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|  <b>Executive</b><br><b>23<sup>rd</sup> July 2008</b>   |   | <b>Agenda Item No.</b> |
| <b>Title</b>   | Interim comments on the Preferred Option to the Regional Spatial Strategy   |                        |
| <b>For further information about this report please contact</b>  | John Archer, Head of Planning   |                        |
| <b>Service Area</b>  | Planning  |                        |
| <b>Wards of the District directly affected</b>   | All   |                        |
| <b>Is the report private and confidential and not for publication by virtue of a paragraph of schedule 12A of the Local Government Act 1972, following the Local Government (Access to Information) (Variation) Order 2006</b> | No  |                        |
| <b>Date and meeting when issue was last considered and relevant minute number</b>  | Executive, 8 <sup>th</sup> March 2007 (minute no. 923)<br>Executive, 10 <sup>th</sup> September 2007 (minute no. 404) |                        |
| <b>Background Papers</b>   | Executive report: 8 <sup>th</sup> March 2007<br>Executive report: 10 <sup>th</sup> September 2007                     |                        |

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|--|---------------|
| <b>Contrary to the policy framework:</b>                                   | No            |
| <b>Contrary to the budgetary framework:</b>                                | No            |
| <b>Key Decision?</b>   | Yes           |
| <b>Included within the Forward Plan? (If yes include reference number)</b> | Yes (ref: 64) |

| Officer/Councillor Approval   |            |                 |
|---|------------|-----------------|
| With regard to officer approval all reports <u>must</u> be approved by the report authors relevant director, Finance, Legal Services and the relevant Portfolio Holder(s).  |            |                 |
| Officer Approval  | Date       | Name            |
| Relevant Director   | 25/06/2008 | Craig Anderson  |
| Chief Executive   | 26/06/2008 | Chris Elliot    |
| CMT   | 26/06/2008 |                 |
| Section 151 Officer   | 26/06/2008 | Mary Hawkins    |
| Legal   | 25/06/2008 | Simon Best      |
| Finance   | 25/06/2008 | Marcus Miskinis |
| Portfolio Holder(s)   | 30/06/2008 | John Hammon     |
| Consultation Undertaken   |            |                 |
| Various consultations have been undertaken to help inform the recommendations in this report. These include:- <ul style="list-style-type: none"><li>Seminar to all councillors – February 2008</li><li>Meeting of Development Plans Working Party – June 2008</li></ul> |            |                 |
| Final Decision?   |            | Yes             |
| Suggested next steps (if not final decision please set out below)   |            |                 |

## **1. SUMMARY**

- 1.1 Appendix A to this report summarises and comments on the Preferred Option to the West Midlands Regional Spatial Strategy (Phase 2 Revision). It makes recommendations for the how the Council may wish to respond to this document during the current public consultation.

## **2. RECOMMENDATION**

- 2.1 That the Executive approves the recommended response in appendix A below as the Council's formal comments on the Preferred Option stage to the Regional Spatial Strategy (Phase 2 Revision).

## **3. REASONS FOR THE RECOMMENDATION**

- 3.1 The West Midlands Regional Assembly is currently consulting on the Preferred Option to the Phase Two Revision to the Regional Spatial Strategy. This is the second formal stage of the Phase Two Revision of the current West Midlands Regional Spatial Strategy and is looking to provide a strategic planning framework for the West Midlands region up to 2026. The Council, along with many other local authorities and other agencies, has been consulted on this document. It is important that a response is given to highlight areas where the Council can support the Review but also to highlight issues of concern.

## **4. ALTERNATIVE OPTION CONSIDERED**

- 4.1 The Council is not required to make any comments at all at this, or indeed any stage of the Regional Spatial Strategy Review.

## **5. BUDGETARY FRAMEWORK**

- 5.1 The Regional Spatial Strategy (RSS) has a major impact on development in Warwick District which will have an impact, in due course, over the funding and delivery of a wide range of Council services. The process of the Council commenting on the Regional Spatial Strategy documents (and possibly attending the Public Examination into the RSS in 2009) has no financial implications and can be delivered using existing resources.

## **6. POLICY FRAMEWORK**

- 6.1 The Regional Spatial Strategy (RSS) has a major impact on development Warwick District by providing a strategic framework within which local planning policies are prepared. In particular, the RSS sets figures for housing and employment levels that the District will need to deliver. These matters have wide reaching impacts on many areas of Council policy.

**West Midlands Regional Spatial Strategy  
Phase 2 Revisions – Preferred Option  
July 2008**

**1. Introduction**

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- 1.1 Members will be aware of the significant work that is being undertaken across the West Midlands region to review the current Regional Spatial Strategy (RSS). Following the publication of the RSS in June 2004, the Secretary of State recommended that some issues should be immediately looked at and developed further. The Regional Planning Body (RPB) took the decision to carry out this task in a phased way. Phase One concentrates on the Black Country Study, where the aim was to identify and 'fast-track' urban renaissance proposals through to implementation. Phase Two is considering housing, employment, transport and waste across the West Midlands region, while Phase Three will look at a range of other issues including; critical rural services, provision for gypsies and travellers, recreational provision and quality of the environment.
- 1.2 This report focuses entirely on the work being undertaken on Phase 2 of the RSS Revision. The purpose of this report is to threefold. It seeks to:-
1. Remind members of the stages that have so far been undertaken so far in the Phase 2 Revision (including decisions which the Council has already made).
  2. To report, and comment on, the contents of the "Preferred Option" document that is currently out for public consultation.
  3. To recommend a response from the district Council to this "Preferred Option" public consultation,
- 1.3 As members will be aware, the Government has intervened in the current public consultation to require that further work be undertaken (independently) to look at options that could deliver higher levels of housing than those set out in the Preferred Option document. This work is still being undertaken and I understand will not be available until early October. This report therefore only focuses on the figures contained in the Preferred Option document.
- 1.4 Because the RSS Preferred Option as submitted remains the substantive document, it is appropriate to report it to members at this stage. This will enable a position to be established on the West Midlands own view of how its future should be addressed. A further report on the implications of the Government's own study will be brought before you in the Autumn for you to consider any further submissions in the light of this new evidence.
- 1.5 Prior to this meeting, I have taken the opportunity to brief all councillors on the contents of the RSS Preferred Option document. I have also discussed the contents of this report with the Development Plans Working Party who have broadly supported the recommendations I am making today.

## 2. The Phase Two Revision: The story so far

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- 2.1 A key driver to this review of the Regional Spatial Strategy has been the Government's desire to see greater levels of house building across the country to meet the needs of our growing population. In July 2007 the Government published a Housing Green Paper which clearly set out its priorities in this area. The Green Paper stated:

*"We want everyone to have access to a decent home at a price they can afford, in a place where they want to live and work".*

*"Our first challenge is to provide more homes. Housing supply has increased substantially in the last few years and is now at its highest level since the 1980s, but supply is still not keeping up with rising demand from our ageing, growing population."*

- 2.2 The Government's intention is to see 3 million new homes built by 2020, and it expects a significant proportion of these to be met through reviews of Regional Spatial Strategies across the country. Information on how many new households will be formed is provided through annual household projections provided by the Office for National Statistics. It is these that have largely guided the production of the figures for the West Midlands Regional Spatial Strategy.

### **RSS Spatial Options Report**

- 2.3 In November 2006, the West Midlands Regional Assembly approved a document entitled "West Midlands Regional Spatial Strategy: Phase 2 Revisions: Spatial Options" for public consultation. This public consultation was undertaken between January and March 2007 and the Council made its formal response in March. This was a detailed response which followed a pre-set format of questions set out by the Regional Assembly. Within this overall response, it is worth drawing out one key comment made the Council.

#### **Question H1: What overall level of new housing development do you think is appropriate to plan for across the Region**

Warwick District Council recognises that it is important for the country in general, and for the West Midlands region in particular, to meet its housing needs. The Council has no evidence to dispute the figures produced by Government that underpin the Spatial Options in the report. If, following careful analysis by the Regional Assembly and ultimately by the Secretary of State, a level of household growth is agreed, then all authorities in the West Midlands region should consider how they play a positive and appropriate role in meeting this need. In doing this, it is right and proper that:-

1. regard is given to all proper factors including the capacity and infrastructure of the region as a whole, and its constituent parts, to absorb this level of growth. This would particularly apply to levels of housing provision above the Option 2 level which this Council considers it may have significant difficulties in accommodating.

2. this is done in a manner which supports the principles of Major Urban Area (MUA) renaissance within existing RSS11 and reflects principles of sustainability where provision is required elsewhere.

### Developing a sub regional strategy

- 2.4 For regional planning purposes, Warwick District sits within the Coventry, Solihull, Warwickshire sub-region. For some years there has been an informal grouping of all of the local authorities in this area to consider matters of shared interest in planning and economic development. A sub-regional Coventry, Solihull, Warwickshire Forum (the CSW Forum) has been established to enable this to happen and provide a basis for sub-regional working.
- 2.5 The CSW Forum has considered how the sub-region as a whole should respond to the growth proposals put forward in the RSS revision. In June 2007 it agreed a sub-regional planning strategy which was then forwarded to the Regional Assembly. In summary, the CSW Development Strategy for the RSS is to:-

- Seek to meet the significantly higher housing levels generated by local needs and migration into the sub-region in a manner which supports the principles of MUA renaissance within RSS11
- Focus most of the housing development in the North-South Corridor running from the vicinity of Nuneaton in the north, through Bedworth, Coventry, Kenilworth, Leamington to Warwick in the south.
- Adopt a specific sub-regional focus role for Rugby related to the situation and needs of the CSW sub-region.
- Allocate employment land, in balance with the level of housing growth, sufficient to provide for the job needs of the sub-region's workers and its strong economic integrity and growth potential.
- Ensure that the Strategic Centres of the CSW sub-region act as the primary focus for investment in retailing and for mixed use development of offices, civic, leisure and housing.
- Achieve a balance of waste management provision relative to the needs generated by the sub-region,
- Upgrade strategic transportation infrastructure, particularly public transport based on rail and bus modes,

- 2.6 The CSW Forum also set out a Position Statement on how the Regional Assembly should address housing allocations in the sub-region. This was as follows.

CSW Forum proposes that the RSS:

**Adopts** the main elements of the CSW Strategy and endorses the CSW Subregion for the purposes of RSS proposals & policies.

**Provides** for estimated housing demand generated by CSW to be met in the Sub-region – so long as it is robust and can be met within the CSW Strategy.

**Maintains** the RSS 'step-change' in the Sub-region i.e. 50% (min) growth to Coventry & Solihull; growth focussed on N-S Corridor & Rugby; supporting infrastructure; growth in N. Warks & Stratford limited to local needs.

**Phases** housing land releases to encourage regeneration in the MUAs by giving priority to:

1. sustainable locations first & foremost and,
2. within those locations, brownfield land before greenfield land;
3. then, if necessary, urban extensions within-LAs areas; and
4. only as a last resort, cross-boundary urban extensions in the N-S Corridor – later in the plan period - if no more suitable alternative capacity is available.

**Enables** specific local Green Belt boundary adjustment for urban extensions to be made through LDFs - when & where essential to meet long term needs.

**Proposes** that releases of land for housing are geared to maintain a constant average annual supply across the Sub-region.

**Excludes** the provision of land in the Sub-region to meet any 'overspill' housing needs arising from elsewhere e.g. Birmingham, Redditch, Tamworth.

- 2.7 In September 2007, the Warwick District Council Executive accepted the CSW Forum development strategy (as set out in paragraph 2.5 above) as an appropriate advisory framework for the consideration of future growth proposals within the sub region. It also endorsed the CSW Forum Position Statement (paragraph 2.6 above), subject to the Council being satisfied in due course that the District would not be receiving an allocation of housing disproportionate to other Shire Districts within the Sub Region.

### **The Regional Spatial Strategy Preferred Option**

- 2.8 In October 2007 the West Midlands Regional Planning Partnership approved the Preferred Option document and in December, the Regional Assembly submitted this to the Secretary of State. Section 3 below outlines the contents of the Preferred Option document in more detail.

- 2.9 On 7<sup>th</sup> January 2008, the Chair of the Regional Planning Partnership received a letter from Baroness Andrews, Parliamentary Under Secretary of State for the Department for Communities and Local Government. In this letter, Baroness Andrews criticised the draft RSS for not making provision for the level of homes:-

- (a) anticipated to be required by the 2004 based household projections (the most recent available which had been produced in mid 2007) and
- (b) to meet the recommendations set out in a report from the National Housing and Planning Advice Unit (NHPAU). This report recommended a building rate of between 20,400 to 23,000 houses per year in the West Midlands region instead of the Preferred Option rate of 19,000 houses per year.

- 2.10 Baroness Andrews went on to say:

*"I have therefore asked the Government Office for the West Midlands (GOWM) to commission some further work looking at options which could deliver higher housing numbers. The aim will be to provide the Examination Panel [which will consider the Regional Spatial Strategy at a Public Examination in due course]*

*with options that could deliver housing numbers which will start to impact on affordability, whilst maintaining as many of the principles of the Spatial Strategy as possible.”*

- 2.11 GOWM has now appointed consultants Nathaniel Lichfield and Partners (NLP) to undertake this work. It is anticipated that NLP will report its conclusions in September. The intention then is to allow consultees to the RSS (including Warwick District Council) time to consider this evidence as part of our response to the Preferred Option document. For this reason, the consultation on the Preferred Option has been extended until 8<sup>th</sup> December 2008.
- 2.12 As stated above, the purpose of this report is to consider the RSS Preferred Option as drafted. In section 3 below, I set out the key elements of the Preferred Option document and give comment on these. It is, however, my intention to bring a subsequent report to the Executive once the outcome of the NLP work is known and seek the views of member on this.

### **3. The Preferred Option - summary and comment**

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#### **Housing - summary**

- 3.1 The Preferred Option distributes the new housing across the CSW sub-region in the following way.

| <b>Area<br/>(Local Authority)</b> | <b>RSS Phase 2 proposals 2006-26<br/>dwgs net (%)</b> |      |
|-----------------------------------|---|------|
| Coventry                          | 33,500  | 41%  |
| Solihull                          | 7,600   | 9%   |
| N. Warks                          | 3,000   | 4%   |
| Nuneaton                          | 10,800  | 13%  |
| Rugby                             | 10,800  | 13%  |
| Stratford                         | 5,600   | 7%   |
| Warwick                           | 10,800  | 13%  |
| County                            | 41,000  | 50%  |
| CSW                               | 82,100  | 100% |

- 3.2 The Preferred Option makes a number of other points which are particularly relevant to Warwick District.
- It identifies a number of towns as “Settlements of Significant Development” outside of the Major Urban Areas. These are towns which are “capable of balanced and sustainable growth”. Warwick/Leamington Spa is one of the named settlements (along with Rugby and Nuneaton/Bedworth within Warwickshire).

- It recognises that in certain circumstances the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries. In such cases, local authorities are required to consider jointly the most appropriate locations for this housing. One such named circumstance is Coventry City where it is recognised that the city's needs may need to be met on land adjacent to Coventry but in Nuneaton & Bedworth Borough and/or Warwick District.
- In setting the levels of growth for each local authority area, the Preferred Option states that in determining the most sustainable forms of development, Local Development Documents should consider whether Green Belt land would provide a more appropriate option than other forms of development. For Warwick District, this means that land within the Green Belt could be considered for development within our Local Development Framework even though we have land which is not within the Green Belt as an alternative, if this was seen as the most sustainable option.

### **Housing - comment**

3.3 The amount of housing proposed for Warwick District in the Preferred Option is significant. It is only slightly less than that set out within option three of the Spatial Options Report of 2006 to which the Council raised concerns in its comments of March 2007 (see paragraph 2.3 above). I do consider, however, that in making comments on this proposed level of housing growth the following factors should be taken into account.

- Any growth must be seen in the context of the Government's wider agenda for providing more homes as discussed in paragraphs 2.1 above. There is no doubt that the Government has set a clear agenda for building more homes across the country over the next 12 years. The tone and content of Baroness Andrews' letter makes it clear that the Government wishes the West Midlands to consider whether it can increase the supply of housing over that contained within the Preferred Option.
- The approach taken by the CSW Forum has been made in the knowledge of the direction of emerging Government policy. This approach has been to propose a robust response from this sub-region which can be seen to constructively engage with the Government's agenda. The Forum's own development strategy for the RSS (as set out in the box following paragraph 2.5 above) is to "*seek to meet the significantly higher housing levels generated by local needs and migration into the sub-region in a manner which supports the principles of MUA renaissance within RSS11*". In recognising the need to plan for more housing in the sub-region, the Forum has therefore made it clear that it recognises the need to accommodate more housing provided this can be done in a manner consistent with the RSS.
- The distribution of houses within the Preferred Option does take on-board most of the CSW Forum Advice set out in paragraphs 2.5 and 2.6 above. In particular:-
  - a) It identifies the focus of growth in the CSW Sub-region as Coventry and Solihull (the Major Urban Areas - MUAs). It is important to note that within



the RSS Preferred Option 50% of the growth within the sub-region is directed towards the MUAs. This is proportionately more for the MUAs than appears in the current adopted RSS where the figure for Coventry/Solihull is 49% and Warwickshire is 51%. The principle of the “step change” introduced in the Regional Spatial Strategy in 2004 is therefore still in evidence in the Preferred Option.

- b) As noted above, Nuneaton/Bedworth, Rugby and Warwick/Leamington are identified as ‘Settlements of Significant Development’. It should be noted that the proportion of housing directed to each of these local authorities is the same (10,800 to each).

3.4 My advice to councillors is therefore that whilst the figures contained within the Preferred Option are a cause for concern, particularly as they are above the level set out in option 2 in the RSS Spatial Options Report, the Council should recognise that the figures do represent a realistic response by the sub-region to the Government’s housing agenda. It should support the efforts being made by the RSS to maintain the “step change”, and the work by the CSW Forum to ensure that within the CSW sub-region this has been maintained. I therefore am not proposing that the Council directly objects to the housing figures in the Preferred Option.

3.5 I do consider, however, that the Council should be vigilant to ensure that the principles contained within the housing proposals in the RSS Preferred Option are maintained. Key to this is:-

- a recognition that each sub-region within the West Midlands should meet its own housing needs in accordance with the Government principles. The CSW sub-region has properly done this through the development strategy that it proposed to the Regional Assembly and that is now embodied within the Preferred Option. It would not be acceptable for the CSW sub-region to absorb more development in order to meet the needs of other parts of the region.
- a requirement for the MUA’s within the sub-region, particularly Coventry, to meet their own growth needs as much as possible. The higher growth figures being proposed for Warwick District (and for Nuneaton & Bedworth and Rugby Boroughs), are only reasonable within a context where Coventry makes a major contribution to the overall housing growth of the sub-region.

3.6 Within this context, maintaining consistency with the sub-regional approach will provide the District Council with a means of deflecting suggestions from other parties, notably at the Public Examination, that there should be a proportionately greater provision of housing in Warwick District to reflect market demands and historic patterns of growth. Rejection of the allocations as submitted would remove the District from the wider agreed sub-regional framework. This is likely to undermine any defence we make against pressures for additional growth.

**Recommendation on Housing proposals:**

**That the Council does not object to the housing allocations set out in the RSS: Preferred Option subject to the comments made in paragraph 3.5 above.**

## **Economic Development - summary**

- 3.7 The Preferred Option also include proposals for employment land, office and retail floor space in centres that are consistent with local circumstances and the level and distribution of the housing growth. The relevant land and floor space growth figures for Warwick District are as follows:-

|                               | <b>Amount required<br/>2006 – 26</b> | <b>Comment</b>   |
|-------------------------------|--------------------------------------|--|
| Employment land (policy PA6A) | 90 hectares                          | This is an indicative figure only, and local authorities are required to provide their own more detailed assessments. Of this figure, a rolling five year reservoir of at 30 hectares should be available at all times. The rolling 5 year reservoir includes a 50% share of the expansion of Warwick University |
| Retail (policy PA12A)         | 60,000 sq m                          | This should be provided within Leamington town centre. Of this, 35,000 sq m should be provided up to 2021 and 25,000 sq m from 2021 – 26.  |
| Offices (Policy PA13A)        | 45,000 sq m                          | This should be provided within or on the edge of Leamington town centre.   |

- 3.8 The RSS Preferred Option also puts a framework in place for seeking to protect existing employment land and buildings for employment uses unless it can be demonstrated that there is no realistic prospect of development. It also recognises that, as with housing, there may be circumstances where the employment needs of one local authority may need to be met in an adjacent authority. Warwick District is cited as one such local authority (along with Coventry, Solihull and all other Warwickshire districts except North Warwickshire). In such cases, discussions will need to take place between relevant authorities.
- 3.9 It should be noted that the office and retail figures relate to Leamington town centre only. This is because the RSS identifies Leamington as one of a network of 25 “strategic centres” across the region. Each centre is classified within 4 tiers, with Birmingham as tier 1. Within the sub region, Coventry is within tier 2, Leamington and Solihull within tier 3 and Nuneaton, Rugby and Stratford within tier 4.

## **Economic Development - comment**

- 3.10 The Preferred Option proposals for economic development are consistent with the CSW Development Strategy. The following comments can be made on these aspects of the RSS Preferred Option.

### **Employment growth**

- This is consistent with that set out within the Spatial Options Report. Work undertaken by this Council on our Core Strategy has shown that we currently (2007) have provided 55 hectares towards our total target of 90 hectares. We can further estimate that it is likely that (very approximately) 20 hectares of further employment may come forward on brown field land within the urban areas of the district over the plan period. (For example, any new employment

created on the Ford Foundry site would contribute to this figure.) This would leave a requirement for a relatively modest 15 hectares of green field land over the period to 2026. This is equivalent to an area slightly less than the Warwick Gates Business Park.

- The Preferred Option includes a policy to protect existing employment land for employment uses. The Council has supported this principle; indeed we already have a similar policy in our recently adopted Local Plan.
- The reference in paragraph 3.7 above to circumstances where the employment needs of one local authority may need to be met in an adjacent authority may raise the prospect that employment growth in Coventry (which is proposed as 246 hectares in the Preferred Option) may need to be met within Warwick District. This would clearly raise the possibility of the need to find green field (and very possibly Green Belt) sites within Warwick District over the period to 2026.

### **Retail floorspace**

- The figures for retail floorspace are in line with those contained in the Spatial Options Report up to 2021. The Council did not object to this level of growth as it was, very broadly, consistent with figures produced from our own retail studies. We did previously recommend, however, that this figure be used as a basis for more local retail needs assessments carried out by local authorities. The RSS Preferred Option does recognise (a) that local authorities will wish to review them as they prepare their Core Strategies and (b) that this may lead to variation in the light of local circumstances (paragraph 7.68). The RSS Preferred Option considers that any significant variation arising from a local retail assessment (i.e. by more than 5,000m<sup>2</sup>) needs to be justified. In my view, there must be at least a reasonable prospect that, over time, the figure produced for the RSS will need revising. It remains my view that local retail assessments (carried out by local authorities for their areas) are the proper basis for planning in our town centres rather than a figure produced as part of a wider regional exercise. I am, however, satisfied that sufficient safeguards are in place within the RSS Preferred Option (policy PA12A and paragraph 7.68 in particular) to protect the Council's ability to determine the proper level of retail growth required for Leamington town centre.
- It should be noted however that the Spatial Options Report only looked at the period to 2021. The Preferred Option also considers the period 2021-26, and moreover proposes significant additional retail growth in Leamington during this period. Over 40% of the total retail growth in the town centre over the 20 year period 2006–26 is proposed to take place 2021–26. This figure appears very high, particularly given that it is acknowledged that any retail forecasts are difficult, and forecasts that far into the future especially so. This is recognised by the RSS which states that the requirement post 2021 should be only treated as indicative at this stage and will be subject to further review of the RSS. In my view, such further review should also be at a local level.

## Office floorspace

- The Spatial Options Report identified a need for between 40,000 and 50,000 sq m in Leamington town centre up to 2021. The figure in the RSS Preferred Option towards the bottom end of this scale (45,000 sq m to 2026). In commenting on the Spatial Options Report, the Council urged:-

*“...the Regional Assembly to look very carefully at the office growth projections given both the take-up of floorspace in recent years in the district and the physical capacity of Leamington town centre to absorb a significant amount of additional new office development. It considers that the capacity for further new offices within Leamington town centre is considerably less than the 40-50,000 sq m stated in the Spatial Options Report. Most of the town centre lies within a conservation area, many of the existing buildings are listed, and there is relatively limited vacant or other undeveloped land which would be suitable for significant levels of office growth.”*

- The RSS Preferred Option does explicitly recognise that capacity constraints exist in some centres – possibly in direct recognition of the comments made by this Council. These comments are still, in my opinion, relevant today. It should be recognised, however, that the requirement is for office development to be within or on the edge of Leamington town centre. This would include sites such as the Ford Foundry site which, as members will be aware, is currently the subject of a draft planning brief. GVA Grimley (the planning consultants that the Council has engaged to prepare the brief) has estimated that this site could accommodate a significant proportion, or even all, of the total office requirement.
- Therefore, whilst I still would advise members that I have concerns about the figures shown in the RSS I recognise that there may be opportunities to deliver the level of office development sought by the RSS. Policy PA13B in the RSS Preferred Option sets clear criteria for considering any large scale office developments outside of strategic centres. This will enable the council to control the location of offices and only release land away from strategic centres where this would not prejudice schemes within (or adjacent to) centres coming forward.

### **Recommendation on economic development proposals:**

- **That the Council does not object to the proposals for employment land provision set out in policy PA6A.**
- **That the Council supports the retail floorspace figures for Leamington town centre up to 2021 set out in policy PA12A subject to the provision that local authorities can at all times keep them under review in the light of changing national and local circumstances. Furthermore, that the Council expresses concern about the projected level of retail growth between 2021 and 2026, however welcomes the clear understanding in the RSS that these figures are indicative. Any further review of retail floorspace figures should be informed by a local, as well as a regional, review of retail requirements.**
- **That the Council does not object to the proposals for office accommodation set out in policy PA13A.**

## Transport

- 3.11 The Preferred Option contains a policy for **Strategic Park & Ride** sites. This identifies both the criteria for considering sites and a number of strategic and potential locations. In the Spatial Options Report, the Council did not make any comments to the criteria. Furthermore, none of the proposed locations is within the district (the nearest one being north of Stratford). I do not propose therefore the Council makes any comments on this aspect of the Preferred Option.
- 3.12 Regarding **car parking standards**, the Spatial Options Report suggested four approaches to developing car parking standards. The one chosen by the Preferred Option is the simplest of those suggested. It proposes a series of general criteria which should be followed in developing parking standards. These relate to (i) having more restricted standards in congested areas to help manage travel demand, (ii) making best use of land, (iii) maintaining the vitality and viability of town and city centres and (iv) avoiding deterring investment in town centres. This approach appears logical and is consistent with the approach taken in our recently adopted Supplementary Planning Document on Parking Standards.

### Recommendation on transport proposals:

- **That the Council does not object to any of the transport proposals in the RSS Preferred Option.**

## Other issues

- 3.13 The Preferred Option covers a wide range of other issues. Whilst I do not wish to comment on all of these, a few are worthy of a mention in relation to the effect they may have on Warwick District.

### Sustainable design and construction

- 3.14 The Preferred Option contains policies that support sustainable design and construction. Policy SR3 contains provisions that Developments of 10 dwellings or 1,000 sqm or more should incorporate renewable or low carbon energy equipment to meet at least 10% of the developments energy requirement however it allows local authorities to set lower thresholds and higher percentages where appropriate. Furthermore, it requires that all new housing should meet stringent standards regarding the Code for Sustainable Homes and CAGE “building for life” standards.
- 3.15 This policy should be strongly supported by this Council as it reinforces, and builds upon, the policy approach taken in our own Local Plan. It will provide a basis upon which our Core Strategy can seek higher standards in terms of renewable energy than we do at present.

### Energy generation and conservation

- 3.16 Policy EN1 of the Preferred Option encourages proposals for renewable energy resources. It proposes that local authorities should provide locational guidance

(through supplementary guidance as necessary) on the most appropriate locations for each renewable energy technology.

- 3.17 This approach is one which is broadly in line with the Council's current approach. Policy DP13 in the Local Plan provides criteria for considering proposals for developments which generate renewable energy. I do consider, however, that it would be difficult in practice to provide supplementary guidance on the most appropriate locations for each renewable energy technology at a very small scale. When the Council considers individual development proposals where renewable energy technology is used, it will look at each proposal in its merits having regard to the appropriateness of the technology for that specific site. It is difficult to see, therefore, how meaningful district-wide supplementary guidance could be provided.

**Recommendation on other issues:**

- **That the Council supports policy SR3 as it will assist the Council in achieving more sustainable design and construction of buildings in Warwick District.**
- **That the Council supports policy EN1 (Energy Generation and conservation) however raises concerns as to the practicality of local authorities providing locational guidance through supplementary planning guidance on the most appropriate location for each renewable energy technology.**

John Archer  
Head of Planning  
July 2008