

REPRESENTATION FROM HERITAGE CHAMPION ON WARWICK DISTRICT LOCAL PLAN

Where the Draft Local Plan fails in respect of our heritage and historic environment

I go to many English Heritage conferences and have learned that there are huge changes in NPPF, in relation to "*conserving and enhancing our historic environment*", whereas PPG is quite simplistic with 13 pages of it revoked. There is now Best Practice Guidance on Listed Building prosecutions, viz why has nothing been done about Warwick's Leper Hospital? Nowadays, special regard, under Section 66 (1) of PPG Listed Building and Conservation Area, via the Act of 1990, re the setting of Conservation Area. This has been completely ignored in the DLP.

As the NPPF is the obligatory element of the Planning system, now, then the PPG is the advisory element and the Good Practice Guide is the infant of the whole system. Only HMG can give guidance re the PPG, even DCLG want Good Practice Guide cancelled, but not yet. There is little reference, in the DLP, to the Enterprise & Regulatory Reform Act (2013). Why not? It is closely linked to NPPF and GPG.

This is an extract from a LGA & English Heritage book: Making the most of your Heritage Assets:-

LGA & English Heritage **MAKING THE MOST OF YOUR HERITAGE ASSETS**

THE FUTURE OF LOCAL HISTORIC ENVIRONMENT SERVICES (July 2013)

A major positive tool in enabling Councils to maximise the growth potential of heritage is the planning system. It is through the planning system that the historic environment is protected, enhanced and improved in a way that balances local economies, social and environmental needs and ambitions. Councils are using planning in a positive way to support the magnets for footfall, including the historic environment, that helps to drive growth by developing attractive and distinctive places.

The Government has undertaken a major simplification of planning legislation with the introduction of the National Planning Policy Framework (NPPF). The NPPF clearly encourages the sector to give specific consideration to protecting the historic environment and to recognising the benefit and opportunities that it can bring. It is expected that local plans include a positive strategy about the conservation and enjoyment of the historic environment, including heritage assets most at risk. Councils are encouraged to identify all heritage assets and those most at risk, and to promote new development in ways that will make a positive contribution to character and distinctiveness.

The Government is also taking forward a number of measures to enhance effective management of listed buildings through the Enterprise and Regulatory Reform Act 2013. ERR In particular there is provision for owners and local planning authorities to make heritage partnership agreements which can give advance consent for minor, routine or repetitive works in managing a group of listed buildings. This could reduce the need for repetitive application for consent and reflects a long-standing aim of the LGA and English Heritage to provide expert advice where it can make most difference. English Heritage will

be providing training and guidance to heritage practitioners on the new legal measures and their operation.”

Has anyone, in the UK, defined sustainable development exactly?

The enormous impact of so many houses, to the south of Warwick, around Bishops Tachbrook, and Whitnash, as well as SDC's plans to build maybe as many as 3,800 houses in Gaydon/Lighthorne Heath, just to the south of Warwick; is really worrying many Warwick residents. They are formed into Save Warwick and Warwick Deserves Better. There is a need to respect our built heritage and to preserve and enhance our three Conservation Areas with more vigour.

The DLP is unsound in, at least 10 points, viz:

1. Housing need forecast of 12,900 is exaggerated.
2. We have a 5 year supply of land, capable of development.
3. Loss of Greenfield and agricultural land is unsustainable.
4. Greenfield allocations, unnecessary, densities, too low.
5. Transport strategy ineffective and unsustainable.
6. Air Quality, already at danger levels, and on Health Impact Study not considered.
7. Social infrastructure impact is not ready.
8. Large gap in infrastructure funding (£150M has been quoted).
9. **This DLP will damage our historic environment.**
10. Consultation with and involvement of interested parties is flawed.

I am only concentrating on item 9, as others are concentrating their concerns about the other nine points, above.

The effect of so many houses, to the south of Warwick, BT and Whitnash, Gaydon/L/H and their vehicles will increase traffic in our three town centres to an unacceptable level. These 8000 houses, if built, will bring cars with families seeking schools, doctors, libraries, and medical/dental services. Leamington Spa residents seem unfazed by the enormous increase of car journies (and attendant delivery/refuse trucks) coming in and out of L/Spa along Clemons St, already much glamorised by Mary Portas money and WCC speed reduction humps; ditto along Tachbrook Rd and then getting tangled up in the rail station traffic lights and gyratory. L/spa residents only shrieked when Severn-Trent Water replaced sewers along and under the rail bridges (one demolished) and High St when a diversion was set up. It is disappointing that the cross-party Three Towns, who've been meeting fortnightly since February, have been unable to attract any concerned L/spa Town Councillors, only the Leamington Society and one WCC Cllr.

NPPF Para 16, NPPF Para 00004 and NPPF Para 129 dictate firmly how Local Authorities should decide how their DLP protects Heritage Assets. I applaud the English Heritage letter from Rohan Torkildsen, Historic Environment Planning Advisor for the West Midlands, with whom I had a long conversation in Coventry's magnificent Guildhall in May. There is the full script in Save Warwick's submission to you, so I won't repeat it.

Our 3 historic town centres, and a tiny part of Whitnash, are chockablock full of heritage assets which we have inherited from our ancestors. Warwick is currently "en fete" celebrating our 1100 anniversary, founded by Princess Aethelfreda, in 914, she is daughter

of King Alfred the Great, along with the School and the Castle, hence HRH Prince Charles visit earlier this month.

You have failed to give enough emphasis to protecting our assets from the onslaught of modern traffic. WCC seem intent on ruining our town centres by trying push more and more traffic through by allegedly mitigation schemes of traffic lights at Bridge End roundabout and Castle Hill gyratory in Warwick. The independent assessment of STS(4) by WCC has now been formalised and it castigates WCC with its "mitigation" plans which actually means accommodating more vehicular traffic along our narrow streets to the detriment of the built environment and the health of people who live, work or visit our towns. These narrow streets cannot take any more traffic and WCC's STA(4) is flawed. Mitigation in their language really means accommodation according to their designers (Atkins). There is new research on the effect of the multiplicity of diesel cars, which now don't belch black smoke, but the invisible exhaust fumes are actually more deadly. Environment Health must be in discussion with WCC on reducing the impact of traffic on town centres.

Warwick is a tourist town depending on nearly 1M visitors to the Castle, St Mary's and Lord Leycester Hospital (to name but three assets). The refurbished Court House, in Warwick, is now attracting a vastly increased number of visitors to the TIC and the new ballroom, where many events are booked. There is a good spread of volunteers, showing people around the revamped building. There is now a possibility of a link up with the University of Warwick encouraging more undergraduates researching the history of this building in the archives, at Warwick Record Office, then going on to present some incidents as theatrical productions.

Warwick Hospital is now a regional destination for an increasing number of out-patients from all over Warwickshire, it employs 2000 staff, whose parking spills over into residential streets, causing local "civil wars", which are difficult to contain. Certainly, Warwick Hospital is able to find more parking along Millers Rd, currently on Pickering Perforated land.

Save Warwick and Warwick Deserves Better have produced magnificent representation to you on heritage and the effect of traffic, both poor air quality and the effect of vibration on historic buildings. As Heritage Champion, I have talked to Kent Councillors on the effect of vibration on buildings, and, to their astonishment HS1 vibration is felt much further away from the actual rail line than the highly qualified engineers thought at the design stage. They are now worried about Ingham Mote and some foundation-less oast houses. Why has the request for a Health Impact study not been done with Warwick District, we have been asking for this since April 2014, when Dr Linnane was supposed to address the Council? North Warwickshire, Nuneaton & Bedworth have had one done.

Therefore, the DLP is patently unsound in its protecting of what we all treasure, our historic town centres, our visitor economy and of both Castles (Merlin and English Heritage managed) and to our graceful Regency Town.

Please think again and revise, radically, the DLP especially in light of the nearly 30% drop in the expected numbers of people and, therefore, houses, needed over the next 20 years.

Cllr Elizabeth Higgins Warwick West Town & District Councillor, Heritage Champion

25th June 2014