Since Matter 13 covers a wide range of policies, this submission briefly identifies those issues which concern the Society as a participant.

They are:

- **Density** at which new housing developments are expected to be built.

**Garden Towns, Villages & Suburbs** prospectus, as a guideline.

Within the draft Local Plan, the references include:

<table>
<thead>
<tr>
<th>DS3</th>
<th>DS5</th>
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<tr>
<td>2.87 (a) &amp; 2.11</td>
<td>BE1 (a c j)</td>
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<tr>
<td>5.9 5.10 5.11</td>
<td>BE2 (c d h)</td>
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<td>5.16 5.18</td>
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**Density** is a key factor in allocating land needs for new housing. Reading the guidance for the Examination, it seemed clear that Matter 4 - Spacial Strategy listed questions on distribution, but not on the extent of land use arising from density. Guidance was sought from Mr. Kemp, but it was not clear whether this critical matter is intended for examination or not.

Density also has a very significant impact on sustainability, especially in relation to the environment, but also in economic and social factors.

Major new housing proposals are described as urban extensions, but are to be low density suburbs which do not relate well to the urban form and character of either Warwick or Leamington.

**Prospectus: Garden Towns, Villages & Suburbs (BE01)**

Our objection is that the Prospectus is an inadequate document: by turns it is unrealistic, vague or simply misleading. Including, for example:

- Garden City references, with photos, are typically of housing costing £1/2 - 1 million and often considerably more. (Locally Northumberland Road is featured in 2 photos).

**Planning & Design Principles (pp 5-6)**

* Repeated reference to a leafy environment and extensive grass, "maintained to a high standard by management programmes . . . over their lifetime" (How realistic is this in the context of sharply reduced LA budgets.)

* "Each home is carefully designed and detailed . . . design of individual groups of homes to create variety and character." (This bears little relation to actual developments being built or proposed.)

* Accommodating cars. Later in the Prospectus, parking arrangements are to be mainly on street. "Cars form an orderly element in the street" (p.17) more realistically, they will clutter the street and in large numbers due to car dependency of these suburbs. "Carriageway allows for bus and safe cycling" (p.14) i.e. no cycle ways.

**Garden Suburb Attributes (pp 7-8)**

* Local employment. This was indeed a key element of the original Garden City movement, but is largely absent from the WDC garden suburbs, many of which are likely to house longer distance commuters.

* Regular public transport service to town centre. At densities of 30 per hectare any bus service will at best be infrequent and too distant from many households to encourage regular use. The car will overwhelmingly be the default mode of transport.

* "Integrated water, waste and energy systems may be possible. District heating may be possible." But
in practice almost inconceivable within these low density suburbs: the very last place any such schemes will be viable.

Overall, this Prospectus lays claim to various very general architectural principles which in no way arise from or are exclusive to a garden suburb layout. "Groups of buildings that provide interest and rhythm." "Buildings are designed to 'turn the corner'..." (an architectural skill more frequently displayed in a close knit urban setting than in suburbs.) (Built form p.15)

Much of the text consists of empty phrases: "pavements tend to be linear" "buildings have a recognisable built line". For developers and their architects - with the task of drawing up detailed designs for these outline schemes - the Prospectus is not an effective or useful tool.

Richard Ashworth (chairman, Leamington Society)

Footnote

The following WDC publication has also been noted, although it does not appear to be included in the Examination reference documents.

Final Draft Design Guidance for the STRATEGIC URBAN EXTENSION South of Royal Leamington Spa and Warwick October 2015