

Warwick District Council (WDC) Village Housing Options and Settlement Boundaries Consultation

Objection to the Preferred Housing option for Radford Semele (site1) and support for site 2

Introduction

In this document and attached pages I set out my objections to the selection in Radford Semele of the preferred site – site 1 and explain my support for the development of site 2. It naturally follows that I do not agree that the village boundaries should be extended to include site 1 but instead altered to include site 2.

I recognise that WDC has a difficult task in planning for future needs, locating new homes throughout the district and accept that Radford Semele has to take an additional 100 houses.

I object to the selection of the preferred site for future development and feel that there are stronger arguments to be made for selecting and developing site 2. These arguments are articulated further in this document.

It is apparent to me that the work carried out to evaluate the four sites discussed in the Village Housing Options document for Radford Semele has not been carried out with the same level of rigour across each site. The parcel of land RS3 in the Greenbelt report (confusingly also known as RS04 in the Landscape and Sensitivity and Ecological & Geological Study) is massively incorrectly sized and its findings do not corroborate with the area of land that forms site 2.

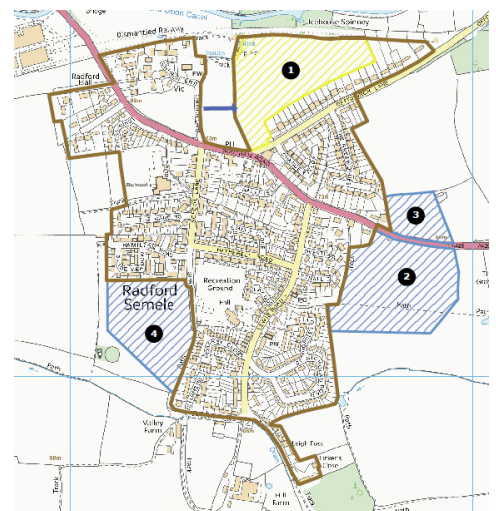
In addition information supplied during the consultation process regarding access to site 2 is also incorrect. Access to site 2 is very achievable as discussed later in this document under the section “Site 2 discounted option.”

Site 1 – WDC’s Preferred Option

Overall

Site 1 lays north of the Southam Road (A425) and is detached from the main part of the village indeed the majority of the village is located south of the Southam Road. It doesn’t make sense to develop the site north of the A425 when all the amenities of the village are south of the road forcing all the residents from the new development to have to travel to use the amenities and expose them to the busy road and safety issues.

Site 1 provides one of the few open remaining spaces in Radford Semele which helps give the village its identity tying the Grade II Listed Church to the village and its rural past. The open land and views of the Church are part of what makes Radford Semele such a nice village to live in and visit. Villagers and people from the wider community will often enjoy recreational walks and eat at the White Lion pub whilst enjoying the vista of the Church and its setting.



Developing this site will destroy what can only be described as the heart of the village and turn Radford into a district of Leamington Spa.

Site 1 was not contained within the recent Council's Strategic Housing Land Availability Assessment (SHLAA) consultation exercise with the public therefore, has not received any comments to its appropriateness to the village from local residents. However, numerous submissions on the options that were available in the SHLAA were made by the public and indeed Radford Parish Council who favoured development on site 2 and 3. It is my understanding from Parish Council meetings that Radford Parish Council feel they have not been consulted with by WDC and their view in supporting sites 2 and 3 has been ignored.

In the past the WDC has rigorously rejected any development on site 1, see below 1994 Local Plan enquiry - nothing has changed.

Heritage

The field identified as the preferred site, site 1, is adjacent to St Nicholas Church. The Church is Grade II listed as are many of the buildings surrounding the proposed development site.

Site 1 provides the rural **setting** for the Church and connects the village to heritage in the area and its rural past, it is currently outside the main area of the village.

This is further backed up in WDC's Landscape and Sensitivity and Ecological & Geological Study zone RS02 states "...creating a framed landscape with important views of the Parish Church, Glebe House, the roofline of Radford Hall and the garden / churchyard boundary walls. The zone is isolated with the settlement edge and canal corridor but provides an important setting to the church and the churchyard and listed building.."



The above picture is taken from Southam road just opposite the White Lion Public House



Views from St Nicolas Church over the proposed development

English Heritage confirms that listed buildings are nationally important and of special interest. English Heritage also publishes guidance which confirms that any development that will be harmful to the view, character and setting of a Listed Building is unacceptable.

English Heritage state the following on setting:

The contribution of setting to the significance of a heritage asset is often expressed by reference to views – a view being a purely visual impression of an asset or place, obtained from, or by moving through, a particular viewing point or viewing place. The setting of any heritage asset is likely to include a variety of views of, across, or including that asset, and views of the surroundings from or through the asset. A long-distance view may intersect with, and incorporate the settings of numerous heritage assets. Views from within extensive heritage assets can also be important contributors to significance: for example, views from the centre of an historic town, through the townscape to its surrounding countryside, or from an historic house, through its surrounding designed landscape to the countryside beyond

Any development of the site and proposed access from Church Lane would totally destroy the setting of Church, the views across the land from and to the Church from the Southam Road (see photographs above) and would be forever lost.

English Heritage policy HE 9.2 confirms that where development affecting the setting of a designated asset results in substantial harm to significance, it can be justified only if it delivers substantial public benefits that outweigh that harm. For the harm to be necessary there will be no other reasonable means (such as an alternative design or location) to deliver similar public benefits. NPPF Section 12, Conserving and enhancing the historic environment, goes to great length in explaining how Heritage assets should be protected and managed..

The **harm** to the village, Church and setting that would be caused by developing this site will far outweigh any benefit from developing it. The heritage of the site would be destroyed forever and ensuring the village loses **the** key area which links it to its rural past.

This point is further supported in the 1994 planning enquiry report (see section 1994 Local Plan enquiry – nothing has changed). Extract 2.2.341 “The village has seen considerable development over recent years and this site and the setting provides for the northern part of the village are one of the last remaining connections with its rural past.”

WDC has an alternative to developing site 1. If development took place on any other site then clearly the council would not destroy the heritage assets of the Church, its setting and the surrounding listed buildings.

The development of site 2 would have none of the above disadvantages of developing site 1.

It is clear from the points raised above that any development of this site will have serious landscape impact far greater than those of the other sites. Based on the points raised above it is clearly demonstrated that site 1 has a high heritage and landscape value of greater value to the other sites in Radford Semele.

I must object to the selection of site 1 as the preferred site and it should be excluded from any future SHLAA.

See notes on traffic for further impact to heritage.

Wider Visual Impact

Site 1 can be viewed from the Grand Union Canal, Newbold Common, Cubbington and as far east as Hunningham Hill. Screening may mitigate some of the impact of development but not eliminate it. As visual impact is far less on other sites I would suggest that Site 2 is a more appropriate site for development.

Traffic and Highways



Above left: Traffic backing up on the Southam Road (A425) from School Lane and Church Lane past Offchurch Lane

Above right: Traffic trying to exit Offchurch Lane onto Southam Road (A425).

Site 1 is severed from the main part of the village by the A425 Southam Road. Traffic measured just east of Radford Semele shows a 48% increase in volume from 2010 to 2012 (see link: <http://www.uktrafficdata.info/cp/warwickshire-a425-radford-semele-56785>). This trend is likely to continue exasperating the existing traffic issues.

The development of site 1 is likely to add to the traffic issues (see photographs above) seen in the village with in all likelihood an additional 200 cars trying to exit and access the site at rush hour.

Access is currently being suggested via Church Lane or Southam Road. It has been suggested that in order to get access to site 1 Traffic lights should be positioned at Church Lane/School Lane junction with the Southam Road to help the congestion along the A425 and assist cars emerging from School Lane and Church Lane. This will cause traffic to back up along these roads. Turning from the A425 into Church Lane and to a lesser degree School Lane will not be possible due to the tailbacks. Consequently these roads will have to be widened.

Church Lane plays an important part in the setting of the Church and the widening of this lane will harm this setting as well as result in the removal of trees which line the lane. Access, whether from the Southam Road or Church Lane will cut directly across the view between the two listed buildings this and the impact of streetlights which will change and damage the views and heritage of these listed buildings. – see notes on impact to heritage.

Either access points are right in the middle of the village and very close to School Lane with many children making their way to school at this time.

Although no accidents with children have occurred recently it is only a matter of time and as reported in the courier (<http://www.leafingtoncourier.co.uk/news/local-news/accident-blackspot-must-not-be-used-for-housing-villagers-furious-after-woman-injured-on-road-near-leafington-1-5794551>) an accident severely injuring a motor cyclist occurred 6th January 2014 close to the proposed Southam Road exit.

As a consequence of the proposed site location and the traffic on the busy Southam Road (A425) there will be a greater safety risk to school children and individuals crossing the road to use the amenities which are all located south of the village. Although there is potential to mitigate some of the traffic and safety issues it is not possible to remove all the issues.

The logical conclusion drawn from the points above would be not to select and develop site 1 which is separated from all the local amenities but to select an alternative more suitable site which I suggest is site 2, see site 2 Discounted Option. Some of the traffic exiting a new development on site 2 will turn towards the Fosse Way which will not add to the traffic issues already seen in the village but will be exacerbated by developing site 1.

1994 Local Plan enquiry – nothing has changed

In 1994 report produced by the WDC Local plan enquiry, which in part relates to site 1, WDC totally rejected any notion of development of site 1.

I would argue that since the report was published nothing has changed in fact some of the arguments are even more valid today i.e. any development of the preferred site would be detached from the village being north of the A425 and therefore separated from the main part of the village and maintaining the area of separation from Leafington.

I have extracted the relevant parts of the report below and highlighted key points in yellow. The report was produced by WDC and nothing in the intervening years has changed to the sites usage or landscape therefore, I would expect the Council to be cognisant of its own views and stand by them unless a case for change has been made.

As no case for change is apparent and any development on the site would totally change the site from an open area of land to a highly density residential area; would close the gap between Leafington Spa and Radford Semele; destroy the rural landscape and heritage of the site; be detached from the main part of the village and finally destroy the link to the villages rural past I therefore, object to the selection of site 1 as the preferred option and suggest site 2 is a better site to be allocated for development

2.2340 “..There are views from Southam Road across the site to the open country side surrounding the village and the land provides a setting for the Church. **From Church Lane the rural surroundings of the Church are even more apparent.**”

2.2.341 The village has seen considerable development over recent years and this site **and the setting provides for the northern part of the village are one of the last remaining connections with its rural past. The site is not properly part of the village being wholly peripheral**, the housing in Offchurch Lane with which the development would connect being itself a ribbon extending into the countryside. The land is Grade 3a and it could be anticipated that there would be an objection to the loss of land of this quality. **The village green proposed by the Objectors would not replace this rural setting provided**

by this agricultural land and would be surrounded by housing which would extend close to the Church. The green itself would be likely at a later date to come under pressure for further development.

2.2.342. The Council believed that the site would not relate well in scale and location to the village or be well integrated with the pattern of development as the advice requires. If developed, it would, rather, be detached from the village, severed by the main road. It was considered that a sufficient variety of housing sites had been provided in the Plan without the need to allocate this land.

2.2.343. The Council was satisfied that including this land in the Area of Restraint was helping to further the objective of maintaining the separation of Leamington Spa and Radford Semele. The structure Plan established the principle of an Area of Restraint in this area, but left it to the Plan to define the boundaries. Along Radford Road the effectiveness of the separation is weakened by the presence of industrial buildings and it is the open land to the north of the road that reinforces the gap. The open land extending to the north of Southam Road and Offchurch Lane is only broken by the outlier of development around Radford Hall and the Church. The proposals would close much of this open outlook and in so doing affect the impression of the separation of Leamington and Radford Semele.

Flooding

The Environment Agency demonstrate on their flood risk maps that that site 1 “the preferred site” is at risk of flooding.

Any development of the site will increase the drainage issues faced by the village. Poor drainage has led to open sewage being seen in School Lane. This land acts as a natural drainage point for the dwellings on Offchurch Lane, Chance Fields, The Greswolds, Southam Road and School Lane. Housing on this site would interfere with this natural drainage increasing the risk of flooding in the area of the Church and its surroundings. Any further pressure risks pollution of the Grand Union Canal and the River Leam.

No Flood Risk assessment plan from the current site promoter Gladman has been submitted to Warwickshire County Council Sustainable Urban Drainage System Approval Board to show that they comply with the Environment Agency requirements for limiting urban flooding.

It would be unacceptable to increase the already poor drainage issues that face the village and an alternative site should be selected, see site 2 Discounted Option.

Ecology

It is noted that no assessment of the habitat of Site 1 has been carried out and no report included in the Warwick District Habitat Assessment August to October 2008. Therefore, it is impossible to understand impact of any development on site 1.

As a local resident I can confirm although the site is predominately agricultural it is home to bats or bats are in the vicinity as they are often spotted in the gardens of Offchurch Lane residents. In addition the site is also used as resting place for wetland birds during their migratory periods.

Site 2 Discounted Option

Overall

WDC has chosen to discount site 2 on the grounds of high landscape impact and insufficient vehicle access. Below I will demonstrate why both of these suggestions are not valid and that site 2 should be selected as the preferred option for development.

The village amenities are all south of the Southam Road. Any development of site 2 will allow easy access to those amenities. This will also ensure that there are no major roads to cross for school children and predestines and thus reducing the likely hood of future accidents.

Landscape Impact

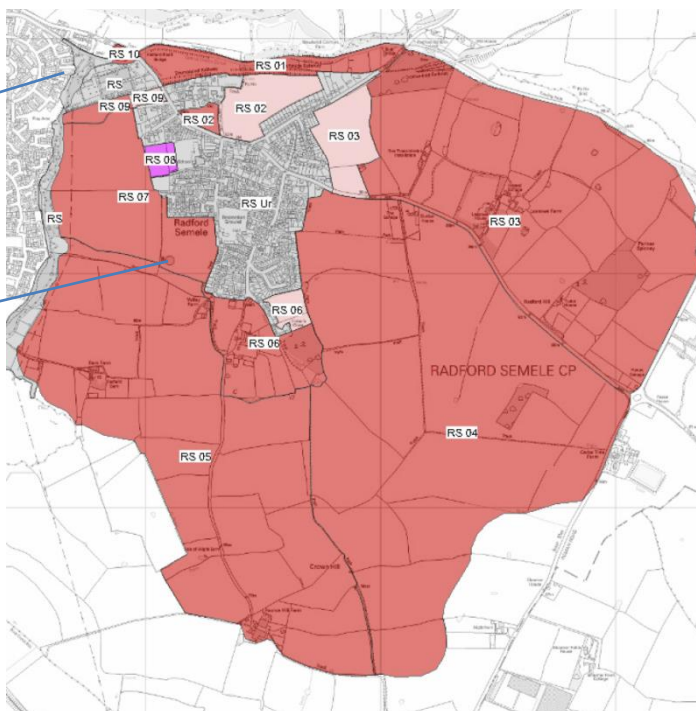
I have explained in my comments above that I believe the development of site 1 would have much greater impact on heritage and landscape than if any of the other four sites were developed. Until now WDC has protected the preferred site – site 1 from development. (see 1994 Local Plan enquiry – nothing has changed)

I feel that site 2 is a more logical and sensible area for development which would not compromise the environment and landscape to the extent that the development of site 1 would.

Site 2 is south of the Southam Road and any development of this site is a more natural extension of the village and will link to the main area of the village south of the road.

In addition the 1994 Inspectors report specifically mentions that the main part of the village is on the Southern side of Southam Road where site 2 is located.

The land at site 2 is significantly (approximately 15 to 20 times) smaller than parcel RS3 assessed in the greenbelt report (also known as RS04 in the Landscape and Sensitivity and Ecological & Geological Study). See map below



Location of site 2

Area assessed in the greenbelt report and Landscape and Sensitivity and Ecological & Geological Study

The parcel of Land in RS3 is described as being “**very open landscape with wide ranging views**” however this does not relate to the land proposed for site 2. Only a fraction of land that is described in RS3 applies to site 2.

It is therefore logical to conclude that the report relied on by WDC in its decision to discount site 2 is not relevant and should be discounted.

Most of the land RS3 identified in the Greenbelt report will remain undeveloped. On balance the impact on the landscape and heritage in developing this site (site 2) will be far less than the harm that would be done in developing site1, see section Heritage above.

It has been suggested that site 2 might be impacted by a gas pipeline. This is not the case and any development will be well away from the pipeline and the guidelines which recommend a “no build” zone can be more than accommodated.

Based on the points above I support the development of site 2.

Traffic

In the consultation documentation supplied by the WDC it is stated that site 2 has insufficient vehicle access.

I also understand from meetings with WDC officers that access is difficult because Highways will not reduce speed limits for developments on **one** side of the carriageway. The current speed limit is 50mph.

In the Department of Transport Traffic Advisory leaflet for speed limits in villages 1/06 section 6.3 states that “It is therefore government policy that, where appropriate, a 30 mph speed limit should be the norm in villages.” and “For the purpose of applying a village speed limit of 30 mph, a definition of a village can be based on the following simple criteria relating to frontage development and distance: 20 or more houses (on **one** or both sides of the road); and a minimum length of 600 metres.”

Any development on the south Side of Southam Road would clearly classify as part of the village and therefore allow Highways to reduce the speed limit along Southam Road to 30 mph adjacent to site 2 allowing easy and safe access.

It should also be noted that many villages with developments on one side of the carriageway have 30 mph speed limits. The most obvious being the other side of Radford Semele travelling towards Leamington Spa where the Ricardo facility is on the left and to the right is open countryside.

In addition through discussions with Taylor Wimpey, who are interested in developing site 2 and will submit their own representations to this consultation, that their experts believe safe access is very achievable.

A report by Martyn Bramich Associates which includes **expert** advice from traffic consultant Woods Ferrer Limited also concludes that access to site 2 is perfectly achievable without changing the current speed limits. This report will be submitted separately to consultation process.

It should also considered that it is perfectly possible to straighten the road or make any other adjustments that might be necessary to make access easier by utilising a section 106 agreement,

It is clear that vehicle access to site 2 **is** achievable and therefore should not stop the development of this site.

Due to the location of site 2 on the east side of the village it is very probably that a number of the potential residents from this site will exit the village towards the Fosse Way thus reducing the impact on the village of additional traffic. Clearly this benefit is not afforded to site 1 where all traffic will exit into the middle of the village.

As has been mentioned this site is south of the main road and close to the local amenities which will ensure that minimal pedestrian impact on the traffic of the Southam Road reducing any potential traffic problems and risks to the public.

One advantage of extending the 30 mph speed limit to this development is that it will give vehicles far more time to slow down before drivers encounter the sharp bends before Lewis Road and Offchurch lane and happening upon the stationary traffic that backs up from School Lane.

For the above reasons it is clear that safe access can be gained to site 2 and additional benefits afforded to drives entering an area of queuing traffic in the village I therefore support site 2 and being selected for development.

Site 3 - Discounted Option

I agree with the WDC and do not believe this site should be promoted primarily as it is north of village and the A425. This site would suffer from many of the issues identified above in site 1.

Site 4 – Discounted Option

I do believe that this site could be developed in some small way but that it would not deliver the number of houses required by WDC. I do **not** agree with WDC that developing this site would lead to coalescence with Sydenham but would form the natural rounding off of the southern area of the village. I do however, believe the development of this sight will add to the traffic issues of School Lane and the junction with the Southam Road.

Conclusion

I conclude the best site for development within Radford Semele is site 2 and I request that the current preferred site 1 be discounted. I proposed that the village boundary be extended to cover site 2 and **not** increased to include site 1.

