

Dear Mr. Matheson

The comments below seek to respond to some of the opening enquiries you have posed in respect of the RLSNDP. Whilst your enquiries are primarily for the Qualifying Body (QB) to address, the Local Planning Authority (LPA) officer responses below seek to provide additional clarification, evidence, and support as appropriate in respect of a number of policies.

Housing Development

Assistance with the map overlay you request is available should the QB require it. This applies also to other mapping enquiries throughout. This offer has been extended to the QB.

RLS1 – Housing in the Leamington Spa Urban Area

Element 5 referring to Purpose built student accommodation (PBSA) – PBSA is regularly a sensitive issue in some parts of Leamington Spa. WDC officers had undertaken work on the preparation of an SPD on PBSA, however it later became apparent that the scope of the content would be more appropriately addressed within a DPD. The [Local Development Scheme](#) (p6&7) now identifies the LPA's intention to publish a PBSA DPD.

RLS2 – Housing Design

Please be advised that Local Plan policy FW3 refers to water efficiency and includes requirements on water consumption which exceed current Building Regulations.

RLS17 – Royal Leamington Spa Town Centre

It is not anticipated that an Area Action Plan will be forthcoming in the foreseeable future.

RLS18 - Royal Leamington Spa Creative Quarter

The Creative Quarter project is being undertaken in partnership between Warwick District Council and Complex Development Partnerships Ltd (CDP). It is an ambitious and creative regeneration project for the Old Town intended to create new spaces for those within the creative industries. Work on the Creative Quarter project has been evolving simultaneously with the progress of the RLSNDP. Dialogue between WDC and the Qualifying Body has led to the inclusion of policies within the RLSNDP, which are designed to support the development aspirations of the project.

Further information in respect of the Creative Quarter can be found at the links below:

<https://www.leamingtoncreativequarter.co.uk/>

https://www.warwickdc.gov.uk/info/20801/projects/1237/leamington_creative_quarter

Figure 13

Figure 13 on page 63 of the RLSNDP is a map provided by WDC indicating the extent of the Creative Quarter. This map was created from WDC's GIS system and is based upon the published material on the Creative Quarter, including p6 of the [Leamington Spa Creative Quarter: Big Picture document](#).

A map illustrating the relationship of the Creative Quarter area and the defined Town Centre boundary in the Local Plan is attached to this response.

Uses

The aforementioned map attached to this response, illustrates that the area of the Creative Quarter sits largely (though not wholly) within the defined town centre of Leamington Spa. Within the Creative Quarter there are 'retail areas' to which Local Plan policy TC7 is relevant. Policy RLS23 in the RLSNDP Submission version, actively seeks to take a more flexible approach to these retail areas than the Local Plan, with the intent of supporting the specific objectives of the Creative Quarter (see below in respect of RLS23).

Policy RLS18, and specifically the uses supported by this policy within the Creative Quarter must therefore apply beyond the 'retail areas'. There may perhaps (subject to the views of the Qualifying Body) be an opportunity to make this more explicit.

Opportunity sites

In October 2019, a [Phase One report](#) was published in respect of the Creative Quarter. Pages 2 and 3 of this report specifically identify the opportunity sites set out in policy RLS18. They appear in two lists in the Creative Quarter Phase One report, as some are owned by WDC, and others are not.

Policy RLS19 – Old Town Retail Area

Policy TC2 does refer to the Local Plan Policy. The map attached to this response identifies the 'retail area' south of the River Leam which is locally referred to as 'Old Town'. It is suggested that subject to the views and intentions of the Qualifying Body, the relevance of this policy may now superseded by policy RLS23 which is a later addition to the RLSNDP (developed with planning officers), as it addresses the same secondary retail area. Alternatively, an amalgamation of the policies might be appropriate.

Policy RLS23 – Secondary Areas within the Creative Quarter

This policy is a later addition to the RLSNDP and was drafted with LPA officers. The objective of this policy is therefore supported by the LPA. It is designed to introduce a more flexible approach in one particular area in support of the Creative Quarter aspirations. This area (as identified in RLS19 – see comments above) already has a greater artisan quality, than other equivalent areas within Local Plan (i.e. Secondary retail areas), which has the potential to develop further.

Whilst the Creative Quarter project masterplan is specific in terms of sites and buildings, the aspirations behind the principle and the area identified are broader. This is highlighted within Creative Quarter 'Big Picture' document (hyperlink above), but also further underpinned by the following documents:

- [Warwick District's Creative Sector. Analysis of Impact and Strategy for Growth. June 2019](#) – highlights the significant contribution the creative sector already makes to the District's economy, and highlights existing clusters within Leamington and elsewhere.
- [Warwick District Creative Strategy 2020-2025](#) – amongst the priorities identified in this strategy document, one is stated as “...use the creative sector to revitalise and enhance our town centres...” (p22). Key points and actions identified to support and contribute to the achievement of this priority (and most pertinent in support of RLS23) might be summarized as follows:
 - cultural organisations and creative businesses alike strongly underline lack of available space in the district for their operations, and specifically cite B1 and D2 uses amongst the requirements. 40% of respondents indicate that this is a major barrier for the development of their businesses or practice (pages 14 & 22)
 - temporary pop up's in retail areas/town centres to exhibit the work of creatives (p23)
 - harnessing the benefits of the creative sector for regeneration, specifically referring to the Creative Quarter (p23)

This policy seeks to seize the opportunity to further support the Creative Quarter in the ways highlighted above, and contribute to the vision below:

“A Creative Quarter offers an environment that allows creative industries the opportunity to start up, grow and thrive. A Creative Quarter should be supported by a mix of sustainable, independent businesses, artisan food and drink producers, unique shopping and an exciting and varied cultural programme, making it a great place to live work and enjoy! Starting to change this area of Leamington to create a successful Creative Quarter should lead to increased businesses investment, to commercial growth, and new opportunities for physical and economic regeneration.” (The Big Picture, p5).

The first paragraph of the policy does repeat Local Plan policy TC7. In the drafting, it was felt that this would reiterate that the Local Plan policy remains the starting point when considering proposals for a change of use from A1 in this area. However, the policy goes on to outline that a more flexible approach may be adopted in this specific secondary retail area in the Creative Quarter (see map attachment), where the proposed use would specifically support the overarching aims of the Creative Quarter. Many of the current ideas emerging from CDP's masterplan work for example, rely heavily on B1 and D2 uses. Such uses would otherwise not be supported within this retail area, which is geographically central to the Creative Quarter.