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1. **Objections to the Draft Local Plan Revised Development Strategy**
2. **Objections to additional Housing for Village settlements**
3. **Objections and Proposals for Gypsy & Traveller Sites**

1. Objections to the Draft Local Plan Revised Development Strategy

We wish to register a number of objections to the Local Plan Revised Development Strategy. The most important objection from which flow all the other challenges to the Revised Local Plan is the projected need for 12300 new homes within the next 15 years.

False premise of the housing need forecast

From 1991 to 2011 WDC population grew by 18% owing to major housing developments at Hatton, Warwick Gates etc. In most part the growth was caused by immigration not due to organic demographic growth of the existing population. Similarly with the Revised Plan, projected is growth of 20% in 15 years is largely based on immigration. On a projection of natural growth following a paper based on 2011 census data written by Bishop's Tachbrook Parish Counsellor, Ray Bullen, and making allowance for migration, only 5400 homes are required. What's more WDC's own figures prepared by G.L. Hearn (December 2012) provided an economic and demographic forecast a figure of only 4405 new homes.

This figure is further reinforced by employment figures. WDC has very low unemployment at only 1.7%. WDC's figure for housing requirements must therefore be based on major immigration into the area. The 2012 Strategic Housing Market Assessment stated that the overall Warwick District had a very good job-homes

balance. As the Gateway project South of Coventry allocates over 1300 jobs for WDC, it seems idiocy to build houses so far from a major area of new employment.

Growth is obviously necessary but not at this excessively high level. In simple terms if more houses are built more people will move here as it is an attractive place to live, in so doing destroying what made it attractive in the first place by over development.

Such a disproportionately large housing development will create another soul-less commuter estate that lacks identity and social cohesion. In the main it will be a dormitory for Birmingham and Coventry

G. Renshaw, economist at Warwick University states. "Estimating housing need in Warwick District involves forecasting migration *within* the West Midlands including in particular outward migration from Coventry and Birmingham. This is where the methodology becomes completely unsound because migration into Warwick District from other parts of the country will depend in no small part on the availability of housing in Warwick District and elsewhere so the reasoning is circular: **"supply creates its own demand"**. This problem actually affects every step of the forecasting; for example it is well known that net immigration into the UK depends on the availability of jobs in the UK which depends on public policy in no small part. Consequently, due to this circularity of the reasoning, whatever level of housing provision is made by WDC those houses will always be occupied, **thereby appearing to validate the forecast.**

The above is concerned with forecasting, "need", or the demand for housing in Warwick District. There is then the entirely separate question of the extent to which WDC should meet national and regional housing need. This depends on a whole host of environmental considerations such as transport links, preserving the green belt, etc., so there are further circularities in the reasoning here because these factors are also policy variables. It is perfectly reasonable and rational to argue that environmental considerations should be given a heavier weight than elsewhere in the country or region, and therefore that the appropriate contribution of Warwick District to meeting national need is very small and even zero.

One of the key problems is that the forecast of housing “needs” has a numerical value that gives it an entirely false precision whereas the environmental factors cannot be quantified. We live in an age in which numbers are worshiped and this biases the whole decision making process. Council Planners, when confronted by opposition to their proposals based on environmental arguments, tend to reply, “How else can the need for housing be met?” This glosses over the fact that this “need” is really no more than numbers plucked out of the air. It also confuses the *general* argument that more housing needs to be provided in the UK (because of likely population growth) with the *specific* argument that more housing needs to be supplied in Warwick District.”

Detrimental visual & environmental impact of 2000 new homes South of Harbury Lane & Gallows Hill

As made clear above, environmental and aesthetic considerations are not quantifiable. To a large extent these define the quality of life in an area and no more so than in Warwick District. Protection of the rural environment is a prime factor when considering development and local residents should have a major voice in decision making according to the guidance laid down in the National Planning Policy Framework.

Large areas of the landscape south of Leamington and Warwick are considered to be uniquely beautiful with rolling fields providing far-reaching views. Given the overriding concerns about the excessive numbers of new houses proposed is it right that this landscape should be lost? The Planning Inspector who reviewed the current local plan in 2006 stated that Woodside Farm should not be built on now or in the future. WDC’s landscape consultant Richard Morrish in his report Landscape Character Assessment in 2009 referred to the land south of Gallows Hill concluded, “this study area should not be considered for urban extension and that rural character should be safeguarded from development.” Why therefore has WDC gone against that recommendation?

Building 2000 homes South of Harbury Lane, extending down the side of the Tachbrook Valley will have a severe visual impact. The development would encroach the urban fringe into the parish, whilst to some, a country park may provide a remedy in maintaining a minimum separation, the proposed house building on

rolling countryside, will make it highly visible, and the "Country Park" as separation remedy will be ineffective. As it stands the existing fields provide an excellent "Country Park" that is maintained by the farmer at not cost to the local taxpayer, unlike the WDC's costly proposal. In addition, much of the land south of Harbury Lane is high-grade agricultural land capable of growing multiple crops per year. This valuable food producing land would be lost to needless housing

Furthermore the development would be a major step toward coalescence of the settlements which is contrary to the decision of the Government Inspector's 2006 Local Plan report which specifically stated that the existing rural area viz South of Harbury Lane to Bishop's Tachbrook should be maintained and no development should be sanctioned. If development were to go ahead, at its closest point on Oakley wood Road, the separation between settlements will be reduced to about .5 of a kilometre. Moreover owing to the sloping nature of the land South of Harbury Lane the development would be visible from over 2 kilometres away on the Southwest approach to Bishop's Tachbrook

Despite the intention of maintaining a "country park", (where does the maintenance money come from), the new housing would set a precedent for further development that would merge Bishop's Tachbrook with Leamington and Whitnash.

Problem of water run off

The sheer size of the development of over 98 ha of farm land would also create a significant problem of run off water. Although the envisaged attenuation measures may well stop flooding although this is debatable as the much smaller Warwick Gates development has had significant problems caused by inadequate drainage: ditto problems along Harbury lane caused by the sewerage pumping station overflowing and constantly causing an obnoxious smell and disruptive clearing and mending of the pipework.

The built environment of the new development will increase the water flow into the Tach Brook and its feed through New Waters into the Avon. This huge increase in water volume could cause considerable flooding problems downstream in Stratford Upon Avon and neighbouring counties.

On the other hand if the If option of 5400 new homes was selected these could be dispersed around the District, preferably on more brownfield sites and would prevent flooding problems

Infrastructure Problems.

As this is a major development there is a concomitant complex and costly infrastructure requirement. New schools, sewers, road improvement, hospital facilities all will require to be financed and maintained from ever tightening local and national budget allocations. The Local Plan does not contain any detailed evidence that Developer contributions through Section 106 and Community Levy will cover any near the cost of infrastructure improvements. In the RDS there is a proposed road-restructuring programme costed at £39m, £3m more than the CIL grant from central government for the proposed housing numbers.

Traffic congestion is already a major problem. As nearly all the development is South of the Rivers, the traffic problem will be impossible at pinch points such as canal, railway and bridge crossings: there is only one bridge in Warwick that is weight limited and at its maximum capacity at peak times.

Europa way into Leamington feeds into a complete bottleneck at the Myton Road junction despite the recent alterations that took seemingly an age to complete. Alleviating this bottleneck by making Europa Way a dual carriage way and adding/modifying 25 junctions will merely widen the funnel to allow more traffic to gridlock near the Princess Drive junction that has just under gone major, and very confusing alterations.

Traffic over the bridge in Warwick is already at its maximum. What happens in rush hour when an Ambulance has to get, in an emergency, to Warwick Hospital from Bishop's Tachbrook?

Where does the money come from?

The Local Plan details a whole range of infrastructure required by the development. The total number of houses in the Strategy would require considerable more money from CIL to finance the infrastructure. There are no details as to where this investment would be sourced. The Revised Strategy is therefore unsustainable. Furthermore, if history is to go by, implementation of much smaller yet important

infrastructure was very much an afterthought that caused great inconvenience to residents of Bishop's Tachbrook. When Warwick Gates was built no additional water and sewerage pumping was installed which meant low water pressure for BT residents. Electric showers and combi boilers had difficulty working and sewerage blockages too became a problem for many years. It took 15 years to build a traffic light junction at Gallows Hill and Banbury Road. Meanwhile workers and increased traffic created by the Science Park had to suffer interminable delays. No provision has been made to alter the T-junction where Mallery Road meets the Banbury Road at Bishop's Tachbrook. The hugely increased traffic volumes created by Jaguar Land Rover and Aston Martin make it impossible to exit the village from this route at many times of the day. The only alteration made to this junction is a passing bay on Banbury Road opposite Mallery Road. Although this passing area is marked, it is continually used as a parking bay thus preventing the flow of traffic as the main road is blocked by traffic turning right into the village. This further delays exiting from BT. Many residents now use the detour of the Gallows Hill/ Banbury Road junction, as it is impossible and unsafe to exit right at the Mallery Road T-junction. Increased traffic has also made Bishop's Tachbrook an unsafe rat run for commuters. The installation of traffic lights at Oakley Wood Road and Harbury lane took many years to implement and then the first attempt caused confusion and accidents owing to the staggered nature of the crossing and ill thought out traffic markings. After a number of alterations the junction is still not functioning properly as traffic turning right (Oakley Wood Road into Harbury lane) does not filter correctly and holds up traffic. Why a simple island couldn't have been installed baffled residents of Bishop's Tachbrook.

Being reassured by the RDS's traffic modelling is tantamount to achieving inevitable chaos. Look at the modeling that went into restructuring junction 14 at the M 40. It had to be re-modelled twice (at great cost) and it still gets jammed. The whole plan for the new road programme lacks common sense. Furthermore any patient who eventually reaches the hospital will have to wait, as the hospital has nowhere to expand its facilities to cope with a massively increased population. The answer that people are treated quicker does not reduce the ever-growing number of old people that are dumped in hospital, as there is nowhere else to place them. On top of all this there is hugely increased pollution and CO2 created by traffic stuck in jams travelling

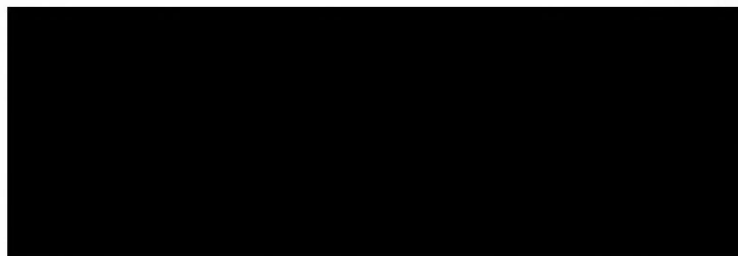
long distances to their work places such as the Gate Way proposal South of Coventry.

This Local Plan Revised Development Strategy should be refused as it contradicts the Strategic Vision of the District Council as set out in the Sustainable Community Strategy, "to make Warwick District a Great Place to Live and Work".

Signed



~~M~~artin Drew



Kim Barnes

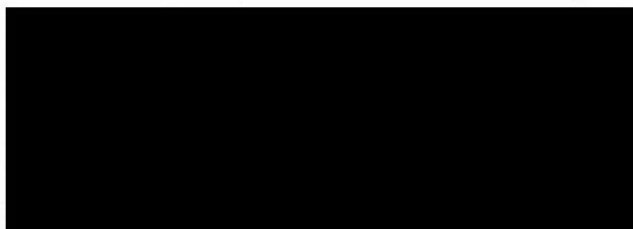
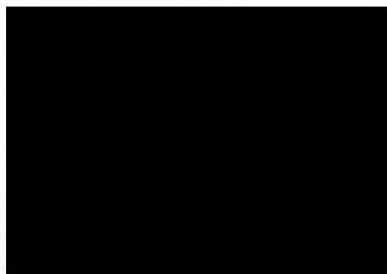
Could we please have a reply to the objections raised in the above document?

2. Housing Proposed for village settlements

The Local Plan proposes expanding housing in an around villages, the numbers of new homes being proportionate to the size of the existing settlement. Bishop's Tachbrook is categorised as the largest type with an expectation that it will accommodate 100-150 new homes.

The most recent housing needs survey carried out by the Parish Council identified a need for only 14 homes, 10 affordable, 4 market priced. A mixed development of 25-30 homes could provide the 10 affordable homes, as the remaining market priced dwellings would finance them. However the proposal of the Local Plan overrides the wishes of residents by a factor of 700%.

The NPPF and Localism Bill clearly state that that Planning Authorities have to take the consensus views of local residents into consideration. Again the WDC's recommendation is flagrant disregard for the rights of local residents.



Kim Barnes

Could we please have a reply to the objections raised in the above document?

3. Sites for Gypsy and Travellers

We wish to propose alternative locations to those recommended by WDC for permanent gypsy and traveller sites. Those recommended near Bishop's Tachbrook do not meet all the criteria listed in the proposal document i.e. the GT04 Fosse way site abutting junction with B42500, site GT05 land at Tachbrook Hill Farm, Banbury Road, site GT09 land to NE of M4 and site GT10 Land at Tollgate House and Guide Dogs for the Blind are too far from the prescribed necessary amenities, schools, GP surgeries, employment opportunities.

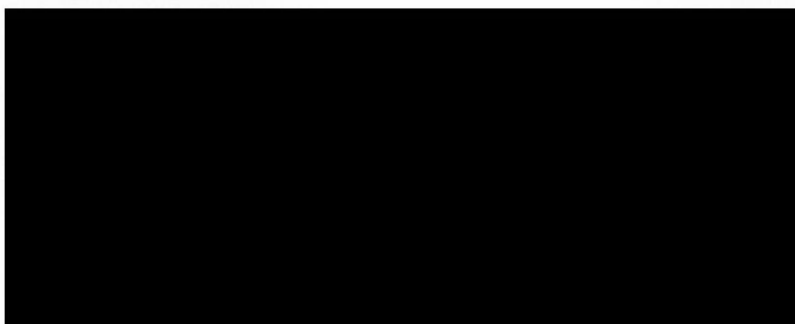
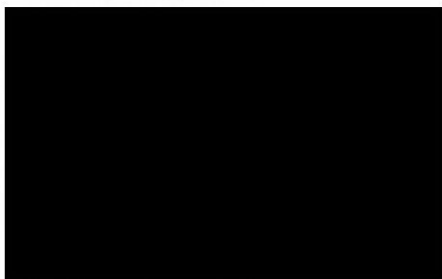
Suitable sites

The following sites are all within easy reach of local facilities and are easily accessed from existing roads

The unused caravan site on the Banbury Road near Warwick, I have asked our District Counsellor Richard Brookes as to why this site is not being used and have not received a reply. He has enquired but not received a satisfactory reply.

Sites on St Mary's Land, Warwick Race Course. There is already a Camping and Caravan Club site there with ample room at its boundary for a 5 to 10 pitch traveller site. Land is also available on the racecourse itself, either on the car park area near the Birmingham Road or on land next to Hampton Road.

Further suitable sites are on land adjacent to the car park at Parkway Station Warwick. Land between Myton and Emscote Roads. The WCC Staff Sports Club has ample land to provide for 5 -10 pitches. **If Farmers' land can be compulsory purchased at great cost there is no reason why the sports ground cannot provide a perfectly good site close to all local amenities.** Also farmland that abuts either side of the canal between Myton and Emscote Roads could provide suitable sites



Could we please have a reply to the objections raised in the above document?