

## Response by Leamington Society to Warwickdc.gov.uk/newlocalplan

July 2012

### **PO1 Preferred level of Growth Full version Whole District**

**SUPPORT**

The Leamington Society considers the growth forecast to be realistic because of the excellent rail links, the good education and employment opportunities and the attractive environment of Warwick District.

### **PO2 Community Infrastructure Levy Full version Whole District**

**SUPPORT**

The Leamington Society supports the proposal for a Community Infrastructure Levy.

### **PO3 Broad location of Growth Full version Whole District**

**OBJECT**

The separation of PO3 and PO4 is artificial. The bullet points in PO3 (para. 7.7) are so broad that points 1 & 3 are contradictory. WDC cannot both “concentrate growth within and on the edge of existing urban areas” AND “distribute growth across the District ...”

The Leamington Society is particularly concerned about the threat of coalescence and in particular the narrowing of the gap between Kenilworth and Leamington and between Warwick Gates and Bishops Tachbrook.

We agree with point 4.

PO3 and PO4 have to be considered in parallel – so please see our comments on PO4 when reviewing PO3.

### **PO4 Distribution of Sites for Housing Full version Whole District**

**OBJECT**

#### **Allocation of sites**

There are clearly difficulties in allocating for a substantial increase of housing numbers, while avoiding coalescence and the Green Belt, within the district landscape. It looks as if, to quote a public meeting comment, WDC have decided to spread the pain around while avoiding difficult choices.

Brownfield Sites & “Windfall” (para 7.10 and “Within the Urban Areas”, p.20)

The details on which these have been calculated (also ref “committed” sites) is by no means clearly set out, for example the substantial area north of Leamington Station is not mapped.

Sites Beyond Urban Areas (“Category 1 and 2 Villages” p.21)

Fairly modest, round figure totals have been uniformly allocated to villages. These look like generalised, indiscriminate guesses. One criterion is expressed as concern for sustainability of transport and other services. But (see our response under Built Environment) the Garden Suburb proposals would also be very heavily dependent on the motor car.

We suggest a much more careful and determined focus on one or more settlements outside the towns. Hatton, for example, could provide an area for substantial housing development with enhanced potential for transport links & community services.

Density of Development

Under PO 10, we make strong and specific criticism of the Garden Suburb proposals. Many of the

claimed benefits are bogus, while the low density sprawl is extremely profligate with land and damaging to sustainability of transport and local services.

It would not be difficult to increase the planned average density and the proposed suburban additions around Warwick / Leamington – which cover broadly 3 areas – could be concentrated in only 2 of the three locations. There would still be choices to be made and not easy ones. But this illustrates that the arbitrary adoption of sprawling, “Garden” layout has a major perverse effect on the wish to maintain natural green landscape and/or Green Belt.

We remark elsewhere that low densities are not a magic formula for community cohesion and safety, or indeed for good design of desirable and varied types of dwelling.

Phasing & Locations (Para 7.20, p.18-20)

The Inspector may well doubt WDC's “exceptional” reasons for developing the green belt. With more imaginative and concentrated plans for housing development, the number and extent of suburban sites could be reduced. Meantime the overall extent of growth over the three phases is at best an educated guess.

The rationale for phasing is unclear. There seem to be at least three vague notions driving the idea of spreading development over time and locations. These are

- a reference to employment in different areas (eg to north or south of Warwick / Leamington);
- the idea the developer might like a wide choice;
- the previously mentioned “spreading the pain”, which is a defensive political strategy.

People change jobs and family members may work in different areas, often commuting long distances quite unlike the early garden city days of the 1920s.

The phasing should be concentrated first on Urban Areas: any plans afoot for the sites indicated should be accelerated to phase 1.

**The Green Belt locations should be limited to phase 3 if, and only if, they are found to be essential.**

As stated above in our response to PO3, the Leamington Society wishes to avoid the threat of coalescence in both north and south Leamington.

We are also keen to see new communities developed in a sustainable way with good access to amenities and transport links. We should like the Council to consider an extension to Hatton Park instead of some of the proposed sites where there is good access to the A46, Warwick Parkway Station and bus and cycle routes. An increase in population at Hatton Park would enable the area to support local shops, a school and community centre activities near residents’ homes.

**PO5 Affordable Housing on Housing Development sites Full version Whole District SUPPORT**

The Leamington Society supports the 40% requirement for affordable housing.

With reference to PO6 (Housing) WDC should also appreciate that HMOs now occupy many of the smaller and more affordable family houses, particularly in the south of Leamington (Old Town). The absence of any policy to restrict the many recent conversions to HMOs has aggravated the problem of affordable housing: they are so profitable for landlords that poorer families are priced out of the market.

**PO6 Mixed Communities & Wide Choice of Housing Full version Whole District**

**OBJECT**

**Only Part D of PO6 is not fully supported by the Leamington Society:**

**A.** The Leamington Society fully supports the principle of mixed housing and varied types but the means chosen in PO10 will not achieve this:

Garden suburbs prescribes row upon row of uniform suburban plots and is too homogenous. Only a small proportion of the population wants to grow their own food and cultivate a big garden. Many have neither the time, energy nor inclination for this and would be happy with communal parks and gardens and playing fields, which have scale and variety and someone else does the maintenance. To meet varied need, a wider and more imaginative mix of terraced houses, flats and maisonettes around courtyards, with off-road parking facilities for cars and bicycles and rubbish bins, would take up less land and be more appropriate.

**B.** No comment

**C.** We support the proposals for provision of homes for older people, which are typically built to a density of 50-100 / hectare and are a good example of urban design with communal gardens.

**D.** We consider it very important to avoid high concentrations of student accommodation and HMOs to maintain a balanced community. We recommend the introduction of maximum percentages of such properties or populations within specified areas. The number of houses in multiple occupancy, whether by students or others, has reached extremely high levels in much of south of the River Leam in Leamington (often referred to as Old Town). WDC has mapped the density of registered HMOs; see Item 6 and Appendices at

<https://estates3.warwickdc.gov.uk/cmis/Meetingdates/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/225/Committee/29/Default.aspx> This high density places an enormous strain on-street parking space. Therefore the new local plan needs to

- control both the density of HMOs
- require reasonable levels of off-street car-parking in all new HMOs
- ensure these requirements apply to HMOs, student accommodation and student hostels irrespective of their designation.

The Council should decide whether some areas of Leamington have already reached saturation point, and look at how well located student hostels could help manage the problem of over concentration.

With reference to PO5 (Affordable housing) WDC should also appreciate that HMOs now occupy many of the smaller and more affordable family houses, particularly in the South of Leamington (Old Town). The absence of any policy to restrict the many recent conversions to HMOs has aggravated the problem of affordable housing: they are so profitable for landlords that poorer families are priced out of the market.

**PO7 Gypsies and Travellers Full version Whole District**

**SUPPORT**

The Leamington Society supports the proposal to provide a site or sites for gypsies and travellers in cooperation with neighbouring districts in order to meet the evident need and to avoid confrontation over illegal sites.

**PO9 Retailing & Town Centres Full version Whole District**

**OBJECT**

Regarding town centres, the Local Plan is based on the following key principles and policy objectives:

- Ensuring that communities have access to “sustainable” destinations for their shopping needs.
- Focusing on the town centres to satisfy those needs, while strongly resisting any further out-of-town retail development.
- Providing a major retail-led development in Leamington town centre.

Whilst the Leamington Society fully supports the “town centres first” principle we believe that the PO9 policy outlined does not reflect the needs, or indeed the views, of the citizens of the district. Neither does it respect or enhance the individuality, historic and cultural nature of our existing town centres.

We therefore urge that the following comments are taken into account before the local plan is finalised.

### **1. The Leamington town centre and Clarendon Arcade**

The Local Plan’s preferred option for retailing and town centres (PO9, p.46), contains only one proposal of any substance: “... the addition of a major retail-led development scheme in Leamington Town Centre.” This we assume refers to the project to redevelop the Chandos Street area project, known as the Clarendon Arcade, which was rejected by the Planning Committee in November 2011.

In justifying its preferred option for retailing and town centres, the Plan cites (p.47) almost a page of recommendations taken from The National Planning Policy Framework (NPPF), para. 23.

However, it is by no means clear that the NPPF provides unequivocal support for the Clarendon Arcade proposal in its present published form. Of course the Plan echoes the NPPF in its desire to promote the “vitality” of town centres, but this term is undefined and thus cannot in itself serve as a guide to action. Moreover it is hard to imagine how anyone could oppose such an objective; the real issue is not whether town centre vitality is desirable, but how best to promote it.

On this question the NPPF is somewhat ambiguous. On the one hand it urges local authorities to “promote competitive town centres that promote consumer choice and a diverse retail offer” – a sentence which has been seized upon by supporters of the Clarendon Arcade project as justification for it. However the very same sentence in the NPPF also urges that development should “reflect the individuality of town centres” (see Plan, p.47). It is highly questionable whether the Clarendon Arcade proposal satisfies this criterion.

Further, the same paragraph requires local authorities to “recognise that residential development can play an important role in ensuring the vitality of town centres and set policies to encourage residential development on suitable sites ...”. Of course, the relevance of this sentence to Clarendon Arcade hinges entirely on whether the site is considered suitable for residential development. The Leamington Society, noting that the site’s previous use was largely residential, takes the view that it would be appropriate to use a good proportion of the site for residential purposes. This would, as the NPPF states, contribute importantly to the vitality of the town centre – especially in the evenings, when Clarendon Arcade as presently proposed would be closed. Some residential use of the site would also significantly reduce the commercial risk of the development. Given the rapid structural change now occurring in retailing, to devote the entire site to retail development would be risky to the point of folly. We return to this question of risk below.

It is worth noting that such a mixed development of residential and retail use is also in accordance with the NPPF guidelines, which state (para. 24) that “applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.” Further, the NPPF points (para. 131) to the “desirability of new developments making a positive contribution to local character and distinctiveness.” This advice also supports the view of many of the critics of the Clarendon Arcade proposal, including the Leamington Society, that the proposed development is oppressive in its bulk, is without aesthetic merit, and by no stretch of the imagination would make a positive contribution

to local character and distinctiveness.

The Leamington Society believes that any development of a mall type on the Chandos Street site or elsewhere would, far from promoting the vitality of Leamington town centre, be actually destructive of its vitality. This is because shopping malls typically involve the privatisation of hitherto public space. In the case of Clarendon Arcade, three streets would be lost, which is not only objectionable in itself but is also destructive of the grid pattern of streets which is such a distinctive feature of Leamington town centre. Malls also result in “gated communities” where security and law enforcement is passed to private companies, with loss of accountability to the larger community. There is more loss of public rights in the fact that malls are typically open only during shopping hours. The presence of dark, shuttered malls in the town centre saps vitality by damaging the “evening economy”, upon which town centres are becoming increasingly dependent as the traditional town centre retailing model fades.

Yet another feature of the Clarendon Arcade proposal which conflicts with advice given in the NPPF concerns traffic management and parking in Leamington town centre. The NPPF advises (para. 39) that “parking policies should take into account the need to reduce the use of high-emission vehicles.” This refers of course to private cars, and clearly the provision in the Clarendon Arcade proposal for parking on the two highest levels for 340 cars is in complete opposition to para. 39. Indeed, more generally, even if the Clarendon Arcade proposal contained no provision for parking whatever, the core of the argument that is used to justify Clarendon Arcade is the perceived “need” to attract shoppers from other centres such as Solihull and Banbury. There can be no doubt therefore that, if successful in its own terms, Clarendon Arcade would increase rather than reduce the use of high-emission vehicles.

More generally, there is a clear tension, not to say contradiction, both in the NPPF and in the Local Plan between appropriate policies for town centres and policies for transport. The Plan’s transport policies are discussed in more detail elsewhere in the Leamington Society’s submission, but one key point is worth noting here. The general objective of the Plan’s transport policy is to promote “sustainable modes of transport, such as walking, cycling and public transport” (see PO 14, p. 74). One important element of this is the development of two park-and-ride schemes (see map 5 in the Plan). However, at the same time the Plan proposes to “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.” This is perhaps the most blatant contradiction in the entire Plan; for as common sense tells us, and is borne out by the experience of towns such as Oxford, it is only when parking in town centres becomes difficult and expensive that motorists begin to explore other options such as park-and-ride. Conversely Southampton’s policy of providing abundant town-centre parking at its West Key development shows clearly that this creates enormous problems of traffic congestion.

#### *The evidence base for Clarendon Arcade*

The Plan states that its preferred option of “a major retail – led development scheme in Leamington town centre” is “in accordance with the identified need/evidence within the retail study.” (PO9, p.46) The study referred to is presumably The Retail and Leisure Study commissioned by the District Council from the consultants Strategic Perspectives LLP (sic) and delivered in 2009. It updated an earlier study, delivered in 2004. The Study concluded that there was already in 2009 a large existing “need” for additional shopping facilities in Leamington and that this need would increase greatly in the future unless new shopping area was provided on a massive scale.

The requirement for such evidence is specified in the NPPF, where paras. 160-1 state that “local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should ... prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market. ...Local planning authorities should use this evidence base to assess ... the role and function of town

centres and the relationship between them, including any trends in the performance of centres...”

Regrettably, the Retail and Leisure Study does not constitute a “robust evidence base”. It contains a number of serious errors which render its conclusions valueless. (A detailed analysis in support of this contention is available from the Leamington Society).

Another source of evidence cited in the Plan (p. 49, para. 9.20) in support of Clarendon Arcade or similar mall development is Leamington’s position in the Venuescore ranking, which has slipped slightly, from a ranking of 101 in 2006 to 108 in 2007, out of over 2000 shopping locations. Venuescore is a research report on retailing published annually by Javelin Group. Venuescore awards points for each retail multiple store that is present in a shopping centre. A store classified as a “premier department store” scores 20 points; a store classified as a “major department store” scores 10 points; and so on, down to a minimum of 2 points for a “leisure destination”. Shopping centres throughout Britain are then ranked according to their total points score. There is obviously a strong element of arbitrariness both in the classification of stores and in the number of points awarded to each class. The scoring system will automatically favour large towns since their centres will contain more shops. For example, Coventry has a far higher score than Leamington, and Doncaster ranks higher than Harrogate. Moreover, local shops carry no weight at all, which particularly penalises a town such as Leamington with its exceptional number and range of solo shops. For these reasons, the Society feels that a small change in Leamington’s position in the Venuescore ranking is not a firm basis for policy.

In support of Clarendon Arcade the Plan also cites in the same paragraph a decline in “footfall” in the northern section of Leamington town centre. The Retail Study reports footfall counts in The Parade and adjacent streets recorded annually between 1999 and 2007, noting that footfall fell by 11.8% over this period and by 1.7% in 2007-08. However, we are not given any information about the date or dates on which the count was taken. This is important because, for example, variation in the weather can obviously affect footfall dramatically. Also, there is enormous month-to-month variation in footfall counts. A footfall count over a period of one week, or even one month, is an extremely unreliable indicator.

Moreover, the significance of any alleged decline in footfall in Leamington should be assessed by comparison with changes in footfall elsewhere. National footfall as published by Experian, a market research company, fell by 2% between June 2007 and June 2008, which makes the fall of 1.7% in Leamington reported above look good. Indeed, national footfall has fallen in most years since 2003 when the data was first collected. If footfall in Leamington is in fact declining – which is highly questionable on the evidence published by WDC – this is simply following a national trend, a further reflection of the demise of the traditional model of high street shopping.

In addition to these many shortcomings of the evidence base on which the case for Clarendon Arcade is founded, the idea that Leamington needs another shopping mall, which may have been plausible ten years ago, has now been overtaken by the rapidly changing retail scene in the UK. In addition to the effects of the current recession, which most observers expect to last for several years more (and even indefinitely, in some views), retailing is undergoing very rapid structural change, due partly to the rapid switch to internet shopping and partly to the consolidation of retail chains into a smaller number of larger stores, predominantly out-of-town.

The recent Ofcom annual report (2010-2011) published in July 2012 reported 30% growth in the full year to February 2012 in on-line sales; see page 13 of the summary of the full report

[http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr12/UK\\_0.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr12/UK_0.pdf)

This is being driven, even accelerated, by the adoption of smartphones that enable their users to “robo shop”, i.e. research purchases in shops by scanning bar-codes or now QR codes, then visit price comparison web sites before making an on-line purchase. (See page 11 of the Ofcom report.)

While the Ofcom noted out that “The high street still accounts for the majority of revenues, but its growth has been much less”, such growth rates will eventually threaten even the high street, unless it modifies what it offers. The Javelin consultancy now predicts that retailing as a whole will grow only by 1% per year between now and 2020. Within this total, internet shopping will continue to grow very rapidly, but by 2020 there will be 20% less chain store space needed in town centres, and chain store numbers will fall by 31%. Stores will be bigger in size and located in key locations such as Bicester Village, the Bullring in Birmingham and Touchwood in Solihull. To continue to pursue the Clarendon Arcade project is to close one’s eyes to these hard facts. If Clarendon Arcade is built, yet fails, this would be very damaging to the town. Leamington cannot expect to swim successfully against the tide of national trends in retailing.

## **2. The way forward for retail in the historic towns of Warwick district**

The town of Leamington Spa is described as an important sub-regional shopping destination containing a department store (HOF) and other branded outlets and High Street chains together with many independent shops. It acknowledges the town’s unique intrinsic Regency character and its importance as a location of fine houses and as a residential centre with major offices, civic buildings, “Old Town” and a diverse range of restaurants, hotel and leisure facilities.

The other two main town centres (Warwick and Kenilworth) are also clearly described in relation to their unique specialist retailing activities, including the recent addition of Waitrose regarded as a rather special form of food outlet.

Out-of-town retail parks have a role in that they provide the opportunity for families to make weekly/monthly purchases of bulky or heavy items and use trolleys to easily wheel the purchases to their cars in ground level car parks. This ingredient is not easily deliverable in historic town centres.

Out of town shopping centres also allow viewing of bulky or major budget items such as white goods, TV and electronics, home furnishings, motor accessories, DIY and gardening goods etc. These goods may then be purchased and take away immediately, delivered later, or even ordered subsequently on-line.

Therefore, whilst the policy of strict control of the expansion of these outlets is essential, it is important to recognise that do have a role for our community and will continue to exist.

## **3. The real needs of the Leamington Spa town centre**

The Mary Portas report suggests possible ways to address these issues, and the Leamington Society believes WDC needs to consider how this can be done.

Town Centres, particularly those contained within the WDC have enormous historic and cultural significance and both residents and visitors appreciate the small, local, artisan type of business, visitor attractions, shops and local markets. This loyalty, and the thousands of visitors that this will attract, will help them to flourish and grow naturally.

PO9 sets out the principle of strongly resisting out of centre development in order to protect town centre activities. This should not imply that such “mega stores” should be introduced to our town centres for reasons already given. The town centre should not seek to compete head-on with out-of-town developments.

Our town centre will be better served by this approach rather than introducing shopping malls with large “anchor” stores in the historic town centre of Leamington Spa; this will not ensure the vitality of the town centre in the rapidly changing retail environment (see PO9).

### **Old Town**

In PO9 there is no specific policy for Old Town (para 9.4) and this is a serious omission. Previously the area was clearly identified as a “second focus” in Leamington (e.g. Core Topic Paper 8 – 2006,

para. 2.4). While there has been some investment and regeneration work in recent years, the task is by no means complete. WDC should seize the opportunity offered by the successful Mary Portas bid for the Old Town Business Association.

While the sum of new money is modest, in terms of regeneration, with carefully matched funding it could herald major improvements in Old Town.

## **PO10 Built Environment Full version Whole District**

## **OBJECT**

The Leamington Society *supports* the fourth bullet point of PO10

**“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.”

Specifically we would encourage WDC to put in place procedures to limit and reduce street clutter (A boards, unnecessary roadside signs etc.). Likewise, WDC should have the power to force the owners of homes or buildings to remove vegetation obstructing footpaths.

**Our chief objection** relates to material in **Appendix 3** (para 10.3):

We are concerned about the proposed development of so called “Garden Suburbs” (GS) on the edges of the District towns with a low density layout. The prospectus is full of green pictures captioned with a number of assertions about the alleged benefits of a GS. It also makes an unsupported claim to inherit the founding principles of such suburbs, for example Brentham Village (London Borough of Ealing).

The facts are:-

1. The anticipated WDC housing developments bear little or no relation to the social and economic principles invoked. The original GS movement was mutual and co-operative in its motivation, providing houses for rent. (Most of Brentham's houses have long since been sold off). The WDC plan is for developer led and financed, commercial development. It may or may not fit the bill, but it is not rooted in GS principles.

2. Many of the alleged benefits claimed for a GS owe nothing specific to the Garden layout, they are simply good architectural practice, applicable to all manner of new development, such as

page 6 “design of individual groups to create variety and character”

page 15 “turning a corner” – an architectural skill unrelated to a GS layout.

page 8 “Community buildings instil a strong sense of identity and community” which is a statement of the obvious – again unrelated to GS layout.

3. Many of the captions have no factual basis:

Page 5 “Green lined streets help create safe and convenient places to work and cycle.”

Page 14 “allows for bus and safe cycling” and page 16 “Regular bus services to the district and town centre.” (Bus provision is a big assumption – see PO14 comments)

Page 15 “Tree lined streets feel intimate” (actually these are less intimate than narrow urban streets)

Page 17 “Cars form an orderly element in the street” (or, more usually, an ugly clutter)

### **A MISLEADING PROSPECTUS?**

The most worrying feature is that the Prospectus is not only full of meaningless assertions, but also seriously misleading.

Page 2 opens with a challenge :-

“We need to find new ways of creating high quality and sustainable homes at a *price people can afford* (our italics)”. There follow photos of expensive houses in Hampstead Garden Suburb, London and of Northumberland Road.

Sustainable Development Opportunities are cited :-

- Integrated water and other systems “may be possible”
- District heating “may be possible”. Both are actually least likely in a low density suburb.
- “Car use and parking required” which is a negative feature (See our comments on traffic PO14).

## **SUSTAINABILITY**

The prospectus is full of green pictures – row upon row of suburban lawns – but note that this is not countryside. It is suburbia, sprawling at low density and it is car dependent and extravagant of space. It is the least sustainable type of development – in terms of transport, civic amenities, utilities, and of land use. It is not only extravagant of resources, but also more expensive both in development and living costs.

The muddled thinking, which has perhaps led to these notions of a virtuous, sprawling green suburbia, is best illustrated in Para 7.14 in the HOUSING section.

“Many felt that increasing sprawl around existing towns would damage the rural setting of the towns . . . follow the emerging garden suburbs principles in order to overcome this loss of rural character.”

In essence this is saying that we don't want our towns to sprawl into the countryside - so why not spread developments at low density so that they sprawl over a whole lot more of the countryside. We will call them garden suburbs and suggest that all this extra suburbia is really countryside.

It is argued that the GS layout is good because all the greenery encourages wildlife, food growing, soaks up rainfall, etc. But if the authors only paused to reflect it is obvious that more compact development would leave more acreage of real countryside, as well as scope for green wedges, allotments, etc. in between and at the margins of development.

### **PO11 Historic Environment Full version Whole District**

**SUPPORT**

Local lists. The Leamington Society supports the recognition of local assets through Local Lists, and would like Local Lists to be introduced quickly to add protection to landmark buildings and assets which do not satisfy the more rigorous standards required for full listing.

11.7 This policy will help the Planning Authority “to justify the status given to the historic environment, ensure appropriate significance of an asset is understood, and rectify deliberate neglect and damage”

### **PO12 Climate Change Full version Whole District**

**SUPPORT**

The Leamington Society supports the assertion (para. 12.26)

The use of green space and vegetation, (such as street trees) to provide summer shading and allowing winter solar gain.

More street trees and vegetation will not only satisfy national and global Climate Change requirements but will also enhance the realm of Warwick District, making it a more pleasant area for

everyone who lives or works here, or visits the district.

## **PO14 Transport Full version Whole District**

**OBJECT**

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

The Leamington Society believes that the stated aspiration – to minimise etc – is admirable but the proposals elsewhere in the document do not merely fail to advance that aspiration; in several particulars they are in direct contradiction to this stated objective:

“Ensuring that new housing neighbourhoods have close range of access to a range of key facilities either within the development or within a short walk (e.g. 15 minutes)”

Low density development is proposed by Garden Suburbs (GS) in PO 14.

This GS layout causes sprawling suburbia and much longer distances to key facilities than in more tight knit communities. There can be no doubt that GS development inevitably relies very heavily on the motor car as the default, almost required, mode of transport.

This is definitely not a sustainable option. It frustrates the best intentions of greener minded citizens (buses not viable, cycling at higher risk, walking long distances) and inhibits mobility for those who do not drive or do not have the use of a car (the young, the old, the poor). The mention of a “short walk (e.g. 15 minutes)” illustrates the unreality within this document. Ideally of course we should think nothing of walking 15 minutes to a shop or bus stop; that may well have been accepted in the days of Ebenezer Howard, when cars were a rare and unreliable novelty. Few of us live like this nowadays.

### **Introduction and Justification**

Throughout this document there is much reference to sustainability (see also PO12). 14.11 quotes the NPPF “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.” whereas, as shown above, the Garden Suburb layout would deny them this choice.

14.3 states in the Introduction that “cars will continue to play a *vital* role in people's lives ...”. This on its own seems a reasonable statement (although it begs the question – does “people's” assume everybody's lives?). Compare this with :-

14.4 “It is *important* other forms of transport ...” which clearly assumes that sustainable transport is actually not “vital” like the motor car. This denies the basic tenet of the NPPF quoted above – WDC tips the balance in favour of the car.

This particular example illustrates a running theme of this document: much talk of sustainability but it fails to provide serious policies to further that end.

It is of course true that Transport is mainly a County responsibility and is driven by national policies (or lack of them). Most of the levers of transport policy are not available to the District. That said, if WDC publishes a chapter headed “Transport” it should not exacerbate the problems (as in the Garden Suburbs); nor should it express a prejudice contrary to NPPF; and it needs to target more specific measures for sustainable modes.

### **Preferred Option Provision of Transport Infrastructure**

PARK & RIDE Ref Map 5

The northern P&R could better be located at the area of Thickthorn roundabout close to the junction of A46 / A452 (on the major bus route Kenilworth-Leamington). This is close to the new housing development proposed to the SE of Kenilworth. This P&R could also be linked via the pick-up area just to the north of Leamington as on map 5 – particularly if the proposals for new development at

that location take place.

## RAIL

The scheme for a renewed rail service, north from Leamington via Kenilworth should be a clearly stated policy objective in the Plan. The present rail system is poorly integrated into the town's transport: buses leave from outside the station at 30 minute intervals at peak times on weekdays and even less frequently at weekends. There are no services after 19:00 hours any day.

A frequent shuttle bus service linking the station to the town and vice versa would make a good substitute for car travel and parking. The University of Warwick subsidises the bus service to the university in term time – cannot the Chamber of Trade and Town and District Council support a shuttle bus?

## BUS

Again, WDC has little potential for shaping policy. However the local services fall far short of the stated NPPF policy for balance in favour of sustainable transport. It is for example lamentable that there is no effective evening bus service linking the principal towns of Warwick and Leamington; similarly evening travellers to or from Leamington Station lack a service through the town. As a matter of integrity of public policy, vague statements of aspiration are not enough..

## CYCLE ROUTES

As with buses, these fall far short of realistic provision. One potential, but unmentioned policy, could be an increased move to 20 mph speed limits in built up areas: at present many cyclists take to the pavements for lack of dedicated routes, while at serious risk from motor vehicles.

### **Preferred Option: Parking**

The Leamington Society supports (p. 74)

“Our preferred option is to ...:

- ensure that sufficient car parking is provided within new residential developments to allow for convenient and safe parking”

and believes this policy must be applied to any proposal to convert existing houses to HMOs, student hostels or other student accommodation, whenever it will increase the requirement for on-street car parking.

PO14 also includes an aspiration to:

- “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 centre are provided”

The key words are “sufficient”: does this mean predict and provide for the developers' wishes (see PO9)? Then there is the phrase “effective alternatives” – when in fact the alternatives are not specified.

The balance is set overwhelmingly in favour of wooing the motorist shopper.

It is not a truly sustainable policy.

### **PO17 Culture & Tourism Full version Whole District**

### **OBJECT**

The Leamington Society shares the concern at the lack of visitor attractions and the need to increase and enhance tourism. However we feel that the Council's policy is too narrow and limited in scope. It does not support “appropriate development of tourism and visitors accommodation” because it has **no stated policy** towards achieving many of the activities listed below, most of which are well

established methods to attract visitors into the district, and particularly the town centres.

Surely the policy must spell out, in language easily understood by both residents and potential investors in the district, what can be done by us all, together with the incentives, in order to increase visitors and tourist income to our towns.

We believe the Council should consider the protection (from Change of Use orders), and encourage the construction and maintenance of buildings and open sites to house:

- **Information** Properly trained and staffed Information centres for all three main towns in central and accessible sites. These must be equipped with computerised real time booking facilities for local B&Bs and hotels and open long hours (as is done in Bath to great effect).
- **Hotels** Good value hotels to serve as a centre for touring in all three towns with provision for nearby and overnight parking. The prerequisite for new visitor accommodation in rural areas to be accessible by means other than the private car is unreasonable and too restrictive.
- **Theatres, concert halls and cinemas** Theatres for professional productions of plays, operatic and musical productions and with real facilities for amateur groups are needed, as are concert venues for professional and amateur groups good enough to attract international artists. These are *in addition* to the cultural quarter (Opportunity Site D) – the *only site* mentioned in the consultation document. The Spa Centre is but one example.
- **Nightlife** Nightclubs and evening entertainment activities (such as the successful Assembly rooms). Many student and amateur bands yearn to have town centre gigs.
- **Food & Drink** A choice of food and drink venues: Restaurants / Bistros / Bars and national popular brands (McDonalds, KFC, Wagamamas) in town centres.
- **Sport** Sporting events (such as National Bowling events in Victoria Park) and also to attract popular national events such as Darts / Choir contests / Indoor bowls / Talent shows etc.
- **Markets & funfairs** Facilities for fun-fairs and markets including regular markets for local crafts people and other groups: Farmers markets, Christmas markets, the popular Arts Trail, the French market.
- **Libraries and classrooms** Libraries and Adult education provision: Line and ballroom dancing, art clubs, craft clubs, Tai Chi, Yoga, Literary clubs, Pilates and sport generally.
- **Parking provision** Provision of late night and low cost parking for evening events – is this a Planning issue?
- **Religious events** Churches, mosques, temples, the Gurdwara, festivals, memorial services.
- **Development of the town of Leamington Spa as a Conference Centre** This should be considered with the E.C. Harris report on the district's assets (perhaps a good new use for the Town Hall or Riverside House?). The spa town of Harrogate is a successful conference centre model which consistently attracts national conferences and trade shows of a diverse nature. Examples are the Gift Fair, Antiques Fair, National Bedding Federation, National Furniture Show, Recruitment Fairs, All major Party Political and Trades Union conferences and others.

The provision for Camping and Caravanning sites (RAP15) should include provision for the accommodation of travellers. See **PO7**.

Central to the planning policy for tourism and its potential for genuine implementation must be the provision of good **Policing and Security policies** particularly for night time, late night and high attendance events.