



**LOCALPLAN**  
helpingshapethedistrict

# Preferred Options

Warwick District Council May 2012

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# New Local Plan

## Preferred Options

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May 2012

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# PART 1: Setting the Scene and Summary

## 1. Introduction

- 1.1. This document has been prepared as a basis for consultation for Warwick District's next Local Plan. It sets out the Council's preferred options on a range of topics and explains the reasons why these options are being suggested. Where alternative options have been considered it also explains why these are not being suggested as preferred options.
- 1.2. The Local Plan will be key to helping the District Council to deliver its Vision over the next 15 years. The Preferred Options set out below have been developed to fit in with the Council's Vision and with other key Council strategies. It has also taken account of what our partners (such as Warwickshire County Council, Coventry City Council, Warwickshire Police, Warwickshire Fire and Rescue Service; the health service and many others) are trying to achieve.

## 2. Our Vision for the District

- 2.1. The Council's vision for Warwick District (which we share with our partners), as set out in the Sustainable Community Strategy, is **"to make Warwick District a Great Place to Live, Work and Visit"**.
- 2.2. The Council and its partners are trying to deliver this vision together through the Sustainable Community Strategy. This sets out our approach to 4 key priorities and included in all these priorities is our approach to 5 cross cutting themes:

### Sustainable Community Strategy Key Priorities

- Safer Communities
- Health and Well Being
- Housing
- Economy, Skills and Employment

### Cross Cutting Themes

- Narrowing the Gaps
- Embedding sustainability throughout
- Families at risk
- Engaging and strengthening communities
- Rurality

- 2.3. The Sustainable Community Strategy is central to improving quality of life in the District across all these themes. It is supported by a of series of Delivery Plans and Locality Plans which set out the approach to improving specific areas of the District.
- 2.4. The Local Plan is a key element in the delivery of the Sustainable Community Strategy. The Preferred Options for the Local Plan have therefore been aligned

with the Strategy to ensure it will address these key priorities and cross cutting themes.

## 2.5. **Strategy for the Future and Sustainable Prosperity of Warwick**

**District:** To deliver its vision, the Council has agreed some key principles for the development of the Local Plan. These include:

### Economy:

- Facilitating the growth and development of the local economy to support a dynamic, flexible, low carbon mixed economy
- An agreement to pursue the potential for a sub-regional employment site at the Gateway
- The need to provide new employment land in and around the District's main towns to meet local needs and encourage the creation of jobs.
- A commitment to maintain and promote thriving town centres
- A commitment to maintain the current strengths in the District's economy

Promoting the regeneration of the more socially and environmentally deprived areas and supporting the rural economy

### Providing for growth and changes within population:

- Meeting the housing need of the existing and future population of the District, including identifying land for around 550 new homes per annum on new allocated sites
- Providing for diversity, including affordable homes, homes for the elderly and vulnerable, sites for gypsies and travellers and other specialised needs
- Providing for neighbourhoods that are well designed, distinctive and based on the principles of sustainable garden towns, suburbs and villages
- Providing for homes and neighbourhood designs that are sustainable, low cost and carbon efficient

### Environment:

- Distributing development across the District
- Avoiding coalescence
- Ensuring new development is based on the principles of Sustainable Garden Towns, Suburbs and Villages
- Protecting biodiversity, high quality landscapes, heritage assets and other areas of significance

### Emphasis on infrastructure

- Developing an effective and sustainable transport package
- Ensuring parks, open spaces, the countryside and areas of importance for wildlife and informal recreation are maintained and improved
- Ensuring education is provided for in major new developments
- Ensuring community activities, health services and other key services are provided for in new developments
- Develop sustainable communities with strong local centres and/or community hubs

### 3. The Local Plan Process

#### What has happened so far?

- 3.1. To get to this point, the Council has already done a lot of work.
  - In May 2011, a document setting out the key issues for the Local Plan and Scenarios for Growth was published. This was the subject of a period of consultation ending in July 2011 (for more information, see the justification for Preferred Option section in each chapter).
  - A substantial amount of information and evidence has been gathered to help us understand what is changing locally and what we need to plan for. This information has been important in helping us develop our preferred options (for more information, see the justification for Preferred Option section in each chapter).
  - In December 2011 the Council agreed its Strategy for the Future and Sustainable Prosperity of Warwick District (for more information see paragraph 2.5 above). This set out some of the key criteria for the development of the Preferred Options
  - An appraisal of a range of options leading to the selection of a preferred option for each aspect of the Local Plan has been undertaken.
- 3.2. The Government has recently published its National Planning Policy Framework (NPPF). This underlines the importance of having well justified and up to date local plans and means that these local plans play a vital role in shaping the future of local areas.
- 3.3. Whilst a lot of work has been done to make sure these options can be justified, it is important to underline that they are suggestions at this stage and are not a final set of proposals for the Local Plan. The Council is therefore keen to hear the views of all interested parties to help us shape a draft Local Plan.
- 3.4. The Council has also prepared an Infrastructure Plan to sit alongside the Preferred Options. This Plan outlines some of the infrastructure (such as transport, schools, health services and open space) which is needed to help new communities prosper. More needs to be done on this, but again, the Council is keen to hear from all interested parties about infrastructure requirements.
- 3.5. For those who are interested in finding out more about why these preferred options have been suggested, there is some information justifying the approach set out in each chapter below. Further information (such as sustainability appraisals, studies in to employment, housing need, transport, retail and so on) are available on the Council's website: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan). A set of consultation questions and a comments form is also available on the website.
- 3.6. Following the consideration of the Preferred Options and accompanying documents by Executive on 21<sup>st</sup> May, an eight week period of consultation will

start on 1<sup>st</sup> June and run though until 27<sup>th</sup> July. During this period, the Council is keen to hear from anyone. The consultation will involve a number of public meetings, exhibitions and roadshows, information in the local press, and information on the website.

3.7. Following the consultation work will be undertaken to develop a draft Local Plan along with the more detailed Infrastructure Delivery Plan and a Community Infrastructure Levy Scheme. This will then lead in to the following stages (and approximate timings) for the adoption of the Local Plan:

- Approval of Draft Local Plan, Infrastructure Delivery Plan and investment strategy and delivery plans at Council - late 2012 / early 2013
- Publication of draft Local Plan - February 2013
- Consultation on draft Local Plan - March/April 2013 (6 week consultation)
- Submission to Secretary of State - June 2013
- Pre-hearing meeting – July/August 2013
- Examination in Public Hearing – October/November 2013
- Receipt of Inspector's report – February/March 2014
- Estimated date for adoption – March/April 2014

## **4. Spatial Portrait, Issues and Objectives**

### **Population and Spatial Portrait** (see Map 1)

- 4.1. Warwick District has a growing, ageing, urban, ethnically diverse and highly skilled population.
- 4.2. 90% of the 138,800 residents live in the main urban areas of Kenilworth, Warwick, Whitnash and Leamington Spa with the remaining 10% living in a number of relatively small villages. The population has grown from 124,000 in 2000—a 12% increase—and is forecast to continue grow, with potentially a 15% growth over the next 15 years.
- 4.3. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to amongst those aged 65 and over.
- 4.4. The District has a diverse population, with a high proportion of non-white British residents (15% of the total population) compared to other Districts in the County.
- 4.5. Notwithstanding the current economic downturn, the District has in recent years had a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages.
- 4.6. A significant proportion of the District is designated for its environmental or historic value. To protect and maintain the character of the District, the Local Plan will have to balance the growth of the District with the protection and enhancement of these assets.

4.7. Areas of historic or environmental importance in the District include:

- 81% of the District 28,000 hectares is Green Belt.
- 7 Sites of Special Scientific Interest
- 15 Sites of Importance for Nature Conservation
- 2145 listed buildings
- 29 conservation areas (covering 4% of the District)
- 11 Registered Parks and Gardens (covering 4% of the District)

## Issues

4.8. The District faces a number of opportunities and issues and it is important that the local plan addresses these. The Council consulted on the issues facing the District during spring 2011 and through that consultation the following issues were identified as important:

- 1 The effects of the recent recession and not knowing how the local economy will change in the future.
- 2 Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable housing for families in towns and villages and the need to provide more housing to meet people's needs in the future, particularly those of older people.
- 3 The threat to the economic strength of the town centres of Warwick, Leamington Spa and Kenilworth from retail and leisure developments elsewhere..
- 4 The size and condition of existing community facilities and services (particularly schools and health-care facilities) and whether they can meet current and future needs.
- 5 People's general health and well-being, and the need for people (particularly teenagers and young people) to have access to sport and cultural experiences, such as cinemas and community events.
- 6 Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns, and within the town centres.
- 7 The threat of flooding of homes and businesses in some areas, particularly where surface water may flood towns and villages, and the concern that the threat of flooding will increase because of climate change.
- 8 Areas of poverty in Warwick and Leamington Spa.
- 9 The pressure for new development threatening the high-quality built and natural environments in the district, particularly historic areas, and the cost of maintaining historic buildings and areas.
- 10 Crime and the fear of crime, particularly in town centres, and the need to protect the community from harm.
- 11 The Government's planned High Speed 2 rail line and its possible effects on the area (the Government is consulting the public separately on this issue).



## Objectives

4.9. During the consultation carried out in Spring 2011, a number of objectives were identified. These set out the key aims that the Local Plan will seek to deliver. Following the consultation, the objectives have been amended to take account of the views received and more recent changes (such as the publication of the National Planning Policy Framework). These objectives have been used to link the Council's Strategy, described in paragraph 2.5, with the specific proposals set out in the Preferred Options in sections 7 to 18.

### 4.10. Providing sustainable levels of growth in the district.

- 1 Provide a sustainable level of economic growth (and balance this with housing growth) to maintain high levels of employment, and to deal with pockets of unemployment in deprived areas. The Local Plan will:
  - identify and maintain a flexible and varied supply of accommodation and land for business that is the right type and in the right location
  - support the growth of knowledge-intensive industries, energy industries and the rural economy; and
  - improve the rates of business growth in the district to support the 'organic' growth of the local economy.
- 2 Provide a sustainable level of housing growth (and balance this with economic growth) to reduce the number of people who are currently homeless or living in unsatisfactory accommodation, to meet future housing needs, and to help deal with the issues of need for affordable housing. The Local Plan will:
  - identify and maintain a flexible supply of land for housing that is the right type, has the right tenure, and is in the right location;
  - make sure that the district can accommodate university students without harming the balance of existing communities;
  - allow providers to meet the special housing needs of the growing number of older people; and
  - make provision for gypsies and travellers in order to deal with local need and historic demand.
- 3 Provide a sustainable level of retail and leisure growth that will meet people's existing and future needs, and will maintain and improve the vitality and viability of existing town and local centres as attractive and safe places to visit both by day and night. The Local Plan will:
  - identify the role of each of the town centres, and a plan for their future management and growth that will provide sustainable levels of retail and leisure growth

### 4.11. Providing well-designed new developments that are in the right location and address climate change

- 4 Make sure that new developments are in places that will reduce the need for people to use their cars. This will improve air quality and help address climate change by reducing road congestion and carbon emissions, and will encourage people to live more healthy lifestyles by walking and cycling more.
- 5 Make sure new developments are designed and built so they use water and energy efficiently and reduce the overall demand for natural

- resources (specifically by increasing the use of renewable and low-carbon sources of energy to reduce carbon emissions).
- 6 Make sure that new developments are located, designed and built so that they can deal with the expected effects of climate change, particularly flooding.
  - 7 Make sure new developments are appropriately distributed across the district and designed and located to maintain and improve the quality of the built and natural environments, particularly historic areas and buildings, sensitive wildlife habitats and areas of high landscape value. In addition new developments should respect the integrity of existing settlements.
  - 8 Make sure new developments are built to a high standard in terms of design, and provide inclusive, lively and attractive places where people feel safe and want to live, work or visit.
  - 9 Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter and recreation which will benefit people and wildlife and provide flood storage and carbon management.
  - 10 Make sure that if buildings and spaces, particularly in historic areas, need to be adapted to meet the changing needs of the economy and to deal with environmental issues, they will be adapted in a sensitive way.

#### 4.12. Enabling the district's infrastructure to improve and support growth

- 11 Enable organisations that provide community infrastructure, such as schools and the health service, to provide and maintain improved facilities and services in locations people can get to and that can meet people's current and future needs, and support sustainable economic growth in deprived areas.
- 12 Enable energy, communications, water and waste organisations to improve their infrastructure and services so that they can meet people's current and future needs, protect the environment, and contribute towards dealing with the causes and mitigating the effects of climate change.
- 13 Enable transport providers to provide improvements, particularly better and more integrated public transport, cycling and pedestrian facilities, to meet people's current and future needs, improve the safety and efficiency of the transport network, and support sustainable economic growth.
- 14 Enable improvements to be made to the built and natural environments which will help to maintain and improve historic assets, improve habitats and their connectivity, help the public access and enjoy open spaces such as parks and allotments, reduce the risk of flooding, keep the effects of climate change (including the effects on habitats and wildlife) to a minimum, and support healthy lifestyles.
- 15 Enable the maintenance and improvement of the quality of sporting and leisure facilities, including opportunities for culture and tourism. This will include maintaining a flexible supply of land and buildings for sport and recreation that is the right quality and in the right location, and can meet people's current and future needs and support healthy lifestyles.

## 5. Preferred Level of Growth

## Introduction

- 5.1. The level of growth we need to plan for in the District during the life of the Local Plan impacts on all other parts of the plan. It is vital therefore that we plan for a level of growth that is founded on the best evidence we have about how the District might change and grown in years to come

## Relevant Issue & Strategic Objectives

- 5.2. Warwick District Council's Vision and Strategy: The Strategy for the Future and Sustainable Prosperity of Warwick District aims to:
- facilitate the growth and development of the local economy,
  - provide for the growth of, and changes within, the local population
  - support growth in the District in the region of 550 new homes per annum on new allocated sites (this does not include sites already with planning permission nor those the allowance proposed to be made for windfall sites), the precise quantum of which will be determined at the preferred options stage... to mirror the expected growth of and change within the local population and economy
- 5.3. **Issue:** Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable housing for families in towns and villages and the need to provide more housing to meet people's needs in the future, particularly those of older people.
- 5.4. **Objectives:** See objectives 1 and 2 as set out in paragraphs 4.13 to 4.15 above
- 5.5. **Our Preferred Option**

### **PO1: Preferred Level of Growth**

Our preferred option for the level of growth between 2011 and 2029 is 10,800 dwellings, an annual average of 600 new homes each year.

## Justification for Preferred Option

- 5.6. Helping Shape the District Consultation: In March 2011 the Council commenced the Local Plan consultation exercise "Helping Shape the District" which put forward three potential levels of housing growth in the District:

Scenario 1: An average of 250 new homes and 4 hectares of land for businesses each year

Scenario 2: An average of 500 new homes and 4.5 hectares of land for businesses each year

Scenario 3: An average of 800 new homes and 5 hectares of land for businesses each year

- 5.7. The majority of respondents to the general questionnaire (58%) considered that Scenario 1 would be best for the District with just over a quarter (28%)

preferring Scenario 2. In the sample household survey, 53% preferred Scenario 1 and 37% preferred Scenario 2. The household survey showed that of those preferring Scenario 1, many felt that there were already enough homes in the District and they were against any development on Green Belt land. They were also concerned about the impact on the environment and local infrastructure of a larger scale of development. Those preferring Scenario 2 felt that this was a more balanced level of growth and represented a compromise between the competing objectives of providing more homes and protecting the environment.

- 5.8. Of those who preferred Scenario 3, many felt that this level of growth was more in line with the Government's policies of encouraging local authorities to embrace growth and that housing growth would support economic growth.
- 5.9. The consultation exercise also asked people about their views on the important issues identified by the Council. One of these issues related to relatively high house prices, which created the need for more affordable housing, and the need to provide more housing to meet people's needs for housing in the future. In the general questionnaire, 55% of respondents thought this was an important issue and in the household survey, 73% of respondents agreed that it was an important issue. Further details are contained within the Report of Public Consultation (December 2011).

### **National, Regional and Local Policy**

- 5.10. Government policy in the National Planning Policy Framework (NPPF) states that local planning authorities should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs in terms of the scale and mix of housing, and the range of tenures, that the population is likely to need over the plan period. This scale and mix of housing should meet household and population projections, taking account of migration and demographic change. Local Plans should meet the full, objectively assessed needs for market and affordable housing in their area. The Council published a SHMA in March 2012.
- 5.11. The NPPF also states that local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and economic viability of land to meet the identified need for housing over the plan period.
- 5.12. Proposals within the Localism Act 2012 have removed the regional layer of strategic planning – Regional Spatial Strategies (RSSs) – subject to a Sustainability Appraisal of the impact of this course of action on each of the strategies. The RSS covering this region is the West Midlands RSS. The housing policies in the adopted West Midlands RSS were in the process of being revised and these would have set a level of growth for each local authority area. With the revocation of the RSS it will be for each local authority to determine its own level of growth in line with the National Planning Policy Framework. In view of the likely revocation of the RSS before the end of the year, the Council is not giving due consideration to the

emerging revised RSS housing policies. The Council will, however be consulting neighbouring authorities on its proposals.

### **What is the Evidence to Support Different Levels of Growth?**

- 5.13. The Council published a Strategic Housing Market Assessment (SHMA) in March 2012. This sets out the current demographic profile of the population of the District and includes a set of population and household projections based on different sets of assumptions about migration and employment growth. Projections of employment growth are based on the West Midlands Integrated Policy Model (Cambridge Econometrics. July 2010). The projections aim to balance the growth in homes and jobs.
- 5.14. The SHMA also tests the three scenarios which were the subject of consultation and examines the implications of these for employment growth. The projections relating to Scenario 1 show that this level of housing growth would lead to an overall reduction in the number of jobs in the District (or increases in out-commuting). Scenario 2 would lead to higher levels of growth in the number of jobs, but not as high as regional employment forecasts would suggest. Scenario 3 would allow for a growth in the number of jobs which exceeds regional employment forecasts.
- 5.15. Three projections from the SHMA are considered to be worthy of further consideration because they would support realistic levels of employment and housing growth. These are set out below.

#### **PROJECTION 1: TREND BASED**

A projection which assumes that recent levels of net migration will continue into the future

#### **PROJECTION 2: EMPLOYMENT GROWTH**

A projection which assumes a certain level of employment growth and looks at what level of net migration would be required to enable this to happen.

#### **PROJECTION 3: EMPLOYMENT GROWTH WITH CONTINUED COMMUTING**

This is similar to Projection 2 but allows for a continuation of existing levels of in- and out-commuting, rather than balancing new homes and jobs.

5.16. The results of these three projections are as follows:

**TABLE 5.1 Summary of Projections 2011-2031**

| Projection  | Population Growth |          | Housing Growth |          | Employment Growth (Jobs) |          |
|---|-------------------|----------|----------------|----------|--------------------------|----------|
|   | Per annum         | % change | Per annum      | % change | Per annum                | % change |
| <b>1</b> Trend Based  | 914               | 0.7%     | 596            | 1.0%     | 413                      | 0.6%     |
| <b>2</b> Projected Employment Growth                            | 1,186             | 0.9%     | 716            | 1.2%     | 593                      | 0.9%     |
| <b>3</b> Projected Employment Growth (With Continued Commuting) | 853               | 0.6%     | 569            | 0.9%     | 395                      | 0.6%     |

Source: Warwick SHMA Figure 2.21

5.17. The implications of these three projections for levels of housing growth over the plan period (2011 – 2029) are as follows:

**TABLE 5.2 Implications of Projections for Housing Growth**

| Projection  | Dwellings |                 |
|---|-----------|-----------------|
|   | Per annum | Total 2011-2029 |
| <b>1</b> Trend Based  | 596       | 10,728          |
| <b>2</b> Projected Employment Growth                            | 716       | 12,888          |
| <b>3</b> Projected Employment Growth (With Continued Commuting) | 569       | 10,242          |

5.18. The Council published an up-dated version of the Strategic Housing Land Availability Assessment (SHLAA) in May 2012. This identifies potentially suitable housing sites within and on the edge of built up areas. Taken together, these sites would be able to accommodate an estimated 11,410 new homes. In addition, it is estimated that further windfall sites could come forward during the plan period and that these could accommodate around 2,300 new homes between 2011 and 2029.

## What are the Options?

5.19. Of the three realistic projections outlined in the SHMA and in Table 7.1 above, the Council dismissed Projection 3 on the grounds that the increase in jobs would not be matched by an increase in homes. Projections 1 and 2, therefore, were considered to be the most realistic options in terms of meeting the housing and employment needs of the District.

Option 1: 600 new homes each year (2011-2029)

Option 2: 700 new homes each year (2011-2029)

- 5.20. Testing of the two options within the Sustainability Appraisal framework showed that Option 2 would be better able to support the projected growth in jobs whereas Option 1 would create better opportunities to protect and enhance the natural and built environment and maintain and improve the quality of air, water and soils. Option 1 was also considered to be a better option in terms of enabling a better range of transport options since new development was likely to be better related to the towns.
- 5.21. The SHLAA findings demonstrate that these two levels of growth could mathematically be accommodated within the District in strategically sustainable locations. However, examination of the capacity of the SHLAA sites, in terms of dwellings, shows that 87% of the homes would be located on greenfield sites and 43% within the Green Belt. In practice, therefore, the development of all potentially suitable sites would lead to a significant impact on the natural environment through the loss of large areas of open countryside, including land within the Green Belt.
- 5.22. In terms of the growth in jobs, Option 2 would meet the projected change in employment between 2011 and 2031, as identified in the West Midlands Integrated Policy Model. However, this projection is likely to be optimistic since it was carried out in 2010 and forecast an increase in employment from 2011. Bank of England GDP projections in August 2010 anticipated continued, albeit slow, growth from a low point at February 2009. However ONS data has since revealed that the rate of increase of GDP has been falling since mid-2010 and has yet to show signs of a recovery.
- 5.23. In terms of both Options 1 and 2, housing would need to be met largely on strategic greenfield sites on the edge of the built up areas. This would be necessary in order to deliver the required infrastructure. The sizes of these strategic sites are largely within the range 500-1600. Due to their size some of these sites will take between 5 and 7 years to come forward following adoption of the plan in 2014. There is a lack of certainty, therefore, that a sufficient number of homes on strategic sites could be delivered within the plan period to meet Option 2.

## 6. Community Infrastructure Levy

- 6.1. **Community Infrastructure Levy:** An important part of delivering our approach will be seeking ways to ensure funding is available to provide the infrastructure that new and existing communities will need. We will therefore develop a Community Infrastructure Levy (CIL) scheme.

### **PO2: Community Infrastructure Levy**

Our preferred option is to develop a Community Infrastructure Levy Scheme alongside the development of the Local Plan

- 6.2. For further information see the Draft Infrastructure Plan.

## PART 2: Delivering Growth

### 7. Housing

#### Introduction

- 7.1 Housing is a basic human requirement and its quality, affordability and availability are crucial for a good quality of life. Maintaining a supply of decent homes in good quality environments that can meet the needs of all is fundamental to maintaining strong communities with a healthy and mixed population, as well as a strong and growing economy.
- 7.2 The population of the District was estimated to be 138,670 in 2011 and this is expected to grow to about 157,000 by 2031 if recent trends in net migration continue. To meet the housing needs of this growing, and ageing, population the Local Plan must identify sites for a range of housing in suitable locations which can offer the necessary community facilities along with good access to jobs, key services and infrastructure. The homes must also be of the right types, sizes and tenures and in safe, attractive and sustainable environments where people want to live.
- 7.3 Warwick District is a popular place in which to live and as a result house prices in the District have been amongst the highest in the West Midlands. It is very difficult therefore for those on low incomes to find housing that they can afford in the District even allowing for the recent fall in house prices. The Local Plan must therefore include measures to help ensure that the needs of those in the community who cannot afford open market housing are also met.

#### Relevant Issue & Strategic Objectives

- 7.4 **Issues:** The most important housing issues for the Local Plan to address are:
- The need to provide more housing to ensure that the needs of current and future residents are addressed, particularly those of older people, and
  - Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable homes for families in towns and villages.
- 7.5 The main role of the Local Plan is to guide future development to deal with the important issues by:
- Establishing the right level of growth in the District;
  - Finding the best location for new development and working out how that development should be designed;
  - Working out how we will use the new development and the money generated from it to improve infrastructure and services, such as schools and roads; and



- Setting a framework for neighbourhood planning in the future.
- 7.6 In addressing the important housing issues, the Local Plan will aim to:
- provide for a sustainable level of housing growth in order to meet future housing needs, reduce the number of people who currently need alternative housing, and to help deal with issues of affordable housing need;
  - provide well-designed new developments in the most suitable location; and
  - enable the District's infrastructure to improve and support growth
- 7.7 The preferred level of housing growth, to address the evidenced housing need, is for an additional 10, 800 new homes to be built between 2011 and 2029, an average of 600 homes per annum. See Chapter 6.

### **PO3: Broad Location of Growth**

It is the Council's Preferred Option to:

- concentrate growth within, and on the edge of, the existing urban areas
- avoid development in locations which could potentially lead to the coalescence of settlements
- distribute growth across the District, including within and/or on the edge of some villages
- allow for a hierarchy of growth in the rural area to include:
  - a higher level of growth in those villages with a broad range of services and public transport to the towns, and
  - a lower level of growth in some smaller villages in order to meet local need and help support existing services

### **Justification for Preferred Option for the Broad Location of Growth**

- 7.8 In developing the Preferred Option the following sources of information have been considered:
- National Planning Policy Framework (NPPF) (March 2012)
  - Local Plan Report of Public Consultation (December 2011)
  - Warwick District Strategic Housing Market Assessment (SHMA)(March 2012)
  - Strategic Housing Land Availability Assessment (SHLAA)(May 2012)
  - Joint Green Belt Study (January 2009)
  - A Strategy for the Future and Sustainable Prosperity of Warwick District (December 2011)
- 7.9 The new National Planning Policy Framework (NPPF) includes a presumption in favour of sustainable development. It states that planning should actively manage patterns of growth to make the fullest possible use of

public transport, walking and cycling, and focus significant development in locations which are, or can be made to be sustainable. On this basis, within Warwick District, the most sustainable locations are within and on the edge of the towns of Warwick, Leamington, Whitnash and Kenilworth.

- 7.10 The Council's survey of land available for housing (the SHLAA) demonstrates that there is limited availability of urban brownfield land in the District – a capacity of approximately 1,320 dwellings or 11% of the total SHLAA capacity. In order to meet the housing requirement, therefore, it will be necessary to locate development on greenfield land outside the existing built up areas.
- 7.11 NPPF also suggests that new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. In the case of Warwick District, as there is limited availability of urban brownfield land, extensions to the urban area can offer the most sustainable location for growth.
- 7.12 In relation to development in rural areas, NPPF suggests that sustainable development can be achieved where it will enhance or maintain the vitality of rural communities or, in the case of a group of villages, where development in one village may support services in a village nearby. The Strategic Housing Market Assessment identifies strong demand for housing in the rural areas.
- 7.13 The Council's agreed Strategy for the Future and Sustainable Prosperity of Warwick District states that the Local Plan should distribute development across the District, linked to the availability of existing, and the provision of new, infrastructure with priority given to bringing forward brownfield land wherever possible and ensuring that such development does not encourage or lead to the coalescence of settlements.
- 7.14 The "Helping Shape the District" consultation exercise carried out last year highlighted much concern about the levels of development which might be required to meet the District's housing needs and the impact this would have on the character and setting of the towns. Many felt that increasing sprawl around the existing towns would damage the rural setting of the towns to the detriment of both their economies and their environment. The Council will require new development to follow the emerging garden suburbs principles in order to overcome this loss of rural character.
- 7.15 The Joint Green Belt Study carried out an assessment of the Green Belt around the towns and on the edge of Coventry. The findings showed that there were variations in the quality of land in the Green Belt and therefore some areas around the towns may be considered for development and therefore, removed from the Green Belt.

## Other Options

- 7.16 The Council considered three other options for the broad location of growth:
- Focus development outside the Green Belt

- Disperse development in small/medium sites, including around villages
  - New settlement outside the Green Belt
- 7.17 Under half (43%) of sites identified in the SHLAA are located outside the Green Belt. These include sites within the existing urban areas and sites to the south of Warwick, Leamington and Whitnash. This option would lead to the concentration of development within one part of the District and offer no scope for meeting the needs of Kenilworth or villages within the Green Belt. Similar issues would apply to the new settlement option.
- 7.18 The option to disperse development around the District on small/medium sites would meet some of the concerns expressed during the consultation exercise about the impact of large development sites. However, such a pattern of growth would make it difficult to properly plan for, and deliver, the necessary infrastructure and would be impractical in terms of the number of sites which would have to be identified. Further, this pattern of development would make it difficult to make the fullest possible use of public transport, walking and cycling and make provision for a full range of community facilities with easy access to jobs, schools and other services.
- 7.19 The sustainability appraisal of the options showed that the option for focusing development outside the Green Belt had clear advantages associated with the provision of sustainable transport options and reducing the need to travel. However, there would be significant impacts on the natural and historic environment due to such a high concentration of new development to the south of the towns with increased cross-town traffic. In the case of the new settlement option, there were many advantages in terms of the ability to properly plan for, and meet the needs of the whole new community but the development would need to rely upon the provision of new public transport services to the towns with limited opportunities for improving and maintaining existing services.

## **The Location of New Housing**

- 7.20 The Local Plan will make provision for 10,800 new dwellings between 2011 and 2029 in three phases as follows:

Phase 1: 2011-2019

Phase 2: 2019-2024

Phase 3: 2024-2029

Some of these dwellings can already be accounted for. At 1<sup>st</sup> April 2011, there were already a number of “committed” sites which had planning approval for housing. In addition, we know that over the period of the plan a number of small “windfall sites” will be developed for housing. These include conversions of existing dwellings, changes of use of buildings to dwellings and redevelopment sites. Some of these sites have been identified in the SHLAA, but many will come forward later in the plan period. If these commitments and windfalls are extracted from the total, the balance will need to be allocated in the Plan.

**TABLE 7.1 Housing to be Allocated in the Plan**

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

- 7.21 In line with the principles of the preferred approach to the location of growth, the Council has identified a number of sites in locations within and around the four towns and has identified 2 categories of villages which are capable of accommodating a limited amount of new development over the plan period. The sites are dispersed as follows:

**TABLE 7.2 Distribution of Housing**

| <b>Site Type and Location</b>                   | <b>Dwellings</b> |
|---|------------------|
| Urban Brownfield Sites                          | 480              |
| Sites on Edge of Warwick, Leamington & Whitnash | 6,250            |
| Sites on the Edge of Kenilworth                 | 770              |
| Village Development                             | 830              |
| <b>TOTAL</b>                                    | <b>8,360</b>     |

- 7.22 The sites/ locations which have been identified would allow for the development of 8,360 new dwellings. This is over and above the balance of the requirement of 6,986 so would give an element of flexibility of about 1,370 dwellings. This flexibility allows for two potential courses of action:
- 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, and/or
  - To provide housing to support a Regional Investment Site in the vicinity of the A45/A46 Junction close to Coventry Airport (the Coventry and Warwickshire Gateway) if further research demonstrates that this is a suitable location (see section 8).

## PO4: Distribution of Sites for Housing

### A. Allocated Sites

The following sites will be allocated for housing or mixed use development. The Council will work with developers and the local community to bring forward sustainable developments in attractive surroundings under the principles of Garden Suburbs. Larger sites will include the full range of supporting uses including open space, schools, shops, community and health facilities and, in some cases, employment

#### Within the Urban Areas

| Site                                    | No of Dwellings | Phase | Use<br>See key below |
|---|-----------------|-------|----------------------|
| Warwickshire College, Leamington Spa    | 300             | 3     | Ho/OS                |
| Ridgeway School, Montague Road, Warwick | 80              | 1     | Ho/OS                |
| Leamington Fire Station, Leamington Spa | 50              | 1     | Ho/OS                |
| Riverside House, Leamington Spa         | 50              | 3     | Ho/OS                |
| <b>TOTAL</b>                            | <b>480</b>      |       |                      |

#### On the Edge of Warwick, Leamington Spa & Whitnash

| Site   | No of Dwellings | Phase | Use<br>See key below |
|--|-----------------|-------|----------------------|
| Myton Garden Suburb (North of Gallows Hill/ West of Europa Way), Warwick | 1,100           | 1 & 2 | Ho/Emp/OS/Com        |
| South of Gallows Hill/ West of Europa Way, Warwick                       | 1,600           | 2 & 3 | Ho/Emp/OS/Com        |
| North of Milverton, Leamington Spa                                       | 810             | 2 & 3 | Ho/Emp/OS/Com        |
| Blackdown  | 1,170           | 2 & 3 | Ho/Emp/OS/Com        |
| Whitnash East (South of Sydenham)  | 650             | 2 & 3 | Ho/OS/Com            |
| Woodside Farm (South of Whitnash)  | 250             | 1     | Ho/OS                |
| Red House Farm (East of Lillington)                                      | 200             | 2     | Ho/OS                |
| Warwick Gates Employment Land (Junction of Harbury Lane/ Heathcote Lane) | 200             | 1     | Ho/OS                |
| Loes Farm (North of Woodloes)  | 180             | 2     | Ho/OS                |
| Fieldgate Lane/ Golf Lane, Whitnash                                      | 90              | 1     | Ho/OS                |
| <b>TOTAL</b>   | <b>6,250</b>    |       |                      |

## On the Edge of Kenilworth

| Site         | No of Dwellings | Phase | Use<br>See key below |
|--------------|-----------------|-------|----------------------|
| Thickthorn   | 770             | 1 & 2 | Ho/Emp/OS/Com        |
| <b>TOTAL</b> | <b>770</b>      |       |                      |

### Key to uses:

**Ho** Housing

**Emp** Employment

**OS** Open Space

**Com** Community Facilities (Shops, Schools, Health & Community facilities)

Strategic sites of over 500 dwellings will be the subject of a Development Brief prepared jointly by the Council and developers and in consultation with the community.

## B. Category 1 and 2 Villages

The Council will work with Parish Councils to define the boundaries of village envelopes. In the case of villages within the Green Belt, land within the village envelope will be removed from the Green Belt to enable development to take place.

| Category 1 Villages | Dwellings<br>Phases 1,2 & 3 |
|---------------------|-----------------------------|
| Barford             | 100                         |
| Bishop's Tachbrook  | 100                         |
| Hampton Magna       | 100                         |
| Lapworth            | 100                         |
| Radford Semele      | 100                         |
| <b>TOTAL</b>        | <b>500</b>                  |

| Category 2 Villages | Dwellings<br>Phases 1,2 & 3 |
|---------------------|-----------------------------|
| Cubbington          | 30-80                       |
| Hatton              | 30-80                       |
| Leek Wootton        | 30-80                       |
| Norton Lindsey      | 30-80                       |
| Rowington           | 30-80                       |
| Shrewley            | 30-80                       |
| Burton Green        | 30-80                       |
| <b>TOTAL</b>        | <b>about 330</b>            |

### C. Development on Brownfield Land

The Council's preferred option is that proposals for housing development and conversions to dwellings will normally be permitted on previously-developed land in the following areas, subject to the proposals having no serious impact upon the amenity and environment of their surroundings:

- The built up areas of Warwick, Leamington Spa, Whitnash and Kenilworth
- Within the village envelopes of the category 1 and 2 villages
- Within the built up areas of the following Category 3 villages, subject to the need to protect the character and scale of the village:

| Category 3 Villages |
|---------------------|
| Ashow               |
| Baddesley Clinton   |
| Baginton            |
| Bubbenhall          |
| Eathorpe            |
| Hampton on the Hill |
| Offchurch           |
| Stoneleigh          |

### D. Development on Greenfield Land

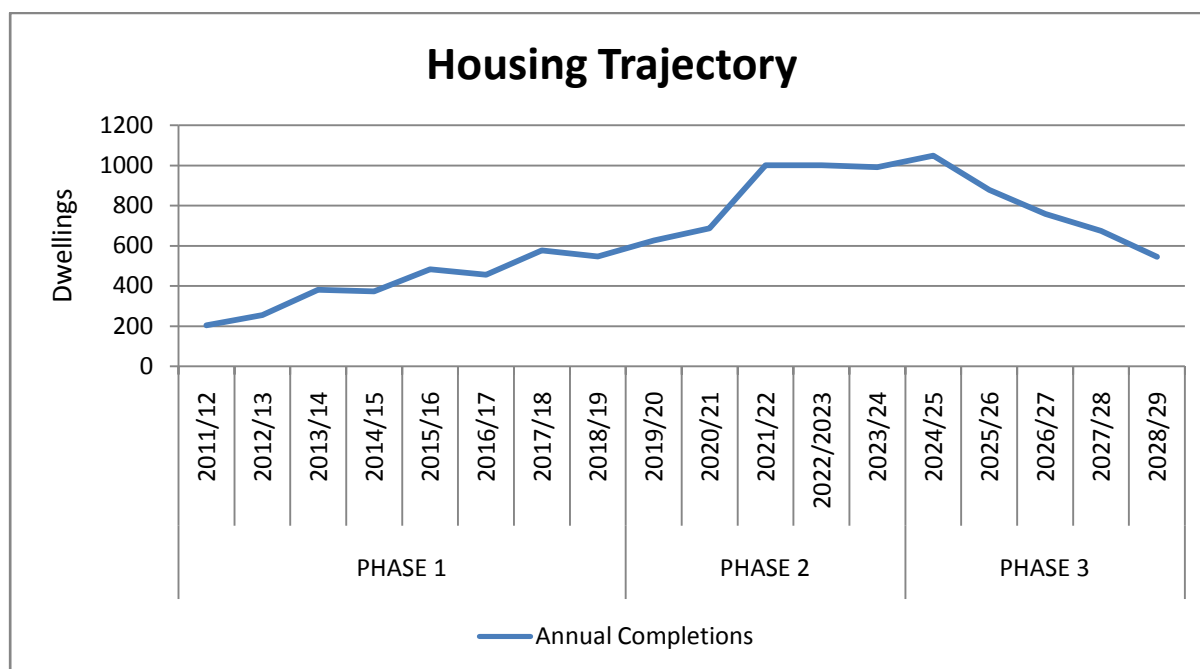
The Council's preferred option is that housing development on greenfield land, other than the sites allocated in the plan, will not normally be permitted unless

- it is for affordable housing
- it is a home for a rural worker where there is a clear functional need for the person to be readily available on the site at all times.
- It is the conversion of a rural building which is located within, or on the edge of a settlement with at least one community facility.
- It is infill development within the existing built up areas of villages, to meet local housing need, and brought forward through Neighbourhood Plans or Community Right to Build Orders

Development on garden land will not normally be permitted unless the development reinforces, or harmonises with, the established character of the street and/or locality and respects surrounding buildings in terms of scale, height, form and massing.

7.23 The following chart shows the potential trajectory for development in the three phases between 2011 and 2029.

**CHART 7.1 Housing Trajectory**



## Justification for Preferred Option for the Location of New Housing

- 7.24 In developing the Preferred Option the following sources of information have been considered:
- National Planning Policy Framework (NPPF) (March 2012)
  - Local Plan Report of Public Consultation (December 2011)
  - Warwick District Strategic Housing Market Assessment (SHMA)(March 2012)
  - Strategic Housing Land Availability Assessment (SHLAA)(May 2012)
  - Joint Green Belt Study (January 2009)
  - A Strategy for the Future and Sustainable Prosperity of Warwick District (December 2011)
- 7.25 Evidence from the Council's assessment of potential housing land in the SHLAA shows that there is a limited supply of land within the existing built up area of the towns. The capacity for housing on suitable sites within the existing urban area amounts to about 30 dwellings in Kenilworth and about 1,280 in Leamington, Warwick and Whitnash. It will, therefore, be necessary to allocate land outside the existing built up areas on greenfield sites.
- 7.26 The northern, western and eastern edges of Warwick and Leamington and the whole of Kenilworth are bounded by the southernmost section of the Warwickshire Green Belt. If development is to be distributed across the District it will be necessary to alter the boundary of the Green Belt. NPPF states that, once established, Green Belt boundaries should only be altered



in exceptional circumstances, through the preparation or review of the Local Plan. Further, when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

- 7.27 Exceptional circumstances can include the need to accommodate housing and employment growth to meet the needs of a community where there are insufficient suitable and available sites outside of the Green Belt. Where it can be justified to review the Green Belt boundary in order to accommodate development, it is necessary to assess Green Belt land in terms of its contribution towards the five “purposes” of including land in the Green Belt (NPPF Para 80). The Joint Green Belt Study carried out such an assessment of parcels of Green Belt land on the edge of Warwick, Leamington, Kenilworth and Coventry.
- 7.28 In the case of meeting the housing needs of Kenilworth, there are limited sites within the built up area of the town and therefore there are no alternatives other than to review the Green Belt Boundary. The Green Belt Study identified the area between the east of the town and the A46 as suitable for further study in terms of development potential. This was largely because the A46 provided a physical barrier to the wider countryside.
- 7.29 In the case of meeting the housing needs of Warwick, Leamington and Whitnash, the SHLAA identifies a potential capacity within the urban area of 650 dwellings on sites of 50 or more. Outside of the built up area, and outside of the Green Belt, the SHLAA identified a capacity of 7,200 dwellings. These sites are concentrated in the area around Europa Way, Gallows Hill and Harbury Lane as well as to the south and east of Whitnash.
- 7.30 The Council has concerns about focussing around 6,000 new homes in such a concentrated area. The reasons for this include:
- The impact on infrastructure, in particular transport and the increased car journeys between the Europa Way area, the town centres and the M40
  - The continued southerly spread of development and the impact of closing the gap between Warwick /Whitnash and Bishop’s Tachbrook
  - The lack of choice of location of new housing and uncertainty about the ability of the markets to deliver this level of development in the locality within the plan period
- 7.31 There are advantages to locating some development to the north of Leamington Spa and Warwick. These include:
- The possibility of including some employment land within the development - employment areas are currently concentrated in the south of Leamington, leading to many cross town centre trips
  - Greater choice of location of new homes
  - The benefits which could be realised from the construction of a northern relief road which would relieve congestion on through routes between Warwick and Leamington town centres

- 7.32 Assessment of Green Belt land to the north of Warwick and Leamington in the Joint Green Belt Study concluded that the land bounded by the A46 in the west, the River Avon to the north and Sandy Lane to the east was worthy of further study. This was largely because there were no other towns to the north, from which the Green Belt would provide protection from encroachment, but also because there were other physical barriers to the wider open countryside. The Green Belt assessment suggested that the land at Blackdown was not suitable for further study. However, the land has similar characteristics to land to the west in that there are no towns to the north, from which the Green Belt would provide protection from encroachment, and there are clear boundaries to the site to protect the open countryside beyond.
- 7.33 The Council's Strategy for the Future and Sustainable Prosperity of Warwick District emphasised the need for development to be dispersed across the District and also to protect the integrity of settlements by retaining the separation between them. For this reason, the Council favours the retention of an area of open countryside between the village of Old Milverton and a strategic development site.
- 7.34 In the rural areas, a limited amount of development is directed to those villages with a good range of services and public transport to the towns. All the category 1 villages have the benefit of a school, shop and village or community hall. Some of these villages have, in recent years, identified a local need for affordable housing but have found it difficult to bring a scheme to fruition. Other villages lack particular sizes of market homes – for example a lack of small family/ retirement homes or a lack of large family homes. A limited quota for new housing will enable villages to expand the choice of housing as well as deliver affordable homes.
- 7.35 The category 2 villages have fewer services but a limited amount of development may help to support existing services or even encourage new services as well as provide a greater choice of housing.
- 7.36 In the case of category 1 and 2 villages which are currently “washed over” within the Green Belt, it will be necessary to identify areas with potential for limited development and include it within a village envelope along with the existing built up area of the village. The boundary of the Green Belt would be adjusted accordingly around the village envelope.
- 7.37 Infill development and conversions have traditionally provided a very important source of supply for new housing. Over the last 10 years an average of 377 homes each year have been built through infill development including conversions and changes of use. In the urban areas, this will allow for the continued recycling of land and buildings, and the sub-division of larger homes. In the rural areas there is only expected to be a small amount of infilling as the supply of previously-developed land is limited.

## Other Options

- 7.38 The Council considered 4 options for the distribution of housing sites and these were the subject of testing by the County Council in their Traffic Flow Modelling System (S-Paramics). See Section 14 (Transport). In addition, discussions took place with the County Council on possible solutions in terms of meeting the education requirements of sites and groups of sites.

**TABLE 7.3 Options for the Location of Housing**

| Location                               | Option       |              |              |              |
|--|--------------|--------------|--------------|--------------|
|  | 1            | 2            | 3            | 4            |
| Warwick/Leamington/Warwick Urban Area  | 700          | 700          | 700          | 700          |
| North of Leamington/ Warwick           | 2,640        | 1,470        | 2,300        | 2,640        |
| South of Leamington/ Warwick/ Whitnash | 2,765        | 4,450        | 3,900        | 3,365        |
| East of Leamington                     | 0            | 200          | 200          | 200          |
| East of Kenilworth                     | 1,620        | 1,620        | 1,260        | 770          |
| Westwood Heath (South of Coventry)     | 880          | 0            | 0            | 350          |
| Rural Area                             | 0            | 0            | 200          | 400          |
| <b>Total</b>                           | <b>8,605</b> | <b>8,440</b> | <b>8,563</b> | <b>8,429</b> |

- 7.39 In terms of the transport modelling exercise, Option 4 had least impact prior to mitigation and showed the greatest improvements when mitigation was applied. However, in general the model concluded that there was little difference between the options in terms of the improvements following mitigation.
- 7.40 In terms of educational provision, none of the options presented difficulties which could not be overcome.

## Meeting the Need for Affordable Housing

- 7.41 The Warwick District Strategic Housing Market Assessment (SHMA) was carried out in 2011 and provided an estimate of 698 households as likely to be in need of affordable housing each year. Of this, 528 households would require a home in Warwick, Leamington Spa or Whitnash, 115 in Kenilworth and 55 in the rural areas.
- 7.42 The Council accepts that it would not be possible for this level of need to be met over the plan period. However, through planning policies it is possible to ensure that, when new development takes place, a proportion of the new housing will meet the needs of the District for affordable homes.

## **PO5: Affordable Housing**

### **A. Affordable Housing on Housing Development Sites**

Our Preferred Option is to require that 40% of new homes on developments of 10 or more dwellings in the urban areas, and 5 or more dwellings in the rural areas, will meet the need for affordable housing as identified in the latest Strategic Housing Market Assessment or Local Housing Needs Assessment.

The policy will apply to developments which contain self-contained units of accommodation including specialist homes for older people.

In order to take into consideration the different nature of development sites and locations within the District, as well as changing market conditions, the Council may in exceptional circumstances take a flexible approach to the policy in terms of:

- the number of affordable units, where there is clear and detailed evidence that the site has particular constraints, the costs of which, along with the full provision of affordable housing, would result in a development which is not viable
- the practicality of providing the homes on-site (in some cases the Council may agree to off-site provision or a financial contribution in lieu)

The policy will also set out ways in which the Council will ensure that the affordable housing :

- meets the affordable housing needs of the District in terms of size, type and tenure
- is genuinely affordable in relation to housing costs and local household incomes
- is retained as affordable housing in perpetuity
- is appropriately integrated into the whole site
- meets certain standards of internal and external design

### **B. Affordable Housing on Rural Exception Sites**

Our preferred option is to allow the development of small schemes of affordable housing, to meet an identified local need, in village locations where housing development would not normally be permitted. This exception to housing policy will be dependent upon:

- the scheme being located within, or adjacent to, a settlement with a reasonable level of services
- evidence of a local need for affordable housing which cannot be met in any other way
- the number, sizes and types of homes reflecting local need as identified in an up to date local needs assessment

- the housing being provided in perpetuity to households with a local connection

In circumstances where there is evidence that a rural exception scheme cannot be adequately funded, the Council will give consideration to the inclusion in the scheme of some market homes to cross-subsidise the affordable homes subject to:

- the market homes representing not more than 30% of the overall number of dwellings
- the type and size of the market homes meeting the local need as evidenced in a local needs assessment
- financial evidence of the need for market homes to cross subsidise the affordable homes

## Justification for the Preferred Option for the Provision of Affordable Housing

- 7.43 In developing the preferred option the following sources of information have been considered:
- National Planning Policy Framework (NPPF) (March 2012)
  - Local Plan Report of Public Consultation (December 2011)
  - Warwick District Strategic Housing Market Assessment (SHMA) (March 2012)
  - Warwick District Affordable Housing Viability Assessment (November 2011) and Addendum (May 2012)
- 7.44 The consultation on the Local Plan showed that of respondents to the general questionnaire, 31% *strongly agreed* and 24% *tended to agree* that high house prices and the lack of affordable housing was an important issue. In the sample household survey, 73% of people who took part in the survey considered this to be an important issue. Nearly a quarter of residents interviewed thought that this issue should have top priority.
- 7.45 NPPF states that Local Plans should meet the full, objectively assessed needs for market and affordable housing. It states that where there is an identified need for affordable housing, local authorities should set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 7.46 The Strategic Housing Market Assessment (SHMA) identifies a high level of need arising for affordable housing of around 698 households per annum. Land Registry data shows that the average 15-percentile house price in the

District for the third quarter of 2011 was £145,000. This compares with £110,000 in Warwickshire and £82,687 in the West Midlands. The ratio of the lower quartile house price to lower quartile earnings was 7.49 in 2011. This compared with 6.79 in Warwickshire and 5.46 in the West Midlands. These figures demonstrate a high affordability ratio in the District even though the towns have a high proportion of small houses and flats.

- 7.47 It is clear that the Local Plan will not be able to set out policies which meet the full needs for affordable housing since the annual need exceeds the annual housing requirement. The SHMA suggests that if all needs are to be met, about 77% of new homes should be affordable. However it accepts that a realistic proportion might be 30% or 180 each year.
- 7.48 NPPF also states that in plan making local planning authorities should give careful attention to viability and costs so that development is deliverable. The Affordable Housing Viability Assessment (AHVA) assessed a number of hypothetical sites typical of sites coming forward in the District. For each site type, a number of different affordable housing policy options were tested for viability within three different market positions (baseline, mid-market and improved market). The results of the assessments showed a wide variation of levels of viability according to site type, site value, amount of affordable housing and the market position. All areas, with the exception of areas of deprivation, were able to show some viability for a level of affordable housing of between 25% and 50%.
- 7.49 The AHVA examined site size thresholds and viability and concluded that there was scope to reduce the threshold for affordable housing to 7 units rather than 10, which is the current Local Plan threshold.
- 7.50 The Council is reluctant to adopt a different policy to suit different site types or locations. It would be difficult to classify site types and areas to suit an affordable housing policy. In terms of the market position, there is no suitable methodology for determining the state of the market. In view of the high need for affordable housing in the District, the Council needs to ensure that it takes every opportunity to ensure affordable housing forms part of housing developments. With regard to the threshold, it is proposed to retain the current threshold of 10 in the urban areas but to increase the threshold to 5 in the rural areas

### Other Options

- 7.51 The Council considered an alternative proportion across the District of 35% affordable housing but such a threshold would have the result of some more valuable developments only delivering 35% when a higher proportion might actually be viable. A flexible approach was considered to be the approach which would maximise affordable housing without impacting upon deliverability and viability.
- 7.52 The Council considered lowering the threshold for urban sites to 7 dwellings but considered that the additional affordable homes provided would not

warrant the additional burden to the Council, the affordable housing providers and the developers.

## **Mixed Communities and a Wide Choice of Homes**

- 7.53 The Council wishes to ensure that new developments include the right mix of homes to meet our needs. The affordable housing policies will ensure that a proportion of affordable homes are built on all developments of 10 or more units and that the sizes, types and costs of these homes meet local needs. However it will also be important to ensure that the market homes meet local needs in terms of size and type and that the needs of specific groups of people are met.

### **PO6: Mixed Communities & Wide Choice of Housing**

#### **A. General Market Housing**

Policies for the mix of housing will ensure that house sizes and types meet the needs as identified in the latest Strategic Housing Market Assessment

#### **B. Lifetime Homes**

At least 25% of homes, across all tenures, on sites of 50 or more dwellings should be built to Lifetime Home standards

#### **C. Homes for Older People**

All strategic sites will include Extra Care Housing schemes located close to local facilities.

Proposals for Retirement Villages and Continuing Care Retirement Schemes will need to meet locational criteria and be accompanied by evidence that the homes/bed spaces meet the needs of the community

#### **D. Student Accommodation & Houses in Multiple Occupation**

New student accommodation/ HMOs will be required to meet locational criteria to ensure they are not located in areas which already have a high concentration of such accommodation

## **Justification for the Preferred Option for Mixed Communities and a Wide Choice of Homes**

- 7.54 In developing the Preferred Option the following sources of information have been considered:

- National Planning Policy Framework (NPPF) (March 2012)
- Local Plan Report of Public Consultation (December 2011)
- Warwick District Strategic Housing Market Assessment (SHMA)(March 2012)
- A Strategy for the Future and Sustainable Prosperity of Warwick District (December 2011)

- 7.55 NPPF states that local authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- 7.56 The SHMA estimates that the main requirement for market housing will be for three bedroom homes followed by two and four bedroom homes with a small requirement for one bedroom accommodation. The SHMA also estimates that 18.7% of future need is likely to be for specialist housing, of which 9.7% is likely to be for affordable specialist accommodation. This type of housing is most likely to be for older households.
- 7.57 The number of pensioner households is likely to increase by 49% between 2011 and 2031. A policy requiring a proportion of homes built to Lifetime Home standards is justified by the growing number of older people as these simple additions to new build homes will make them more easily adaptable and so help more older or disabled people to stay in their own homes.
- 7.58 The requirement for small developments of extra care homes near local facilities will ensure that all new strategic sites make provision for older people who need an element of care. The Council will need to control large developments of retirement communities to ensure that they are meeting local need in terms of care type and affordability. The Council will liaise with Warwickshire County Council and Health providers about the impact on the provision of health and social care services.
- 7.59 The Council has agreed an Article 4 Direction in respect of small HMOS which includes shared houses. This is because of the concentration of shared (mainly student) houses in south Leamington Spa. Changes of use from dwellings to shared dwellings in Leamington now require planning permission. The Local Plan will, therefore, need to include a locational policy to determine planning applications for shared houses as well as other types of HMOs, student hostels and student halls of residences.

## Other Options

- 7.60 The Council does not consider that there are any other options for planning for mixed communities and ensuring a wide range of housing to meet needs.

## Gypsies and Travellers

- 7.61 Travellers experience the worst health and education status of any disadvantaged group in England. As part of a strong community, members of gypsy and traveller communities have the same rights and responsibilities as every other citizen. Research has shown a link between the lack of good quality sites and poor health and education. Furthermore, unauthorised sites used by gypsies and travellers often cause distress and conflict with local communities.



- 7.62 There are currently no temporary or permanent sites for travellers in the District and a number of unauthorised sites have been used in recent years. A study being undertaken for the Council will demonstrate the potential requirements for gypsy and traveller site (s) within the District to meet the identified need and help to avoid the further use of unauthorised sites. However, there is an existing site consisting of 5 plots for travelling showpeople within the district and this accommodates the demonstrated total need.
- 7.63 The accepted definition of Gypsies and Travellers is: *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*
- 7.64 And of Travelling Showpeople: *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers, as defined above"*

## **P07: Gypsies & Travellers**

The Council will bring forward site(s) under a Gypsy and Traveller Sites Allocation Development Plan Document, using the following policy criteria:

- Convenient access to a GP surgery, school, and public transport;
- Avoiding areas with a high risk of flooding;
- Safe access to the road network and provision for parking, turning and servicing on site;
- Avoiding areas where there is the potential for noise and other disturbance;
- Provision of utilities (running water, toilet facilities, waste disposal, etc);
- Avoiding areas where there could be adverse impact on important features of the natural and historic environment; and,
- Sites which can be integrated into the landscape without harming the character of the area.

Site development will accord with national guidance on site design and facility provision.

## **Justification for Preferred Option - Gypsies and Travellers**

- 7.65 Public consultation on the 'Issues' paper identified the requirement to consider the needs of gypsies and travellers as a matter of urgency. It was felt that census information could form the basis for the assessment of

need. A number of potential broad locations and sites were also put forward by respondents.

- 7.66 A Gypsy and Traveller Accommodation Assessment is currently being carried out on behalf of the Council to ascertain specific needs within the district. The results will show the need for sites and the type required.
- 7.67 There are no authorised sites within the district for either transit or permanent pitches. This results in vulnerability when gypsies and travellers pass through or set up unauthorised sites on land owned by themselves or others, including Council owned land. It also results in the Council being weak when defending appeal cases where sites have been set up without the benefit of planning permission.
- 7.68 National Planning Policy Framework (NPPF), 2012: This document states that it should be read in conjunction with the Government's planning policy document 'Planning Policy for Traveller Sites'. Local planning authorities preparing plans for and taking decisions on travellers sites should also have regard to the policies in the Framework so far as relevant.
- 7.69 Planning Policy for Traveller Sites, March 2012: This document came into effect at the same time as the National Planning Policy Framework (NPPF) in April 2012 and is to be read in conjunction with that document. It lists the Government's aims for achieving sufficient pitches on sustainable, suitable sites to accommodate traveller requirements locally. Local authorities are expected to make their own assessment of need for planning purposes, delivering sites over a reasonable time scale and reducing the potential for unauthorised sites and encampments. Policies within the Local Plan to deal with such sites should protect the Green Belt from inappropriate development, be fair, realistic and inclusive. Local authorities should strive to reduce tensions between the settled and traveller communities but locate sites where travellers can access essential infrastructure: schools, employment, welfare and health facilities. To ensure that these aims are delivered, local authorities, in producing a Local Plan should:
- Identify and update annually, a supply of specific deliverable sites, sufficient to provide five years' worth of sites against their locally set targets
  - Identify a supply of specific developable sites or broad locations for growth, for years six to ten and, where possible, years eleven to fifteen
  - Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
  - Relate the number of pitches or plots to the circumstances of specific size and location of the site and the surrounding population's size and density
  - Protect local amenity and environment

- 7.70 Warwickshire Local Investment Plan, 2010: Outlines the opportunity for joint working across LA boundaries to meet the needs of the Gypsy and Traveller community and to explore alternative funding streams. The Plan states that:  
*" With the removal of the regional requirements and the weakening of the evidence base within the current GTAA, Warwick District Council will be reviewing evidence of local need and demand before it can set out and plan for its future Gypsy and Traveller requirements through the new Local Plan and/or subsequent site allocations document. This evidence will be used to inform the issues and options stages of the consultation as part of the preparation of the draft local plan".*
- 7.71 Evidence of Local Need and Historic Demand for Gypsies and Travellers in Warwick District, April 2011: In the absence of a reliable source of data as a result of an acknowledged poor joint GTAA, the district council produced this interim paper to inform an appeal hearing against an unauthorised traveller site in its Green Belt. This paper will be replaced when the new GTAA is published, but gives details of known traveller movement and unauthorised encampments within the district for the period 2007-2010.
- 7.72 Warwick District Council Strategy Market Housing Assessment (SHMA) Final Report, 2011: The SHMA summarises the 'Evidence of Local Need and Historic Demand for Gypsies and Travellers in Warwick District'. It uses the findings as the basis for the evidence of current need with an assumption that a transit site for fifteen pitches is required. This information will be updated when the new GTAA is published.

## Other Options

- 7.73 With no sites available for the use of gypsies and travellers currently, the Council will need to make provision for the number of pitches required resulting from the GTAA study. The Council will work with the neighbouring local authorities to achieve the best outcome. To fulfil the objective a suitable policy is required in the Local Plan. There is no other option.

## 8. Economy

### Introduction

- 8.1. The need to support and encourage sustainable economic growth is a key national objective. Economic growth generates wealth and raises living standards which contribute to the quality of people's lives. High and stable levels of employment can support healthier, safer and more inclusive communities. Economic growth can also help to tackle deprivation and deliver regeneration and improvements to our built environment. It is therefore an important contributor to delivering more sustainable and prosperous communities.
- 8.2. Despite the recent economic downturn the district remains in a strong economic position with unemployment typically below the Warwickshire and National averages. The district has the highest figure for Gross Value Added (GVA)<sup>1</sup> per head in Warwickshire and is in the top 20% of local authority districts at a national level. In addition it has experienced higher than average business growth and high investment with the development of sites such as Tournament Fields and Tachbrook Park helping to drive growth and prosperity. The decline of traditional manufacturing industries has allowed the redevelopment of former industrial premises such as Spa Park.
- 8.3. The district has seen significant growth in higher value knowledge intensive industries over the past 10 years, particularly professional business services, computing and software and high value engineering and manufacturing. There is support nationally and at the sub regional level through the Coventry and Warwickshire Local Enterprise Partnership (LEP) to encourage further growth in these sectors. There has been significant investment at the University of Warwick and Coventry University both of which have a central role in linking these new research and creative industries and contributing a large graduate population to the workforce.
- 8.4. The district benefits from a highly skilled workforce with the highest percentage of residents qualified to degree level or above (NVQ4+) in the County and the lowest proportion of residents with no qualifications (11.3% compared to the Warwickshire average of 14.6%)
- 8.5. The national economic position has however, highlighted the vulnerability of the economy and the need to work harder to ensure the District's businesses and people are able to respond to the rapid changes taking place, particularly related to new technology, whilst remaining a destination for business and innovation.

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<sup>1</sup> GVA is a measure of the value of goods or services produced in an area, industry or sector of an economy.

## Relevant Issue & Strategic Objectives

- 8.6. **Issues:** The key issue for the new Local Plan is how it can shape and co-ordinate future development and economic investment within the district to help address the following issues:
- Identify a sustainable level of economic growth to meet existing and future employment needs, and to help address pockets of unemployment and worklessness
  - Maintain and develop the knowledge intensive industries to ensure the district retains its strong economy and is resilient to changing economic circumstances in the future, such as public sector job losses
  - Improve the rates of businesses growth in the district to support the 'organic' growth of the local economy; and
  - Improve transport infrastructure, the supply of homes, and the skills in the local population to ensure the needs of the local economy can be met within the district
- 8.7. The Local Plan should also maintain a flexible supply of land for business and assessing whether the currently available employment land is of the right type, and in the right location, to meet the future needs of the economy
- 8.8. **Objectives:** See in particular objective 1 as set out in paragraphs 4.13 to 4.15 above
- 8.9. **Sustainable Community Strategy Theme:** The related aim is that there is a strong, diverse economy which provides jobs for all.

## PO8: Economy

It is the Council's preferred option to ensure the availability of a wide range of employment land and buildings to meet the needs of businesses into the future by:

- Supporting the delivery of priorities set out in the Council's emerging Economic Development and Regeneration Strategy
- Supporting the continued growth of knowledge industries and the low carbon economy within the district whilst maintaining a diverse broad based economy to ensure all sectors of employment are provided for.
- Allocating a proportion of land at the following strategic sites (See Map 4) for Employment uses:
  - Land at Thickthorn, between Kenilworth and the A46
  - Land South of Warwick and Leamington to the west of Europa Way
  - Land North of Leamington at North Milverton and Blackdown
- Protecting existing employment land and buildings from changes to other uses unless there is evidence that it is not suitable to accommodate projected needs.
- Developing a policy framework to support appropriate development at identified Major Developed Sites in the Green Belt which may include site specific policies for Stoneleigh Park, the University of Warwick, Coventry Airport and the Former Honiley Airfield.
- Enabling the regeneration and enhancement of existing employment areas through the potential identification of dedicated *Employment Regeneration Zones*.
- Enabling the growth of appropriate rural businesses and diversification of the rural economy.
- Working with partners in the Coventry and Warwickshire sub-region to explore the case for land within the District at the Coventry and Warwickshire Gateway Site (See Map 3) being identified as a site of regional importance for employment to serve the regeneration needs of the Coventry and Warwickshire sub region.

## Justification for Preferred Option

8.10. In developing the Preferred Option the following sources of information have been considered:

- National Planning Policy Framework (NPPF)
- Draft Economic development and Regeneration Strategy (2012 to 2017)
- Warwick District Local Economic Assessment October (2011)
- Warwick District Employment Land Review (2009) and Employment Land Review Addendum (January 2011)
- Coventry and Warwickshire Local Enterprise Partnership (CWLEP) 5 year Strategy (2011 to 2016)

### National Planning Policy Framework (NPPF)

8.11. The NPPF is clear that significant weight should be placed on the need to support and encourage sustainable economic growth and that the planning system should not act as an impediment to this. Planning authorities should plan proactively to meet the development needs of businesses identifying and seeking to address potential barriers to investment (including a poor environment or any lack of infrastructure, services or housing).

8.12. Local planning authorities should set out a clear economic vision and strategy to proactively encourage sustainable economic growth and identify strategic sites to match this and meet anticipated needs over the plan period. Support existing sectors and where possible identify and plan for new and emerging sectors. Policies should also be flexible to respond to changes in economic circumstances and need. In particular local authorities should plan positively to support knowledge driven creative or high technology industries

8.13. Plans should identify priority areas for economic regeneration, infrastructure provision and environmental enhancement. Plans should also facilitate flexible working practices such as the integration of residential and commercial uses.

8.14. The NPPF is clear that land allocations should be regularly reviewed and that planning policies should avoid the long term protection of sites where there is no reasonable prospect of a site being used for that purpose. Where this is the case applications seeking alternative uses for employment land and buildings should be considered on merit giving regard to market signals and the need for different land uses to support sustainable local communities.

8.15. In order to promote a strong rural economy planning policies should:

- Support the sustainable growth business in rural areas both through conversion of existing buildings and well design new buildings
- Promote the development and diversification of agricultural and land based rural businesses

- Support sustainable rural tourism and leisure developments
- 8.16. Working with neighbouring authorities and the LEP local authorities should develop a robust evidence base to demonstrate a clear understanding of business needs within their area. This should include:
- Evidence of quantitative and qualitative need for land for economic development
  - Assess the existing and future supply of land available for economic development and its suitability to meet identified needs. Review of employment land should be undertaken at the same time as the SHMA

### **Draft Economic Development and Regeneration Strategy 2012 to 2017**

- 8.17. In line with the NPPF the Council is developing its vision for the direction and focus of economic development in the District through this strategy. It intends *'to deliver an economically vibrant and creative community that is low carbon based, focused of the development of knowledge economy, creative industries, high value engineering, research and design industries, healthy and resilient town centres and reinvigorated rural areas'*. To achieve this six priorities are identified:
- 1) Grow existing business base
  - 2) Create the conditions that attract investment
  - 3) Support and grow the retail, visitor and rural economies
  - 4) Invest in regeneration
  - 5) Improve skills and access to employment
  - 6) Build an entrepreneurial enterprise and innovative culture

### **Coventry and Warwickshire Local Enterprise Strategy (LEP) 5 year plan (2011 to 2016)**

- 8.18. The LEP has set out its vision for the sub regional economy. It has three key ambitions:
- Key Ambition 1: Create an environment where it is easy for businesses to start, locate and thrive
  - Key Ambition 2: Accelerate the growth of our economy through targeted support in our key strategic sectors
  - Key Ambition 3: Tackle the skills problem by aligning supply and demand
- 8.19. The identified target sectors for Coventry and Warwickshire are advanced engineering and high value manufacturing, automotive and low carbon mobility, business and professional services, computer and gaming, creative and cultural industries, low carbon technologies, sustainable construction and tourism. The strategy also identifies the need to ensure that relevant sites and infrastructure provision to support the growth of these target sectors.



## Developing the Employment Land Requirement and Supply

- 8.20. As part of the preparation of the previous Core Strategy an Employment Land Review (2009) was carried out to assess the employment land need in relation to the housing and growth targets set out in the Phase two Regional Spatial Strategy (RSS). An addendum to this was prepared which considered the expected employment requirement based on three scenarios for growth put forward in the Issues paper. These documents were used as a starting point in developing the Preferred Option.
- 8.21. The Councils preferred growth option for housing (set out in detail in Housing – section 7) would require 8,253 additional jobs to be provided through the plan period from 2011 to 2031. It is anticipated that this would require in the region of 66 hectares (ha) of employment land over the period 2011 to 2026. However, further work is needed to clarify this figure in relation to more up to date economic and demographic projections and to examine the impact of potential development at the Coventry and Warwickshire Gateway site (discussed later in this paper). It will also be necessary to establish how the requirement should be split in terms of the need for different types of employment (i.e. B1, B2 and B8).
- 8.22. The Council has a portfolio of committed employment land made up of sites with planning permission, those covered by development briefs or allocations included within the adopted Local Plan. Progress on these sites is monitored and reported annually. An initial review of these sites was undertaken to identify those which are unlikely to come forward, where other uses had been granted planning permission and where employment land had been proposed for housing through the proposed growth option. A supply of approximately 43 hectares has been identified which leaves a requirement of in the region of 23 hectares of new employment land to be allocated.
- 8.23. There is potential that a proportion of the overall requirement could be met through proposals to redevelop and intensify existing employment at sites such as Stoneleigh Park and the University of Warwick. It is proposed that the Draft Local Plan includes site specific policies to provide the framework for bringing these proposals forward.
- 8.24. **University of Warwick** - The Phase two RSS recognised that the University of Warwick has a role in delivering employment growth in Warwick District. The Council recognises the importance of the University as a higher education institution but also its role in supporting the research and development of knowledge based industries in the district. The University has set out its expansion plans to 2018 including proposals for employment related development and it is reasonable that this could contribute in part to the employment land supply. The removal of land from the Green Belt to support these proposals would however need to demonstrate exceptional circumstances.
- 8.25. **Stoneleigh Park** – The former National Agricultural Centre is an established employment area within the Green Belt. It provides a unique collection of uses of national importance related to the rural economy. As

the site brings significant benefits to the local economy, the Council is keen to support its ongoing viability, subject to managing its impact on traffic, local communities, adjacent historic parks and gardens and the green belt.

- 8.26. The Council will assess the need for site specific policies to deal with other Major Developed Sites in the Green Belt currently identified in the adopted Local Plan such as the Former Honiley Airfield.

### **Location of employment land**

- 8.27. Options for the location of new employment sites are closely linked to the distribution of housing. The Council has set out in detail the growth options it has considered for housing in section 7. The Local Plan must provide employment opportunities in locations to meet the needs of new housing therefore the selection of sites is guided by those identified for housing (see section 7 and Maps 3 and 4). In addition, priority should be given to available previously developed land within the urban areas first. The existing supply portfolio takes account of the available brownfield options including redevelopment of the Former Ford Foundry, Leamington, Land at Benfords, Cape Road and the Former IBM car park, Warwick.
- 8.28. The remaining options for locating employment land are on green field sites. However, it is anticipated that the requirement can be accommodated within the strategic sites allocated for housing as part of the Councils overall garden suburbs approach. The preferred choice of sites seeks to distribute employment opportunities across the district taking account of the existing concentration to the south of Warwick and Leamington and limited opportunities in Kenilworth.
- 8.29. It is proposed that committed employment land at Warwick Gates is developed for housing and as an alternative a proportion of land at South of Gallows Hill/ West of Europa Way, and Myton Gardens Suburb (West of Europa Way) is allocated for employment uses. This arrangement of sites presents better options for configuring employment uses and locating development in the vicinity of Warwick Technology Park to support the clustering of industries and expansion of knowledge based sectors. Concentrating employment uses in this area also increases opportunities to utilise existing infrastructure and could support the development of new infrastructure to serve the needs of businesses such as a Park and Ride (see Map 4).
- 8.30. Providing for employment land north of Leamington would address an existing deficit in provision and have the potential to reduce the need to travel across the district. Land at Thickthorn benefits from access to the strategic transport network and will address existing shortages in employment. There may also be opportunities for small scale employment development within the Category 1 villages (see section 7) as part of mixed use housing sites.
- 8.31. More widely the Council will develop a policy framework to support the development of a strong and diverse rural economy. This should include

policies on agriculture and farm diversification schemes, the expansion of existing buildings, creation of new rural enterprises and the reuse of buildings for economic purposes such as tourism.

- 8.32. An alternative option for locating new employment land would be to allocate land within the other sites identified for housing. Opportunities at Whitnash East are thought to be constrained in terms of transport infrastructure and in particular access to the major transport network. The land available at Fieldgate Lane, Lowes Farm and Red Hill Farm is considered to be of insufficient size to accommodate employment opportunities.
- 8.33. **Coventry Gateway** - The Coventry and Warwickshire LEP is committed to the identification of a site of regional importance for employment to serve the needs of the Coventry and Warwickshire sub region and have indicated that land at Coventry and Warwickshire Gateway (see Map 3) could be a suitable site. It has the potential to provide in the region of 14,000 jobs as well as facilitate major improvements to the transport network. The Council is supportive in principle but considers that further work is needed to justify the identification of this site:
- To demonstrate that there are not any other preferable and suitable sites within the sub-region
  - To understand the local impacts of a major development at the Gateway in relation to housing and employment need and the District's transport infrastructure
  - To explore the case for releasing land in the green belt
- 8.34. The Council is working with partners on the CWLEP and neighbouring local authorities to undertake this research.

### **Protecting Existing Employment Land**

- 8.35. In order to maintain an appropriate supply of employment land to address future employment needs it is important to ensure existing employment land and buildings is protected. However, the NPPF is clear that local planning authorities should avoid the long term protection of employment sites where there is no prospect of the site being used for that purpose. In line with the government's approach to driving economic growth the NPPF has recommended the need to consider flexibility towards alternative uses in instances where employment land has laid dormant for many years. More widely it is recognised that the portfolio of employment land should be flexible to respond to changing needs.
- 8.36. The Council has assessed its current employment land supply however it will review its position with regard to any proposals on longstanding sites based on the relative merits of each case.
- 8.37. It is also recognised that there are existing employment areas which are in need of regeneration and may not be in the right location or offer the right type of environment to meet current demands. It is considered that an assessment of existing employment areas is needed to identify these and

further work to establish the appropriateness of identifying *Employment Regeneration Zones* to address these issues.

- 8.38. The Council will also consider opportunities for employment led regeneration within the town centre as part of the appraisal of town centre '*opportunity sites*'.

### **Supporting Economic Growth**

- 8.39. The Local Plan will provide a policy framework to deliver the objectives set out in the emerging Economic Development and Regeneration Strategy, and in particular to support the continued growth of knowledge based industries within the District. This approach is supported in the NPPF and at the local level knowledge driven industries are identified as a priority sector by the Coventry and Warwickshire LEP.
- 8.40. The District is well suited to an approach that has a focus on knowledge based industries and low carbon technologies. However the Council recognises that supporting the growth of these sectors must be set in the wider context of delivering a broad based, flexible and diverse economy to ensure that a wide range of employment opportunities are provided. This may mean taking steps to support and regenerate some existing employment areas (see potential proposals for Employment Regeneration Zones) as well as supporting the rural economy.
- 8.41. In providing employment land it is also important to ensure that appropriate infrastructure is in place to support the needs of businesses (for example, the existence of high speed broadband). These requirements will be considered in more detail through the emerging Draft Infrastructure Delivery Plan and in the development of the Draft Local Plan.

## 9. Retailing and Town Centres

### Introduction

- 9.1 Retailing and the ability of communities to have access to an appropriate network of sustainable destinations for their shopping needs is an important factor in building a successful and well balanced district.
- 9.2 Our town centres are very much at the heart of our communities, providing key destinations for shopping, services, employment and leisure. Their future success and attractiveness can play an important part in ensuring a strong economy, meeting the social and economic needs of the community, supporting more sustainable patterns of development, and reducing the need to travel.
- 9.3 Warwick District has three main town centres in Leamington Spa, Warwick and Kenilworth which provide the focus for retailing activity and other town centre uses. Outside of these town centres there are a number of important local centres within the urban area, each performing a different complementary function for both the local population and visitors to the area.
- 9.4 Leamington is the largest of the district's town centres and is acknowledged as an important sub-regional shopping destination. Leamington contains a large number of major outlets ranging from a department store to representation from many high street chains as well as local and independent specialist shops. The town centres retail attractions are complemented by the location of major offices, civic buildings, leisure and hotel uses and residential properties that all benefit from the towns intrinsic, attractive Regency character. Leamington town centre also includes the smaller Old Town shopping area south of the River Leam. This area contains a range of specialist shops, many of which are independent, together with a diverse range of restaurants.
- 9.5 The District's other two main town centres are much smaller in size than Leamington and therefore contain a more limited size range of shops and services. Warwick Town centre is heavily influenced by the mediaeval street patterns and in retail terms fulfils the dual role of being a local shopping centre for the people of Warwick whilst also serving a tourist market attracted in a large part and influenced by its proximity to Warwick Castle.
- 9.6 Kenilworth town centre is smaller still and offers a range of local shops for the people of Kenilworth, including being a main food shopping destination. Kenilworth has seen recent improvements to its retail offer including the addition of a Waitrose store which has helped attract more visitors to this centre. Kenilworth town centre also offers a good range of quality restaurants.
- 9.7 Notwithstanding the importance of the district's three main centres there are also a number of major out of centre retail outlets that add to the

district's retail offer. The main ones are Leamington Shopping Park (previously known as The Shires Retail Park), the adjacent Shires Gate and the Retail Warehouses on Myton Road, Leamington. As well as these clusters of retail outlets there are other significant out of centre retail stores across the district that include Homebase, (Emscote Road, Warwick), Asda, (Chesterton Drive, Sydenham), Tesco, (Emscote Road, Warwick) and Lidl, (Myton Road, Warwick). It should be noted that there is shortly to be an addition to the above list of out-of -centre stores with work to deliver a new Morrisons supermarket on the former Ford Foundry site underway.

- 9.8 Warwick District also has a large number of smaller local centres, shopping parades and isolated shops. These include small clusters of shops in historic parts of the towns (e.g. Coten End, Warwick and High Street, Kenilworth) and shopping parades developed as the towns have expanded (e.g. Crown Way, Lillington and Othello Avenue, Warwick Gates). These local centres and the individual town shops provide an important role in providing access to shops and services within easy walking distance of many people.
- 9.9 A number of the district's villages also contain local shops and services serving their local communities and in recent years a number of farm shops have become established, e.g. Hill Top Farm, Hunningham. The largest concentration of shops in the rural area is at Hatton Country World. This site has become a major tourist attraction in this part of the district and attracts people from a wide area as the shops operate alongside a restaurant and farm park as part of a wider visitor attraction.
- 9.10 The challenge facing the district will be to ensure that new retail requirements are delivered at the most appropriate locations and that the district's town centres remain the focus for future retail and other main town centre uses in line with the sustainable development aspirations of the Local Plan. It is also important to maintain an appropriate range and balance of complementary retail opportunities at other locations within the urban context and in the rural villages.

## Relevant Issue & Strategic Objectives

### Relevant Issues:

- The impact of the current recession on the local economy ;
- The need to maintain the economic strength of the town centres of Leamington Spa, Warwick and Kenilworth, and the threat to these from retail and leisure developments elsewhere;
- The desire to build prosperous communities by improving the economic performance of towns and local areas;
- The need to identify a sustainable level of retail growth to meet existing and future needs;
- The need to identify a network and hierarchy of centres to meet the needs of their catchment; and
- The need to identify a strategy for future management and growth of the town centres to meet future needs (including retail and other main town centre uses such as offices , leisure, culture and tourism and other uses defined in the NPPF Annex 2: Glossary)

- 9.11 **Strategic Objectives:** See in particular objective 3 as set out in paragraphs 4.13 to 4.15 above

### **PO9: Retailing & Town Centres**

- Our Preferred Option is to incorporate retail and town centre policies to:
- Identify a clearly defined local retail hierarchy, and strategies for the district's network of town and local centres (including rural shops);
- Apply the 'town centres first' message at the heart of Government retail policy advice that will be central to promoting the vitality and viability of the district's town centres. Town centres will be the focus for retail development and the Council will plan positively for their growth and development in accordance with their particular role within the network of town and local centres;
- In accordance with the identified need/evidence within the retail study, support the addition of a major retail –led development scheme in Leamington Town Centre;
- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary retail frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
- Strongly resist out-of-centre retail development unless it can be proven that there will be no adverse impacts on other town/ local centres in the catchment area;
- Review the existing town centre opportunity sites to reconsider their potential regeneration potential;
- Provide a framework for more detailed area action plans to be prepared with the local community and businesses in those centres where significant change or conservation is needed. These plans will identify the distribution of uses, and their inter-relationships, including specific allocations to meet the need for new retail, leisure and office floorspace within the town centres.
- Protect rural shops and services, by allocating housing development in Category one villages and also by restricting the change of use of existing shops and services. This will help to support existing shops or may even lead to the creation of new outlets (see Policies for the Location of New Housing Preferred Options).

## Justification for Preferred Option

### National and other policy context

- 9.12 The latest national planning policy regarding retailing and town centres is set out within the NPPF (April 2012) and the accompanying Technical Guidance to the NPPF.

### Ensuring the vitality of town centres

- 9.13 The NPPF underlines the importance of Town Centres saying that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:
- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
  - Define a network and hierarchy of centres that is resilient to anticipated future economic changes;
  - Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
  - Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
  - Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
  - Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that need for retail, leisure and office and other main town centre uses are met in full and are not compromised by limited site availability. Local Planning authorities should therefore undertake an assessment of the needs to expand town centres to ensure a sufficient supply of suitable sites;
  - Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
  - Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
  - Recognise that residential development can play an important role in ensuring the vitality of centres and set policies to encourage residential development on appropriate sites; and
  - Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.
- 9.14 For wider retailing policies the NPPF sets out the following:
- Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. they should require applications for main town centre uses to be located in town



centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

- This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.
- When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include an assessment of:
  - The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal: and
  - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

9.15 Where re an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

9.16 It should be noted that in 'Promoting healthy communities' the NPPF states that Local Plans should deliver the social, recreational and cultural facilities and services the community needs and that this includes planning positively for the provision of community facilities including shops.

9.17 The NPPF also sets out a framework for 'Supporting a prosperous rural economy'; within this it clearly states that Local Plans should promote the retention and development of local services and community facilities in villages, including local shops.

### **Warwick District Retail and Leisure Study (May 2009)**

9.18 The Warwick District Retail Study(May 2009) has produced the following key findings that have informed the preferred options process with regard to retailing and town centres.

9.19 Leamington Spa is perceived as a relatively healthy town centre with its current retail offer being broadly in line with other high order centres in the UK. It has department store representation and a good range of national multiple retailers present. These all serve an important anchor function to the centre, because they continue to bring shoppers into the town centre. The vitality and viability of the centre is also underpinned by:

- The expansion, albeit small, in the quality and range of retailers in recent years (such as the introduction of Regent Court);
- The healthy list of retailers seeking representation in the centre;
- Steady prime Zone A rentals; and an environmentally attractive shopping environment.

9.20 However the retail study expresses concerns about:

- Leamington's fall in the UK Venuescore (Town Centre) rankings;
- The loss of independent department store operator, Woodward's;
- The level of vacant outlets and floorspace;
- Decreasing pedestrian footfall; and
- Limited scale of substantial new development in the centre during the last two decades.

9.21 **Leamington Spa's** retail performance and prospects cannot be divorced from those of competing centres. In this context the town centre competes at a sub-regional level with Coventry and Solihull, and with the regional centre of Birmingham. All of these centres have seen the implementation of major retail and leisure schemes, which has resulted in Leamington Spa losing its competitive edge due to the limited amount of investment in new retail facilities in the town centre.

9.22 The retail study states that Leamington (and the district) would benefit from further investment and an injection of new retailers in order to remain robust and competitive. In this context the study has agreed that a retail development centred on Chandos Street would have the potential to meet the need for an uplift in the quantum and quality of retailing in the heart of Leamington town centre.

9.23 **Warwick** town centre is considered to accommodate a good range of middle to upmarket independent and leisure service operators catering for shoppers and tourists alike. This is in contrast to Leamington which is predominantly governed by national multiple retailers selling mainstream fashion. In this way, it can be argued that these neighbouring shopping destinations complement each other.

9.24 **Kenilworth** is judged to be a healthy town centre catering for the local catchment and visitors alike and is performing well in the shopping hierarchy. Positive indicators include:

- a good range of national multiple retailers present;
- an increase in rental levels;
- environmentally attractive
- relatively low vacancy in the centre;

9.25 The centre's profile and trading performance has been significantly enhanced by the new investment associated with the redevelopment of Talsiman Square, anchored by the Waitrose store. The existing shopping provision in the town centre has benefitted from the Talisman Square

redevelopment that has generated additional footfall, spend and linked trips across the centre.

### **Future Retail Capacity Estimates for Warwick District**

- 9.26 The retail study has also produced a strategic forecast of new comparison goods and convenience goods floorspace up to 2026. Utilising population forecasts that are commensurate with the overall levels of housing growth proposed over the local plan period, the retail study indicates that there is economic capacity for major comparison goods and commercial leisure floorspace over the short to medium term. There is also a limited identified quantitative capacity for convenience goods retailing, although this should not preclude any qualitative improvements to the existing convenience offer in existing centres and specifically Leamington Spa.
- 9.27 The retail study identifies proactively planning for new growth within the context of the districts town centres as the main challenge for future of retail and leisure development in this area. It states that if new development is not facilitated in existing town centres then there will be increased pressure for new development from alternative sites in edge-of-centre and out-of-centre locations.

### **Other Options**

- 9.28 Planning proactively at the local level, and setting a range of strategic policies (as identified in the Council's preferred option above) is the only way to underpin the government's requirement to ensure the vitality of town centres in Warwick District.

## 10. Built Environment

### Introduction

- 10.1. The design of buildings and the wider spaces around them influence where people choose to live, work and spend leisure time, and how they feel about their area. High quality design and attractive environments can therefore encourage investment and economic development in an area, support social inclusion and help to create civic pride and community cohesion. Good design is therefore a key element in achieving sustainable development
- 10.2. In general terms, the quality of the built environment in Warwick District is high. This area is a very popular place to live and attracts people from other areas and regions as evidenced by higher than average house prices. These qualities need to be maintained and improved, particularly during the current economic downturn and within those parts of the District in need of economic, social and environmental regeneration.
- 10.3. The Council wishes, by 2029, that the district will be known as a place for its 'Sustainable Garden towns, suburbs and villages', with the appropriate infrastructure and design codes in place to support this principle. The Garden Suburbs and Villages study/prospectus (see appendix 3) shows how these principles could apply to the existing towns, parts of which already demonstrate the advantages of tree lined streets, appropriate housing density, suitable vehicle parking facilities and increased plot sizes. It should be noted that these objectives can be achieved through a demonstrable reduction in the proportion of development land utilised for highway purposes.

### Relevant Issue & Strategic Objectives

- 10.4. **Relevant Issues:** Pressure for new development could potentially threaten the high quality built and natural environments, particularly in historic areas
- 10.5. **Strategic Objectives:** See especially objectives 8 and 9 as set out in paragraphs 4.13 to 4.15 above
- 10.6. **SCS Strategic Aim:** The built and natural environment has been protected and enhanced

## PO10: Built Environment

Our preferred Option is to:

- **Promote and deliver high quality design** through including policies to protect and enhance the built environment. This will include utilising the principles of sustainable Garden Towns, Suburbs and Villages and reference to the prospectus (see appendix 3) commissioned by the Council to guide developers and inform decisions on planning applications
- **Protect and enhance the historic environment**, with particular reference to the principles of garden towns, suburbs and villages where appropriate (see also Historic Environment - section 11)
- **Promote and deliver inclusive communities** (see Inclusive, Safe and Healthy Communities - section 13, Housing – section 7 and Economy – section 8)
- **Protect, enhance and link the natural environment** through policies to encourage appropriate design of the built environment and set out a framework for subsequent more detailed design guidance to ensure physical access for all groups to the natural environment (See also Green Infrastructure – section 15)
- **Provide secure, safe and accessible places** to promote community safety (see Inclusive, Safe and Healthy Communities – section 13)
- **Adapt for the effects of climate change** (see Climate Change – section 12 and Water and Flooding – section 18)
- **Reduce energy use and other resource use, reduce emissions, design for adaptability and promote the development of renewable energy resources.**
- **Encourage sustainable waste management** by ensuring that the design of new development takes into account the need for bin/compost storage, access to recycling and kerbside collections.

## Justification for Preferred Option

10.7. National Planning Policy Framework, 2012. Good inclusive design is a key aspect of sustainable development. The core planning principle in the NPPF is to *“always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”*. This relates to all new, converted and replacement buildings for any use. New homes in the

countryside can be considered if the design is *“truly outstanding or innovative, helping to raise standards of design more generally in rural areas; reflect the highest standards in architecture; significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area”*. The LPPF encourages the use of design codes, to deliver high quality outcomes, but these should avoid being over prescriptive. Codes should concentrate on scale, density, massing, height, landscape, layout, materials and access. Good design also encompasses connections and the *“integration of new development into the natural, built and historic environment”*. There is also mention of re-introducing the principles of Garden Towns; *“The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”*. This style of development is seen as enduring in the NPPF and considered therefore desirable for new development in appropriate circumstances. Design review arrangements are also recommended.

- 10.8. Garden Towns, Villages and Suburbs, 2012: Illustrates the overarching principles of the original movement and future potential for this approach, as suggested in the NPPF so that it can be developed into more guidance in support of this Local Plan.
- 10.9. Secured by Design: The UK Police flagship initiative supporting the principles of “designing out crime” through the use of effective crime prevention and security standards for a range of applications.
- 10.10. Manual for Streets, 2007 and 2, 2010: emphasises that streets should be places in which people want to live and spend time in, and are not just transport corridors. In particular, the manual aims to reduce the impact of vehicles on residential streets by asking practitioners to plan street design intelligently and proactively and gives a high priority to the needs of pedestrians, cyclists and users of public transport.
- 10.11. Planning for Places: Delivering Good Design through Core Strategies: Case studies from a number of local authorities are given to illustrate an understanding of how a place works, what makes it special and the opportunities it offers and how this is critical to developing a core strategy.
- 10.12. Building for Life Standards, 2009: promotes design excellence and celebrates best practice in the house building industry. Good quality housing design can improve social wellbeing and quality of life by reducing crime, improving public health, easing transport problems and increasing property values.
- 10.13. Code for Sustainable Homes, 2006: the national standard for the sustainable design and construction of new homes. The Code aims to reduce carbon emissions and create homes that are more sustainable.
- 10.14. Urban Design Compendium 1 and 2: 1 – the key aspects of urban design and how these can be applied to create places where people want to live, work and socialise. 2 – practical guidance on the steps that can be taken and

barriers that need to be overcome during policy and project development to improve the quality of place delivered.

- 10.15. Car Parking: What Works Where, 2006: Identifies the widest range of available options, reviews that options in relation to housing density, then gives examples from around the country and evaluates them against a set of criteria including quality, convenience, safe pedestrian routes, security of parked vehicles and efficient use of land.
- 10.16. The Bishop Review: The Future of Design in the Built Environment, 2011: An independent report that examines the legacy of the Commission for Architecture and the Built Environment (CABE) in the context of the new planning system and economic and political context, and makes recommendations for a new ecosystem of design support
- 10.17. West Midlands Farmsteads & Landscapes Project, 2010: An evaluation of what future uses farm buildings should be put to and identifying the most significant and vulnerable cases.
- 10.18. Landscape Character Assessment for land south of Warwick and Leamington, 2009: A study which examined parcels of land outside the Green Belt which could be considered as potential areas for urban expansion, whilst protecting the character of the towns.
- 10.19. Green Infrastructure Study, 2010: Identifies key natural, ecological, health and quality of life assets and resources that make up Warwick District's strategic green infrastructure network.
- 10.20. District Residential Design Guide, 2008: provides a design framework for all who are involved in the provision of residential accommodation within Warwick District
- 10.21. District Council's DPD's on:
- Vehicle Parking Standards, 2007;
  - Sustainable Buildings, 2008;
  - Open Space, 2009
  - Affordable Housing, 2008

## Other Options

- 10.22. There is potential for developments to repeat some of the less desirable designs of the past. In order to minimise this possibility and ensure that new development exceeds these standards, the Council has considered which designs and types of development are the most successful and popular. The result has informed the report on Garden towns, suburbs and villages. The Council will ensure that policies promote high quality design within new developments and in areas of redevelopment or where conversions or the replacement of buildings takes place.

## 11. The Historic Environment

### Introduction

- 11.1. The district has a rich heritage which has left a fine legacy of historic buildings and places within the district. The historic environment is a vital part of our cultural heritage and helps to contribute towards both the understanding of the past and of the present. The historic environment therefore has a visual appeal, being made up of Listed Buildings, Scheduled Ancient Monuments, Conservation Areas, Registered Parks and Gardens and locally important Historic Assets. The historic environment is therefore of vital importance for education, culture, leisure, tourism and the wider economy. Warwick district has over 1,500 Listed Buildings, 31 Conservation Areas, nationally and locally Listed Parks and Gardens, Scheduled Ancient Monuments and nationally important buildings such as Warwick Castle, Kenilworth Castle and the National Trust properties of Baddesley Clinton and Packwood House.

### Relevant Issue & Strategic Objectives

- 11.2. **Relevant Issue:** The pressure for new development threatening the high quality built and natural environment in the district, particularly in historic areas.
- 11.3. **Strategic Objectives:** See in particular objectives 7, 10 and 14 as set out in paragraphs 4.13 to 4.15 above. Objectives 8 and 15 are also relevant to this topic.



## **PO11: Historic Environment**

Our preferred option is to work with property owners and other stakeholders in the historic environment to both protect the historic environment and ensure its economic viability for future generations. This will be achieved in the following ways:

- Support the understanding of the significance of Heritage Assets, by:
  - the provision of appropriate research for all applications relating to the historic environment.
  - submission of nationally important historic assets for listing.
  - reviewing Conservation Area
  - recognising other local assets through Local Lists.
- All reviews should be done in consultation with the public in order to bring a shared understanding of why assets and areas are being designated.
- Offer help and advice and seek to disseminate information about the historic environment by offering guidance to stakeholders, producing new leaflets and reviewing existing guidance leaflets, promoting events which make the historic environment accessible to all
- Protect the historic environment from inappropriate development, by
  - Including policies which protect Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Historic Parks and Gardens, and locally designated Historic Assets.
  - Developing guidance as to the interpretation of policies in line with the National Planning Policy Framework.
  - Agreeing Article 4 Directions which will be reviewed or introduced as appropriate
  - Using enforcement powers will to control inappropriate development or maintenance of Historic Assets.
- Encourage appropriate regeneration of the historic environment and high quality new buildings on appropriate sites within the historic environment by
  - Developing policies which support sustainable development and high quality design
  - providing appropriate advice to stakeholders
  - Being flexible about new uses where they bring listed buildings back into use encouraging their survival and maintenance

11.4. In order to implement this option and to deliver it effectively and appropriately policies will be included and justified in the Local Plan. These policies will supported as necessary by supplementary documents.

### **Justification for Preferred Option**

11.5. The Planning (Listed Buildings in Conservation Areas) Act 1990 – provides a statutory background against which protection of the historic environment is made.

11.6. The National Planning Policy Framework, 2012- replacing PPS5 this is a shorter and more succinct document. Section 12 sets out the Conservation

and Enhancement of the historic environment. This document notes that planning authorities are required to set out in the Local Plan, a positive strategy for the Conservation and enjoyment of the historic environment. In developing this Strategy local planning authorities should take into account the desirability of sustaining and enhancing the significance of Historic Assets and putting them to viable use consistent with Conservation.

- 11.7. The wider social, culture, economic and environmental benefits to Conservation of the historic environment can bring:
- Desirability of new development making a positive contribution to local character and distinctiveness.
  - Opportunities to draw on the contribution made by historic environment to the character of a place.
  - Planning authorities are also required to justify the status given to the historic environment, ensure appropriate significance of an asset is understood, and rectify deliberate neglect and damage.
- 11.8. Local Planning Authorities are required to determine planning applications taking account of:
- The desirability of sustaining and enhancing the significance of Heritage Assets and putting them to viable uses consistent to their conservation
  - The positive contribution that Conservation of Heritage Assets can make to sustainable communities including their economic viability
- 11.9. Other documents produced by English Heritage are relevant to the historic environment. In particular, guidance documents on the designation, maintenance and management of Conservation Areas and the identification of the setting. English Heritage is developing non-statutory best practice guidance for the identification and management of significant local heritage assets using a Local List, fulfilling a commitment made in the 2007 white paper 'Heritage Protection for the 21st Century'.
- 11.10. English Historic Towns Forum has also carried out research into the use of Article 4 directions and has found that they can be used successfully:
- within the curtilage of listed buildings
  - where permitted development rights need to be taken away
  - for the painting of facades on commercial development
  - in Conservation Areas to protect character
  - to restrict alterations to residential property such as altering a chimney

## Other Options

- 11.11. Other options would include taking a less balanced view of protecting the historic environment. This could involve not providing advice to stakeholders by relying on the development management process, refusing applications and enforcing without negotiation. Other aspects of this approach could involve the more widespread use of Article 4 directions to preserve the historic environment.

## 12. Climate Change

### Introduction

- 12.1. Climate change is widely regarded as one of the major challenges facing our communities, likely to affect people's lives, homes and businesses in the future. There is concern at all levels to address the causes of climate change through reducing carbon emissions, making more efficient use of resources as well as adapting the design of new buildings and infrastructure to be resilient to the potential impacts.
- 12.2. In Warwick District, per capita carbon dioxide emissions are slightly higher than the UK average but have seen a 17% reduction in the last five years compared with a UK reduction of 16%<sup>2</sup>. Transport is the biggest contributor to carbon emissions within the district and within this sector road transport is responsible for 98% of emissions.
- 12.3. The Council is committed to carbon reduction and how to address this not only within its own buildings but also within the district over the next 15 years. As part of this it is important to locate new development to reduce the need to travel and construct sustainable buildings which incorporate energy efficient layout and design, utilise renewable and low carbon resources and water conservation measures.
- 12.4. In terms of the potential impacts of climate change it is anticipated that the future climate in Warwick District will be characterised by:
- Warmer, wetter winters with average temperatures 1.3 higher by the 2020s and 2.1 higher by 2050s with 5% more rain
  - Hotter drier summers with average temperatures 1.5 higher by the 2020s and 2.6 higher by the 2050s with 7% less rain
  - More frequent extreme weather events<sup>3</sup>

### Relevant Issue & Strategic Objectives

#### Key Issues

- 12.5. The key issue for the new Local Plan is how it can shape and co-ordinate future development and investment within the district to help address the following issues:
- Increasing the use of renewable and low carbon sources of energy and reducing reliance on fossil fuels, particularly in relation to the issue of peak oil and gas;
  - Ensuring new development is designed and built to a high standard of energy efficiency to reduce the overall demand for energy;
  - To contribute towards meeting Government targets for achieving zero carbon buildings and reducing carbon emissions;
  - To design buildings and spaces which are able to adapt to the projected impacts of climate change; and,

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<sup>2</sup> Source: Warwick District Low Carbon Action Plan (2012)

<sup>3</sup> Source: Climate Change Adaptation Study (2011)

- 12.6. To ensure renewable and low carbon technologies and energy efficiency measures are implemented sensitively within the historic environment and particularly for listed buildings.

### **Strategic Objectives**

- 12.7. See objectives 5 and 6 as set out in paragraphs 4.13 to 4.15 above
- 12.8. The related aim in the Sustainable Community Strategy is to ensure that *our community has actively minimised environmental impacts.*

### **PO12: Climate Change**

- The Preferred option is to develop a policy framework to support the reduction of carbon emissions within the District and ensure that buildings are resilient to the potential impacts of Climate Change in the following ways:

#### **Preferred Option: Achieving Sustainable Buildings**

- To support opportunities to reduce carbon emissions in the existing building stock.
- To adopt a requirement that seeks a 20% reduction in carbon emissions from development to include a contribution from renewable and low carbon technologies. It is proposed that this requirement would be applied to residential developments of 1 dwelling or over and non residential developments of 100sqm or over.
- In terms of achieving sustainable construction, to require new residential development to meet standards set out in the Code for Sustainable Homes and non residential developments to meet BREEAM standards.

#### **Preferred Option: Planning for Renewable energy and Low Carbon Generation**

- To develop a policy framework to support proposals for the development of appropriate low carbon and renewable energy infrastructure. To ensure that opportunities for large scale renewables and district heating are considered as part of the master planning of strategic sites.

#### **Preferred Option: Climate Change Adaptation**

- To include a policy on Climate Change Adaptation to require that new development is designed to be resilient to and adapt to the future impacts of Climate Change.

### **Justification for Preferred Option**

- 12.9. The Government has set out a framework for enabling local authorities to require a proportion of energy to be sought from renewable or low carbon sources. It has set out a timetable for achieving zero carbon homes by 2016 through the progressive tightening of building regulations.
- 12.10. National targets have been set in relation to climate change which will need to be taken into account in planning for future growth:

- 12.11. To ensure that 15% of total energy is provided through renewable sources by 2020 (Compared with under 2% in 2009), and
- 12.12. To cut carbon dioxide (CO<sub>2</sub>) emissions by 80% by 2050 compared to 1990 levels
- 12.13. At 2010 a 25% reduction in CO<sub>2</sub> levels against 1990 levels had been delivered and it is anticipated that, to reach an 80% reduction by 2050, a further 25% reduction is required by 2027<sup>4</sup>. This suggests that action is needed at the local level to contribute towards the delivery of these targets.

### **National Planning Policy Framework (NPPF)**

- 12.14. The NPPF is clear that planning has a key role in reducing green house gas emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of low carbon and renewable energy. To do this local planning authorities should:
- adopt proactive strategies to mitigate and adapt to climate change
  - plan new development to reduce greenhouse gas emissions and avoid increased vulnerability to impacts arising from climate change.
  - actively support energy efficiency improvements to existing buildings
  - set local requirements for a buildings sustainability consistent with the government's zero carbon buildings policy
- 12.15. In assessing planning applications local planning should expect new development to:
- comply with adopted local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable.
  - be designed to minimise energy consumption
- 12.16. Local authorities should promote and increase the use and supply of renewable and low carbon energy by:
- designing policies to maximise renewable and low carbon energy development whilst ensuring that adverse impacts are addressed
  - potentially identifying suitable areas for renewable and low carbon technologies
  - support community led initiatives
  - identifying opportunities where development can draw energy supply from decentralised, renewable or low carbon supply systems
- 12.17. The NPPF is clear that applicants should not be required to justify the overall need for renewable or low carbon energy proposals and that local authorities should recognise that even small scale projects contribute towards cutting greenhouse gas emissions
- 12.18. In developing the Preferred Option the following evidence has been taken into account to consider the capacity for renewable energy and carbon reduction in the district.
- Warwick District Climate Change Adaptation Study (2011)

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<sup>4</sup> UK Greenhouse emissions: Performance against emissions reductions targets – 2010 provisional figures (DECC July 2011)

- Warwick District Low Carbon Action Plan (2012)
- Renewable and Low Carbon Energy Resource Assessment and Feasibility Study (2010)

### **Renewable and Low Carbon Energy Resource Assessment and Feasibility Study (2010)**

- 12.19. The potential viability and feasibility of renewable and low carbon options within the District was identified as:
- The potential for standalone wind turbines within the district is limited due to the existence of a wide range of constraints
  - The use of biomass heat and power within the district may be possible on a small scale providing that a local supply chain can be established
  - There is potential for communal systems within large new build settlements (such as urban extensions over 1,000 dwellings) and, with the opportunity to exploit Government incentives, it is considered that this size of development has the potential to reach zero carbon by 2013
  - There is a case for exceeding the current timetable for tightening building regulations in smaller developments (such as urban infill) by requiring 20% of the energy demand to be met through renewable and low carbon options. This was on the basis that Government initiatives to support low carbon development (Feed in Tariffs and the Renewable Heat Incentive) are exploited
  - That larger developments should require 20% renewable energy in the period 2010 – 2013, however, after this time buildings regulations will have caught up requiring residential development to meet Code Level 4
  - There is potential for the creation of a Carbon Investment Fund to collect financial contributions where the requirement cannot be met on site and used to support the delivery of low carbon measures such as off site renewable energy infrastructure (such as local authority led district heating) or retrofitting energy efficiency infrastructure in existing building stock
  - In the rural area there is more potential for a shift to renewable and low carbon sources of energy as more properties are 'off gas' because it is uneconomical to invest in gas grid connections

### **Warwick District Low Carbon Action Plan (2012)**

- 12.20. The Council's Low Carbon Action Plan (2012) has identified opportunities to reduce carbon emissions in Warwick District by 12% (128,000 tCO<sub>2</sub> per year) over the next 15 years towards meeting the national target of reducing 2009 levels by 25% by 2027.
- 12.21. To deliver this, a series of schemes and initiatives have been identified in three broad areas: energy efficiency projects in buildings, use of low and zero carbon technologies for generating energy locally and transport. It is recommended that the Council set up a Low Carbon Task Force to take responsibility for the delivery of these projects. The Council is currently considering how to take forward the recommendations of the report.
- 12.22. Overall analysis of current and projected energy use in the District shows that the biggest opportunity and need is to address energy use in existing

buildings. Existing private sector housing is responsible for around 91% of total emissions within the domestic buildings sector.

- 12.23. However, new development will increase consumption and it is anticipated that the Council's preferred growth option will result in an increase in district wide carbon emissions of between 1 and 4% over the next 15 years. National requirements for the construction of new buildings through building regulations mean that the scope to improve on this at the local level over the long term may be limited.
- 12.24. The application of an onsite renewables target is still thought to have merit in reducing emissions. However, it is considered that for smaller projects the costs of compliance and managing the policy may outweigh the benefits. It is suggested the Council may wish to consider applying a higher threshold and being more flexible by allowing carbon reduction targets to be met either through onsite renewables or achieving passivhaus standards<sup>5</sup>.

### **Climate Change Adaptation Study 2011**

- 12.25. At the local level it is important that a policy framework is in place to ensure that new developments and buildings are designed to be resilient to and minimise the future impacts of climate change such as heat and water stress, increased risk of subsidence during hot long summers and risks of flooding, wind and extreme weather events. Opportunities should also be taken to minimise the risk and vulnerability of existing buildings to adapt to potential impacts
- 12.26. Potential adaptation measures include:
- Ensuring that the design, layout and orientation of buildings maximises opportunities for natural ventilation and cooling (i.e. windows, use of building materials)
  - The use of greenspace and vegetation, (such as street trees) to provide summer shading and allowing winter solar gain.
  - The use of open water features to promote cooling
  - Maximising opportunities for water cooling
  - Locating development outside flood risk areas
  - Ensuring flood resistance and resilience (i.e. Sustainable urban drainage)
  - Ensuring infrastructure resilience (i.e. impact of flooding on underground cabling and pipes)
  - Minimising water stress (greywater recycling)

## **Explanation and Other Options**

### **Reducing carbon emissions**

- 12.27. It is acknowledged that a significant contribution to reducing carbon emissions will be made through improvements to the existing building

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<sup>5</sup> Passivhaus is a performance standard for both domestic and non domestic buildings originally conceived in Germany but now used throughout the world.

stock. There is clear evidence in the Low Carbon Action Plan to support the advantages of doing this at the local level. There may be potential to extend technologies implemented as part of new development, such as district heating systems, to meet the energy needs of existing buildings. There may also be options to fund retrofitting of energy efficiency measures through new development. Further consideration of how this could be delivered will be undertaken in developing the Draft Local Plan.

## **Achieving Sustainable Buildings**

- 12.28. In setting requirements for achieving sustainable buildings the following options have been considered:
- 12.29. **Energy or carbon emissions:** The options are whether the requirement should relate to energy as in the current local plan policy or carbon emissions. A requirement based on carbon emissions is considered to have the potential to make a greater contribution towards tackling climate change. It is in line with the delivery of national climate change targets and objectives for meeting zero carbon buildings. It would also contribute towards the delivery of the District Council's objectives for reducing carbon emissions as considered in the Low Carbon Action Plan. Responses to the previous Core Strategy Preferred Options consultation indicated support for carbon reduction targets.
- 12.30. In framing the policy in terms of carbon reduction it is appropriate to acknowledge the contribution of energy efficiency measures in reducing carbon emissions and meeting the requirement. It is considered that this will represent a strengthening of the current policy framework and result in the development of more sustainable buildings.
- 12.31. The development of renewable and low carbon sources of energy is supported through the NPPF and is an objective the Council supports locally. It is therefore appropriate that the requirement should be met at least in part through the use of renewable and low carbon technologies. However, the proportion to be met through these technologies is not specified to allow flexibility in terms of the viability and feasibility of individual developments.
- 12.32. **Target and threshold:** Options exist in terms of the level at which the target should be set. It is considered reasonable to set the target at 20% as energy efficiency measures will be taken into account and there is evidence to suggest this could make a positive contribution to reducing carbon until zero carbon standards are achieved. A lower target would have the potential to result in fewer decentralised renewable and low carbon technologies being installed. This would be inconsistent with both national and local aims in relation to climate change.
- 12.33. The current policy framework applies to all development including extensions unless it can be demonstrated it would not be appropriate to apply the requirement. Interpreting this has been difficult in certain cases, therefore, it is considered that setting a threshold would provide more clarity to applicants and ensure consistency. Therefore, it is proposed to set



a threshold of 1 dwelling or 100 sqm. It is considered that the viability of requiring decentralised energy production on developments smaller than this, such as extensions, may outweigh the benefits in terms of sustainability.

- 12.34. The Council could set a higher threshold which only requires larger housing developments to meet the target as suggested in the Low Carbon Action Plan. However, this would not be in line with the current policy framework which has successfully been implemented. In addition, in this district a high proportion of windfall developments are conversions under ten dwellings which would mean the requirement would not apply and opportunities for reducing carbon emissions would be missed.
- 12.35. **Sustainable Construction:** It is important that standards are set for sustainable construction and that these are in line with the national policy requirements set out in the Code for Sustainable Homes and BREEAM.
- 12.36. **Proposals for Low Carbon and Renewable Energy Installations:** National policy recognises the contribution of renewable and low carbon energy generation and opportunities have been identified at the local level for reducing carbon emissions. For example there is potential to encourage the use of low carbon and renewable alternative energy sources in off gas areas in the rural areas. It is important that a policy framework is in place to consider and support these proposals coming forward.
- 12.37. **Climate Change Adaptation:** The need to mitigate and adapt to the potential impacts of climate change is set out in national policy and at the local level through the Climate Change Adaptation Study. It is, therefore, important that a policy framework is in place to support this.

## 13. Inclusive, Safe and Healthy Communities

### Introduction

- 13.1. Meeting the diverse needs of all people in existing and future communities is important in promoting personal well-being, social cohesion and inclusion, and creating equal opportunities for all citizens. It is therefore particularly important to ensure that everyone is able to enjoy equal opportunities in community life including access to a healthy lifestyle and sense of well-being. Much can be done to deliver inclusive, safe and healthy communities through the Local Plan by controlling the location and design of development to provide physical access for all groups to the district's assets in both the built and natural environment.
- 13.2. Compared with other areas in Warwickshire, Warwick District (as a whole) has a healthy population with higher than average life expectancy and lower levels of health deprivation and obesity. However, this hides the fact that the gap in life expectancy between the least and most deprived areas of the District is over five years for men. Similarly, levels of recorded crime across the District are low in comparison to other areas, although the fear of crime and anti-social behaviour is an issue in some communities. The Local Plan will have to support wider initiatives to maintain and improve both the health and safety of the local population.
- 13.3. Overall, levels of deprivation in the District are low with the majority of communities within the 50% least deprived areas nationally, and some communities within the top 5% least deprived areas across the country. However, like many areas, there are pockets of deprivation and particular deprivation issues around access to housing and services across a wide area of the District which the Local Plan must help address through narrowing the gaps between affluent and deprived areas.
- 13.4. Levels of crime and disorder are important factors in determining where people want to live. Everyone should be able to feel safe in their surroundings as this is a key contributor to people's quality of life and a fundamental element of community cohesion. Addressing crime and antisocial behaviour can also reduce social inequalities and support the economic regeneration of areas.
- 13.5. Another important factor that can support healthy lifestyles is ensuring that sufficient land is made available to all for play, sport and recreation. Good access to open space can also facilitate social inclusion and provide educational opportunities. Open space can also play an important part in urban regeneration by enhancing the environment, supporting nature conservation, and improving air quality. For further details see Green Infrastructure - section 15 .

## Relevant Issue & Strategic Objectives

### Relevant Issues

- Crime and the fear of crime, particularly in town centres, and the need to protect the community from harm
- Need to make sure new developments are built to a high standard in terms of design, and provide inclusive, lively and attractive places where people feel safe and want to live, work or visit
- Need to make sure that new developments are in places that will reduce the need for people to use their cars and encourage people to live more healthy lifestyles by walking and cycling
- Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter and recreation which will benefit people, wildlife, flood storage and carbon management
- To enable improvements to be made to the built and natural environments which will help maintain and improve historic assets, improve habitats and their connectivity, help the public access and enjoy open spaces such as allotments, reduce the risk of flooding, keep the effects of climate change (including the effects on habitats and wildlife) to a minimum, and support healthy lifestyles
- To enable improvements to be made to maintain and improve the quality of sporting and leisure facilities including opportunities for culture and tourism. This will include maintaining a flexible supply of land and buildings for sport and recreation that is the right quality and in the right location, and can meet people's current and future needs and support healthy lifestyles

## **PO13: Inclusive, Safe & Healthy Communities**

Our Preferred Option is to:

- deliver community safety and reduce crime and anti-social behaviour through the appropriate design and location of new development
- where appropriate, undertake community safety measures at specific locations. and Tthis may be best achieved by working with communities through the development of specific area action plans or supplementary planning documents
- require new large scale housing development to provide levels of open space and provisions for sport to meet community needs and create inclusive communities. It will be important to maximise linkages and access to the wider countryside for recreational purposes for all
- protect and improve the quality of existing open spaces in the District and to enhance both the quantity and quality of open space provision as the towns and villages grow over the plan period
- contribute to the provision of facilities for sport to enable good levels of access for the public
- provide/ require improvements to existing children's and young people's play areas as well as the provision of new facilities in conjunction with new developments.

## **Justification for Preferred Option**

### **National and other policy context**

#### **Core planning principles**

- 13.6. The NPPF states that a set of core land-use planning principles should underpin both plan-making and decision taking. These principles include that planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs

#### **Requiring good design**

- 13.7. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people
- 13.8. Development should optimise the potential of a site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks

- 13.9. Development should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

### **Promoting healthy communities**

- 13.10. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans, and in planning decisions, and should facilitate neighbourhood planning. Planning policies and decisions, in turn, should aim to achieve places which promote:

- Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion
- Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.
- Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a sustainable location; or
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
- Local communities, through local and neighbourhood plans, should be able to identify special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should, therefore, be consistent with the local planning of sustainable development and

complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

## **Evidence Base**

### **Levels of crime and disorder in Warwick district**

13.11. In 2009/10 there were 8,129 recorded crimes in the district. This is the lowest total for 10 years with 1,584 fewer crimes than the previous 12 month period. In 2010/11 there were a total of 8,147 crimes, an increase of 0.2%. In the same period:

- Violent Crime was up 5% to 1,391 from 1,324
- Serious Acquisitive Crime is at its lowest ever level down to 1,472 from 1,780 (17%)
- Burglary is at its lowest ever level at 449 down from 606 (26.%)
- Vehicle crime is at its lowest ever level at 971 from 1104 (12%). Though there were 31 more thefts of a vehicle, thefts from a vehicle were down by 164.
- Robbery was at its lowest ever level at 52 down from 67 (22%)
- Criminal damage was 1,530 from (1.4%) up from 1,551
- There were 6,334 reported anti-social behaviour incidents which is up 256 on the best ever performance of 6,078.

13.12. In 2009/10 Fear of crime levels are the lowest for 10 years with significant reductions recorded. Local people were asked how concerned they were and the figures for those very or fairly concerned were:

- being physically attacked by a stranger 33.2%, in 2005/06 this figure was 38.1%
- their home broken into and something stolen 45.1%, in 2000/01 this figure was 64.1%
- having their car stolen 32.2%, in 2000/01 this figure was 51.8%

### **2011/12 priorities**

13.13. Tackling anti-social behaviour is the Warwick District Council Community Safety priority and, together with Stratford-on-Avon District Council, take the lead in tackling this priority in South Warwickshire.

13.14. Based on the findings of the Strategic Assessment, the priorities for Safer South Warwickshire (Community Safety Partnership) are tackling violent crime, tackling anti-social behaviour, tackling alcohol abuse and tackling those causing most harm.

### **A District with low levels of 'Multiple Deprivation'**

Indices of Deprivation 2010

13.15. The new English Indices of Deprivation 2010 have recently been released by the Department for Communities and Local Government as the official measure of deprivation at Lower Layer Super Output Area level (SOA) in England. SOAs have an approximate population of 1,500 people and allow

the identification of small pockets of deprivation; there are 333 SOAs in Warwickshire.

- 13.16. These indices are weighted and combined to create an overall Index of Multiple Deprivation (IM D) score for each SOA in the country.

#### **Multiple Deprivation in Warwick District**

|   |    |
|---|----|
| Number of areas ranked in the top 20% most deprived nationally  | 1  |
| Number of areas ranked in the top 30% most deprived nationally  | 4  |
| Number of areas ranked in the top 10% most deprived nationally in terms of barriers to housing and services | 14 |

#### **Warwick District Parks and Open Spaces Audit 2008**

- 13.17. In 2008 the District Council commissioned the production of a Parks and Open Spaces Audit. The audit has enabled the Council to understand the current quantity and quality of open space provision across the District as well as the public's perception of existing open space.
- 13.18. The audit supplied a significant amount of information on the amount, type and quality of open space currently available throughout the District and the varying qualitative and quantitative needs of different areas. The audit also involved a household questionnaire to help develop a thorough understanding of the public's perception of the District's existing and future open space requirements; in brief the key findings were: -
- The District has an overall average amount of 5.47 hectares of unrestricted green space per 1,000 population, it is intended that the District Council has a policy position to continue to replicate this overall average across the District by insisting on appropriate levels of new open space provision within or associated with future new development.
  - The majority of people have used parks and open spaces in their local area, with parks and gardens being the most popular type of venue
  - Major barriers to use include "lack of time" and a perceived fear of personal safety
  - In general terms, the public feels that the current amount of green space provision is about right
  - The overall quality of open space in the District is perceived to be high (but this does not relate to specific venues)
  - Respondents still feel that there is scope for continual improvement of parks and open spaces
  - Management issues relating to dog fouling, maintenance of infrastructure and responding to litter and vandalism need to be addressed to improve customer satisfaction levels

## Other Options

- 13.19. Planning (and land use matters) can do much to influence social cohesion and the ability of communities to have appropriate access to services and facilities. The distribution and detailed design of the built environment (including open space) can do much to ensure the creation of safe places and participation in healthier/ active lifestyles. Therefore there are no alternative to the options set out above.



## 14. Transport

### Introduction

- 14.1. Providing a high quality, convenient range of transport options to enable people to access jobs and the service and facilities they need in their lives is a significant challenge. If we succeed we can reduce congestion, reduce pollution, encourage healthier lifestyles and provide more enable more inclusive and affordable transport options.
- 14.2. Whilst travel is essential for everyone, reducing the need to travel and the distance people travel helps people reduce costs and lead more convenient lives. It also means people are less reliant on cars thereby reducing impacts on the environment. A challenge in the Local Plan will be to provide a good range of high quality facilities and work opportunities close to where people live.
- 14.3. However, cars will continue to play a vital role in people's lives and providing for cars in terms of an effective road network, sufficient parking in the right locations, effective links with other modes of transport and the right opportunities to refuel has to be addressed through the Local Plan.
- 14.4. Alongside providing for cars, it is important other forms transport are also well provided for to ensure people have choice and to encourage healthier and more sustainable ways of travelling. The Local Plan will therefore need to address how public transport (buses and trains), cycling and walking are all effectively provided for.
- 14.5. Looking wider, the District has a strong position within the geography of Britain, given its proximity to the A45, A46, M40 and M42, and the busy Birmingham Snow Hill to London Marylebone rail line. Its relative proximity to the South East, but within the West Midlands, provides opportunities for the area but also means there are pressures on local transport networks.

### Relevant Issue & Strategic Objectives

- 14.6. Warwick District Council's Vision and Strategy: The Strategy for the Future and Sustainable Prosperity of Warwick District states:

*"The Plan will ensure that the district has appropriate infrastructure in place that will... resolve air quality and traffic management problems and make sure public services are easily available and accessible."*

It goes on to explain that this will be delivered through

*"a comprehensive sustainable transport package including, for example, local bus and rail services, new and diverted traffic routes, traffic free routes, a park and ride scheme, electric car promotion, cycle and footpath networks; but which does **not** include provision or support for HS2"*

- 14.7. **Relevant Issue:** Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns and within the town centres (Warwickshire County Council Local Transport Plan)
- 14.8. **Strategic Objectives:** See objectives 4 and 5 as set out in paragraphs 4.13 to 4.15 above.

## **PO14: Transport**

### **Access to services and facilities:**

Our Preferred Option is to enable access to services and facilities that people need through the right location of housing and employment sites and through the provision of effective transport infrastructure (see Maps 3,4 and 5)

### **Preferred Option: Sustainable forms for transport:**

Our Preferred Option is to minimise the need to travel (see Maps 3,4 and 5) and to promote sustainable forms of transport (such as walking, cycling and public transport), by

- ensuring that new housing neighbourhoods have close access to a range of key facilities either within the development or within a short walk (e.g 15 minutes);
- focusing the location of new housing neighbourhoods on the fringe of existing urban areas or within/adjacent to villages that have key services such as a shop, school and are served by public transport ensuring opportunities for people to work close to home are available by encouraging super-fast broadband across the District;
- by locating new employment areas to enable inclusive and sustainable access to jobs from residential areas;
- encouraging, through infrastructure levies on new development, the provision of improved public transport to existing employment areas.

### **Preferred Option: Provision of Transport infrastructure**

Our Preferred Option is to ensure mitigation against the negative transport impacts (such as additional congestion, impact on air quality) of new development by requiring developers to contribute to transport infrastructure improvements (for example road junction improvements, rail improvements, cycle networks, park & ride and bus services), ensuring this infrastructure improves safety, is convenient and affordable and minimise the impact of transport on climate change (e.g supporting alternative fuels) and where relevant to prepare a Transport Impact Assessment and Travel Plan (see Map 5).

We will safeguard land close to potential transport infrastructure improvement sites, as identified in the transport section of the Infrastructure Plan, to ensure appropriate schemes can be brought forward. Whenever possible we will ensure new infrastructure brings local benefits, helps with integration of different transport modes, improves existing infrastructure and minimises impact on the environment.

### **Preferred Option: Parking**

Our preferred option is to review the Vehicle Parking Standards supplementary planning document (2007) in light of the National Planning Policy Framework to:

- ensure that sufficient car parking is provided within new residential developments to allow for convenient and safe parking
- maintain sufficient parking in town centres so as not to undermine their vitality, whilst ensuring that effective alternatives to the car for access to town centres are provided
- ensure that the level of provision of other non-residential car parking limits the number of additional car journeys, whilst ensuring that such car parking is in appropriate and safe locations (for instance by providing and encouraging use of

- park and ride facilities) and
- provide for high quality, convenient and secure cycle parking.

### Preferred Option: Rural Transport

Our Preferred Option is to support a choice of effective and affordable transport options for people who live in rural areas by locating new development in villages with an existing bus service (See Housing – section 7 - for details of which villages this applies to)

### Preferred Option: High Speed 2 Rail Line

Our preferred option is for the transport infrastructure proposals to make no provision or support for the High Speed 2 rail line (see Map 5) and encourage the Government to invest in existing rail infrastructure.

## Justification for Preferred Options

Key Background papers:

- National Planning Policy Framework: paras 29 to 41
- The Local Transport White Paper, 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen' (January 2011)
- Warwickshire County Council Local Transport Plan 2011-2026
- Warwickshire County Council Strategic Transport Assessment (August 2011)
- Warwickshire County Council Strategic Transport Assessment (modelling report) – Overview report (March 2012)

### National Transport Policy

- 14.9. The Local Transport White Paper, 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen' (January 2011) underlines the Government's vision for a sustainable local transport system that supports the economy and reduces carbon emissions
- 14.10. National transport policy is underpinned by five national transport goals:
  - To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of **tackling climate change**.
  - To **support economic competitiveness and growth**, by delivering reliable and efficient transport networks.
  - To promote greater **equality of opportunity for all** citizens, with the desired outcome of achieving a fairer society.
  - To contribute to **better safety, security and health** and longer life expectancy by reducing the risk of death, injury or illness arising and by promoting travel modes that are beneficial to health.
  - To **improve quality of life** for transport users and non-transport users, and to promote a healthy natural environment.
- 14.11. National Planning Policy Framework (NPPF): The NPPF requires local authorities to focus transport policy on delivering sustainable development and choice for people saying *"The transport system needs to be balanced*

*in favour of sustainable transport modes, giving people a real choice about how they travel."*

- 14.12. To do this the NPPF requires local authorities to:
- support reductions in greenhouse gas emissions and reduce congestion.
  - support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport
  - ensure plans and decisions take account of whether:
    - the opportunities for sustainable transport modes have been taken to reduce the need for major transport infrastructure;
    - safe and suitable access to the site can be achieved for all people;
    - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
  - ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised
  - to take account of policies relating to rural areas
  - aim for a balance of land uses encouraging shorter journey lengths for employment, shopping, leisure, education and other activities.
  - locate key facilities such as primary schools and local shops within walking distance of most properties.
  - If setting local parking standards, local planning authorities should take into account:
    - the accessibility of the development;
    - the type, mix and use of development;
    - the availability of and opportunities for public transport;
    - local car ownership levels; and
    - an overall need to reduce the use of high-emission vehicles.

### **Warwickshire Local Transport Plan 2011-2026**

- 14.13. The Local Transport Plan summarises the challenges facing the County and the potential solutions as follows:

14.14. Transport and the Warwickshire Economy

- Improve the connectivity by public transport to enable journeys to take place and to maximise accessibility of labour markets to jobs
- Reduce lost productive time including by maintaining or improving the reliability and predictability of journey times on key local routes
- Support the delivery of planned housing and employment growth in ways whilst minimising congestion levels
- Ensure the maintenance and work on the highway network and structures supports the efficient movement of traffic

14.15. Transport and Carbon Emissions

- Accommodate development in locations which reduce the need to travel

- Encourage a shift to lower carbon forms of travel, including walking, cycling and public transport
- Where motorised transport is necessary, encourage the efficient use of vehicles (e.g. car sharing) and improve driving techniques

#### 14.16. Safety Security and Health

- Continue to reduce the risk of death or injury due to accidents on the transport network
- Reduce / minimise the number of areas declared as having poor air quality as a result of road transport emissions
- Encourage a shift towards more active forms of travel, including promoting a more positive public perception of walking and cycling

#### 14.17. Equality of Opportunity

- Enable disadvantaged people to more easily connect with a wide range of services and facilities
- Support the ageing population and associated service needs
- Working with partner agencies to support the delivery of services in ways which improve access to services

#### 14.18. Quality of Life in Warwickshire

- Minimise the impacts of transport on the built and natural environment
- Managing transport related noise
- Improve the quality of transport integration into streetscapes and the urban environment
- Enhance well-being and sense of community by creating more opportunities for social contact and better access to leisure activities and the natural environment

### **Research and Consultation**

14.19. In the "Helping Shape the District" consultation undertaken in 2011 47% of respondents to the questionnaire agreed tackling road congestion and air pollution was important and that vast majority (69%) felt this would be best addressed through low growth.

14.20. In the sample survey undertaken at the same time, 68% agreed that road congestion and air pollution should be addressed through the Local Plan (18% disagreed), although the issues was not viewed as a high priority in comparison with crime, housing, the economy and community facilities.

14.21. Between 2000 and 2009 traffic levels fell in Kenilworth and Leamington and showed no change in Warwick (Warwickshire LTP 2011-2026). During the same period, traffic levels increased by 2-9% in Rugby, Bedworth and Nuneaton. The traffic reduction in the District's towns can be attributed to a combination of factors including rising unemployment levels, increases in fuel prices and a higher level of awareness of different transport options available

14.22. For journeys to work, car usage is lower in Warwick District than across the County as a whole and conversely, levels of train usage, cycling and walking are all higher. This reflects the urban nature of much of the District. This

data suggests that an approach which maintains a focus on the urban settlements of the District has the potential to reduce the need to travel and promote more sustainable forms of transport.

- 14.23. There are currently four declared Air Quality Management Areas (AQMAs) within Warwick District. in Warwick, Leamington Spa, and Kenilworth. Each of these has been declared as a result of careful monitoring which has shown poor air quality as a result of traffic.
- 14.24. The 2011 Strategic Transport Study for Warwick District looked at the transport impacts of three different growth scenarios – low growth (250 new homes per year); medium growth (500 new homes per year) and high growth (800 new homes per year). It concluded that:
- 14.25. Overall the network should be able to accommodate the different levels of growth proposed, but the capacity of existing services will not be sufficient to accommodate any of the levels of growth proposed
- 14.26. There will be areas of the network that will suffer from increased congestion issues with no potential mitigation options and that levels of congestion will be closely related to the level of growth adopted.
- 14.27. There may be some areas of the network that accrue significant benefits from well targeted mitigation measures especially where a critical mass of development exists.
- 14.28. The 2012 Strategic Transport Study (Modelling of Potential Development Site Options) was undertaken once the potential level of growth in the District had been agreed. This modelled the transport impacts of four collections of development sites:
- Option 1: Distribution around the Urban Fringe
  - Option 2: Focus south of Warwick, Whitnash and Leamington
  - Option 3: Distinctive settlements (minimising risk of coalescence)
  - Option 4: Distributed Development including sustainable village expansions
- 14.29. The study concluded that:
- 14.30. All options of development sites can be accommodated in terms of traffic impact (subject to a combination of innovative engineering solutions combined with significant, effective, sustainable transport provision).
- 14.31. All options will have implications in terms of traffic impact
- 14.32. Option 4 has least impact prior to mitigation and accrues the greatest benefits in the Warwick and Leamington area from the mitigation packages.
- 14.33. Further benefits may be accrued in Option 4 through more extensive mitigation such as Leamington Northern Relief Road.

- 14.34. Option 2 accrues greater benefit in the Kenilworth and Stoneleigh area, however, less congestion is experienced in this area overall.
- 14.35. The report includes a range of potential mitigation schemes and initiatives – see Infrastructure Plan for details. These schemes include road and junction improvements, public transport enhancements, rail infrastructure, park and ride and improvements to the cycle network.
- 14.36. High-Speed Two (HS2) Rail: In January 2012 the government gave approval for the continuation of work to develop the detailed design and implementation strategy of the High Speed Two (HS2) rail proposal (see Map 5). Warwick District Council is opposed to the principle of the HS2 proposal as it considers that the cost of the project is not in the national interest and that there are alternative solutions that can be delivered at a much lower cost (both economically and environmentally) within a much shorter timescale. There are also concerns about the impact that HS2 will have on this district's local environment, its economy and many communities.

## Other Options

- 14.37. A range of other options relating to transport have been considered such as:
- locating different land uses without reference to ease of access
  - Different options for the distribution of development (see Housing – section 7), but these were rejected on the grounds that would increase the need to travel and would potentially lead to greater reliance on the car.
  - Lower levels of growth have also been considered (see section 6 on level of growth).
  - alternative option would be to support HS2
  - As an alternative, we could retain our current parking standards in to the future
- 14.38. These approaches are either not consistent with the requirements of the National Planning Policy or are not supported by the evidence in relation to how best to bring benefits locally. They have all therefore been rejected.



## 15. Green Infrastructure

### Introduction

- 15.1. Green Infrastructure (GI) is a new term that encapsulates the importance of the natural and outdoor environment and the multiple benefits it can bring for people and nature. GI has an essential role in the delivery of sustainable development from all three dimensions: environmental, social and economic.
- 15.2. The natural environment provides us with a wide range of important benefits, including areas for recreation and education, healthy food, and clean water and air. These areas have a positive impact on the quality of people's lives, as well as providing many wider social and economic benefits for local communities. However, the fragile state of our natural environment means that it is important that we protect and enhance it to ensure that future generations can also benefit from these areas. Furthermore, we should seek to create new green infrastructure assets and restore degraded ones.
- 15.3. Warwick District possesses a natural environment that is regarded as being of a particularly high quality. Broadly speaking there are two types of natural asset that combine to give Warwick District its distinct natural environment. They are:
  - particular landscape characteristics familiar to the locality, based upon its topography, farming, history and settlement patterns; and
  - specific environmental assets including nature conservation/ biodiversity interests, and features of historic value (including geologically/geomorphologically important features).
- 15.4. The majority of the natural landscape falls within either the Historic Arden or Dunsmore landscape character areas. The district also contains a large number of environmental assets, including features of historic interest, geological/geomorphological significance and particular habitats of nature conservation interest. These range from Sites of Specific Scientific Interest (SSSI's), Local Nature Reserves and significant tracts of woodland deemed to be of ancient origin. There are also many other sites and features that are subject to non-statutory designations, such as Local Wildlife Sites identified through the Habitat Biodiversity Audit, that reflect their particular contribution to biodiversity.
- 15.5. It is important to note that this topic has important links to a number of other preferred option topics within this paper including, Climate Change, Historic Environment, Built Environment, Transport, Healthy Communities, Housing and Flooding & Water.

## **Relevant Issue & Strategic Objectives**

### **Relevant Issue**

15.6. The key issue for the Local Plan is how it can assimilate any growth in the locality without prejudicing the future of the district's most valuable green infrastructure assets. In doing so the plan will have to address the following issues: -

- Maintaining the current high quality of the natural environment, particularly sensitive habitats and areas of landscape value;
- Improving the quality of the natural environment, particularly in areas where there are opportunities to improve public access and enjoyment of such assets;
- Habitat change and migration patterns in response to climate change; and,
- Delivering opportunities to improve habitat connectivity both within the district and the wider sub-region.

### **Strategic Objectives**

15.7. See objectives 7, 9 and 14 as set out in paragraphs 4.13 to 4.15 above

## **PO15: Green Infrastructure**

### **District Wide Strategic Green Infrastructure**

- Our preferred option in relation to Strategic GI is to protect, enhance and restore the strategic network and associated assets as identified in the Warwick District Green Infrastructure Study 2010 and any future updates to this study. Furthermore, the Council support the creation strategic green infrastructure through the promotion of Strategic GI opportunities as identified in the Warwick District GI Delivery Assessment and any future opportunities such as improvements to the River Avon corridor or Whitnash Brook and emerging opportunities such as the restoration of the Kenilworth Mere.

### **Local Green Infrastructure**

- At the local level Green Infrastructure requirements should be identified on an individual site basis, based on an understanding of the existing green infrastructure provision; requirements for open & green space as set out in the Inclusive, Safe & Healthy Communities section; and the opportunities for appropriate creation, enhancement and restoration of local and strategic GI assets (see Map 6).

### **Sub Regional Green Infrastructure**

- The Council will continue to support the preparation of the emerging Coventry, Solihull and Warwickshire Green Infrastructure Strategy. This will ensure that biodiversity is planned at a landscape scale, enhancing linkages and restoring fragmented habitats, access to large scale natural green spaces and improvements to landscape character.

### **Development Proposals**

- Development will only be permitted which protects and enhances important green infrastructure assets and positively contributes to the character and quality of its natural and historic environment through good habitat/landscape design and management.
- Development proposals should take a positive, integrated approach to designing green infrastructure on site, particularly urban extensions, utilising the Council's preferred approach to new sustainable garden suburbs with enhancements to key landscape features and the wider GI network.

### **Biodiversity Offsetting**

- All development proposals will be expected to avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as compensation measure. An appropriate ecological assessment should be undertaken to demonstrate this based on the sub regional approach to biodiversity offsetting and the options for offsetting

should be informed by the Coventry, Solihull & Warwickshire Green Infrastructure strategy. The result of this approach is to ensure development secures net gains in biodiversity.

### **Green Wedges**

- The Council will identify and protect a network of green wedges important for their ecological, landscape and/or access functions in the setting of differing urban areas and urban rural fringe. It is intended that this approach will revise and replace the existing policy of Areas of Restraint in the Local Plan 1996 – 2011 (see Map 6).

## **Justification for Preferred Option**

- 15.8. The National Planning Policy Framework places great importance on the natural environment. It emphasises that the planning system's environmental role should contribute to protecting the natural environment; improving biodiversity; use natural resources prudently; and mitigate the effects of and adapt to climate change.
- 15.9. Specifically, local plans should contribute to and enhance the natural environment by protecting and enhancing valued landscapes, geological conservation interests and soils and recognise the wider benefits of ecosystem services. As such a strategic approach in the local plan should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- 15.10. The Lawton Report on the health of the nation's natural environment has identified the loss of habitats and species as key issue that must be seriously addressed. The Natural Environment White Paper has responded to this and is taking the approach that in terms of biodiversity that there should be 'more, bigger, better & more inter connected' habitats. Thus the Government is committed to halting the overall decline in biodiversity, and the planning system should help ensure there are net gains in biodiversity where possible. Hence, it is important to identify and create connected ecological networks that are more resilient to current and future pressures.
- 15.11. The NPPF also states that biodiversity should be planned for at a landscape scale across local authority boundaries. The Warwickshire, Coventry & Solihull sub region is responding to this by preparing a GI Strategy and is one of several biodiversity offsetting pilot areas. In addition, the Council is a member of the emerging Local Nature Partnership for the sub region which will have a key role in overseeing the improvements that the Government is seeking through the White Paper.

### **Warwick District Green Infrastructure Study 2010**

- 15.12. The GI Study defined and identified the strategic network of green infrastructure and recognised the importance of a calling upon a wide range

of associated plans and evidence. The District has many GI assets, including a network of major and minor rivers; woodland and parks and green spaces of varying size and accessibility. The study also identified gaps in levels of accessible natural green space. This includes a deficiency to the south of the Warwick, Leamington and Whitnash area for town sized sites (20ha or more) and a deficiency in the northern part of the District for district sites (100ha or more).

### **Warwick District Green Infrastructure Delivery Assessment 2012**

15.13. The GI delivery assessment built upon the GI study to identify several options to improve the provision of strategic GI within the District (See Map 6). Each opportunity has a different approach reflecting the multifunctional nature of green infrastructure. This preferred options paper is an opportunity to engage with the public and seek their views on options identified, concept plans and associated costs.

15.14. The opportunities include:

- Peri-Urban<sup>6</sup> Park, North of Kenilworth
- Peri-Urban Park, South of Leamington, Warwick & Whitnash
- River Leam Tree Planting & Wetland Habitat Creation
- Arden Landscape Enhancement
- Urban Tree Planting Strategy

### **Warwickshire, Coventry & Solihull Green Infrastructure Strategy**

15.15. A sub regional strategy for green infrastructure is currently being prepared. The strategy will have three elements:

- Access – to large scale accessible natural green space and the strategic rights of way network, including addressing deficiencies
- Landscape – to understand the existing landscape condition and broadly update the Warwickshire Landscape Guidelines
- Biodiversity – to scientifically identify areas where improving habitat connectivity through biodiversity enhancements will have the most beneficial results.

15.16. The sub region is also a national pilot area to explore the concept of biodiversity offsetting, informed by the evidence from the above strategy.

### **Warwick District Draft Green Space Strategy 2012**

15.17. Green and open spaces are an important element of green infrastructure provision. The Council has recently published a draft Green Space Strategy, which focuses on this. The strategy sets out how the Council will provide,

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<sup>6</sup> 'Peri-urban' is another term for the transition between the rural and urban landscapes, sometimes known as the urban-rural fringe.

manage and develop greenspace in the future. It will bring together various research work undertaken, set out a long term vision for green space and will include the establishment of a number of principles and local standards to manage and enhance green space. The requirement and protection of green and open spaces is addressed within the Inclusive, Safe & Healthy Communities section.

### **Local Biodiversity & Geodiversity Action Plans & Habitat Biodiversity Audit**

15.18. At the county level, the aim is to work with partners to protect and enhance existing and future wildlife populations and habitats in Warwickshire, within a resilient landscape. This is based upon up to date ecological assessments undertaken by the Habitat Biodiversity Partnership. This will be achieved by increasing the amount of land and buildings positively managed for biodiversity, averting local extinction of species and reducing the number of species on the danger list. The local biodiversity action plan contains action plans for local habitats and many species. Finally, a Local Geodiversity Action Plan for Warwickshire is currently being prepared identifying important geological sites and objectives for their conservation and interpretation.

### **Green Wedges Network**

15.19. The preferred option for the Local Plan is to delete 'areas of restraint' and to replace this approach by identifying and protecting a network of strategic green wedges. The Green Infrastructure map associated with this stage of the Local Plan sets out the initial broad areas of search for these wedges (see Map 6). Elsewhere, development proposals should be assessed against alternative policies in the Local Plan and Local Green Space designations identified through any future Neighbourhood Plans.

### **Participation**

15.20. The majority of respondents to the 'Helping Shape the District' consultation agreed that threats to the environment are important issues for the local area which should be dealt with in the Local Plan. This is supported by the Council's own research which demonstrates for example, that parks and open spaces are important to the residents of Warwick District.

### **Other Research**

15.21. The Council has the following documents and evidence which summarise the value and importance of some of the various components of the District's natural environment, and provide a strategy for its enhancement:

- Warwickshire Landscape Guidelines;
- Landscape Character Assessment and Joint Green Belt Review of the urban fringe of the District's towns (also informed the Strategic Housing Land Availability Assessment);
- Sites of Special Scientific Interest;
- Sites of Importance for Nature Conservation;
- Local Nature Reserves;
- Ancient Woodlands;

- Warwickshire Historic Environment Record (including the Historic Landscape Characterisation and Historic Farmsteads studies)
- Regionally Important Geological and Geomorphological Sites;
- Warwickshire Rights of Way Improvement Plan
- Warwickshire, Coventry and Solihull Local Biodiversity Action Plan and Strategy; and,
- Habitat Assessment of the urban fringe of the District's towns (also informed the Strategic Housing Land Availability Assessment).

## Other Options

- 15.22. The quality of the natural environment makes an important contribution to the success of the overall success of the district. Without these attributes, the towns and villages would have considerably less charm and appeal as places to work, live or visit. Therefore the preferred options sets out the Council's only reasonable policy direction in protecting and enhancing the natural environment and the strategic approach to GI. This could be supplemented in due course by more detailed policies in respect of particular sites or areas, such as the River Avon corridor, through the development of a subsequent supplementary planning document.

## 16. Green Belt

### Introduction

- 16.1 The Warwickshire Green Belt covers a large part of Warwick District (see Map 3) and seeks to prevent urban sprawl that would prejudice the open nature and rural character of the open countryside between Warwick/Leamington Spa, Kenilworth and the urban areas of the West Midlands conurbation including Coventry and Solihull.
- 16.2 Government policy in the NPPF recognises the contribution of Green Belts towards sustainable development objectives by assisting in safeguarding the countryside from encroachment and encouraging urban regeneration.
- 16.3 Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term so that they should be capable of enduring beyond the plan period.
- 16.4 The Council's preferred option for the location of sustainable housing and employment growth across the District – on the edge of Warwick, Leamington Spa, Kenilworth and within some of the larger villages - will necessitate an alteration of Green Belt Boundaries. This will enable development to be accommodated and will ensure that the countryside beyond the new limits to growth will continue to be protected.
- 16.5 In reviewing Green Belt boundaries, the National Planning Policy Framework requires the Council to consider whether any further changes should be made to Green Belt boundaries to meet the longer-term development needs of the District beyond 2029. Whilst it is hard to project forward over that period of time and provide robust evidence to justify further changes, the Council will give this consideration prior to publishing a Draft Local Plan.



## **PO16: Green Belt**

Our preferred option for the Green Belt is to

- A. Alter the existing boundary in the following locations in order to accommodate development:
  - to the east of Kenilworth,
  - to the north of Warwick and Leamington Spa,
  - east of Lillington, and
  - around Cubbington
- B. Remove the following villages from the Green Belt and draw new Green Belt boundaries around the settlements to allow for development:
  - Hampton Magna
  - Hatton
  - Lapworth
  - Leek Wootton
  - Norton Lindsey
  - Rowington
  - Shrewley
  - Burton Green
- C. Protect the Green Belt from inappropriate development but allow for limited development in the following circumstances where the proposals do not conflict with the purposes of including the land within the Green Belt:
  - Replacement buildings which are not materially larger than the ones they replace
  - Rural affordable housing or housing brought forward under a Community Right to Build Order
  - Housing, within the existing built up area of a village, to meet local housing needs and brought forward through a Neighbourhood Plan
  - Farm diversification schemes
  - Limited infilling, on previously-developed land, in Category 3 villages and in existing major developed sites in the Green Belt

## **Justification for the Preferred Option for the Green Belt**

16.6 In developing the Preferred Option the following sources of information have been considered:

- National Planning Policy Framework (NPPF) (March 2012)
- Local Plan Report of Public Consultation (December 2011)
- Warwick District Strategic Housing Market Assessment (SHMA)(March 2012)
- Strategic Housing Land Availability Assessment (SHLAA)(May 2012)
- Joint Green Belt Study (January 2009)
- A Strategy for the Future and Sustainable Prosperity of Warwick District (December 2011)

- 16.7 NPPF states that once Green Belts have been established, they should only be altered in exceptional circumstances, through the preparation or review of a local plan. At that time, local authorities should consider whether the boundaries are capable of enduring beyond the plan period. In reviewing the boundaries, the local planning authority should take account of the need to promote sustainable development.
- 16.8 The Housing section outlines the justification for the Council's preferred option of locating some development on land currently included within the Green Belt.
- 16.9 NPPF outlines the types of development which are appropriate in the Green Belt. This forms the basis of the Council's preferred option. However the Council will also consider favourably buildings for farm diversification schemes in order to support the rural economy.
- 16.10 NPPF allows for limited infilling in villages. However, some of the settlements which the Council wishes to retain in the Green Belt have built up areas which are not compact and so difficult to define. It is the Council's preferred option, therefore, to only allow limited infill on previously-developed land in some of those villages with more clearly defined boundaries – the Category 3 villages.

## Other Options

- 16.11 See the Housing section for alternative options considered, including an option to locate development outside of the Green Belt.

## Enhancing the Beneficial use of the Green Belt

- 16.12 NPPF states that once Green Belts have been established, local planning authorities should positively enhance its beneficial use, such as looking for positive opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land.
- 16.13 There are naturally many opportunities for enhancing the Green Belt given the extent of its boundaries within the District. The Green Infrastructure section outlines several opportunities for improvement to the strategic green infrastructure network. These include a peri-urban park to the North of Kenilworth, Arden landscape enhancements & tree planting and wetland habitat creation upstream of the river Leam. Further strategic improvements may be identified through the development of the Green Infrastructure strategy. Furthermore, the Warwickshire Rights of Way Improvement Plan emphasises the importance of new development having access to the countryside.
- 16.14 The Inclusive, Safe & Healthy Communities section recognises the importance of open space and outdoor recreation provision. As such, new

limited facilities for the outdoor sport and recreation can be directed to the Green Belt where appropriate and there is a demonstrable need.

## 17. Culture & Tourism

### Introduction

- Cultural assets such as theatres, cinemas, libraries, historic sites and places of worship can enrich people's quality of life. They can also act as a magnet to attract visitors and thus form a key part of the economy. It is therefore appropriate to consider how planning can assist in culture and tourism.
- The District is culturally rich and has a vibrant and active local arts community together with a confident and high profile professional arts sector. There are regular cultural festivals and sporting events. Furthermore, the attractiveness of the towns, parks and local countryside are attractions in and of themselves.
- The District has many historic assets that operate as visitor attractions such as castles in Warwick and Kenilworth, Stoneleigh Abbey, the country houses of Packwood and Baddesley Clinton, the canal network as well as the regency buildings and parks of Royal Leamington Spa. The District also has other attractions such as Hatton Country World and Stoneleigh Park, all of which generates approximately 3.1m trips a year to the area. The estimated spend is £220m and supports over 4,850 jobs.
- The Council's Vision for the Future Sustainable Prosperity of Warwick District sees tourism as being a key part of the local economy and the Local Plan should positively promote and actively deliver tourism. The district's cultural assets and visitor facilities should therefore be supported to grow and improve in ways which maintain its attractiveness and integrity, particularly those assets associated with the historic environment.
- It is important to note that this topic has important links to a number of other preferred option topics within this paper including, Green Infrastructure, the Historic Environment, Transport, Healthy Communities, Employment & Town Centres.

### Relevant Issue & Strategic Objectives

#### Relevant Issue

- The Local Plan needs to ensure that there are opportunities for enhancing the level and quality of cultural and leisure facilities in order to improve health and wellbeing and positively promote tourism as part of the local economy.
- Cultural facilities provision contributes to vibrant and sustainable communities. Cultural facilities within new development may provide opportunities for community activity and social cohesion.

### **Strategic Objectives**

- See objectives 3 and 15 as set out in paragraphs 4.13 to 4.15 above

### **SCS Strategic Aims:**

- There is a thriving tourist economy making it one of the top visitor destinations
- There are opportunities for everyone to enjoy and participate in sport, the arts and cultural activities

### **SCS Strategic Priority:**

- Economy, Skills & Employment: An economically vibrant and creative community – low carbon based, focusing on the development of the knowledge economy/creative/high value engineering and design industries, the health of its town centres and rural areas and promoting continuous learning and innovation in our educational, economic, tourism, sporting and cultural activities.

## **PO17: Culture & Tourism**

The sustainable development of new visitor attractions and cultural assets will be supported where it can be demonstrated that there is a need and the location is appropriate.

### **Tourism**

- Our preferred option in relation to tourism is to set out a strategic policy supporting the appropriate development of tourism and visitor accommodation. The Council's preferred option to support tourism is to protect existing visitor accommodation within or adjoining the District's three town centres unless it can be demonstrated that the use is no longer viable or suitable. Within the urban areas, new visitor accommodation will be directed to the town centres.
- In the rural area, the development of new buildings for visitor accommodation will be considered favourably in locations which are accessible to visitors by means other than the private car and can be developed sensitively in the rural area. Outside of these locations, new visitor accommodation will not be permitted, however, the conversion of appropriate rural buildings will be permitted where they are of small scale or a low intensity and will not harm the character of the rural area. Extensions to visitor accommodation in the rural area will only be permitted where these do not significantly intensify the use of the site or establish new uses which are not ancillary to the normal business of the visitor accommodation.

### **Culture**

- Our preferred option in relation to culture is to set out a strategic policy supporting the appropriate development of cultural facilities and attractions that positively shape places and the public realm. This includes:
  - Continuing to support the development of the cultural quarter in Leamington Spa as identified as Opportunity Site D in the Local Plan 1996 – 2011.
  - Seeking contributions towards cultural facilities in conjunction with new development where appropriate.
  - Seeking contributions towards the provision of new works of art as part of new development and ensuring it is integrated into development at an early stage.
- Furthermore, for the rural areas, the following Local Plan 1996 -2011 will be carried forward:
  - RAP13 Directing New Outdoor Sport and Recreation Development
  - RAP14 Golf Facilities
  - RAP15 Camping & Caravanning Sites

## Justification for Preferred Option

### National Planning Policy Framework

- Cultural well being is recognised as a key element of one of the three dimensions of sustainable development – *the social role* – supporting strong, vibrant and healthy communities. One of the Core Planning principles in the NPPF states that local plans should “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.” In addition, the NPPF recognises tourism and cultural facilities as main town centre uses and, as such, should be directed to these areas and ensure a sufficient supply of suitable sites.
- The NPPF states that, in rural areas, local plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres. And local planning authorities should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- The NPPF also states that local plans should set out strategic policies for the provision of cultural infrastructure. Furthermore, to promote healthy communities and to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
  - plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
  - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
  - ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and
  - ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- In addition to the NPPF, extant planning policy on tourism is also contained within The Good Practice Guide to Planning and Tourism (2006). The guide directs local authorities to include policies in the Local Plan for tourism where it has been identified as a key issue. This should be done through engaging with the tourism industry and designing policies that address location, design and sustainability, and contributions to the environment.

## **Warwick District Tourism & Visitor Economy Strategy**

- The recently prepared Tourism & Visitor Economy Strategy illuminates how and where the Council's involvement will add greatest value to the active promotion of tourism within the District. The vision is to work with partners to 'present a clear, compelling message about the area's unique strengths, which has the active support of local businesses and communities, and which is founded on the highest standards of visitor welcome'. The strategy aims to grow the District's economy by more than 5% a year over the next decade.
- The strategy recognises that most visitors come to the District for the day and live within the West Midlands area. Although, people from further afield do stay in the area for short breaks and there is a significant overseas market making up 13% of all trips. It is, therefore, important that a range of transport options are available for people visiting key cultural assets, so that people can make sustainable transport choices.
- The strategy identifies 'place shaping' as one of the 4 key aims: creating a distinctive destination experiences for the three towns and other areas based on their own strengths which should be built upon.
- The emerging **Economic Development and Regeneration Strategy's** first priority is to grow the existing business base including the creative industries. Priority number three is to support and grow the retail visitor and rural economy.

## **Warwick District Arts Development Strategy**

- The Arts Strategy 2009 – 2013 explores the current arts provision within the District, looking at service provision, the role of public art and the links to cultural tourism. This is encapsulated in an action plan for the arts and culture within the area.
- One of the themes of the strategy is 'Unique Spaces and Places' and includes the objective of using the arts to revitalise and enhance the District's public spaces fostering a strategic approach to public art developments. This includes the development of a well-used Cultural Quarter for the District with its hub at Spencer Yard, Leamington Spa. Whilst funding opportunities for the cultural quarter have changed, the Council continues to maintain a long term commitment to the cultural quarter, including the reuse of the United Reform Church as a creative and performing space.

## **Participation**

- From last year's Helping shape the District consultation, the majority of residents agreed that access to sporting and cultural facilities to improve the health and well-being of local people is a key issue for the Local Plan to address. There was recognition of the role of cultural, heritage and arts facilities as well as community events as a means of education and bringing people together, and that these also deserve protection and enhancement



as foundations for future development. Maintaining cultural and community identity can strengthen the sense of place and belonging, and was also cited as an important related issue. It was also suggested more generally across the three towns that tourism should be included alongside retail and leisure as facilities which need continuing improvement in the town centres. Concern was raised at the lack of visitor attractions and the need to enhance tourism

## Other Options

- National planning policy is clear in terms of the approach that should be taken in the Local Plan to supporting the development of tourism and cultural assets. It is considered therefore that the only other reasonable options available for the Local Plan relate to the provision of visitor accommodation. Increasing the number of visitors to Warwick District who stay overnight has been identified as an issue to address in order to strengthen the local tourist economy. One of the reasons for low visitor numbers could potentially be viewed as a lack of adequate accommodation. However, evidence is needed that the type and range of visitor accommodation is appropriate. This is something that is being prepared as part of the Visitor and Tourism Strategy Action Plan.
- The Local Plan will need to reflect national policy in its approach to supporting new visitor accommodation within town centres, or as part of the reuse of suitable rural buildings. However, in terms of existing accommodation, an option for the Local Plan would be to include a policy that seeks to protect all existing visitor accommodation from changes to alternative uses unless the accommodation is no longer viable or suitable to meet demand. An alternative, would be to seek to only protect existing visitor accommodation within or adjoining town centres. This approach would accord with national policy in terms of directing new visitor accommodation. Another option would be to continue the Local Plan 1996 – 2011 policy approach of not protecting existing visitor accommodation from changes to other uses.
- For the rural areas an alternative option would be to continue to not permit new building for visitor accommodation. However, it is considered this would not support the diversification of the rural economy in accessible centres.

## 18. Flooding and Water

### Introduction

- 18.1. Flooding from rivers is a natural process that plays an important role in shaping the natural environment. However, flooding threatens life and causes substantial damage to property. Although flooding cannot be wholly prevented, its impacts can be avoided and reduced through good planning and management. However, climate change over the next few decades is likely to mean milder wetter winters and hotter, drier summers in the UK. These factors will lead to increased and new risks of flooding.
- 18.2. Warwick District has a history of flooding due to the many rivers and watercourses through the area, including the rivers Avon, Sowe, Leam, Itchen and Canley Brook and Finham Brook. In the last thirty years there has been flooding on many occasions due to heavy rainfall increasing watercourse and river levels and, more recently in 2007, being largely attributable to drainage problems. The anticipated implications of climate change will only increase the District's vulnerability to such events and it is important therefore to appraise, manage and reduce the risk of flooding within the District.
- 18.3. The provision of a safe and efficient supply of water to meet the needs of new development is essential and the Council acknowledges the role of water conservation and efficiency measures in achieving this.
- 18.4. Standards for water consumption are set out in The Code for Sustainable Homes, (BREEAM) with accompanying technical guidance on how these can be achieved. Severn Trent's Water Resources Management Plan outlines the ways in which continuous supplies can be maintained and expanded to meet the additional demands made by new developments in the area.

### Relevant Issue & Strategic Objectives

- 18.5. Relevant Issues:
- To manage the risk of flooding to people and property within the district
  - To ensure that new development does not increase surface water flooding
  - To ensure that an adequate supply of water is available to meet increasing demands
  - To ensure that waste water treatment is adequately met and does not result in a deterioration of the quality of receiving water courses or undermine the ability to meet 'good status'
  - To increase the proportion of water bodies meeting 'good status'
- 18.6. **Strategic Objectives:** See in particular objectives 5, 6 and 12 as set out in paragraphs 4.13 to 4.15 above. Objectives 9 and 14 also apply to this topic
- 18.7. **Related SCS aim:** The built and natural environment has been protected and enhanced. People feel safe.

## **PO18: Flooding & Water**

### **Preferred Option: Flooding**

New development will take place on sites outside flood risk zones as far as practicable:

- controlling development within flood risk areas and the types of development which may be considered
- assessing opportunities to facilitate the relocation of development, and
- the incorporation of measures to address flood risk from all new developments, such as sustainable urban drainage systems (SUDS)

This accords with the NPPF and the Stage One Strategic Flood Risk Assessment

### **Preferred Option: Water Supply**

Ensuring that suppliers are able to provide an adequate supply of water to meet demand and minimise water stress by developing a policy framework to reduce water use in new development.

### **Preferred Option: Water Conservation and Efficiency**

To adopt standards for water conservation and efficiency set out in the Code for Sustainable Homes and require the inclusion of SUDS schemes as part of new development.

The Draft Infrastructure Delivery Plan will include details of the required infrastructure to meet the above

## **Justification for Preferred Option**

- 18.8. The latest national planning policy on flooding and water issues is set out in the National Planning Policy Framework (NPPF) which states that: "Development will be directed away from areas of high flood risk and inappropriate development in areas at risk of flooding will be avoided. A strategic approach will appraise, manage and reduce flood risk by:
- Identifying and assessing land at risk from all forms of flooding by preparing a Strategic Flood Risk Assessment;
  - Planning new development to avoid increased vulnerability to flooding and reduce surface water run-off.
  - When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures
  - Applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change."
  - Steering new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

- If, following application of the Sequential Test, it is not possible, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied
- Ensure that flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test
- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location
- development is appropriately flood resilient and resistant, including safe access and escape routes and that any residual risk can be safely managed and gives priority to the use of sustainable drainage systems (SUDS)"

18.9. Future Water, the Government's Water Strategy for England, Defra, February 2008: The government's vision for water policy and management is to have:

- improved the quality of the water environment and the ecology which it supports
- provided high levels of quality drinking water
- sustainably managed risks from flooding and coastal erosion
- ensured the sustainable use of water resources
- implemented fair, affordable and cost reflective water charges
- cut greenhouse gas emissions
- embedded continuous adaptation to climate change and other pressures across the water industry and water users, by 2030

18.10. At the County level, Warwickshire County Council is the 'lead local flood authority' with responsibility for developing, maintaining and monitoring a local flood risk management strategy in partnership with other relevant bodies in the area. They are required as the Sustainable Urban Drainage Approving Body (SAB), to be responsible for the approval of drainage systems within Warwick District, and also for adopting and maintaining SUDs serving more than one property.

18.11. The Environment Agency is responsible for preparing Catchment Flood Management Plans (CFMPs) covering the whole of England and Wales. They provide an overview of the flood risk across each river catchment and recommend ways of managing those risks by promoting sustainable flood risk management.

## **Water Quality**

18.12. In terms of water quality, the European Water Framework Directive (WFD) has the following objectives:

- To prevent deterioration in the status of aquatic ecosystems;
- That all water bodies should meet 'good' ecological status by 2015;
- To promote the sustainable use of water;
- To reduce or phase out pollutants that pose a significant risk to the aquatic environment;
- Reduce the pollution of ground water; and,
- Contribute towards mitigating the effects of floods and droughts

- 18.13. As the 'competent body' responsible for delivering these objectives the Environment Agency (EA) has prepared a series of River Basin Management Plans which set out the current status of the water body and an action plan for meeting 'good ecological status' in line with the WFD. In addition, the EA also strives to manage and protect groundwater sources and plans activities that might affect groundwater. Water quality has improved significantly over the last 20 years. The chemistry and biology of rivers has improved together with a reduction in nutrient (phosphates and nitrates) levels.
- 18.14. The district lies predominately within the Warwickshire Avon area of the Severn River Basin Management Plan of which, in relation to the requirements of the Water Framework Directive, 11% of water bodies are currently at good ecological status and are expected to remain the same at 2015. A small area of the district lies within the Tame, Anker and Mease area of the Humber RBMP area of which only 3% of water bodies are at good ecological status however this is expected to remain the same.

### **Water Provision**

- 18.15. In terms of water provision, the national strategic vision for managing water resources in England up until 2030<sup>5</sup> includes the following measures:
- Reduced per capita consumption of water to an average of 130 litres per person per day or potentially 120 litres per person a day;
  - Amend building regulations to include a minimum standard of water efficiency in new homes; and,
  - In areas of severe water stress it is believed that near universal metering will be needed.
- 18.16. Severn Trent Water is the appointed water company for the district with the responsibility of providing sufficient quantity and quality of water to meet demand whilst minimising the impact on the environment. They are responsible for the operation and maintenance of the existing public foul drainage network and for providing waste water treatment capacity for future domestic development. They are also responsible for the public surface water drainage networks. From 2011, all private sewers and lateral drains draining to public sewers were transferred into the ownership of the appointed water company removing the burden on householders and allowing for a more integrated sewerage system.
- 18.17. Severn Trent published their water resources management plan to demonstrate how they intend to meet future water demand over the next 25 years. The plan sets out the strategy for ensuring the security of customers' water supplies between 2010 and 2035 by reducing demand and ensuring the sustainable use of water resources. The overall aim is to maintain and achieve target levels of service whilst minimising impact on the environment by reducing leakage, managing the demand for water and developing new resources.
- 18.18. Severn Trent AMP5 Delivery Programme 2010 – 2015 (Longbridge): Severn Trent Water's AMP5 investment programme is essential to delivering higher standards in the quality of water supplied, treatment of sewage and

ensuring that the company's asset base and infrastructure are maintained. Work currently underway will help improve efficiency of the treatment plant for both clean and waste water. More details relating to all water infrastructure can be found in the Draft Infrastructure Plan.

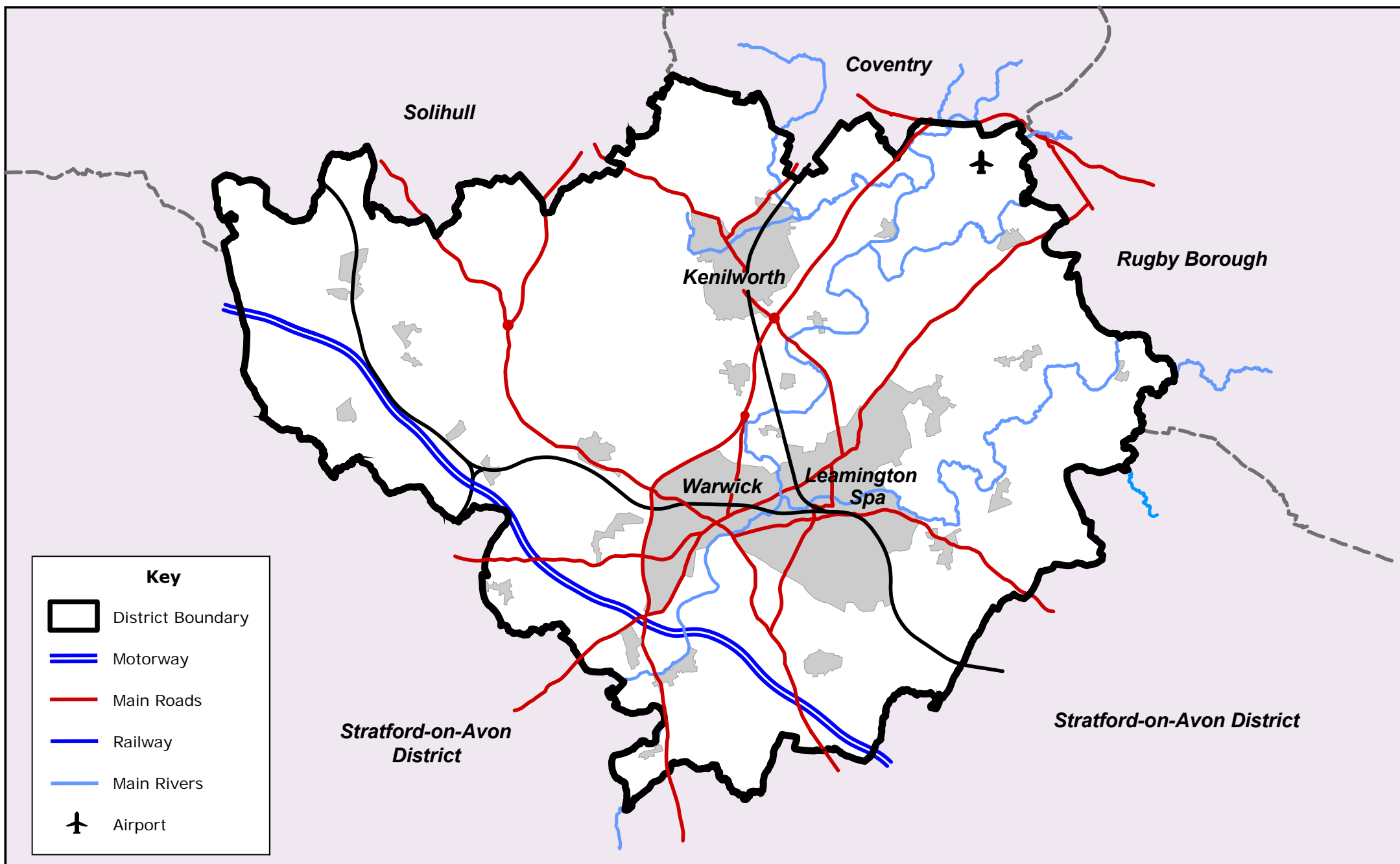
### **What is the situation now?**

- 18.19. A Stage One Strategic Flood Risk Assessment has been undertaken which assesses and maps all forms of flood risk from groundwater surface water, sewers and river sources, taking into account future climate change predictions. It identifies the areas currently under threat and the potential for further flood risk due to climate change based on a 20% increase in flow down the watercourse. The initial assessment showed areas at highest risk followed routes adjacent to rivers and canals. A number of locations within the district are also known to suffer from surface water flooding. This evidence is used to locate future development primarily in low flood risk areas.
- 18.20. River Severn Catchment Flood Management Plan, EA, 2009: In the next 50 to 100 years, it is estimated that as a direct result of climate change and urbanisation the number of properties at risk from flooding in a 1% flood event will rise to approximately 210. The aim of the plan is to establish flood risk management policies which will deliver sustainable flood risk management for the long term, so preparing for the impact of climate change and planning investment.
- 18.21. **Water Cycle Study, March 2010:** The Water Cycle Study advised that for:
- Sustainable water management
    - Across large parts of the district, infiltration type SUDS will be suitable and should be promoted
    - To ensure that run-off from the developed sites is equivalent to greenfield run-off, the drainage assessment shows that less than 10% of development sites would be taken up by storage requirements.
  - Water quality
    - Waste water treatment works which discharge to watercourses with a higher dilutive capacity are preferable
    - Growth must not cause deterioration in water quality
    - New consents to accommodate growth should be discussed early with EA and STW
    - Water quality assessments should be carried out where new development is proposed upstream of combined sewer overflows
- 18.22. There is no reason to believe that this advice would change in relation to the current Preferred Option development sites, many of which are unchanged from those promoted through the now superseded Core Strategy preferred option.
- 18.23. River Basin Management Plan Severn River Basin District, Dec 2009: the plan focuses on the protection, improvement and sustainable use of the water environment. The key issues to address include:
- diffuse pollution from agriculture and other rural activities;

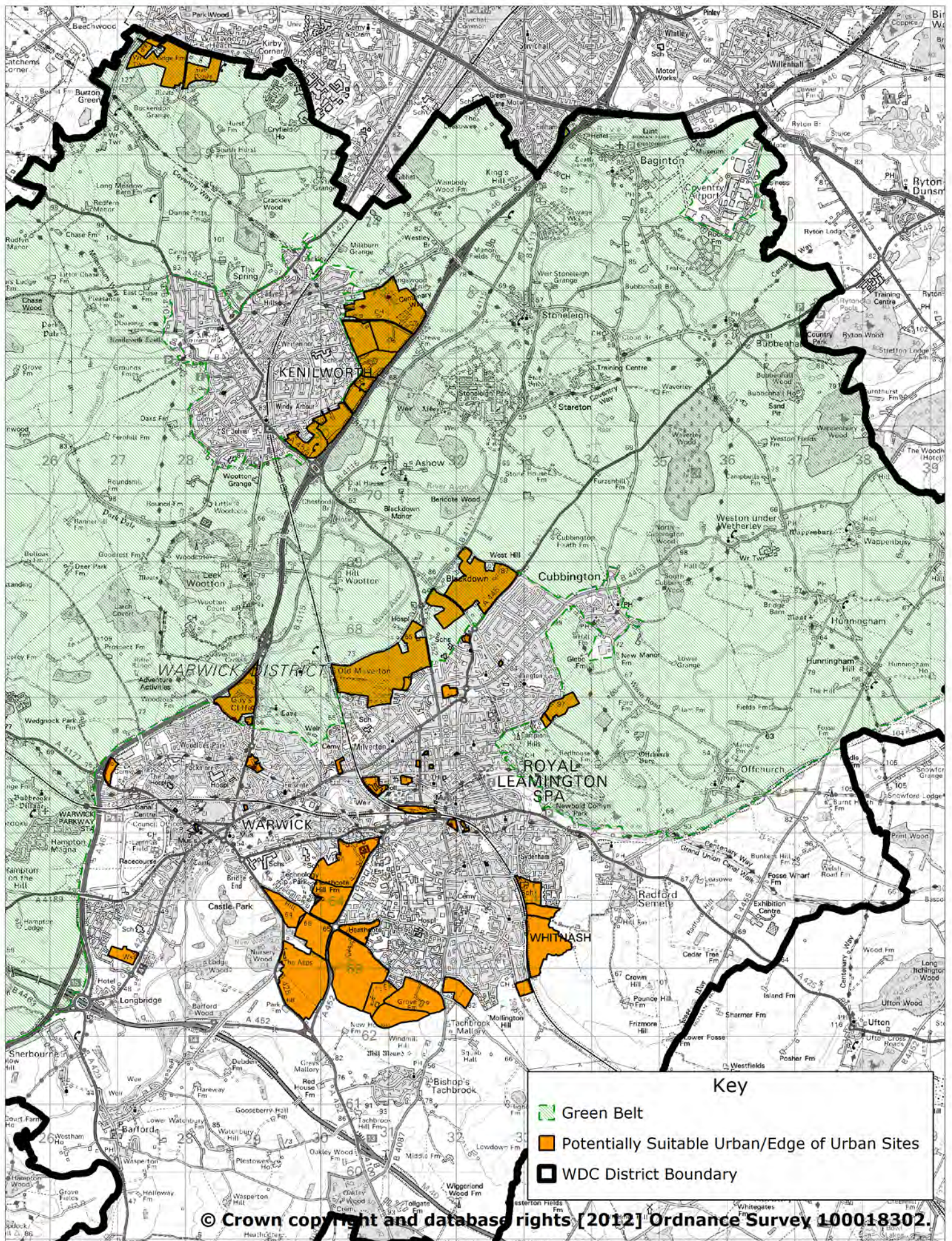
- point source pollution from water industry sewage works;
  - physical modification of water bodies; and
  - diffuse pollution from urban sources
- 18.24. The plan identifies actions to reduce the impacts of transport and the built environment on the natural environment, including improving management of surface water drainage by use of sustainable urban drainage systems (SUDS) and setting aside land during development for surface water storage providing a resource for reuse on industrial and residential development).
- 18.25. The Environment Agency introduced a new classification system in 2011 enabled by The European Water Framework Directive (WFD). This system allows for more rigorous and accurate assessment of water quality. Some water bodies will never achieve good ecological status however, because they have been physically altered for a specific use, such as navigation, recreation, water storage or flood protection
- 18.26. Warwick District Council Climate Change Adaptation Study, 2011 assists the understanding of the impacts on its own buildings and estates and planning for new development in the face of climate change. The flood performance of new buildings can be improved by the use of flood resilient construction methods and existing buildings can be made more flood resilient during restoration works.

## Other Options

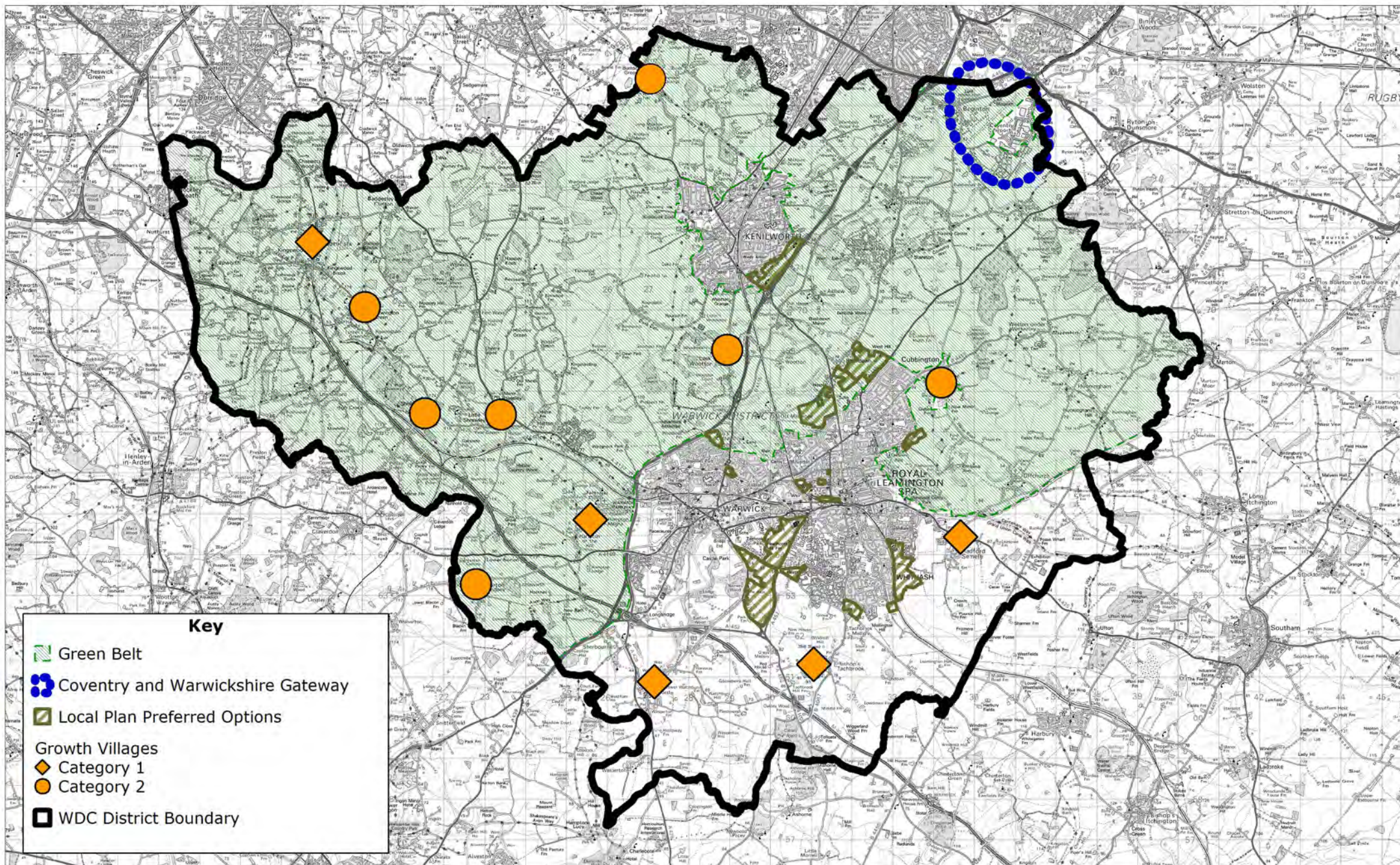
- 18.27. If inappropriate development were to be allowed in the functional flood plain or other areas at risk from flooding, it could put property and lives at risk.
- 18.28. A lack of planning for infrastructure and water supply would result in low water pressure or lack of supply for new developments and for existing residential and commercial uses. It could also affect water quality at the river basins or in supply or in the drying out of streams and other water sources. It could also have a severe effect on the capacity of sewage treatment works and again result in poor water quality.
- 18.29. To meet the Government's requirements for the future protection of people and buildings from flood and to provide quality water supplies and treatment facilities, the Council's preferred option is the only option which will support growth and new development.





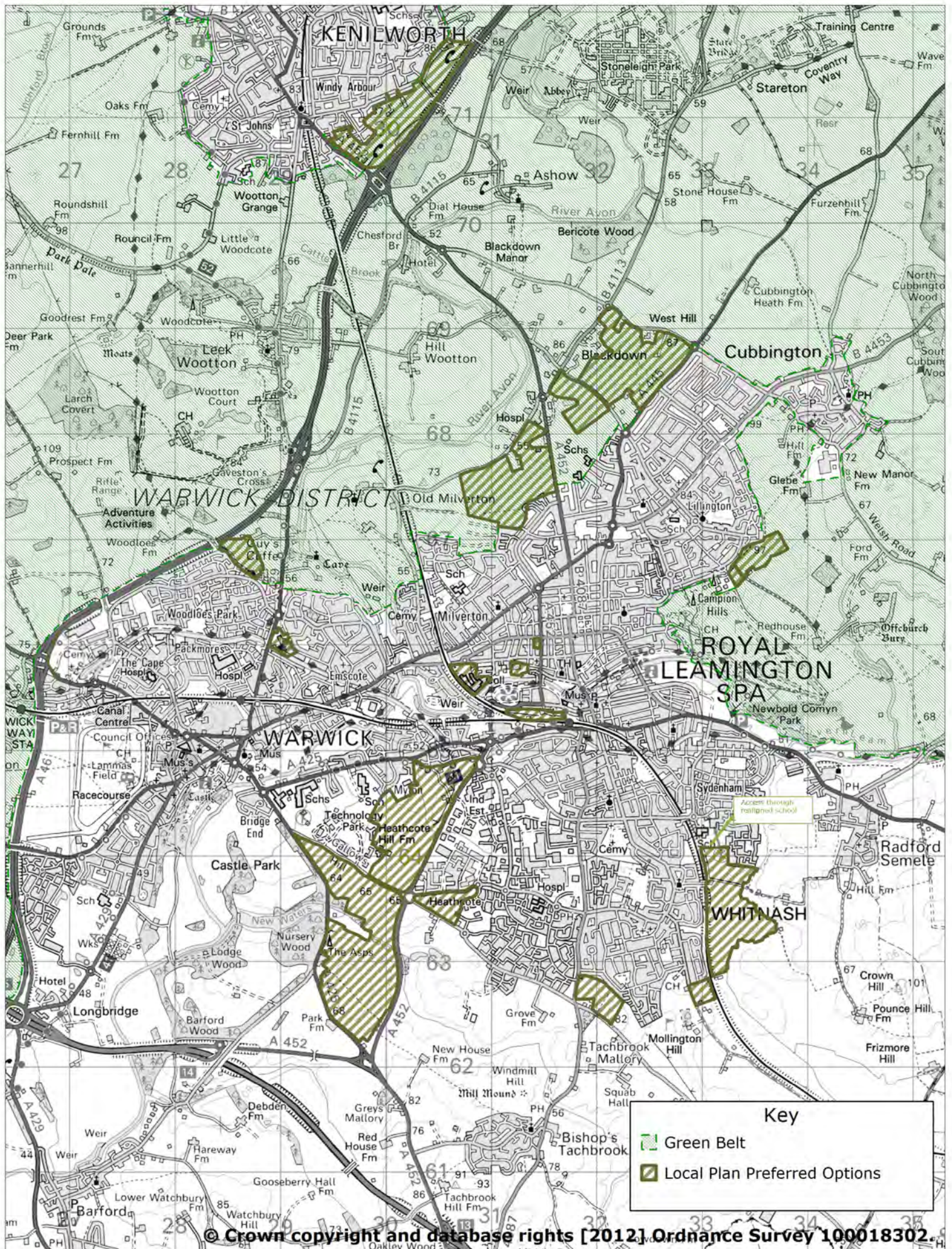




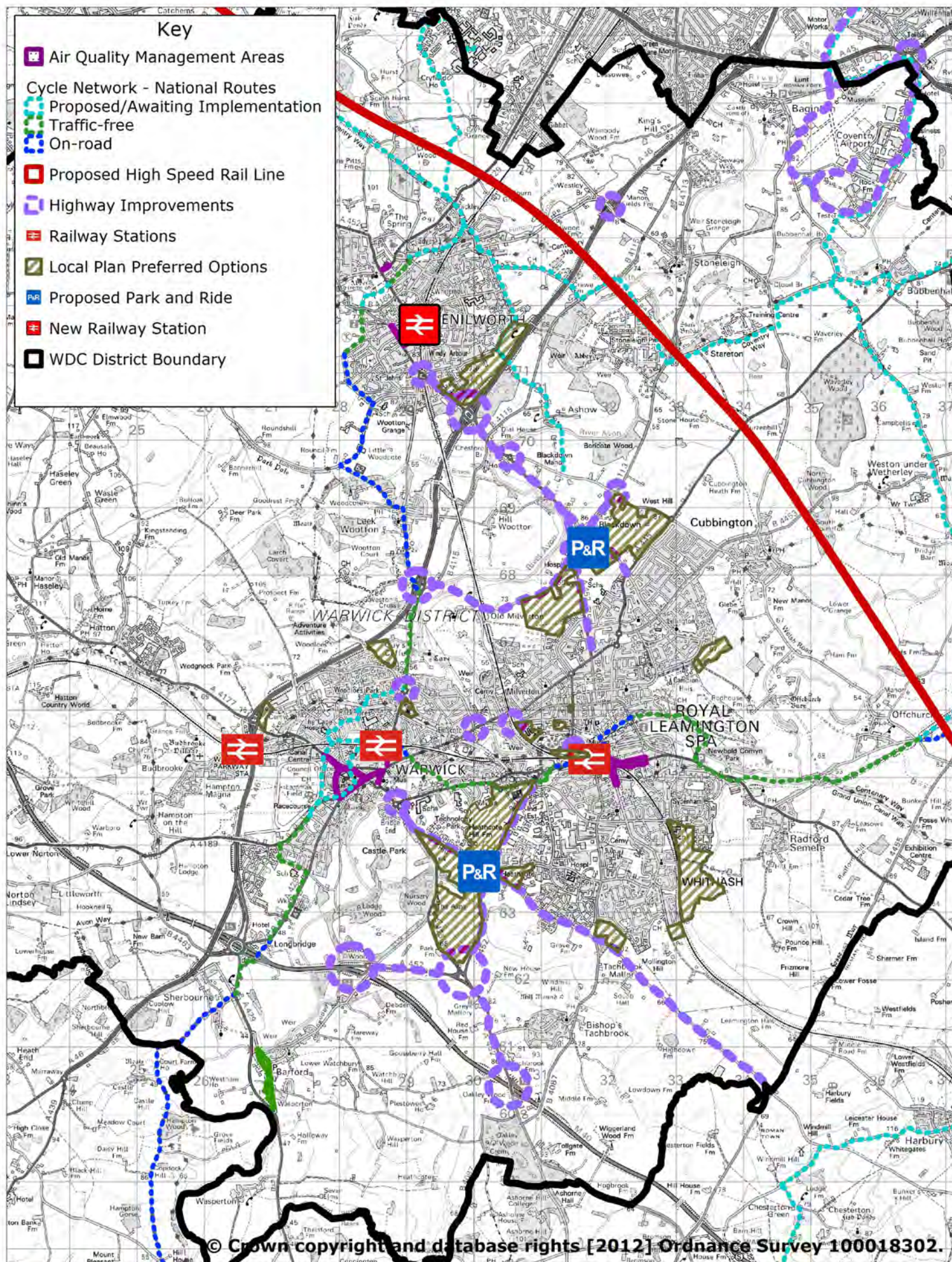


**Map 3: Development Sites - Preferred Option (Whole District)**









**Map 5: Possible Transport Infrastructure**



Not to Scale

Riverside House, Milverton Hill, Royal Leamington Spa, Warwickshire. CV32 5HZ

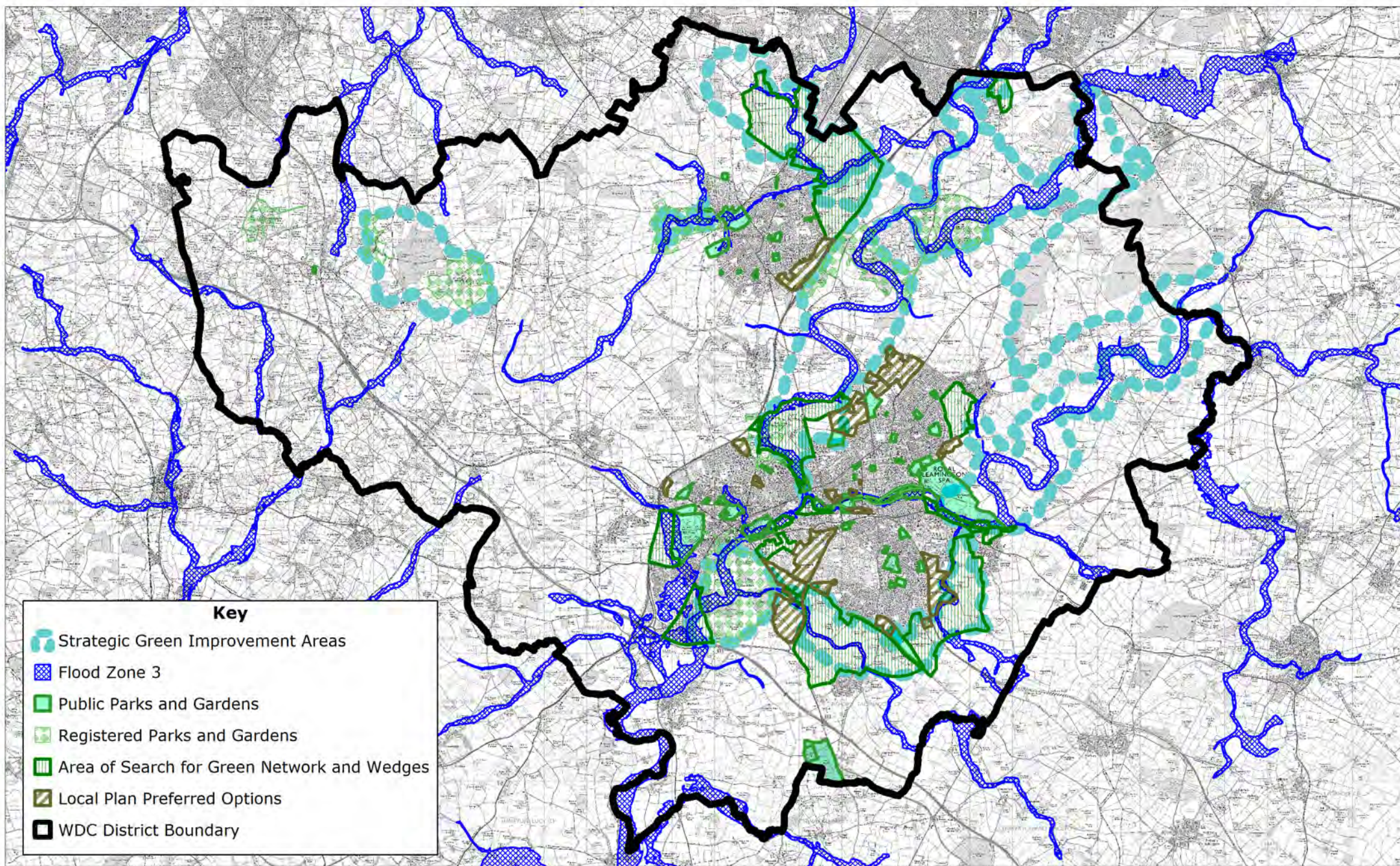
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Tel: 01926 410410

North







## Map 6: Possible Green Infrastructure



# Next steps, comments and feedback

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This forms part of Warwick District Council's consultation on its Preferred Options for a new Local Plan. The consultation period runs from 1 June to 27 July.

If you have any comments, you can use the response form available at:

[www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

or write to:

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

or email:

[newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410

