

Comments By Diane Aries On Warwick District Council (WDC) November 2013 Local Plan for the Village of Radford Semele

1 – Executive Summary and Conclusion

Radford Semele has a limited scope for accommodating new housing due to its limited capacity for schools, the availability of doctor surgeries and the fact its drainage/sewerage infrastructure is at capacity. WDC need to reconsider its proposed allocation of housing and significantly reduce the number and types of houses being proposed such that it is a realistic and sustainable.

WDC's preferred site (Site 1) has a number of issues:

- Building in Site 1 will have a negative impact on village heritage & significantly harm the setting of the many listed buildings, particularly St Nicholas Church. WDC has a duty to protect these settings.
- The village Community believe that Site 1 is an important asset and provides the village with character due to its perception of openness set against the church.
- Site 1 is detached and remote from the village and as such will not support the local amenities (a requirement in NPPF). In contrast Site 2 is near to the local amenities and is connected by a short footpath.
- There are real concerns that the A425 in this area cannot accommodate the additional traffic arising from Site 1 and will create a dangerous set of junctions which will put at risk public health and safety. Sites 2 & 3 have less impact as some traffic will go away from the village.
- There are issues on Ecology due to bats amongst other wildlife.
- Site 1 has greater visual amenity impact and visual intrusion than all the other sites.
- There are problems with flooding and drainage on site 1. This is not so on Sites 2 & 3 and possibly 4.
- There have been many archeological finds in site 1 and surrounding area due to its medieval significance. Sites 2 & 3 have less archeological significance.

The evidence used by WDC in reaching its preferred option has been found to be inappropriate and misleading. Sites 2 and 3 were incorrectly discounted and should have been viable options. The key constraints of landscape impact and vehicular access have been demonstrated to be inaccurate. Vehicular access is possible to these sites and the landscape impact has been shown to be less than the preferred site 1.

In conclusion, Site 4, although a possible site, does have the similar vehicular access issues to site 1 and should therefore be discounted. Sites 2 and 3 are more suitable for a housing development than the WDC's preferred Site 1. These sites have vehicular access and, will result in less traffic in the village centre, less visual impact, do not affect the setting of heritage assets, are more in keeping with the views of the Parish Council and that of the majority of village residents. Site 3 does have the disadvantage that it is remote from the village and for this reason it is

suggest that the preferred option should be changed to Site 2. Site 1 due to its heritage significance should be removed from future Local Plan assessments.

2.0 - General Local Plan Comments:

Paragraph 2.11 of the Local Plan refers to the National Planning Policy Framework (NPPF) paragraph 28 where it states “*support the retention of local services*”. The proposed Site 1 is detached from the village by a busy road and some distance from the local shopping facilities. This detachment will encourage the use cars and therefore people will travel out of the village to supermarkets etc. rather than use the local services. Consequently this will have a negative impact. The encouragement of sustainable transport and reduction in greenhouse gases is also an underlying policy of the NPPF. Site 1 will have negative impact on this whereas the other sites are closer to the local amenities and will encourage people to walk.

Section 5 – Site Selection Process & Methodology. This process has not been adhered to for Radford Semele. This latest Consultation sees a new site (Site 1) entered onto the SHLAA and stated as the preferred option. This site (Site 1) had previously been removed and was referred to in the 1994 Planning Inspector’s report where the Inspector states “... *remaining land, including the Objection site, omitted, to be protected by countryside policies*”. The Radford Semele Parish Council made representation around October 2012 based on the previous Consultation which completed June 2013. They stated that their preferred location for new housing was on the east side of Radford Semele (i.e. Sites 2 & 3). Since then WDC have not been proactive in informing and engaging with the Parish Council over Site 1 which was an unknown option until November 2013. The process and methodology makes it very clear that WDC should have engaged with the Parish Council’s to obtain its view before proposing any new option and has not done so. This is particularly important since Site 1 is now their preferred option (although based upon very dubious evidence). I strongly object to the process the WDC has gone through to reach their decision and to commence their Consultation.

Table 3 – Overview of Findings. The table mentions “*preserving the setting of the village*”. However, the proposed option (Site 1) does the opposite as it is in the historical heart of the village and will destroy the Setting of Radford Semele’s Listed buildings.

The table talks about landscape openness and says that it is “*particularly strong feature towards the east*”. This is not correct. The site in the east is screened by a small cluster of houses and green hedgerows and trees with a small openness onto non public fields (see 3.1). Site 1 on the other hand is clearly visible on the A425 through the village and from Newbold Common right round to Cubbington. It is also clearly visible from the Grand Union Canal.

Site Access issues to the east of Radford are mentioned as “substantial restrictions”. This is incorrect and in fact two independent traffic experts have confirmed access, splays even at 50MPH is viable. Although, a 30MPH speed limit should apply (see 3.2).

The table does not mention that access is also difficult from Site 1 due to the high density of traffic along the A425 in the centre of the village and the complicated number of junctions.

Taking these points into account it is clear that Site 1 is less favorable than site 2 from a visual amenity angle and from a traffic perspective.

The headmaster at Radford Semele C of E primary school has stated that there is no more capacity to expand the school to accommodate more. This is in part due to limited land available and classroom sizes but his main concerns would be that the main drains infrastructure can barely cope with the number of school children already in the school. It has been the case that the toilets overflow due to the inadequate drainage infrastructure in the village. Any expansion of the school would therefore come at a high cost.

There are no Doctor’s surgeries in the village and the nearby surgeries are full to capacity with no room for expansion.

Accordingly, the amenities and scope to take on more people/children in school and health facilities are very limited at best. Consequently, the WDC must think very carefully about the size of any housing development to avoid over populating the village.

3.0 – Key Objections to Site 1

3.1 Heritage



Open Views From Southam Road of the Church Setting Including Proposed Site 1

The English Heritage policy document “*The Setting of Heritage Assets 2012*” defines a setting as “*the surroundings in which [the asset] is experienced.*” It goes on to say that “*from the definition provided above, it can be understood that setting embraces all of the surroundings (land, sea, structures, features and skyline) from which the*

heritage asset can be experienced or that can be experienced from or with the asset. Setting does not have a fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset". The above picture was taken from Southam Road just opposite the White Lion Public House. Both St Nicholas Church, seen on the left hand side of the picture, and The White Lion pub are Grade II listed buildings. The area seen from



View from St Nicholas Church 1

this angle (a public right of way) is WDC's Site 1 and from the middle to far right has been proposed for a new housing development. The picture on the left clearly demonstrates that the area forms a vital setting for St Nicholas Church and for the White Lion pub. Building in this area will significantly harm and damage the setting for these listed buildings. The significant harm for St Nicholas Church is even more pronounced when viewing from the church as shown by the picture on the left. Here one can clearly see all of the proposed development site. Housing

will clearly change this setting giving a major negative impact on Setting.

The NPPF has provided guidelines on how Councils should manage Heritage sites. In Paragraph 7 it states *"an environmental role – contributing to protecting and enhancing our natural, built and historic environment;"* and under Paragraph 17, Core Principles it states it must *"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;"*. NPPF Section 12, Conserving and Enhancing the Historic Environment, goes into great lengths how these Heritage assets should be protected and managed. Heritage Policy and the NPPF encourages local authorities to seek alternatives to harming the settings of Listed Buildings. Furthermore English Heritage *"Conservation Principles Policies and Guidance"* document in paragraph 15 states:

"Changes which would harm the heritage values of a significant place should be unacceptable unless:

- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;*
- b. there is no reasonably practicable alternative means of doing so without harm;*
- c. that harm has been reduced to the minimum consistent with achieving the objective;*
- d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering:*
 - its comparative significance,*
 - the impact on that significance, and*
 - the benefits to the place itself and/or the wider community or society as a whole."*

These conditions do not appear to have been met for Site 1.

In Radford Semele there are other valid development sites, such as Sites 2, 3 and 4 where there will be no harm to Heritage assets and less impact to the environment. Considering the above points I do not believe WDC has carried out its planning duties with respect to looking after and caring for Heritage assets.

The importance of Site 1 was further recognised in the 11th August "1994 Planning Inspectors" report on objections to the then Local Plan. This reports makes several comments regarding the significance of this parcel of land and its attached Heritage assets:-

"There are views from Southam Road across the site to the open countryside surrounding the village and the land provides a setting for the Church. From Church Lane the rural surroundings of the Church are even more apparent."

"The village has seen considerable development over recent years and this site and the setting it provides for the northern part of the village are one of the last remaining connections with its rural past."

Objector comment - *"The proposals for development could include the use of the land adjoining the Church as a village green"* Council Reply - *"The village green proposed by the Objectors would not replace this rural setting provided by this agricultural land and would be surrounded by housing which would extend close to the Church."*

The Inspector concluded that any housing development on Site 1 should *"be protected by countryside policies"*.

In conclusion therefore I consider that Site 1 has a high heritage value as it provides an essential setting for St Nicholas Church and The White Lion Pub. As there are other alternatives (see section 3) this site should not be proposed for housing and should be excluded from the SHLAA.

3.2 Community

The area of land to the North of Southam road has great significance to the village of Radford Semele. This is the remaining area of open space. As such it gives the village character and a sense of openness. The open space and its beauty is immediately apparent as soon as you enter the village along the Southam road for a distance of approximately ½ mile. The view is what people remember and like about the village. Loss of this amenity by building on Site 1 would close out views into the countryside so much enjoyed by the community of Radford Semele. It is a major part of the character of the village.

The area to the east of Church Lane (Site 1) is detached from the main village and separated by a very busy main trunk road (A425 Southam Road). If a development were to take place here then it would be remote from the main amenities of the village. This point was brought up in the 1994 Inspectors Report where in which he stated for Site 1:

“The site is not properly part of the village, being wholly peripheral, the housing in Offchurch Lane with which the development would connect being itself a ribbon extending into the countryside.”

“If developed, it would, rather, be detached from the village, severed by the main road.”

Nothing has changed since 1994 therefore this fact remains and has previously been the opinion of the Council and the Planning Inspector.

The NPPF wants developments to take place such that it encourages use of and supports the local amenities. Site 1 will not do this as people will avoid crossing the dangerous A425 and opt to use cars instead. This will encourage people to travel out of the village rather than use the local facilities.

The local Primary School is on the opposite side of the A425 from Site 1. Children will need to cross this busy road to reach the school in an area where there is a complexity of road junctions. This exposes children to unnecessary health and safety risk. There are alternative locations for housing such as Site 2, and 4 that have none of these difficulties and disadvantages as they are on the right side of the A425 and within easy walking distance of local amenities.

The Parish Council provided a response to the previous Consultation proposals in October 2012 stating that their preference was to have any housing on the east of the village (i.e. Sites 2&3) as this would have the lowest environmental impact and was better from traffic and community amenities point of view. This advice appears to have been ignored by WDC and the WDC have made little effort to advise the Parish Council of any changes since.

3.3 Ecology

As far as I am aware there have been no ecology or habitat surveys carried out on Site. However, locals know that it is an important open space for Bats which are frequently seen to fly in a large area of this site and therefore must roost in the area. Bats are a protected species and must not be harmed through development.

The field also serves as an important resting place for wetland birds during their migrating. Canadian Geese and other species are seen in spring and late autumn flying into the field resting overnight.

The WDC environment report stated that the ecological sensitivity for this site was LOW. Bearing in mind the known presence of Bats and wetland birds it should be rated as MEDIUM.

3.4 Visual Amenity

The WDC environmental report stated for intervisibility that Site 1 was MEDIUM because it can clearly be viewed from along the A425 (Southam Road). This fact is correct but the report fails to acknowledge that the site can also be viewed from along the Grand Union Canal between the bridge at Rocardo and the bridge at the Lower Bottom lock. The site and the Church is also clearly visible from public spaces in Leamington, Newbold Common, Cubbington and as far east as Hunningham Hill.

In fact, the site can be seen from a panorama of at least 300°. Screening may limit this to some extent but not eliminate it. The visibility panorama of Sites 2 & 3 are far lower and less intrusive than site 1.

For this reason Sites 2 or 3 are better from a visual amenity perspective.

3.5 Traffic

Site 1 is located Between Offchurch Lane and Church Lane. This stretch of road known as Southam Road (A425) is extremely busy and has traffic turning into and out from Offchurch lane, The White Lion pub, School Lane and Church Lane. The Highways Agency monitoring station located to the east of Radford Semele (see link <http://www.uktrafficdata.info/cp/warwickshire-a425-radford-semele-56785>) shows that in 2012 the average daily flow of vehicles at this location was 15,134. Also it should be noted that there has been a 48% increase since 2010. This is an extremely high flow and is increasing at an alarming rate. The Location of Site 1 has in addition traffic coming out of the village roads at Lewis Road and School Lane and significant traffic which uses the cut through via Offchurch Lane to Coventry and the North Fosse Way.

At peak times, particularly around 8.45am this traffic can bring the village to a standstill. The pictures below were taken when delivering my children to the Primary school in School Lane. As one can see traffic is backed up the hill on Southam Road and Along Offchurch Lane Causing cars to take chances to enter into the main traffic stream.



Church Lane to Offchurch Lane Crossing on Green



Offchurch Lane Junction



Looking up Offchurch Lane 100M from junction



Looking East From Offchurch Lane on A425

The Junction of Southam Road is on a blind bend of the A425 and the road slopes downwards from east to west. In the morning the sun is directly in line and causes blindness when viewing traffic coming from the left. This is an extremely dangerous junction and there have been many near misses and on January 6th 2013 there was an accident. Within metres of this junction cars and lorries turn into the White Lion pub and into School Lane. As the Southam Road is on a slight incline turning right can involve looking directly into the sun which further exacerbates the problems in this area. Accordingly, this short stretch of road has a very complex arrangement of junctions with blind bends. Having an additional access point into this area from the north (such as would arise from a development in Site 1) will injecting more cars at peak time and is likely to bring this stretch of road to a complete standstill or give rise to an accident in the making.

The stationery traffic is likely to result in increased pollution levels in the village, particularly Nitrogen dioxide and carbon monoxide. These might reach level in excess of European levels as forecast in parts of Leamington.

Access from Site 1, whether into Southam Road or Church Lane, will cut directly across the view between the two listed buildings. This will significantly change these views and harm these Settings. At night the church is beautifully floodlight. The new access road will have streetlights which will radically change this views and consequently harm the setting of the church.

Church lane is a small single track road leaning from Southam Road forming a crossroads with Church Lane. It has been suggested that Traffic lights should be positioned at this location to help the congestion along the A425 and assist cars emerging from School Lane and Church Lane. It has also been suggested that this may be a possible access into Site 1. With Traffic lights at this junction, traffic will back up along these roads. Turning from the A425 into Church Lane and, to a lesser degree School Lane, will not be possible due to the tailbacks and inadequate width of roads. Consequently, these roads will have to be widened. Church Lane plays an important part in the setting of the Church and the widening of this lane will harm this setting as well as result in the removal of historic trees which line the lane. For these reasons I do not feel that a set of traffic lights can be justified at this junction.

For the above reasons I feel that Site 1 would not be a suitable site for housing due to the increased traffic issues it would cause. Sites 2 & 3 have distinct advantages over Site 1. These sites will spill more vehicles out onto the A425. However, because they are on the edge of the village a high proportion of this traffic is likely to go east and away from the village centre based on jobs locations such as Gaydon, Coventry etc. and that people tend to skirt around Leamington rather than travelling through Leamington due to traffic delays. Therefore Sites 2&3 will have a limited impact on traffic within the village.

Gladman Developments who are promoting Site 1 and WDC have carried out traffic surveys although these have not been made available to the public. It is believed that these were carried out during the summer periods, during a time when there has been a diversion in place at the Fosse way and in Leamington due to road closures on the A425 High Street in Leamington. The diversion(s) takes heavy traffic away from Radford Semele. These surveys will therefore understate the problem being

experience in Radford Semele and should only be used as a guidance rather than a definitive statement of highways issues in a planning environment.

3.6 Flooding and Drainage

Site 1 is susceptible to flooding from run-off water as indicated on The Environment Agency Flooding Maps which show that flooding can occur in the north east of the site and across the site from Church Lane to the pumping station.

Site 1 is at a low point in the village and acts as a natural soak away for the run-off water from Offchurch Lane, The Greswoldes and Chance field. Run-off water also comes from the village down School Lane and from Southam Road east and west where it combines and runs down Church Lane and across into the field (i.e Site 1) down towards the pumping station. Any change to this flow from development (or change in road layout) has the potential to flood the Church and Church End if it were not allowed to drain into the field.

The combined run-off from these sources together with a development would need an enormous SUDS system. Any such system would be out of keeping with the Setting and potentially dangerous to public health. Additionally, it should be noted that from time to time the village run-off can get contaminated by raw sewerage as the village main drainage system overflows due to inadequate infrastructure.

The potential to contaminate the water aquifers of the Grand Union canal and River Leam is, in my opinion significant if a large housing development were to proceed.

3.7 Archeology

There have been many historic finds dating back to Roman and Medieval times in and near to Site 1. Indeed there is evidence of a medieval village just to the rear of The White Lion Pub only a few metres away. Some of these finds which have been formally registered with the Warwick Museum HERS database. As the Church dates back to medieval times and there is a medieval village nearby it is highly likely that there could be many artifacts in this area.

Consequently, this site (Site 1) is likely to be significant from a historical point of view.

3.8 Land Quality

Site 1 is Grade 3a or 3b agricultural land. The farmer has made significant efforts to upgrade the land to Organic status which has involved taking a loss whilst the land lies fallow. Since then the land has seen many successful crops over the years. The loss of 5.4 hectares of good quality organic grade agricultural farmland is an unwanted loss to UK food production.

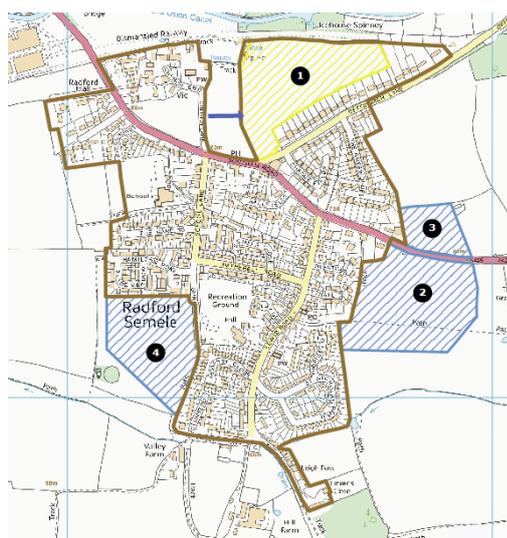


Poppies in Site 1

The field is renowned in the village and afar for its lovely spectacular display of poppies which bloom from time to time. This event is enjoyed by all the village community and by visitors who remark on its beauty. The loss of this vista will impact on the overall village community and on the potential attractiveness of the village.

4.0 – Examination of Other Locations in Radford Semele

The WDC local plan showed four sites. Three of these were discounted by the WDC based on evidence in Appendix 6 of the Local Plan. The sites and reasons given were:



Site 1 – WDC Preferred Location

Sites 2 & 3 – Discounted on basis of “High landscape impact and insufficient vehicle access”

Site 4 – Discounted on basis of “Impact on main village centre and potential to encourage coalescence of settlements”

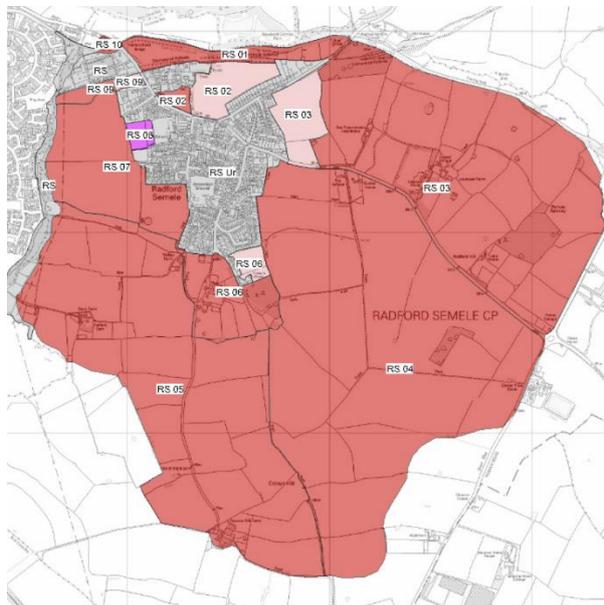
Having examined the evidence and looked into the issues I am convinced that the reasons for discounting sites 2, 3 and possibly 4 are incorrect and misleading.

For this analysis I have discounted site 4 due to its location and the fact that it will exit traffic onto the same stretch of the A425 as site 1. This is considered unacceptable for reasons mentioned previously.

4.1 Environmental

4.1.1 - Sites 2, 3

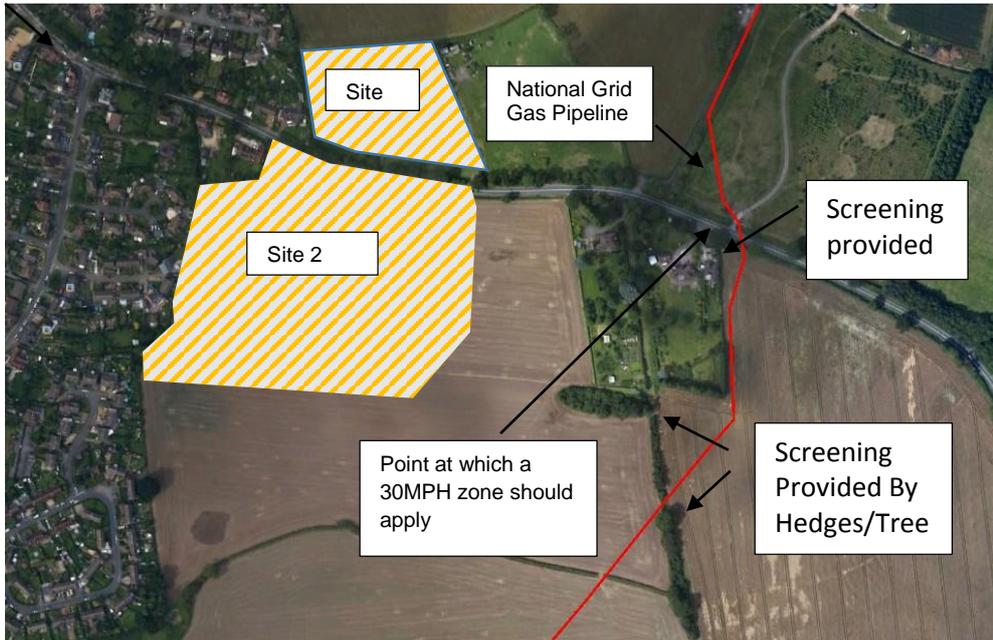
The environmental report carried out for Sites 2, 3 and 4 (RS 03, RS 04 & RS 05)



have large parcels of land. These do not represent the areas of land under consideration in the Local Plan i.e. sites 2, 3 and 4. For example RS 04 is some 10-15 times larger than Site 2 and encompasses an area of land stretching from Radford Semele down to the Fosse Way and back to the railway. When assessing this area for visibility one is bound to get a report that shows the area to be highly visible. For RS 04 the WDC report clearly stated that visual impact would be high from along the Fosse and surrounding Areas. However, in reality from the Fosse Way, looking west, there is a ridge which would hide any development in Site 2 when looking from this point. Moreover Site 2 is not visible until you round the bend in the A425 just adjacent to the site as it is screened by the natural undulations in the landscape and by buildings and hedgerows. Site 2 does have some views to open countryside to the south but these are small and not from public spaces. For this reason intervisibility on this site is considered to be MEDIUM-LOW.

The protected visibility of Site 2 is clearly demonstrated in the aerial view below where it can be seen there is natural screening to the east of site 2.

A similar view can be taken for Sites 3 and 4 which are also misrepresented by the large areas studied by WDC. Taking this into account Sites 2, 3 and 4 are viable from an environmental viewpoint to accommodate housing. However, Site 4 does have the disadvantage that it can be viewed from Sydneham and Whitnash and Site 3 has the disadvantage that it is more remote from the village being on the opposite side of the A245.



Aerial View Sites 2 & 3 1

Consequently, as the WDC environmental report is not representative of the parcels of land known as Sites 2, 3 and 4 it cannot be used as evidence to drive a preferred option. Further assessment is required although there is strong evidence that Site 2 and possibly 3 should be the preferred site over 1 on the basis of environmental visual amenity assessment.

4.2 – Vehicular Access

4.2.2 – Sites 2 & 3

A highways report was not provided by WDC as evidence in this consultation but it was mentioned that access into these sites is not feasible.

On reflection it would look like WDC and highways have carried their Access assessment based on the existing 50MPH speed limit alongside Sites 2 & 3. WDC have stated that it would be inappropriate to reduce the speed limit to 30 MPH if housing was to be on one side of the road. Both of these statement appear to be misleading.

The DOT advice on speed limits for villages circular 1/06 (available on WDC website) section 6.3 and DOT circular 01/04 state the following.

1111 - *“It is therefore government policy that, where appropriate, a 30 mph speed limit should be the norm in villages.”*

1112 – *“For the purpose of applying a village speed limit of 30 mph, a definition of a village can be based on the following simple criteria relating to frontage development and distance:*

- 20 or more houses (on **one** or both sides of the road); and
- a minimum length of 600 metres.”

Consequently, a speed limit of 30 MPH should apply as the village boundary will need to be changed to include any new housing estate whether it be on one side or both sides of the road.

Two independent highways experts, one sourced by residents & one by Taylor Wimpey (who I understand have an interest in Site 2) have carried out Access Visibility Splays at 50MPH and have concluded that Access can be achieved at this speed. Having said this, based on the speed limit policy used by WDC the 30MPH speed limit would apply and must be extended beyond Site 2 making an access onto the A425 from these sites perfectly achievable at 30MPH.

Again, there is no reason why Sites 2 & 3 should have been discounted and I would ask WDC to reconsider vehicular access to these sites in accordance with policy and the advice of traffic experts.

4.2.3 - Site 4

Site 4 will access into School Lane. This road is very congested at peak times and often gets blocked due school traffic. In addition, School lane exits onto Southam road. For the same reasons given in 2.4, an additional 200-300 vehicles exiting out of a housing estate would cause havoc within School Lane and on the Southam Road. For this reason Site 4 should be discounted on access.

4.3 – Impact to Residents

In considering what is the best option for the village WDC should have considered the impact a development will have on existing residents and their quality of life. Looking at the properties that will be affected by a development on these sites it can be shown that:

Site 2 has a 44% less impact than Site 1

Site 3 has 87% less impact than Site 1

Site 4 has 27% less impact than Site 1

It is therefore evident that Site 1 is the least attractive area of land and will impact on existing dwellings in the village than any other option.

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