

**ROYAL LEAMINGTON SPA TOWN COUNCIL DRAFT RESPONSE TO THE SOUTH WARWICKSHIRE LOCAL PLAN –
SCOPING AND CALL FOR SITES CONSULTATION MAY 2021**

<u>CONSULTATION QUESTION</u>	<u>DRAFT RESPONSE</u>
<p>1. Do you agree we should prepare a Local Plan for South Warwickshire? If not, why not?</p>	<p>Yes</p> <p>Planning issues in the two districts are similar e.g. the need for carbon reduction, improved affordable housing, new and improved infrastructure, balance between urban and rural needs, safeguarding the historic and natural environment. Both authorities are effectively within the same wider housing market area, employment market and travel to work area</p> <p>A Joint LP should result in cost-savings by producing one strategic plan for both districts (one set of evidence studies, one Local Plan examination and one Planning Inspector, sharing of resources, speed up what can be a very lengthy process)</p>
<p>2. Do you agree with our approach of starting with a high-level, strategic part 1 Plan? If not, why not?</p>	<p>Yes</p> <p>Provide certainty and direction for those living in, working in and enjoying the area over a longer term. Setting out overarching strategic proposals for growth would provide welcome, straightforward guidance as to what development is and is not acceptable, where that development should and should not be and how that development should be best delivered with infrastructure requirements built in.</p> <p>It is imperative that the role of Neighbourhood Plans is made explicit in terms of the detailed local policies they contain and the role they will play in future development management decision making. If there is to be a suite of more detailed policies supplementary to the JLP, then where do the NP's fit in?</p>
<p>3. Do you agree that the Local Plan should run to 2050? If not, what alternative end date do you suggest and why?</p>	<p>The average lifespan of a Local Plan is around 10-15 years with each taking about 7 years from conception to adoption. A lot of work for something that has such a comparatively short shelf-life so the benefits as outlined seem preferable.</p>

	Key word is 'flexibility' – a Local Plan with such a long lifespan must be able to be responsive to all and any changes which may occur which affect the Plan, be they legal, geographic or developmental. Will reviews still take place every five years?
4. Do you agree that this is the right evidence that we need to inform the Local Plan? Is there further evidence you think will be required?	Yes Would add: Upcoming WCC Local Cycling and Walking Infrastructure Plan Updated WDC Conservation Area Assessments Any current Town Centre strategies/BID forward plans
5. Do you have any comments on the impact assessments that accompany the South Warwickshire Local Plan?	We are encouraged by and supportive of the inclusion of Health Impact Assessment. In order for the planning process to maximise the contribution of new development to the health and wellbeing of communities, it is important that the likely health and wellbeing impacts of different proposals are identified and understood, in order to inform planning policies and ultimately planning decisions. Could also include: Heritage Impact Assessment
6. Please tell us about specific sites you wish to promote for: a) Housing b) Employment/industrial/commercial c) Retail d) Leisure/community e) Gypsies & travellers f) Open space/biodiversity/green infrastructure g) Utilities/Infrastructure (inc renewable energy) h) Other Please provide a map showing boundaries of said sites	No opportunity for large scale residential development within the Leamington boundary (Fire station site at Dale Street should it become available, Riverside House site and some redevelopment at Court St car park would be acceptable) Neighbourhood Plan supports provision of hydropower from the River Leam if appropriate.
7. Do you agree that the South Warwickshire Local Plan should address social isolation and loneliness?	Loneliness and social isolation are conditions that are difficult to identify, complex to address and hard to resolve. If included in the JLP, then there should be clear, concrete ways in which this issue can be addressed e.g. new housing schemes

	<p>such as garden communities which can create opportunities to bring people together, maintain and create networks and friendships, and promote activities using community assets at neighbourhood level.</p>
<p>8. Do you agree with encouraging connectivity and ensuring key infrastructure is in place to support this? How should this be done?</p>	<p>Yes</p> <p>Connectivity is crucial in several formats – travel, work, community, service provision.</p> <p>Post-Covid, an increasing no. of people have moved to more permanent working from home and it is therefore imperative that wifi and broadband provision is high quality and available to residents and businesses.</p> <p>Inclusion of improvements to rail connectivity and links across the district and further afield as well as significant investment in the timely provision of improvements/creation of the strategic road networks must be included, based on reliable, realistic forecasts of where those improvements/changes need to be made and when.</p>
<p>9. Do you agree that the Local Plan should address each of the housing matters proposed? If not, why not?</p>	<p>Yes</p> <p>Supported by a robust and regularly updated Housing Needs Assessment. Affordability of housing in the area is a constant challenge and one which the viability test often defeats. SDC does not hold its own housing stock whilst WDC does – would more building of council housing be supported?</p> <p>Certainly, from a Leamington Spa-centric view we would want reassurance that the Article 4 direction currently in place to manage HMOs in town would remain and that a Policy similar to WDC Local Plan Policy H6 would be included at a pertinent stage in the JLP.</p>
<p>10. Do you agree that the strategic design principles outlined should inform directions/locations for growth?</p>	<p>Yes</p> <p>Movement, context and place identity encapsulate the more detailed design issues mentioned earlier. Design of places needs to include how the development will look but equally must address how the development will work and how well it will</p>

	<p>meet the needs of its users. New or extended development must be sympathetic and work well with that which is already there but should also be fresh and different where such design works and is appropriate and welcomed.</p> <p>Consideration should be given to the role that Building for Life 12 (Building for a Healthy Life) could play within the Local Plan, especially given the inclusion of health as a strategic theme.</p>
<p>11. Do you agree with the emphasis on connectivity? If not, why not?</p>	<p>Yes</p> <p>Leamington Spa is the largest population centre in the area and functions well as a local service centre with a broad range of services, facilities and recreational opportunities. Effective connectivity of travel and information within the town and extending to its surrounding rural area is vital to maintain this.</p> <p>Any new development must be linked into existing connectivity as well as having its own internal, requisite functioning connectivities.</p>
<p>12. Do you agree that the Local Plan should seek to explore ways in which the reliance on the private vehicle may be reduced? If not, why not?</p>	<p>Yes</p> <p>Future development across the area should be based on access to high quality public transport and good walking and cycling infrastructure. Reducing reliance on the car will only effectively come about through strong improvements to the availability and reliability of these facilities for everyone in both urban and rural settings.</p> <p>Cutting the use of the private vehicle and introducing more electric buses and electric vehicle charging points will also lead to an improvement in air quality – something much required in certain parts of Leamington Spa.</p>
<p>13. Do you agree that enhancing connectivity and prioritising active and sustainable travel are the best ways to achieve this? Please explain your answer.</p>	<p>Cannot think of preferable ways to achieve this goal.</p> <p>Need to recognize that reducing the requirement for residential off-street parking would be challenging within the town – not enough on-street parking provision in</p>

	<p>many parts of town leading to existing congestion and potentially dangerous situations.</p> <p>New development of all sizes should be required to provide electric vehicle charging provision and secure cycle parking commensurate to the development.</p>
<p>14. Are there any additional transport issues or priorities you think that the Local Plan should address? Please explain your answer.</p> <p>There appear to be two question 14s and two question 15s in the consultation document in the report...</p> <p>Q14. Do you agree that the Plan should seek to improve infrastructure, such as charging points, for electric vehicles and e-bikes?</p> <p>Q15. Are there any other ways you think the Plan could encourage the increased uptake of electric and other low-emission vehicles? Please explain your answer.</p>	<p>HS2? Impacts of, legacy of?</p> <p>Yes – absolutely</p> <p>Improved public charging point provision, better requirements for EV charging points at new development and in extensions to existing properties, hire of electric bikes? Support for electric taxis and buses?</p>
<p>15. Do you agree that the South Warwickshire Local Plan should seek to diversify the local economy by supporting growth in new industrial sectors? If not, what other ways should the plan support economic growth?</p>	<p>Developing new and existing sectors and skills, targeted business diversification programmes, looking at specific locales to better understand place-specific issues and potential best-fit solutions are all crucial factors in supporting and improving the local economy, particularly now after Covid 19 and Brexit.</p> <p>Looking at Leamington Spa, diversification and development in the newer industries based here such as gaming and digital media should be supported, particularly through the development of the Creative Quarter, and efforts need to be focused on the retail/leisure/nighttime sector which is set to struggle for the longer term.</p>

<p>16. Do you agree that new employment opportunities should mainly be focussed in existing employment locations? If not, what other locations should be considered?</p>	<p>Yes</p> <p>Accessibility should already be good to these locations with scope for further improvement. Consist of brownfield land and offer the potential for redevelopment and expansion.</p> <p>If there are large areas of land available within existing employment areas which could deliver employment growth, makes sense to focus efforts there.</p> <p>Other locations across the area?</p>
<p>17. Do you agree that the affordability of employment land and premises is a key issue that the Plan should address? If not why not?</p>	<p>Yes</p> <p>Affordability and competitiveness are key when considering appealing to existing businesses/industry to relocate to new sites, and attracting new set-ups. Businesses even more than ever will be looking for low-cost, flexible locations.</p>
<p>18. Do you agree that the Local Plan should seek specific opportunities to support small and emerging businesses? If not, what do you suggest?</p>	<p>Yes</p> <p>Proposals for flexible, affordable units which can accommodate start-ups and small enterprises are vital as is the provision of larger units into which these small enterprises can grow to the next level. Look at examples such as 1 Mill Street, Leamington and the proposals for Spencer Yard – can more such sites be developed both in towns and in suitable rural locations?</p>
<p>19. Do you agree that the Local Plan should seek to build on South Warwickshire’s existing cultural and heritage assets in order to enhance the economy? If not, what alternative do you suggest?</p>	<p>Not to do so would be to miss a massive opportunity. Rebuilding, developing and effectively marketing those assets to a global market post-Covid will play a huge part in attracting people back to the area to spend and invest. These assets must be supported by appropriate funds and officer time in order to maximise the varied income opportunities.</p>
<p>20. Do you agree that the Local Plan should aim to reduce skills ‘leakage’ and provide greater opportunities for education and training? If not, what is your alternative?</p>	<p>Yes</p> <p>How could this be worded into effective, enforceable policy? Need to focus on the skills needed to support our local industry/sectors – colleges, adult education, apprenticeships, work experience, secondary schools.</p>

<p>21. Do you agree that the Local Plan should seek to adapt to the changing role of town centres? What do you suggest?</p>	<p>Our attractive, vibrant town centres are the means by which people are attracted in for retail, entertainment, office, leisure, cultural and tourist opportunities. Must be supported as sustainable locations which attract a wide range of people throughout the day and evening to strengthen their role as an accessible focus for meeting local needs – active frontages, flexible changes of use, temporary licences, street markets.</p> <p>Town centre usage is already changing as national chains no longer require large square footage and people shop more online– need to look at adapting to more community uses, residential uses, office and shared space usage etc. Town centres need to offer an attractive experience rather than just retail opportunities.</p>
<p>22. Do you agree that congestion and the car-dominance of town centres are key factors to address when considering how town centres can be enhanced?</p>	<p>Congestion and the predominant use of the private vehicle in Leamington contributes to poor air quality and dangerous situations for drivers, cyclists and pedestrians. The Local Plan should focus on reducing congestion through a reduction in local and urban car trips, improvement in safe, sustainable travel options, an increase in EV point availability and timely improvements in road layouts which contribute poorly to journeys across town.</p> <p>Reducing the dominance of cars and car infrastructure can improve town centre environments and thus the attractiveness of town centres and people’s experience of it.</p>
<p>23. Do you agree that the provision of sufficient utilities infrastructure is a key issue for the Plan to consider? If not, why not?</p>	<p>Utility infrastructure providing energy, drinking water, drainage and communications are fundamental to good development. They must at the very least be sufficient and should be high quality in order to make the most effective and economic use of them at residential and industrial/commercial sites.</p>
<p>24. Do you agree that the Local Plan should encourage the use of the ‘energy hierarchy’ in developments, aiming to reduce the use of</p>	<p>The Local Plan should support energy efficiency and the use of renewable energy in land use planning and sustainable development with achievable, deliverable policies. These policies should focus on site layout, planting, insulation, solar,</p>

<p>energy in the first instance wherever possible? If not, what approach do you suggest?</p>	<p>reducing the need for private vehicles, higher building design standards and renewable energy technology.</p>
<p>25. Do you agree that it is important to protect natural resources and that mineral resources are extracted before development commences?</p>	<p>Our local natural resources include a wide variety of biodiversity, geodiversity and landscape character which contribute to appropriate climate change adaptation and flood mitigation. Also provide quality of life benefits for the local community including recreation, sustainable transport, wellbeing and sustainable quality of place. It is therefore vital that all natural resources are considered and protected wherever possible during the consideration of and subsequent implementation of a new development.</p> <p>Not qualified to consider minerals extraction – WCC Minerals Local Plan</p>
<p>26. Is it important to ensure that the development of best agricultural land is avoided wherever possible?</p>	<p>Yes</p>
<p>27. Do you agree that development should provide compensatory measures / enhancements to compensate for their impacts (including biodiversity offsetting/ landscape restoration)? Are there any other matters that should be considered?</p>	<p>Imperative that necessary and appropriate mitigation measures are identified and implemented in permissions to ensure negative impacts are avoided. A Biodiversity and Development SPD would be very helpful guidance.</p> <p>????</p>
<p>28. Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?</p>	<p>Yes – a particularly strong issue in Leamington with its numerous parks and green spaces. The public reaction to the current proposals at Newbold Comyn highlight how strongly local people feel about their open space</p> <p>The protection and enhancement of our existing green and blue infrastructure is key to promoting healthy lifestyles, experiencing nature and enhancing mental health and wellbeing.</p> <p>Accessibility of open spaces is an important factor.</p>
<p>29. Do you agree that wherever possible and practical large-scale developments should also deliver substantive areas of green space (such</p>	<p>New development should always be matched with the creation of a high quality environment and public access to green space. This links back to the social isolation/strong community theme of Q7.</p>

<p>as country parks etc.)? If not, what is your alternative?</p>	<p>Opportunities to bring forward new open space should always be investigated where appropriate and viable.</p>
<p>30. Is tree planting an important issue that the Local Plan should seek to encourage?</p>	<p>The creation of new woodland and planting of more trees is an important and visible form of land-use that should be recognised in the Local Plan. The Plan should include a specific policy covering trees to include protected trees, provision of new street trees on a street frontage and protection of trees during a development.</p>
<p>31. Do you agree with the proposed ways in which the Plan should tackle climate change? What other ways can the Local Plan help us achieve net carbon zero?</p>	<p>Local Plan policies on this issue are pivotal to achieving the net carbon zero target by 2050. These policies should cover:</p> <ul style="list-style-type: none"> • Sustainable design standards • Energy efficiency and renewable energy generation • Minimising greenhouse gas emissions and waste • Ways to address overheating and flooding <p>They should also link to other pertinent areas such as sustainable transport options, trees, green/blue infrastructure and biodiversity.</p>
<p>32. Do you agree that flood mitigation should be a major priority for the Local Plan when delivering new housing?</p>	<p>Yes</p>
<p>33. Do you agree that the provision of health facilities should be a major priority when delivering new housing?</p>	<p>Yes, although there are many other ways that planning decisions can contribute to health and the wider health and wellbeing implications of development proposals should also be considered and addressed.</p>
<p>34. Do you agree that the South Warwickshire Local Plan should look to address congestion in town centres in order to improve air quality? If not, what is your alternative?</p>	<p>Yes</p> <p>Fumes from idling traffic in narrow key routes and where there are a predominance of bus stops are the cause of the two existing AQMAs in Leamington town centre. Better funnelling of traffic, better provision of electric buses and safe cycle routes and increased EV points (outside of car parks) should be included in policy.</p>

	(See also answer to Q22)
35. Do you agree that the Local Plan should prioritise and support additional guest accommodation in South Warwickshire?	<p>Yes</p> <p>Interested in how that would be most effectively delivered through policy.</p> <p>More flexible changes of use? Support accommodation in highly accessible sections of town centres? Sites in close proximity to train stations or other locations where there is good public transport access? Design quality, pedestrian linkages, accessibility of the building, parking provision?</p>
36. Do you agree that the provision of education facilities should be a major priority when delivering new housing?	<p>Yes</p> <p>For all age groups but obviously particularly for children of school age on developments which deliver a high percentage of family housing. The school facilities should be built and ready to open by first occupation. No unacceptable pressures should be put on existing schools who are at their numbers limit.</p>
37. Do you agree that the four overarching principles will deliver the South Warwickshire you want? If not, what changes would you like to see?	<p>Yes</p>
38. Do you agree with this approach to establishing visions for those key places identified in the South Warwickshire Local Plan? If not, what is your alternative?	<p>Visioning is positive and directional but needs to be monitored – after certain time milestones, how close is each Vision to being recognized and how do we measure such? What if it becomes apparent that a Vision should be altered or added to?</p> <p>Issue with Visioning is that it can be subjective and hard to pin down. Needs to be tied to deliverable targets if possible.</p>
39. Do you agree that these should be the strategic objectives for the Local Plan? Are there any others?	<p>Yes</p> <p>Holistic and adaptable.</p>
40. How do you think we should best address the affordability of housing?	<p>Increase new council housing/social housing stock and shared ownership options. Investigate opportunities to bring forward affordable housing development on brownfield sites</p>

	<p>Maintain the existing WDC LP policy whereby 40% of properties on larger developments (11 or more properties) are allocated as affordable housing</p> <p>Explore ways to provide additional affordable homes working with parish/town councils, co-operatives, community land trusts and community housing groups.</p> <p>Develop live/work units where appropriate and required which would also support the local economy.</p>
<p>41. If we are required to meet housing shortfalls from elsewhere, how best should we accommodate such shortfalls?</p>	<p>What is that shortfall?</p> <p>What do both DC's 5 year land supply look like?</p> <p>Review of the 2015 MoU agreed by Coventry City, Rugby Borough, Warwick District, North Warwickshire Borough, Stratford on Avon District and Nuneaton and Bedworth Borough necessary to confirm or alter housing shortfall numbers to be accommodated?</p> <p>Is existing WDC Local Plan policy DS20 still fit for purpose in its proposal for the location of this shortfall?</p>
<p>42. Do you agree with prioritising jobs by increasing employment opportunities and therefore potentially increasing the minimum housing requirement for South Warwickshire?</p>	<p>If necessary, yes but would want to know what amount of housing shortfall we would be required to accommodate from Coventry as well.</p> <p>Where would you be looking to locate this increased minimum number of housing?</p> <p>What types and tenures of housing? Would need to be proportionately spread across the area and not have an adverse impact</p>
<p>43. Are there any locations in South Warwickshire where you have specific infrastructure concerns? Please specify.</p>	<p>???</p>
<p>44. Do you agree with the initial findings of the high-level sustainability assessment of the Growth Options? If not, why not?</p>	<p>Yes</p>
<p>45. Do you agree with the initial findings of the climate change analysis of the Growth Options? If not, why not?</p>	<p>Yes</p>

<p>46. What is your favourite Growth Option and what do you particularly like about this option?</p>	
<p>47. What is your least favourite Growth Option and what do you particularly not like about this option?</p>	
<p>48. Do you agree that we should be considering densification as part of our Growth Option? If not, why not?</p>	<p>Increasing the density of urban areas can support regeneration and sustainability by limiting boundary sprawl and better linking housing to transport infrastructure. Small-scale, “soft” changes to density, such as in-fill development and sub-division and extension of existing properties, can result in increased strains on existing infrastructure if not managed properly but might equally support local businesses and services.</p> <p>Densification can affect the existing character of an area and be opposed by existing residents. Would not support increased densification if it drove out these residents – there are benefits to be had but location, appropriateness and size are key.</p>
<p>49. Do you agree that we should be considering new settlements as part of our Growth Option? If so, where in South Warwickshire should they be located?</p>	<p>Yes - potentially</p> <p>There are already a substantial number of possible new settlements in WDC Local Plan policy DS11 – how many of those have been or are being delivered? This needs to be reviewed before any fresh sites are brought forward. Also link to Q41 and the need to accommodate Coventry shortfall.</p>
<p>50. Subject to the growth option, do you agree that we should be considering exploring growth in Green Belt locations? If not, why not?</p>	<p>Building on green belt land is contentious and potentially divisive, and therefore must be handled with care.</p> <p>The green belt helps prevent urban sprawl and offers valued environmental protections. However, not all green belt land is high quality agricultural land or has</p>

inherent natural beauty. Carefully designed infill developments do not necessarily impede the openness or purpose of the green belt.

If the public benefit of limited development (particularly any which provides an uplift in affordable or social housing) outweighs the loss of the land in the green belt, then it could be allowable. Proposed infill sites that are within or immediately adjacent to existing built-up areas, are proportionate in size to the existing settlement and have good physical infrastructure provision and transport connections could be a positive gain.