

David Barber – Development Policy Manager
Development Services
Warwick District Council
Royal Leamington Spa

Wednesday 17th July 2013

**A response to Revised Development Strategy – WDC Local Plan
June 2013**

Dear Mr Barber

We wish to respond to the above Local Plan and will present our views following the broad outlines as set out in the published document from Warwick District Council.

Strategic Vision and Revised Dev. Strategy

We would broadly agree with the lofty vision for our area, but will disagree strongly with the revised local plan on many issues.

In June/July 2012 WDC presented a broad plan for the whole area, which while still basing a heavy proportion of development to the south of the river, some 62%, also allocated 38% to the north. WDC in their deliberations took note of the facts of a possible reduction in the gap between the settlements of Warwick Gates (a 1400 home recently completed estate), Whitnash and Bishops Tachbrook, and the position of Heathcote Park, a Park Home settlement of 80 homes for over 55's retired or semi retired people.

They declared... 'no development south of Harbury Lane', a natural protective boundary to urban sprawl south of Warwick and Leamington!

They acknowledged the cumulative impact of this high level of development to the south; the impact on infrastructure, particularly the effect of a huge increase in traffic and car journeys along Europa Way and the consequent further decline this would give to their attempt to reduce the already above European standards of air quality in the centres of Warwick and Leamington Spa.

WDC acknowledged that this would require a relatively small amount of use of greenbelt but would help towards a more equitable sharing of the weight of housing for the district. We would point out here that the Government Communities Minister, Lady Hanham, as reported in the Telegraph of 4th February 2013, said that the Government believes that affordable homes will now have to be built on green belt land. She said that some of the land is not 'absolutely brilliant' and should be used for developments in order to avoid having to build in 'real open space'.

WDC PLANNING
Ref
Officer
18 JUL 2013
SCANNED
CC CR PD MA

Further to this, we would suggest that creating a NEW greenbelt area, south of Harbury Lane, would balance any greenbelt land used to the north of Warwick & Leamington resulting in no loss of greenbelt, perhaps even increasing the total in WDC.

The Government's policy as set out in chapter 9 of the National Planning Policy Framework (NPPF) – updated on 14th January 2013 SN/SC/934, encourages local councils to “.....use existing laws to review the extent of greenbelt in their local areas... (and) local planning authorities....to establish greenbelt boundaries in their Local Plan.....Greenbelt boundaries can be altered as part of the Local Plan review process.”

With Warwick and Leamington already being 80% surrounded by greenbelt, it would make sense to 'complete the circle' of greenbelt, thus fully protecting the historical importance of Bishops Tachbrook and its separation from the urban spread of Warwick, Leamington and Whitnash, whilst immediately **increasing** the amount of green belt in the WDC area.

WDC must use creative strategies like this to address both the need to protect greenbelt and to further enhance greenbelt in any discussion with Government Inspectors. It does of course allow for a more equitable sharing of the total area development around the whole district. There would be no north/south 'discrimination' over greenbelt or green field land, at whatever the level the requirement is eventually set.

Strategic Housing Market Assessment (March 2012)

The SHMA carried out by consultants GL Hearn in 2011/12 gave a projected population and household level of between 11,300 and 14,300. WDC have set a level of 12,300 as their target figure for housing development.

However the baseline for their projected figures started from an area level of increase some 18% higher than the national average over the last 20 years. It is unrealistic to conclude that this higher than average growth will continue at that rate for a further 15 years, when we have already had an increase of 176% over the last 20 years. Local studies suggest that a more realistic level of requirement will be not more than 6000 new homes, around 50% of WDC's target figure, based on the last population census levels of growth and need.

Broad location of housing development

WDC's NEW location of housing development differs from the 2012 Plan by stating that most of the new housing can only be put into the south of the river area because it cannot use, or will not use, any greenbelt land, based on a fear of plan rejection by Government Inspectors.

They further state that analysis of the 2012 representations only showed objections to building to the north of Warwick and Leamington; - did they not 'see' the 96% who objected to building the Myton Garden suburb; the 99% objecting to building South of Gallows Hill; They did not see any objection to building South of Harbury Lane **because it wasn't in the plan**; but also not 'seeing' the support for WDC to **not build south of Harbury Lane** from residents of Heathcote Park. This **is** an objection to any building. Is this not a little 'sharp practice' on the part of WDC.

They cite a 17% usage of greenbelt land in the new plan, having already reduced it from 20%, but fail to elaborate that nearly 11% of this greenbelt usage derives from building part of Kenilworth's required housing in greenbelt land. However Kenilworth is surrounded by greenbelt, so where else could it go? This cannot be seen as breaking into greenbelt land. Only a very small portion of greenbelt is to be used in the Plan, since from the figures supplied some of this small usage of greenbelt derives from development around the Villages, where again some of this development is required by the villages own direct requirement. This in reality means that WDC have decided to use virtually no greenbelt land but force the whole development of housing to the south of the river.

Looking at the supplied map of the whole development area (Page 24/25 of booklet) it is easy to see that virtually no greenbelt land has been used despite a greenbelt cushion of over 8km to the north, east and west of Warwick & Leamington, albeit Kenilwoth sits in the middle of the area.

Perhaps we now look at the research survey for WDC by Richard Morrish Associates, a landscape architects company who supplied information to Council for the 2013 Plan. This company looks at architectural issues surrounding the development of newly suggested land for possible development. Their brief was an in-depth look at just five parcels of land to the south of the river, those taking the main force of housing ie. land south of Gallows Hill; land south of Harbury Lane ; land at Blackdown; Loes Farm; Red House Farm. They were further required to look at five larger areas, encompassing the effects of the five 'in-depth' study areas within the larger picture of development for the whole of WDC area to assess how this might affect the individual five 'special' areas as indicated above. They acknowledged right at the start, that in previous studies for WDC they had already identified the five pieces of land as having a 'higher value' or more sensitive landscape, suggesting that these areas should in effect not be included as first in line for development, but since this was their brief from WDC they would assess what might be essential requirements to WDC to alleviate the landscape damage in developing these sites.

This study used 'desk-top' studies, with three field visits in spring of 2012. Their final conclusions are woolly and seek as best they can to finding reasons why WDC might use these areas of land for development, but that every piece of land will need areas of green land, tree and shelter belt provision to give 'acceptability' to their use. They further conclude that in looking at the wider picture, in the second part of their brief, the impact of large additional developments nearby; Europa Way; Gallows Hill; Myton suburb etc puts further doubt on an acceptable final solution in 'landscape' terms.

We were also incensed when, from either a visit or a desk-top view, they describe the beautiful Heathcote Park – Park Home settlement as "*an anomalous caravan park*", and suggest it should be integrated into the development of the former Severn Trent sewage works! They do explain that they did not seek the views of any local residents when completing their study!

As a 'balance' to the 8km of greenbelt surrounding the north of Warwick & Leamington they suggest a parkland belt of some 75 to 150 **metres** to compensate the people in the

South. At the same time they point out that this is totally inadequate in creating a wild life sustainable landscape which would require a minimum width of 1 mile and a separation distance from the nearest urban development of a further ½ mile, which is not possible to achieve in using land south of Harbury Lane.

As residents already 'on site' south of Harbury Lane, we would also inform WDC that, albeit 'brown land', the former Severn-Trent sewage works, having been 'isolated' in human terms for over 15 years to allow for 'settlement', has now become a wild life park with considerable wild life living undisturbed there including many wild bird species; green woodpeckers; (uncommon) common woodpecker; and an active owl population (species not identified), all protected by law in the UK; other wild life include various mammals; rabbits supporting a fox population; badger; and a species of roe deer. The whole of this area would have the requirements of a real wild life park.

We would suggest that WDC seriously consider the creation of new greenbelt land to the south of Harbury Lane, incorporating a proper wild life area accessible to residents of Heathcote Park, Warwick Gates and all the population south of the river, and balancing development more fairly around the whole of the Council area.

Strategic Development Sites and infrastructure

Whilst WDC continually stress that the New 2013 Plan does not have 'finalised' sites in mind, they are unable to find any other sites, as long as they stick to their declared decision not to put development on greenbelt land. This huge concentration of housing, schools and possible employment land thus creates an infrastructure impossible to comprehend. The north /south routes into the towns of Warwick and Leamington are already at bursting point at peak periods and the studies carried out by Warwick County Council, responsible for transport matters at best present themselves as a 'wringing of hands' and 'it will be all right on the night' (day), coupled with WCC not considering the situation "irreconcilable". With some 4000 new houses south of the river, 1500 of them immediately south of Harbury Lane and opposite the Warwick Gates settlement of 1400 homes already in place and a further 80 homes on Heathcote Park the traffic generated is impossible to contemplate.

WCC uses old census figures based on 2001 census but the 2011 census figures are readily available. Could this be because the earlier figures for car use are lower? From 2011 census we see that there are on average 12 cars for every 10 homes, an increase of 10% on the 2001 figures. The RAC Foundation for Motoring prepared by David Leibling Oct.2008 (later than council's use of a 2004 study) predicts a likely car ownership increase of 30% by 2020, with a very conservative figure of 77% household ownership. The study also found that 80% of homes would use a car EVERY day.

County Councils own data (2.2.27) states that the district already has some of the slowest journey times within Warwickshire.

Warwickshire Local Transport Plan 2011 – 2026 (LTP3) submitted to the Dept. for Transport in March 2011 included the points; To reduce the impact of transport on

people..... and improve the journey experience of transport users; To reduce transport's emissions of carbon dioxide and other greenhouse gases.....;

The District Council uses a figure of growth of approximately 8,500 dwellings (now updated to around 12,000). Which figures were used in their travel times and queuing times in the study?

The study has many so called 'mitigation' suggestions to improve traffic flow into and out of Warwick & Leamington at peak times. All of them need to be looked at very carefully even though WCC say they cannot finalise or detail studies until the final sites are confirmed. Just some examples to note: build a dual carriageway along Europa Way and the Banbury road into Warwick, to ease queuing – what happens when two lanes get to one of the single lane bridges is not mentioned - , however whilst a dual carriage way might have some usefulness, a later statement that one of the extra carriageways could be used as a priority bus lane does not resolve the dilemma; maximize rail traffic by extending parking at Warwick Parkway and Leamington stations. – would this not INCREASE traffic into/out of especially Leamington .

WCC have used a micro-simulation programme for traffic studies (S-Paramics) They explain that S-Paramics can accurately portray the variable circumstances which lead to congestion in all types and sizes of road networks. However the simulation then says that apparently forward traffic projections are not used; the outcome figures are based on the 'worst case scenario' of TODAY'S traffic counts. Perhaps it would be better to look at worst case scenarios for FUTURE traffic flows.

The mitigation does not give requirements for site access – there could be up to 7 possible site access roads along the $\frac{3}{4}$ mile of Harbury Lane alone with suggested levels of development (There are already 3 existing). Neither do the mitigation schemes include any minor schemes which would be required such as bus shelters, footpaths pedestrian crossing etc.

The report goes on to state that the overall strategy should be to NOT generate significant numbers of car trips through town centres and in surrounding communities; to minimize the need for significant new highway infrastructure. How would dual carriageway of Europa Way be undertaken without immense disruption, perhaps total lockup of traffic if this were required; the effects of roundabout work for the Ford Foundry/ Morrisons project roundabout caused months of disruption before completion. This mitigation has somewhat improved the flow of **current** traffic but do transport planners really think it could solve the huge increase in traffic numbers if the major housing projects being put forward for south of the river were confirmed?

Time and time again the report states that high traffic volumes cause issues at the present time and would be **FURTHER EXACERBATED** in the future at Greville road/Emscote road Junction; Princes Drive/ Warwick New Road junction; Adelaide Rd/ Park Drive junction; problem of traffic queuing onto /off M40 motorway.

The study has high hopes for public bus service improvements, but nationally public transport does not reduce much car travel (except perhaps in London). A scheme for virtual park and ride where you wait for a local bus to take you to the park and then wait for a second local bus to come along to take you into town would be a non-starter for most motorists at any time.

We would conclude that the WCC/WDC traffic plan for the area south of the river is not a sustainable or achievable set of proposals, is based on inaccurate and out of date data, and does not put a true picture of what would most likely happen to traffic flows into/out of Warwick and Leamington with the plans as presented.

What's missing from the revised new 2013 Plan

The new plan does not consider in any detail the affect on the present people living mainly to the south of the river. The 'sacred cow' of green belt and the possible loss of a few hectares of greenbelt are set far above the impact of the huge development that must as a consequence of this policy be shoe-horned into a tiny portion of the district.

In 2004 WDC had to declare AQMA's (Air Quality Management Areas) to monitor the already poisonous quality of the air in the centres of Warwick , Leamington Spa and Barford. They were able to remove the Barford aqma by building a by-pass to take traffic away from the centre of the village. Where is the 'by-pass' solution for Warwick and Leamington. The Plan makes the situation much, much worse for both towns, with hundreds of extra cars trying to access the towns.

The Air Quality Strategy target stated that traffic should be retained at 2004 levels and ensure that air pollutant levels do not exceed National standards, which in themselves exceed the European required levels for its people. Yearly reports informed how Council was doing. However the latest reported figures seem to be for 2008.

Public Health England - Annual Report for Warwickshire 2012 states that “ “Health and Wellbeing should be included as CORE considerations in every planning and transport policy in Warwickshire and as part of the District & Borough Council Core Strategies & Neighbourhood Plans as part of becoming a health improving local authority”.

Warwickshire Structure Plan (Wasp) – adopted by Warwickshire in August 2001 in its core strategy Objective 2F; To protect and improve air quality states; WDC will seek to maintain and improve local air quality by guiding and controlling the location of new development..... and ; DP2 Amenity; “Development will not be permitted which has an unacceptable adverse impact on the amenity of nearby uses and residents.....

And ..DP7 Development will not be permitted which generates SIGNIFICANT ROAD TRAFFIC MOVEMENTS.....

It concludes that the potential effects of proposed developments on local air quality will be assessed and comments made to Planning authorities (County and District).....
Has this been done , and what conclusions were reached?

Within WDC's report it states that – based on **2008** data NOT EVEN A 30% REDUCTION IN TRAFFIC ALONG BATH STREET WILL RESULT IN CONCENTRATION LESS THAN THE OBJECTIVE OF 40ug/m3.

On these facts alone the proposed level of development should not be accepted.

Conclusion

The New Local Plan 2013, with its decision, as it stands, to locate most of the planned development south of the river is not acceptable to the people of the area.

The real level of housing requirement based on actual local need and a realistic estimate of housing to meet actual new jobs being created should form the basis of any new Plan for the district.


Greenbelt land must not be put above the rights of people, but must be put alongside the effects on the local areas of Warwick Gates, Heathcote Park, Whitnash, and Myton, whose quality of life, quality of air, loss of good farming land, and destruction of the variety of animal and birdlife in the green area to the south of Harbury Lane must be protected just as it is in the large areas of greenbelt land to the north of the Towns of Warwick, Leamington and Whitnash.

Government Inspectors must be made to understand the unacceptability of squeezing this huge development into a relatively small area of the district's land on the basis that this Greenfield land is the only land available in the district and then attempting to impose a huge transport infrastructure to try and support it.

However, by creating new greenbelt land south of the natural line of Harbury Lane and then using small parcels of land development to the north of the towns in the greenbelt area, as recognized in the Richard Morrish Study, there would be a balance across the whole of the District in the use of 'green' land. This would give a much fairer division and sharing of whichever is the final required level of new development and follows Government guidelines for the creation of new greenbelt land and **no overall loss of any greenbelt land at all.**

We would ask all local councillors to instruct the planning department of WDC to look again at their proposals and come up with a realistic and acceptable sharing of any new development in line with the wishes of **ALL** the peoples of Warwick District area.

Yours sincerely



Philip & Barbara Lennon

Cc: Councillor Linda Bromley Warwick South
Councillor Michael Doody Leader WDC
Councillor Gerry Guest Warwick South
Councillor Anne Mellor Warwick South
Councillor Bernard Kirton Whitnash