



Revised Development Strategy Response Form 2013

For Official Use Only

Ref: 1851.

Rep. Ref.

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

Part A - Personal Details

| | 1. Personal Details | 2. Agent's Details (if applicable) |
|--|------------------------------|--------------------------------------|
| Title | MR. | |
| First Name | DENNIS | |
| Last Name | CRIPS | |
| Job Title (where relevant) | CHARTERED ENGINEER (Retired) | |
| Organisation (where relevant) | | |
| 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? | | <input type="checkbox"/> No |
| About You: Gender | | |
| Ethnic Origin | | |
| Age | | <input type="checkbox"/> 35 - 44 |
| Where did you hear about this consultation? | | <input type="checkbox"/> bin hanger? |
| | NEWSPAPER | |

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Officer
23 JUL 2013
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PRE GEN DIS

[Signature] 19/7/13

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

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?

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).

PLEASE SEE ATTACHED REFERENCE PAPERS

" DETAILED COMMENTARY AND OBJECTION "

" CRITIQUE OF THE AQMA ANALYSIS "

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WARWICK DISTRICT LOCAL PLAN

DETAILED COMMENTARY AND OBJECTION

(Paragraph numbers refer to the Revised Development Strategy dated June 2013)

| PARA No | QUOTATION | OBJECTION |
|---------|---|--|
| 3.4 | ..the strategy seeks to..."care for our built, cultural and natural heritage" and "protection of areas of special significance" | It does not, specifically: -the suitability of the Avon Bridge to support the increased levels of traffic - Warwick's townscape on entering the town at St Johns will be despoiled by a forest of traffic signals - The townscape at Castle Hill, with the background of the Castle itself will be despoiled - St Nicholas Church Street, mediaeval or earlier in origin, will become an "urban clearway" to encourage through traffic |
| 3.5 | "Environment...Distributing development across the District" | The proposed development is concentrated immediately south of Warwick |
| | "Infrastructure ... Developing an effective and sustainable transport package" | By not resolving the air quality problems, the transport package is both unsustainable and illegal. |
| 3.6 | "Health and Wellbeing" | The failure to tackle the air quality problem is a direct attack on the health of all users of our towns. |
| | "Sustainability" | This key word/expression is not defined. One must therefore resort to the definition agreed at the 96 th Plenary Meeting of the United Nations in December 1987 as "...sustainable development...implies meeting the needs of the present without compromising the ability of future generations to meet their own needs". This the Plan clearly does not especially in the matter of air quality. |
| 4.3.1 | Justification for the broad location for development for housing | One of the key elements of this section is that Phases 2 and 3 of the Strategic Transport Assessment demonstrated that traffic generated by development on non-Green-Belt land to the |

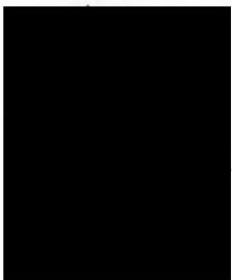
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| | | south of the towns could be mitigated, hence development could be permitted. This is an entirely false conclusion based on the evidence of the STA itself. See 4.3.10. |
| 4.3.10 | “The (Phase 2 modelling) showed that although development...would lead to significant amounts of additional traffic in this area, this could reasonably be mitigated....(thus) exceptional circumstances for releasing green belt for development on traffic grounds could not be justified.” | This is an entirely false conclusion from both Phase 2 and Phase 3 modelling. This objection has three elements: <ol style="list-style-type: none"> 1. The WCC’s relevant traffic management policy, established at the Warwick Area Committee in January 2008 is to plan for traffic reductions in Warwick town centre. This was in response to extensive public consultations and a general desire to improve the air quality. To that end it established the Joint Study Groups (JSG) to consider options for traffic reduction. The JSG is still in session and the author is a member. Thus any scheme which actively plans to increase traffic in Warwick town centre is out of order and unacceptable. 2. The existing traffic network is already overburdened, as witnessed by the illegal levels of air quality in our towns. 3. All the WCC’s 12-hour traffic counts and modelling on which these conclusions were reached were based on the statistics arising at times of maximum traffic flow ie when the schools were in session. In 2003, the author working with the Warwick Society demonstrated that the “schools related traffic” adds about 14% to the traffic burden during the morning peak hour. (Ref 1). This exceptional flow occurs on about 150 days per year. The STA is silent on the likely volume of traffic in off-peak periods and at school holiday times and at weekends. Thus the mitigation measures proposed, which will be in operation 24/7, are based entirely on data relating to just 300 hours per year (about 3.4% of the total year). It is shown below in the response to Mitigation Measure 12 that these measures are entirely counterproductive at off-peak times. |
| 4.3.10 | Modelling | Please also see the separate Paper “Critique of the AQMA Analysis” which forms part of the Objection. |
| 5.1.1.5 | “Other road improvements” | The proposals for Priory Road/Smith Street and Castle Hill are unacceptable for reasons given below in the responses to the Mitigation Measures. |
| 5.1.29 | “Studies have shown that the scale of development proposed in this | The studies (presumably the STA’s) show no such thing. They show that at peak times only, and only when the schools are in session, the measures will reduce the traffic burden to less |

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| | area can be accommodated on the transport network subject to appropriate mitigation measures being brought forward.” | intolerable levels, and which will result in yet further deterioration of air quality in our towns. These “mitigating” measures actually make matters worse during off peak periods – See Mitigation Scheme 12 |
| 5.1.3.3 | “No insurmountable constraints” | The potential constraint of the capacity of the Avon Bridge has not been addressed. There is great concern in professional circles about the fatigue life of masonry arch bridges – issues are age, maintenance, increasing traffic loads. The 7.5 tonne weight limit is routinely ignored and offers no protection. The STA makes no mention of the bridge which is pivotal to the proposals. |
| 5.6.1 | “...a range of transport mitigation measures...have been costed and prioritised. These will be delivered...” | Patently untrue. The STA Phase 3 states (Para 8.1.2) “It should be acknowledged that the (mitigation) schemes proposed within the modelling, at this stage, have not been tested to a sufficient level of detail to determine that they are the optimum solution, rather it is intended that the principle of what has been proposed should be implemented, in some form, alongside the proposed allocation strategy.” |
| 5.6.3 | “It is critical that sustainable transport improvements form part of the mitigation package to.....contribute towards the delivery of sustainable development;..” | The proposed ban on the right turn from Smith Street into St Nicholas Church Street will have an immediate adverse effect on shoppers with cars, on the traders themselves and on their suppliers for whom St Nicholas Church St is the only means of accessing the Banbury Road and southwards, or back into the town centre itself. |
| 5.6.5 | Phase 3 Strategic Transport Assessment | Paragraph 8.1.2 states (in relation to the mitigation proposals) “The primary function of these proposed works is to maintain the flow of traffic southbound from the A429 Coventry road, down St Nicholas Church Street and southwards along the Banbury Road.” This approach encourages and generates the very through traffic which is the bane of Warwick town centre, and which the WCC is determined to reduce (see comment to 4.3.10 above) |
| Mitigation Scheme | Myton Road Roundabout signalisation | No evidence has been presented that pedestrian stages have been included in the signal cycle. If they have not, this is a very serious omission considering the volume of pedestrian traffic, especially schoolchildren, at peak times. If pedestrian stages have been included, then it will |

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| 11 | | result in a loss of about 20% of highway capacity at peak times, and it is therefore unlikely that the junction will be able to serve more vehicular traffic. |
| Mitigation Scheme 12 | Priory Road, Smith St, St Nicholas Church St signalisation | <ol style="list-style-type: none"> 1. No evidence has been presented that pedestrian stages have been included in the signal cycle. Comment as for Mitigation Scheme 11 as above. Pedestrians including many elderly and partially disabled residents will be unable to gain safe access to the St Johns shops except by a 200m diversion to the existing St Johns/Coventry Road signals. 2. If pedestrian stages have been included, then it will result in a loss of about 20% of highway capacity at peak times, and it is therefore unlikely that the junction will be able to serve more vehicular traffic. 3. If pedestrian stages have been provided, then pedestrians will have to wait at up to 3 separate signals to cross to the St Johns shops and a further 3 to return to the street. 4. The signals have been proposed on the sole basis of peak hour estimates with schools in session. These conditions apply for only 300 hours per year (30 weeks for 10 hours per week). No evidence has been provided that they would be necessary at any other time. It is therefore likely that for 96.6% of the year, they will be unnecessary and will in fact create additional congestion and pollution by causing traffic to stop when it would be unnecessary. This proposal, far from mitigating the effects of traffic, would actually make it worse for traffic, for pedestrians and for local businesses. (The new signals at the Toll House on the Banbury Road act a reference example of this flawed approach, causing even light traffic to wait unnecessarily when a mini roundabout would serve so much better for all concerned). 5. Visitors to the town centre would be faced with a veritable forest of signal heads as the foreground to the mature and pleasing townscape immediately behind. |
| Mitigation Scheme 13 | Castle Hill Gyrotory Signals | <ol style="list-style-type: none"> 1. No evidence has been presented that pedestrian stages have been included in the signal cycle. Comment as for Mitigation Scheme 11 as above. 2. If pedestrian stages have been included, then it will result in a loss of about 20% of highway capacity at peak times, and it is therefore unlikely that the junction will be |

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| | | <p>able to serve more vehicular traffic.</p> <ol style="list-style-type: none"> 3. The signals have been proposed on the sole basis of peak hour estimates with schools in session. Comment as for Scheme 12 above. 4. No evidence has been provided regarding the future retention of the existing Pelican crossing on the Banbury Road. 5. No evidence has been provided that the existing signals at Eastgate have been included in the signal co-ordinating proposals. Such co-ordination would be essential to prevent exit blocking from St Nicholas Church St 6. The existing townscape of mediaeval buildings against the backdrop of the Castle itself would be entirely ruined by yet another forest of signal heads. |
| Mitigation Scheme | General Comment | These particular proposals have been poorly thought through and would be extremely damaging to the historic environment, to air quality and to the local economy. On the evidence presented, they could only be justified and on traffic grounds alone for 3.4% of the total year. |
| | | |

References: 1. School Term Traffic Count 2003 dated 8th October 2003 D.M. Crips/The Warwick Society



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19th July 2013

WARWICK DISTRICT PLAN

Phase 3 Strategic Transport Assessment – Section 10

Critique of the AQMA Analysis

The analysis in the Strategic Transport Assessment makes a number of fundamental mistakes:

1. The analysis is based on peak hour traffic data derived on a weekday when the schools are in operation. It was established in 2003¹ that “schools related traffic” accounts for about a 14% overload during the morning peak time, ie for some 150 hours during the year. The morning peak analysis, (Table 32) is therefore irrelevant at any other time, ie for the other 8610 hours (98%) of the year, yet is being used as a rationale for the introduction of “critical” measures. In any case the schools related traffic is unlikely to grow since Warwick’s schools are not affected by the new proposals.

Note that the “Schools run” in the afternoon may be observed between about 15.45 and 16.15 and thus falls outside the range of the data in Table 33.

2. Table 33 shows that, taking Warwick as whole, the proposed mitigating measures, even if valid would make about 2% difference to the traffic flows. This level of difference is “in the noise” of any assessment, and cannot therefore be used as a justification for introducing such draconian measures.

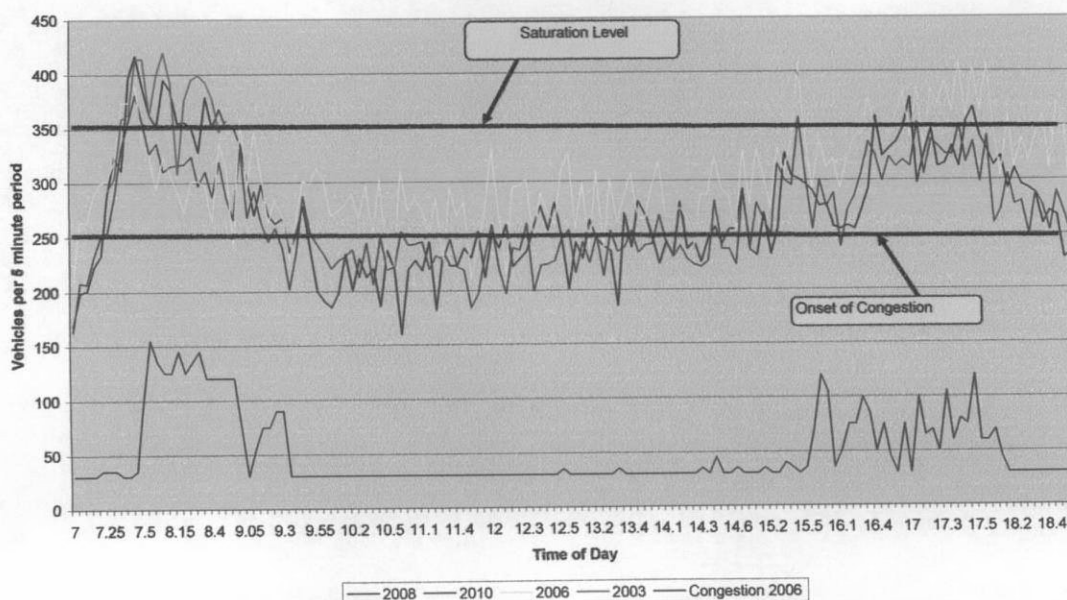
The outcome of these mitigating measures, and these would include the proposals for the Myton Road/Banbury Road Junction, would be that for the substantial majority of the time the traffic signals would be unnecessary and actually be introducing delay and pollution into the local area. That this is true can be seen in the operation of the new traffic signals at the Gallows Hill/Banbury Road intersection, when for the majority of the time a simple roundabout would be quite sufficient.

3. The Assessment makes the wholly incorrect assumption that traffic in and around Warwick will grow in accordance with the NTEM Adjusted TEMPRO database. This may be a reasonable assumption in the general case, but fails to acknowledge that such guidelines do not and cannot apply when the volume of traffic saturates the highway network in question. If the capacity of a network is “X” then assuming constant or increasing traffic demand, the flow in 15 years’ time will also be “X”. What will change is of course the length of time for which the highway network remains saturated.

The accompanying Figure shows the recorded traffic flows between 2003 (Warwick Society) and 2010 (WCC), together with the WCC’s record of congestion incidents in 2006. All show a similar pattern, which may be interpreted as follows:

- a. A morning “rush” to beat later congestion, commencing about 07.15. This can be shown in the more detailed (street-by-street) analysis to begin in St Johns inbound, presumably to beat congestion on Castle Hill.
- b. A peak period lasting until about 9am when traffic saturates at about 4200 vph
- c. A period of “normal” but heavy flow with occasional congestion events until about 15.30.
- d. The afternoon peak is in two stages, beginning at about 15.30 with the “schools out” traffic and ending about 16.15. At 16.45, there is a second peak lasting until about 18.00. During these periods individual roads (eg Smith St) become congested, but overall the town centre is not saturated.

Inbound Traffic and Congestion 2003, 2006, 2008, 2010



The morning peak is focused on drivers reaching their destinations (school, business) by 9am, and it may be assumed that this will continue to be the case. It may also be assumed that drivers will not want to begin their journeys any earlier, leading to the conclusion that additional traffic demands from new housing developments will in general find alternatives.

Conclusion – Warwick’s morning peak traffic will be largely unaffected, hence “mitigating measures” are not required.

In regard to the afternoon peaks, the “schools peak” is likely to remain unaffected since the capacity of the schools does not change.

In any case, the STA analysis shows for Warwick overall only a marginal difference (about 2%) if the mitigating measures are applied. This difference is statistically “in the noise” and therefore any proposed mitigating measures are irrelevant.

Conclusion – The proposed mitigating measures are unnecessary during the pm peak.

Other Comments on Table 32

- a. The morning peak hour on St Nicholas Church St is 07.00 to 08.00

- b. No explanation is given for the forecast huge growth in St Nicholas Church St traffic, which is southbound.
- c. St Nicholas Church St has never recorded traffic flows as great as 1172 vph and is probably incapable such a volume due to exit blocking at Castle Hill, thus throwing doubt on this forecast.

Overall Conclusion

The Assessment seems to have been made by taking a unique set of data (from 2011) and manipulating them without thought as to the limitations of those data and without any "reality check" as to the validity of the forecast outcomes. Neither has any comparison been made with an extant "mitigating measure" at the junction of Gallows Hill and Banbury Road, which can be seen to delay and frustrate traffic at most times.

In essence, the Assessment is invalid, and hence its recommendations for "critical mitigating measures" in the Warwick area should be discounted.



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19th July 2013

References:

1. School Term Traffic Count – the Warwick Society, September 2003