

# LOCAL PLAN

helpingshapethedistrict



WDC PLANNING  
 Ref  
 Officer  
 - 5 JUL 2013  
 SCANNED  
 CC CR PD MA  
 PRE GEN DIS

For Official Use Only  
 Ref: 9695  
 Rep. Ref.

## Revised Development Strategy Response Form 2013

Please use this form if you wish to support or object to the Local Plan - Revised Development Strategy.

**If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.**

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available (see back page). You can also respond online using the LDF Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	MR & MRS <del>EBORNE</del>	
First Name	BEN AND ANNE	
Last Name	ORME	
Job Title (where relevant)	_____	
Organisation (where relevant)	[REDACTED]	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone number		
Email address		
Would you like to be made aware of future consultations?		
About You: Gender		
Ethnic Origin		
Age		
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?	WORD OF MOUTH, MEDIA	

# Part B - Commenting on the Revised Development Strategy

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of  ⇒ LETTER ATTACHED

Which part of the document are you responding to?

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Proposed Development Sites - District Wide)

What is the nature of your representation?

PREFERRED OPTIONS - P04  
DIST OF SITES FOR  
HOUSING, A ALLOCATED SITES,  
ON THE EDGE OF WARWICK,  
LISPA & WHITNASH, SOUTH  
OF GALLONS HILL WEST OF EUROPA  
WAY, WARWICK

Support  Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

(SEE ATTACHED)

↑      ↑

REPRESENTATIONS & ORIGINAL SUBMISSIONS

## Representation

- Traffic congestion is already extreme and can only get worse as a result of the development
- The scale of development (3,300 houses) is totally unacceptable
- Places disproportionate burden on south Warwick area
- Erodes green belt and reduces the gap between conurbations of Leamington Spa and Warwick
- Will worsen already dire air quality issue in centre of Warwick
- Will result in unsustainable population increase
- Takes no account of current flood risk in proposed area
- Threatens heritage value of the town
- Poses additional burden on the known bottleneck of Castle Bridge

## Original Submission

We are writing to object in the strongest possible terms to the proposal to build 3,300 homes to the south of Warwick on the grounds that the existing road infrastructure is already stressed to the limit, with formidable traffic problems which will not be addressed by the planned mitigation measures. We also believe there will be a consequent significant worsening of the already dire situation regarding air quality in the town

We would like you to consider the following points;

### 1) Why have local plans changed?

Why have previously earmarked sites on the north side of Leamington been deleted, in preference for site-ing the greatest concentration of development on environmentally sensitive areas to the south of Warwick. The original plan spread the growth around the periphery of the urban core of the district, spreading the load of housing. A relaxation of the Green Belt to the north of Leamington is well overdue and would have little impact on the gap with Coventry.

### 2) Population Growth

The 40% increase in Warwick's population over 15 years projected as a result of the development is unsustainable and will irreparably damage the town's historic character. Nearly 40% of the 10,800 homes proposed for Warwick District are to be built on land south-east of the town – with estates three times the size of Warwick Gates, Woodloes Park or Chase Meadow.



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### 3) Green Belt

The National Planning Policy Framework (79) states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.”

The area to the west of Europa Way was identified as an area of restraint when the Warwick Technology Park was given planning permission. It was promised it would be a protected area of green belt to prevent urban sprawl between Leamington and Warwick. Its loss would damage wildlife and biodiversity, as well as the quality of life of the area’s residents.

### 4) Traffic

The road system on the approach to Warwick via Castle Bridge is already at breaking point, and the mitigation measures proposed will be totally inadequate to deal with the projected 6,000 plus extra cars on the roads as a result of the development. Parking is already a nightmare in Warwick, local businesses are suffering – as numerous vacant units on Smith Street, for example, bear testimony.

### 5) Air quality

The NPPF (175) states: “that the Local Plan should “support the transition to a low carbon future” and contribute to “reducing pollution.” They should also (NPPF 124) “sustain compliance and contribute with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new developments in AQMA are consistent with local air quality action plans.”

The Warwick District Air Quality action plan 2008 identified the road network with Warwick town centre as exceeding maximum NO<sub>2</sub> levels as set out in the Air Quality Regulations (England) (Wales) 2000.

The report said Warwick already suffers from the lowest peak period journey speeds in the County. It said that within the Warwick AQMA a minimum reduction of 43.1% in (nitrogen oxides) was required.

In Bridge End, the level of 37 µg/m<sup>3</sup> (units per cubic meter of air) is just below the permitted maximum of 40 µg/m<sup>3</sup> but other streets are already above this level (ie Jury St). Even now the Myton Road and Banbury Road are frequently grid-locked with traffic that has come to a standstill at the Castle Bridge bottleneck over the river Avon – spewing out noxious fumes.

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I would remind you that Warwick District Council's own Core Strategy is "to maintain and improve local air quality by guiding and controlling the location of new development, particularly where this would have an impact on public health or the natural environment."

Creating bicycle lanes and encouraging sustainable transport is all well and good, but it pales into insignificance when set against the context of uncontrolled housing development, with its consequent increase in road traffic pollution.

Just two years ago there was talk of creating low emission zones and restricting access to Warwick city centre to alleviate the problem – if such radical measures were contemplated then, what has changed since?

There is a glaring and obvious contradiction between Warwick District Council's avowed aim to improve air quality and the proposed development which will significantly exacerbate the problem.

#### 6) Flooding

The NPPF (101) stipulates that; "The aim ... is to steer new development to areas with the lowest probability of flooding." Houses in Bridge End and parts of Myton Road are already under threat from flooding. How much worse will the situation become when acres of agricultural land are concreted over with housing, and run-off increases exponentially. It seems incredible that you are proposing to remove existing green 'soak-up' areas, given this known flood vulnerability, and build on that land.

#### 6 Protecting our heritage

The 300-year old Castle Bridge already carries 20,000 vehicles a day and will have to endure increasingly higher volumes of traffic with the possibility that the structure will be damaged and could even suffer catastrophic failure. It is clear that Warwick has long needed another bridge over the River Avon to redirect traffic from this funnel point. The historic and listed buildings in Warwick will be further damaged by road traffic fumes and pollution.

#### Conclusion/Proposal

We are not NIMBY's. We realise that some residential housing may need to be built to the south of Warwick. Perhaps a new housing estate of 500 units – but we object to the scale of the proposed plans for nearly 4,000 houses.

We believe the proposed local plan is dangerously flawed and we urge you to think again about the consequences for the historic town of Warwick and its inhabitants, whose way of life, and even health, is now so threatened.



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