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22 July, 2013

Dear Sir/Madam

*The Local Plan - Revised Development Strategy*

I am writing in response to your request for comments on the *Revised Development Strategy* as set out in your pamphlet dated June 2013 and distributed by hand within my neighbourhood. In doing so I note that a Warwick District Council form that was distributed separately at a local meeting on the same subject states that comments on multiple sections of the plan will need to be submitted on separate sheets. Since I wish to comment on several aspects of what I have been able glean to-date about these latest proposals, and also to suggest that there is more than one way of alleviating the congestion damage that is inherent in your proposals, I do not propose to subdivide my comments as instructed. I hope, none the less, that they will be read by someone.

Yours faithfully



Graham Pyatt

Enclosure: A comment on Warwick District Council's *Revised Development Strategy*, June 2013.

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22 June 2013

Dear Sir/Madam

The Local Plan - Revised Development Strategy

I am writing in response to your request for comments on the Revised Development Strategy as set out in your pre-published June 2013 and distributed by hand within my neighbourhood. In doing so I would like to thank Warrick District Council for that was distributed separately at a local meeting in the same subject areas that comments on multiple sections of the plan will be published on separate sheets. Since I will be contacted in several areas, I would like to state that I am not commenting on the whole plan, but only on the areas that I have highlighted. I do not propose to include my comments as individual sheets, but as the less that they will be considered by you.

Yours faithfully

Graham Youn

Enclosure: A comment on Warrick District Council's Revised Development Strategy  
June 2013

Discussion draft: comments welcome. But please do not quote without prior clearance from the author [grahampyatt@btinternet.com](mailto:grahampyatt@btinternet.com)

## **The Warwick District Council's Revised Development Strategy, June 2013**

### *An overview and a proposal*

The *Revised Development Strategy* which is currently being canvassed by the Warwick District Council is being presented to the local community at a time when work on the second phase of the Chase Meadow housing development has been resumed following a lengthy *interregnum* during which a traffic management plan for Warwick town centre was to be prepared. It was hoped by many of the residents that this new plan would help to reduce traffic pollution in the old town centre, since this was increasingly recognised as having become an unacceptable threat to public health. Unfortunately, however, the traffic plan that was eventually submitted was generally thought to be an inadequate response to the town's problems and a working party, which included representatives of all the main interest groups, was formed with the help of James Plaskett, who was the MP for Warwick and Leamington at that time. This group has yet to complete its work, which may not be surprising, given the combination of difficulties that are inherent in the topology of the town, with its complex mix of rivers, the canal, our medieval castle, St Mary's church, the Lord Leycester Hospital, and numerous other listed buildings, all of which need to be reconciled within any long-term resolution of Warwick's congestion and pollution problems. Indeed, these problems may well be such that there is no straightforward way of accommodating any significant population growth in the vicinity which would not have some acute consequences for public health. Pollution is already above legal limits. And the *Revised Development Strategy*, if implemented, would surely have a significant impact on the current level. That cannot be allowed to happen, can it?

Against this background, it is surprising to find that congestion and its consequences, not least its implications for pollution, fail to be mentioned in the pamphlet on the *Revised Development Strategy* which is being distributed by the Warwick District Council as a basis for public information and to encourage debate. Yet the recent resumption of work at Chase Meadow will inevitably aggravate a deteriorating

situation by raising the base-line against which the impact on public health of the construction of some 6-7,000 new homes, mainly to the south of the rivers Avon and Leam should be assessed. The fact that no such assessment appears to have been attempted would seem to be a serious omission, not least because the problems of congestion and pollution were put to the planners as matters of significant public concern at the information-gathering stage of plan formulation. These representations may or may not have been forgotten subsequently. But, be that as it may, a clear statement of the likely public health implications of the *Revised Development Strategy*, especially in Warwick, is nowhere to be found in the documentation. Is this an audacious gamble by the promoters of the *Revised Development Strategy*? At the very least it suggests a serious failure of governance.

While significant increases in congestion and pollution may be the most serious consequence of the increased traffic that would be an inescapable consequence of the *Revised Development Strategy*, there would also be some additional public health consequences for non-vehicular traffic. This other sort of traffic ranges from youngsters walking to school or on bikes, residents on foot taking their dogs for a walk and others who would lose their present safe passage going to and from the bus stops, taking a stroll at lunch time or hastening to church: it seems that in future they are all going to have to dodge their way across the new multi-lane highways with which it is proposed to replace existing roads. As emphasised by the Warwick Society in its own commentary on the *Revised Development Strategy* this plan is preoccupied with maintaining a north/south flow of vehicular traffic, not least across Warwick's 'new' bridge which is to remain the only way of entering Warwick from the south, and with minimum concessions to pedestrians and bicycles. As of now, this bridge is a tourist destination in its own right, often attracting groups of sight-seers who spill over into the road as they jostle to look back on the castle, standing high above the river, and to take their mandatory photos. Indeed, it is not uncommon for bus-loads of tourists to stop at the crest of the bridge to admire the iconic view. Presumably, all this is going to become a thing of the past if the planners are to have their way, if only because railings are going to be necessary to protect the pedestrians from the stream of traffic which the *Revised Development Strategy* seeks to facilitate. All of which will be one of many small ways in which Warwick will cease to be such a fun day's outing for the tourist. Indeed, much is at stake, and it is hard to see how the eclectic

collection of specialist shops and restaurants in Smith Street will be able to survive its conversion from an historic retail attraction into a one-way, two lane through-way, with no parking allowed. And who is going to want to live on St. Nicholas Church Street once it has been sacrificed to a similar fate. It seems a pity, then, that the planners have not as yet bothered to obtain a professional engineering assessment as to whether our 'new' bridge - which is well on its way to its bicentenary - can safely carry the additional traffic that is implicit within the *Revised Development Strategy* and whether or not their verdict on this delicate matter will be contingent on the enforcement of the weight restrictions which are currently being ignored. In default, I am given to understand that the limited width of the 'new' bridge means (a) that it will continue to be a prime source of congestion that will inevitably increase with the number of cars and hence a source of even more pollution for Warwick residents (and of danger for those who choose to stand on the bridge or to walk into town from south of the river); and (b) that since there are currently no cracks in the 'new bridge' there is no reason to think that cracks might appear in future. My own view, as an amateur in such matters, is that the large increase in the volume of traffic that is built into the *Revised Strategic Plan* is more than enough reason to think that cracks might appear at some future date. And I am not at all sure that, in the absence of an opinion from an independent structural engineer, I will ever be persuaded otherwise.

Traffic and its implications for the quality of life of the local residents are at the root of many of the most important problems that are raised but not answered by the *Revised Development Strategy*, which is why I have focussed on some of these issues at the outset in this note. But there are other issues that also need to be recognised, such as the need to expand the capacity of all public services more or less *pari passu* with the population growth envisaged by the *Strategy* since schools, libraries, primary health care facilities and Warwick Hospital, etc. will all need to be expanded eventually which might be difficult for the hospital, for example, given that there is little room left at its present site. Such things cannot, of course, be ignored and will have to be resolved eventually. Meanwhile, however, there are two particular reasons why I have chosen to focus initially on the problems that are created by traffic. The first is that Warwick already has an overdose of these problems and they will not go away unless something is done about them. Yet the planners seem to be intent on ignoring the inherent difficulties. I have previously made the point that pollution is

already exceeding the legally accepted limits. It should not be difficult, therefore, to persuade oneself that a better option to that which is being proposed by the District Council would be to do nothing *i.e.* to scrap their *Revised Development Strategy* and start again. My second reason for focussing on the pollution and public health implications of the *Revised Development Strategy* is that there is a way of ameliorating pollution and congestion problems which apparently has not as yet received the attention it deserves.

The standard approach to congestion problems in public economics is to construct a system of tolls or tariffs which impinges directly on the problem itself. In the present context this means that a toll should be levied on all vehicular traffic that enters Warwick, but with the possibility of making exemptions for tourists and shoppers and those who live in the town centre which, for present purposes, would need to be defined to include the Butts, Smith St and St. Nicholas Church Streets. Others would either have to pay the toll or to find an alternative route. Under such a scheme, residents of the proposed housing developments to the south of Warwick and Leamington would have the option of avoiding Warwick by travelling North *via* Leamington or of taking the more southerly route *via* the Banbury road and the Longbridge roundabout. We already know that some three-quarters of the vehicles that are currently entering Warwick do so because they prefer to travel through the town, despite the congestion, rather than go round it, because to do so remains their quickest route from A to B. The introduction of a toll would hopefully induce some of these free-riding opportunists to change their minds, although the actual number who might be influenced in this way would obviously depend on the size of the toll, which would also have the important additional effect of raising money for the Town Council, who should have overall responsibility for the scheme and for parking, since the two policies would need to be co-ordinated. It would then probably make most sense for the entire proceeds of such a scheme (net of administrative costs) to be paid into a ring-fenced fund to be used exclusively to ameliorate the direct and indirect effects of pollution on buildings and people. The overall impact of the scheme would therefore be to reduce congestion in part and to redistribute revenues from those who continue to cause pollution to those whose health and property would remain at risk. Eventually, a southern Warwick by-pass from the Banbury Road through to the

Stratford Road and the A46 might be an alternative to the toll that may be worthy of consideration.

All the relevant features of a toll system are well-known within public economics, including rules for determining the optimal size of the toll. Which is not to say that the practical implementation of such a scheme may not be difficult. Or that such a system might even be impossible to implement in practice. But if that was indeed the case, then there really is no way of reconciling a growing population, many of whom will be intent on commuting *via* the centre of Warwick, with a genuine concern for the health and welfare of those who will suffer from the consequent congestion in the town itself. At some point, a red-line will have to be drawn to protect Warwick from anything, such as the *Revised Development Strategy*, that would exacerbate the current levels of pollution. In the final analysis we cannot let the Warwick District Council implement a strategy that will jeopardise the health of Warwick's residents.

#### *Some second-best solutions*

If for any reason the introduction of a toll fails to command the general support that it deserves, there is a range of second-best solutions we can turn to, some of which might be considered to be more attractive, and all of which are variants of the theme of building fewer houses, probably in different locations. The case for some such alternative approach can be developed by taking a closer look at the logic that underpins the *Revised Development Strategy*.

An implicit point of departure for some important features of the *Revised Development Strategy* is known as the Gateway Project which is being jointly sponsored by the Coventry City and Warwick District Councils, with the latter having entered into an agreement "to pursue the potential for a sub-regional employment site in the vicinity of Coventry Airport". The creation of a logistics centre which is potentially of national significance lies at the heart of this project, which is to be located near Baginton and either side of the common boundary between Warwick District and Coventry City. An important part of the proposed development will therefore be situated within the green belt. The project's promoters claim that it will eventually sustain some 11,000 new jobs, and this fact has been fed into a computer model which has come up with the answer that Warwick District will need to build

12,300 new houses between now and 2029 if demand and supply are to be kept in proximate balance. These calculations provide the point of departure from which *via* various routes our local planners have now arrived at their *Revised Development Strategy*. Their arithmetic can be questioned on three counts.

Firstly, there is no information available in the public domain to tell us what the computer might have said about how many new homes would have to be built in our District if there was no Gateway project. This is unfortunate since, by default, we can only guess that the calculation would suggest a significantly smaller number since there is only a very small amount of unemployment in Warwick and, therefore, no existing pool of labour within the District on which the Gateway Project would be able to draw were fewer houses to be built. But there are, of course significant levels of unemployment in other places which are well within commuting distance of Coventry Airport. Accordingly, it is not at all clear why the Gateway project is of any great value to Warwick District, which needs only half the prescribed amount of housing to support the endogenous growth of its local economy; or why our District is of any great value to the Project, other than for the land we are making available. Indeed, it seems to me that the District Council might be inviting exposure, at some future date, to concerted pressure to reverse its current policy, which is to oppose the construction of a second, longer runway at the airport, since that would, of course, give a considerable boost to the case for a logistics hub in the immediate vicinity. And it would also, I fear, expose those residents of Warwick District who are located under the flight path to a new and intrusive form of pollution. This might yet happen.

Meanwhile, there is some suggestion that the modelling exercise which generates the estimate of 12,300 new homes as being necessary has failed to take adequate account of the construction activities that are being planned elsewhere - in the Stratford District, for example. There is therefore an urgent need for a much clearer statement from the District Council of the assumptions it has made in calculating its estimate of housing needs in excess of the needs that are generated by endogenous growth. The *Revised Development Strategy* should not be approved until this information has been made available.



Secondly, the figure of 11,00 jobs being claimed by the Gateway Project can be questioned for the simple reason that it might not happen because the project proposal currently sits on the desk of the `Minister who has yet to decide whether or not to allow an appeal against it, possibly on the grounds of the proposed use of green-belt land. And in this connection it may be relevant to note that Chris White, who now represents Warwick and Leamington in Parliament, has openly declared his opposition to the *Revised Development Strategy*.

Some other reasons for doubting the Project's claim that it will eventually sustain some 11,000 jobs have been set out by Alan Roe & Mark Symes in a closely argued critique of the Project in general and of its employment claims in particular. Their paper has the title "The Gateway Project: an assessment of the employment and investment potential" and is dated October, 2012. In it they make a strong case that the employment creation potential that is claimed by the Project is not based on any serious economic or market analysis of the demand for a new logistics hub. Their claim that the project will generate some 11,000 jobs should be discounted accordingly in my opinion.

And finally, it can be argued that even if the Gateway project was to deliver most of the new jobs it promises, it still requires a leap of faith to conclude from this that the optimal strategy for the development of Warwick District is to locate lots of new housing to the south of the rivers Avon and Leam to accommodate an influx of new residents who will spend a significant fraction of their lives commuting to the north along congested highways. The predictions of total housing requirements that can be generated by computerised models cannot and do not exonerate local planners and politicians from their responsibility to consider all of the available options for the location of any new housing within the District. A failure to do so is a failure of governance, the consequences of which some of us will have to live with for the rest of our lives. Let us hope, therefore, that the *Revised Development Strategy* will now be subject to extensive further revision.