

Margaret Hamilton

Consultation Response to Revised Development Strategy

25th July 2013

Dear Sir,

I have decided to respond in this format to the New Local Plan for WDC , revised development strategy paper, I have also made some references to the full options paper.

I largely support the views of the Warwick Deserves Better Campaign.

I am mystified that the WDC has chosen to ignore the views of the local population on the previous consultation in July 2012 when there was a vast majority rejecting the approach and number of new houses suggested.

Instead the Council officers have chosen to revise up its proposals from 10800 houses then suggested to now 12300, *and ignored the views of the District Councillors who I understand voted for 9300.*

This is both undemocratic – *going against the views of our elected representatives-* and totally undermines the Government's stated principle of "Localism".

The stated public position of the senior council officers and the executive that they "must" have far more housing than the current inhabitants of the District want in the local plan appears to directly contradict the Localism Act.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf

Specifically the revised development plan is seeking to meet the needs of hypothetical future people who may wish to come to the Warwick District and not the housing and development needs of the current population.

The logic of this approach is bizarre and can be moulded into what ever policy an official saw fit, irrespective of facts or probability. Perhaps the approach can be summed up as the "Field of Dreams" philosophy of "*build it and they will come*".

Providing sustainable levels of growth:

The levels of growth envisioned are not sustainable- in that the level of infrastructure, its distribution, housing location and jobs, do not match the population growth forecast.

A 40% increase in Warwick's population over 15 years is clearly unsustainable and will cause immense, irreversible damage to the the character of the County Town.

Level of Housing Growth 2011 - 2029 Level of Population Growth and demand for housing assumptions:

- **National Planning Policy Framework requires** the approval of 'sustainable development' which meets an established housing need, planning applications already made or imminent

for much of the land meet neither of these criteria. The revised plan approach is not “sustainable”.

- Arguably a realistic forecast of need would mean that the District already has the required five-year supply of sites, balancing housing with employment growth and matching the housing market.
- These are flawed in the proposed revised development strategy paper, because:

The projected housing need of 12,300 new homes to be built is much too high.

- Less than half that number would meet local needs.
- It is wrong to forecast as far into the future as 2029, and to allocate greenfield land now.
- It is akin to having no plan at all, allowing uncontrolled growth, just leaving developers to decide what to build when. - *This already appears to be happening with proposals to build commercial property on St Mary Lands and housing on land designated for future employment*

Given that more than 50% of national population growth has been from immigration over the last two decades, and the government has publicly stated it wishes to greatly reduce this future net immigration, why is Warwick District planning for an even greater level of growth over the next 15 years, than has been experienced in the recent past?

Recent government figures show that demand from migration is now falling, and it is stated National Government policy to greatly reduce net migration in the future. YET WDC is still apparently planning for this to fail and overall growth to be higher than in the last 15 years when the UK had the highest period of growth for more than 1000 years, WHY?

- Housing demand growth in England is from a combination of net immigration and changes in household demographics towards smaller households.
- However the impact of a prolonged recession which the Prime Minister says could last another decade, will impact on the ability of individuals to afford housing.
- This is manifest in the rapidly rising age of first time buyers and the profound demographic change since 2008 in more young adults living at home with their parents for much longer than in the past.
- So why is the plan still assuming a rapid increase in demand for single occupancy households; when the actual demographic trend is away from this? Average age of first house purchase is now 37, <http://www.propertywire.com/news/europe/first-time-buyers-uk-201304097647.html>
- Is the modelling based on current data, or is it simply looking at the demand during the decade of rapid growth and easy availability of mortgage loans pre the 2008 crash?
- This in turn could mean that in fact far less individual units are required for the District as a whole, but a greater emphasis should be given for multi generational living , with semi independent adults?
- The complete rejection of the vast majority of respondents views at the previous consultation and instead deciding on an even higher number- 12300- is both perverse and undemocratic
- The Local Plan does not appear to consider that many potential individuals from outside the area may choose to live at the new town proposed for Gaydon rather than within the District.

Distribution of housing within the District

The plan talks about the need to distribute housing across the entire District, but then in fact does not do this!

A starting point should be that EVERY ward has the same level of housing growth during the plan, i.e. A 20% across the board increase.

- Most housing will be again concentrated within Warwick and parts of Leamington Spa, with very little in the large villages or in Kenilworth.
- The housing growth of 4000 units adjacent to Warwick will lead to a 40% increase in the town's population, this is completely unsustainable in quality of life, transport, air quality, employment, schools, and health infrastructure. And will destroy the character of the town totally, and therefore damage the local economy which depends upon it.
- The inexplicable lack of housing growth in and around Kenilworth is most odd given that the job growth is likely to be around the University and Coventry Airport -Warwickshire Gateway- and the town already has a lot of facilities.
- The greenbelt should in principle be protected, but not where this protection will cause massive detriment to the life and health of the inhabitants of Warwick.
- 1000 houses over 15 years in the villages is clearly inadequate to meet their housing needs or the lack of affordable housing, this is only 67 houses per year spread across a wide geographical area. This is curious, as it also points out the lack of affordable rural housing but then basically ignores any provision for it!
 - I suggest as a minimum 3500 of the 12800 houses in the plan be developed in the village areas spread evenly across the district. Conceivably this number could be much higher, built on the existing village fringes.
 - The infrastructure is much more likely to be able to cope with 6-10 new houses per rural ward per annum than the huge estates proposed adjacent to Warwick.
 - This provision WOULD meet some of the need for affordable rural housing projected, at 67 per year if 33% was "affordable".

I suggest three areas which have been overlooked for large scale housing provision are Bagington, Radford Semile and Lapworth.

- All are ripe for large scale "garden suburbs", supported by business parks. This would support and make more viable their existing shops and schools.
- I suggest that at least an additional 1000 to 1500 houses are considered for each ward, and therefore the significant benefits of population growth extolled by this plan are met, coupled with local affordable housing and retail provision
- I note they both have existing primary schools, and good proximity to public transport and roads, and Lapworth has a commuter railway station.
- There is also the opportunity in Lapworth to build a business park to tap into the proximity to Solihull and at Radford Semile to build a business park dedicated to engineering to tap into the expertise and supply chain associated with Ricardos. Warwick Gateway would be supported by new housing and infrastructure, too.
- This in turn would mean much smaller developments around Warwick would therefore by

required.

The land between Warwick, Whitnash and Bishop's Tachbrook is rural and agricultural and present policies respect this.

Building on it would merge our built-up areas, making them a single suburban sprawl.

The green land is as important as the Green Belt, arguably more so, to the north of Leamington and Warwick, and should be safeguarded just as strongly.

Transport

Transport: sprawling development is inevitably car-dependent.

I do not own a car and no one in my household has access to one; as is the case with many people in my age group. Yet my use of public transport will be compromised by this plan as it will lead to longer journey times and less timetable reliability

- The transport strategy is car-based, just squeezing more congested traffic on to the existing road network, bridges over the River Avon, and parking.
- Contrary to transport policies, it would. make walking and cycling less attractive, and could not have good public transport.
- For the plan to be actually sustainable, there needs to be a lot more vision for integrated public transport.
- **The historic environment would directly be damaged** by the increase in traffic and by wide new junctions cluttered with traffic lights and signs at beautiful places: in Warwick at Bridge End, over the Castle Bridge, on Castle Hill, and at St John's; and on the approach to Leamington via Europa Way, giving no impression of the beauty of the spa town

Cycle ways:

It would be a good objective to work with the County Council to ensure that EVERY community is served by a dedicated cycle way, especially within the urban areas, where short lengths of cycle way often just stop.

This should be funded by developers of the new housing as a priority via the **Community Infrastructure Levy**

- Why is there no provision for improvements to national route 41, which serves Aylesford School and the Woodloes Estate?
- Its missing section on Hampton St should be protected from development in the local plan, as this is already transport policy on the safer routes to school policy?

Commuter Rail and Bus Routes:

The plan envisions much new low cost housing, yet this is concentrated mainly around Warwick, and the new job provision is in the north of the District.

HOW are those in low paid jobs who will presumably be the beneficiaries of the "low cost" housing, be able to commute to where the jobs are if they cannot afford their own cars?

For the plan to be sustainable surely it would be better to have more smaller housing developments within walking/ cycle distance of the new job provision; i.e. small estates near small business parks?

- IF this is not possible a commitment to provide and subsidise long distance inter nodal commuter bus routes is essential.
- Low paid workers will need to be able to commute quickly and cheaply to where the jobs

actually are!?

- This can be achieved, by developing inter town express bus routes to link together; Warwick, Leamington, Stratford, Coventry, The University, Nuneaton, Rugby, Kenilworth and the larger villages; integrated with mini bus services which will THEN serve the local housing areas. Funded by the **Community Infrastructure Levy**.
- NOT the farcical situation as now when it take between 90 and 120 minutes each way to get between towns , which IF a direct town centre to town centre route could be achieved in 20 -30 minutes, (existing buses take very circular routes).
- This lack of effective public commuter transport compounds inequality and creates greater dependency on state subsidies, as those able and willing to work cannot afford the transport to get to the jobs, and the bus services are simply too slow and too infrequent to be a viable alternative.
- Similarly regular local new commuter train services linking together ALL the major Warwickshire Towns and Coventry should be a priority, funded by the **Community Infrastructure Levy**.
- The “virtual” park and ride scheme, seems like a lot of hot air political spin. Does it effectively mean NO park and ride , but a slightly extended bus route?

Air Pollution

As a pensioner with age related health problems are am very concerned that my legitimate concerns on air pollution will not be met by the revised local plan.

- Parts of WDC already do not meet the Nox emissions EU Directive, including large parts of the centre of Warwick.
- This is likely to be tightened up in the near future with harder targets and lower permissible emissions, possibly wit fines for non compliance.
- It therefore seems curious that the large-scale housing developments on the edge of Warwick are suggested with a likely 40% increase in the town's population, over 15 years.
- This will inevitably add to the congestion and air pollution; so why is it in the plan on this scale?
- Pollution from car exhausts in many streets in Warwick town centre and some in Leamington is already worse than is legally permitted.
- The District Council is required to improve air quality, but the plan and its transport strategy would worsen it.
- Noise and vibration would also be constant, businesses and tourism would be damaged. Worse, the long-term health of residents of these streets would be even more threatened.

Historic Distinctiveness and lack of “vision”

- I believe the plan should do more to promote good design in housing. My husband was a prominent modernist architect and would be horrified by the lack of commitment to good design in this plan.
- It is should also seek to unambiguously protect the historic buildings in the area and their settings, as this is one of the major “draw” factors for population growth and economic vitality
- The plan has some very vague and bland statements, it needs a clearly articulated “heritage vision”, backed up with detailed planning guidance and then an appetite for rigorous enforcement.

- Our towns are special, BUT only if the key historic and architectural elements and values are protected, otherwise they risk becoming a sprawling new town reminiscent of Milton Keynes.
- The existing open spaces, sports fields, allotments and parklands should unambiguously be protected from development, including their settings.
- An alternative approach could be to build modern squares rather than “garden cities”, the higher density and ease of mixed development can lead to more sustainable communities and less urban sprawl. Leamington and Hove have fine Regency examples, but the concept can work with modern buildings too.
- <http://www.livablecities.org/articles/european-square-conference-report>
- <http://www.english-heritage.org.uk/content/imported-docs/a-campaignforlondonsquares.pdf>
- http://www.londonlegacy.co.uk/media/LLDC_Your_sustainability_guide_to_the_Queen_Elizabeth_Olympic_Park2030.pdf
- http://www.reading.ac.uk/PeBBu/state_of_art/urban_approaches/compact_city/compact_city.htm

Definitions of affordable Housing

I suggest that the definition of what is affordable housing needs broadening.

- The plan highlights the need for housing for the elderly and the growth of the elderly as a % of the population.
- One solution to their needs and the obvious trends in semi independent adults living much longer with their parents because they cannot afford to get on the housing ladder, would be to classify “granny flats” or semi separated apartments within houses as going towards the “affordable housing” targets.
- Multigenerational living should be encouraged as it meets housing need, is sustainable and reflects changing land-use patterns. There is the opportunity to boost this by incorporating it into the plan's housing targets and helps meet the need for “mixed” housing.

Gypsy Site:

I suggest the land adjacent to the Junc 15 of the M40 might be a suitable site.

There is little nearby existing housing, but a public bus service and good road access

Employment Land

I support the use of green belt land to expand employment opportunities on well designed business parks at Stoneleigh and around the University. BUT there must be good public transport links to allow potential workers to access these jobs from the existing WDC Urban areas.

I am concerned that there is not enough employment land and some has been allowed to be used for housing development rather than kept for future jobs.

Strategic Development Sites and Infrastructure

I am not convinced that the infrastructure proposals for the southern sites will work.

The funding streams for new expensive infrastructure appear to be inadequate and the likely volume of road traffic due to the commuting necessitated by the the density of housing and lack of likely local schools, shopping and employment will inevitably lead to a gross worsening of traffic congestion in Warwick and parts of Leamington Spa.

The admission that no modelling has been done on the impact of health from higher traffic emissions in the WCC Traffic plan suggests it is not fit for purpose.

This serious omission calls into doubt the legality and practicality of the entire "Sites South of Warwick and Whitnash" development.

Public Space:

Existing open space, sports and recreational buildings and land, including playing fields, **should not** be built on !

Any new developments should have additional public space.

5.4.14, 5.4.16 and 5.4.17 The need for extra public space is mentioned, to accommodate the great increase in population proposed, why then is there not a clear policy to designate all existing public parks such as St Nicholas, Priory and St Mary Lands as "areas of restraint". As their need to serve the huge increase in population means their preservation and protection is even more important now?

Gypsy Sites:

- I support the provision by Jnc 15 of the M40 and the site beside the sewage works on the Stratford Road.
- I suggest other sites adjacent to Kenilworth and Baginton be considered too.
- No site should have more than 8 pitches.

Conservation Areas and Historic Environment

One of the prime selling points for Warwick is its historic environment, this is vital for the health of the local economy long term and must be robustly protected.

- WDC must commit to protecting the existing listed buildings, open public spaces and conservation areas, from encroachment by development.
- And protection from excess traffic.
- Particularly as most development needs – as defined by this plan-will be met by building on greenfield and brown field sites, there is therefore less pressure to damage the existing historic town buildings?
- I suggest the English Heritage Guidance published in May 2011 in "Seeing History in the View" should be incorporated into the plan.

Climate Change

Flooding and SUDS. Given the recent patterns of heavy rainfall and the long history of local flooding, great care should be given to the siting of all new developments.

Claims of 1000 year flood modelling should be treated with extreme scepticism as reliable data only exists for the past 90 years.

Especially in existing urban areas a conservative approach should be given to any large new buildings and their impact on surface water drainage.

Consideration should be given to more local flood defences and helping individuals to flood proof their homes.

Fear of Crime

As a pensioner I feel that the local plan should do more to address the issues of fear of crime.

- No sex clubs or night clubs should be allowed near housing- *they should only be built in non residential areas.*
- No new pubs, bars or hotels should be built or change of use in areas of predominately residential nature, *to protect existing residential amenity.*
- There should be the presumption that in residential areas new businesses will not increase the background ambient noise levels. If this cannot be achieved these businesses should be located in designated areas such as retail or business parks.

Good Design:

The plan highlights good design and sustainability, this should be supported but defined

All new housing should be built to Parker Morris standards

<http://www.singleaspect.org.uk/pm/index.php>

- These standards are based on ergonomics of the minimum space needed to meet “***a functional approach to determining space standards in the home by considering what furniture was needed in rooms, the space needed to use the furniture and move around it, and the space needed for normal, household activities.***”

As these were the minimum set for UK 1961 social housing it is not unreasonable that they should be the very minimum acceptable in WDC for the next 15 years. OR we run the risk of creating housing that CANNOT meet the needs of the occupants and risks becoming dysfunctional or slums, which by definition is hardly “sustainable”.

Tourism

- Any new visitor accommodation -over a small number of bedrooms- should be examined to see if it would have a negative impact on the existing providers locally as a material planning consideration.
- Small independent providers of accommodation tend to support far more local jobs and have a bigger local economic impact by their use of local suppliers.
- It is desirable to have a diversity in type and location of accommodation providers.
- New budget chain hotels which have a similar impact on existing hotels and guest houses, to that of supermarkets on independent retail traders. They should only be permitted where it can be demonstrated there is an unmet demand or capacity need. And there will not be a detrimental impact on existing businesses

Green Wedges : This seems to be a meaningless concept.

Conclusion: *There are better alternatives:* lower housing numbers to meet local needs, especially for houses which people can afford, instead of encouraging in-migration; gradually releasing land

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for development as demand grows; giving absolute priority to using brownfield and infill sites near schools, shops and railway stations; building homes close to jobs; and co-operating with other local authorities, instead of competing with them for development.

- I think we need a plan primarily for local needs, and which will not destroy the nature of Warwick, so major revisions are required.
- Greater emphasis on compact top quality urban design so a larger number of smaller developments around the entire district, not sprawling estates beloved only by the shareholders in the large building companies.

Yours faithfully,

Margaret Hamilton