages of planning any major development that will have an impact on the health infrastructures ability to serve the local population.

- Public Health Warwickshire and other health partners should be considered/consulted in the early stages of planning any major development that will have an impact on the health infrastructures ability to serve the local population.
- Public Health Warwickshire and other partners recommend that Warwick District planning policy systematically considers health and wellbeing as a matter of course. Public Health Warwickshire considers that in any new development, addressing inequalities and accessibility should be essential planning considerations.
- Public Health Warwickshire and other partners recommend that Warwick District Council consider the needs of the local population through use of the Joint Strategic Needs Assessment (JSNA).
- Public Health Warwickshire and other health partners recommend that Warwick District Council request that developers conduct a Health Impact Assessment on any new development over 1000 square meters or 50+ residential dwellings.
- Public Health Warwickshire and other partners would urge Warwick District Council to create environments to enable maximum opportunity for healthy living and reduce opportunities for unhealthy behaviour.
- Public Health Warwickshire and other partners understand the need to develop additional housing in the district to support the local population and economy; however Public Health Warwickshire and other health partners would urge planning colleagues that any additional residential development prioritise decent and affordable housing and extra care housing where appropriate, whilst incorporating green spaces, cycle routes and measured miles in any new developments.
- Public Health Warwickshire and other partners would also encourage thorough consultation with health partners when considering any extra care housing developments that the inclusion of green spaces and measured miles are incorporated into any new development.
- Public Health Warwickshire and other partners would welcome development that encourages and supports raising the local population's aspirations in terms of education and employment; both of which are wider social determinants of health. In order to retain local people to support and be employed within the local economy, the planning process must consider an adequate amount of education provision targeted at children and young people, coupled with employment opportunities locally that can support the growth of the local economy.
- Sir Michael Marmot's recent review (2010) Fair Society; Healthy Lives highlights the need to mitigate the impact of deprivation on children during the early years. This needs to be considered in terms of planning and should also take a life course approach, starting in the womb, as what happens during these early years has lifelong effects on many aspects of health and well-being—from obesity, heart disease and mental health, to educational achievement and economic status. Public Health Warwickshire and other health partners would urge planning colleagues to consider any development

opportunities with a life course approach taking into account provision for the entire local population.

- Public Health Warwickshire and other partners value the importance of retaining local people through adequate community structures which in turn support the local economy. Some parts of the District are homes to people who live in the town but are employed in other towns, districts and boroughs. Public Health Warwickshire and other health partners view supporting the wider social determinants of health which include job creation, economy growth and affordable housing as a mechanism in which to retain local people to be employed and support local economies.
- Public Health Warwickshire and other partners welcome planning policy which helps people maintain their health and wellbeing and supports them to live independently in their own homes. This involves recognising that all aspects of a person's life (wider social determinants) can have an impact on health.
- Whilst on the whole, people are living longer; they are not necessarily living well for longer. Public Health Warwickshire and other partners encourage Warwick District Council to promote healthy lifestyle messages to people of all ages. If a life course approach is taken, the cost of providing health care to the older population should be reduced because preventative approaches to healthier lifestyles would have been implemented in previous years, therefore reducing primary and secondary care health costs in the future.
- Public Health Warwickshire would encourage WDC to continue to measure air quality in the district, particularly during and after any development, to ensure any raising levels of pollution are adequately mitigated.
- Future development and associated population growth will create a need for enhanced and additional, public open spaces, green spaces and other urban green infrastructure (e.g. street trees, pocket parks). This will be required to improve public accessibility and to facilitate increase levels of usage.
- There is also a need to provide community recreational facilities, and infrastructure to support health and wellbeing agenda of an increased population, including; physical activity, mental wellbeing and social inclusion.
- Future development will necessitate revised carbon management of recreational facilities and green space management regimes to mitigate and adapt to climate change, including facilitating community food production, encouraging biodiversity and protecting fauna and flora habitats.

Public Health Warwickshire will continue dialogue with WDC planners regarding the impact of planning on health and wellbeing, in order to support the policies and broad location contained in the Draft Local Plan.

Minerals considerations and Local Plan

The County Council as the Mineral Planning Authority take the view as that any sites brought forward should not sterilise viable sand and gravel reserves in the emerging plan.

Para. 144 of the National Planning Policy Framework (NPPF) states that "local planning authorities... should not normally permit other [non-mineral] development in

minerals safeguarding areas where they might constrain potential future use for these purposes".

The County Council has "set out" Minerals Safeguarding Areas (MSAs) / Minerals Consultation Areas (MCAs) to identify known locations of important mineral resources and ensure that they are not needlessly sterilised by non-mineral development. Please refer to the attached plans.

Our initial assessment indicates that the 'Whitnash East' allocation (see plan 1 as approximately 70% (40ha) of the site appears to be underlain by sand and gravel (based on the resource information supplied by the British Geological Survey). Therefore, a detailed minerals survey (complete with borehole evidence) is required undertaken to establish the volume and quality of the material and, in consultation with WCC and the mineral industry, whether prior extraction in advance of the development is "practicable and environmentally feasible" (para 143, bullet point 5 of the NPPF). Such prior extraction may offer flood attenuation/alleviation and biodiversity opportunities given that the site falls within EA flood zones 2 and 3.

The issue of sand and gravel provision is of particular importance for the County as the NPPF states that mineral planning authorities must maintain a landbank of at least 7 years. The latest West Midlands Aggregate Working Party (WMAWP) information shows that Warwickshire's existing sand and gravel landbank about 3 years at 2010 and based on the County's latest 'call for sites' information, there appear to be few sites put forward by the industry for potential allocation. If the County is to meet its existing apportionment, prior extraction of sand and gravel (if practicable and environmentally feasible) may contribute to meeting any shortfall.

There appears to be no detailed allocations for the rural settlements, should the District Council wish to consider any sites please refer to attach a plan (plan 2) showing the full extent of the sand and gravel resource/MSA for your information.

The safeguarding of viable economic minerals is a primary consideration before the allocation of sites in accordance with national policy.