

Michael Martin

From: Stephen Trinder <[REDACTED]>
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To: newlocalplan
Subject: REPRESENTATION ON WARWICK DISTRICT COUNCIL LOCAL PLAN 2029

Categories: Michael

Hello

REPRESENTATION FROM S.J.TRINDER ON THE WARWICK DISTRICT DRAFT LOCAL PLAN TO 2029

S.J. TRINDER
[REDACTED]

I support the distribution of proposed new housing as set out for Leamington Spa, Warwick, Kenilworth and the various growth-point villages in Warwickshire in the Draft Warwick District Local Plan up to 2029.

I believe the current proposals contained in the Draft Local Plan to 2029 satisfy Warwick planning authority's legal requirements in respect of the plan, including its duty to cooperate, and the plan meets all the requirements of soundness.

I do also support the construction of fewer dwellings AT THESE LOCATIONS if new ONS data downgrades the projected population figures for Warwick District and then leads to a reduction in the numbers of dwellings proposed for construction.

OBJECTION TO SOUNDNESS OF LYNNETTE KELLY'S EXTREMELY LATE PROPOSALS TO TRANSFER 5000 OF WDC'S HOUSING QUOTA UNDER THE WDC LOCAL PLAN TO KING'S HILL, ON THE WDC-COVENTRY BOUNDARY

HOWEVER, I want to vehemently object to a proposal which is not as yet part of the Draft Plan but which has been proposed with just days to spare by Lynnette Kelly, prospective Parliamentary Labour MP for Leamington Spa and Warwick at the next general election.

And I'm not even sure that I'm able to object to something that's not yet officially - and I believe deserves never to be - part of the Draft Plan.

My objections to the soundness of Kelly's proposals are summarised below:

Positively Prepared

"This means that the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."

"Objectively Assessed Development"

Any possible amendment from Lynnette Kelly to the WDC Local Plan 2029 i.e. 5000 houses on King's Hill on the WDC-Coventry boundary could not, as of June 2014, be positively prepared because:

There appear to be no current objectively assessed development and infrastructure requirement figures behind Kelly's proposals at the time she made them (late June 2014), and nor could there be.

With new ONS figures still under scrutiny at this time, and, as of late June 2014, initially appearing to show lower figures for population increase in the WDC area than were initially forecast, then Kelly's housebuilding proposals of 5000 houses for King's Hill could not possibly be based on a sound basis of need for housing AT THE TIME THEY WERE MADE. The figures were still in flux.

No figures for infrastructure requirements and how they impact on her proposals appear to have been made in support of Kelly's proposals.

Kelly's proposals also appear not to meet a neighbouring authority's unmet requirements, i.e. Coventry's, as her proposal is that a large chunk of WDC's future housing stock be transferred to the edge of Coventry. She has made no suggestion that the boundary of Coventry be extended outward to include the new houses - indeed, Coventry's intervention in the whole affair was to offer to SELL the land at King's Hill (currently owned by Coventry) to Warwick, not to expand its city outwards and meet unmet need.

At no time was Kelly's call to move the 5000 Warwick houses to King's Hill presented as assisting a neighbouring authority in meeting its unmet need, but rather as an exporting of Warwick houses elsewhere. These were still to be Warwick houses, just out of sight of her would-be electorate.

The WDC Plan, on the other hand, is sound and has been positively prepared, based as it is on has been objectively assessed development and infrastructure requirements. New (as of June 2014) ONS figures initially appearing to show lower figures for population increase in the WDC area than were initially forecast if anything suggest a need for fewer dwellings needed to be built in the WDC area over the Plan period.

THEY PROVIDE NO OBJECTIVE JUSTIFICATION WHATSOEVER FOR A WHOLESALE UNLOADING OF 5000 HOUSING UNITS ONTO THE EDGE OF A NEIGHBOURING AUTHORITY.

"Achieving Sustainable Development"

The Kelly 5000-house to King's Hill transfer also makes a mockery of sustainable development because:

The proposed site, King's Hill, sits within yards of one of the thinnest greenbelts in the West Midlands, the tiny Crackley Gap between Kenilworth and Coventry, and this whole area already faces massive turmoil and destruction from HS2. Construction traffic for King's Hill would, unbelievably, actually share narrow roads with that for HS2.

Traffic to and from the regionally vital University of Warwick, which injects £222 million-a-year into the local economy, already snarls up the same B-rated Stoneleigh Road that 4000-odd cars would disburse onto from Lynnette's proposed King's Hill mega-estate.

Construction of a new, dedicated A46 access point for the site would entail colossal delays and expense, on top of the Kenilworth Bypass closures already scheduled during HS2 construction.

Over 4000 local people (from 1931 households canvassed) signed a petition against just 3500 houses on this exact location when they were proposed in 2009. Their resistance is still extremely strong.

Justified

"The Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence."

The Kelly proposal is not based on proportionate evidence, and is not the most appropriate strategy when considered against reasonable alternatives. She has no up-to-date ONS figures to show a need for Warwick DC houses in King's Hill, there is no sustainable transport plan, she takes no account of the massive turmoil and considerable destruction this area is already scheduled for from HS2 from 2017 onwards, and she neglects even to consider that many of the roads construction traffic for King's Hill would clog ARE ALREADY HS2 construction-traffic routes.

The Kelly proposals are not the most appropriate and reasonable strategy, but are instead a political move tailored to suit the wishes of a would-be electorate in Leamington Spa and Warwick concerned about possible housing allocations under the Warwick District Local Plan 2029.

Effective

"The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities."

Consistent with national policy

"The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF."

Section 30 of the NPPF states:

"Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."

The King's Hill site is not a solution which supports reductions in greenhouse gas emissions, reduces congestion, or which facilitates the use of sustainable modes of transport.

In surveys undertaken during a prior investigation of the site as the possible location for 3500 houses in 2009, reservations were then made about the ability of the site to achieve sustainable modes of transport. And that was with a site of 3500 houses onto which a stop on the Kenilworth-Coventry railway line was appended.

With this route now scheduled for far greater use as part of the Electric Spine electrified railfreight line from Southampton to Nuneaton and thence to the North, it is unlikely that many slow, stopping trains could stop at a halt at the King's Hill development. Anyway, no suggestions for such a rail line have even been included in Kelly's suggestions, and with her talking about 5000, rather than 3500, houses, the room for any railway halt and associated car park in the scheme would seem to be far less now.

Most of the 5000 house-dwellers on King's Hill would thus be expected to be car users, making this a wholly unsustainable transport site.

Section 32 of the NPPF states:

"Plans and decisions should take account of whether: the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure"

As it is expected that most traffic to and from a King's Hill site would use the A46, effectively an M road, the lack of opportunities for sustainable transport mode use would increase the pressure for new major transport infrastructure near and around the settlement.

In particular, greatly increase traffic from King's Hill would further snarl up traffic along the B-rated Stoneleigh Road, which is used by very heavy numbers of Warwick University commuters going to and from their work, visits and study to the University.

This regionally important university puts £222 million a year into the local economy.

The lack of sustainable access to any future King's Hill housing site would greatly increase the need for new and widened traffic infrastructure on and around the site - such as a new southern relief road off the A46 and running over open greenbelt fields to the University campus, as well as a widening of the beautiful and regionally noted Kenilworth Road, between Gibbet Hill and the Kenpas Highway crossroads where the Kenilworth Road crosses the A45.

Section 32 of the NPPF states:

"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

The residual cumulative impacts of the King's Hill site on transport infrastructure in the vicinity and for miles around the site would be severe, expensive, time-consuming, and congestion-causing to an area already scheduled for HS2 construction and the closure of the A46 Kenilworth Bypass to achieve this.

Section 32 of the NPPF states:

"All developments that generate significant amounts of movement should be supported by a Transport Statement or a Transport Assessment".

None has yet been advanced by Kelly in support of her King's Hill proposals.

Section 34 of the NPPF states:

"Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised."

As Kelly is proposing the King's Hill site as a Warwick settlement in WDC's area, her proposals run foul of Section 34's recommendations. New Warwick and Leamington Spa housing constructed in the vicinity of

these settlements would better satisfy the advice of NPPF Section 34. Warwick and Leamington people moving to King's Hill would need to commute the distance back to these towns to work and burden an already extremely busy A46 Kenilworth Bypass as well as heavily used smaller roads such as the Coventry to Kenilworth roads and Kenilworth to Leamington roads.

NPPF Section 35 states:

"Therefore, developments should be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities"

Most of the traffic from the King's Hill site would need to disburse onto and come off the A46 Kenilworth Bypass. This is, in effect, an M-road and unused by pedestrians, cyclists and bus services. The site would not, and cannot, have pedestrian, cycle, and high quality public transport facilities along its principal means of access and egress, the A46.

Pedestrian residents of the King's Hill estate who wished to turn right at the main exit to the site and move east along Stoneleigh Road would also find their way barred by a complete lack of a footpath or the room to construct one. Both sides of the road are gardens fronting onto many properties along the Stoneleigh Road.

Section 37 of the NPPF states:

"Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities."

As the King's Hill settlement is proposed by Kelly as a WARWICK settlement, the movement of largely Warwick people to and from a site eight miles from their normal jobs, friends, places and routines runs completely counter to a planning policy guided by Section 37.

Section 66 of the NPPF states:

"Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community."

The Kelly proposals of increasing the number of houses proposed from the 3500 under a previous proposal, which incorporated community parks, to 5000, which presumably would have far less area available for these, hardly constitutes an attempt to "evolve designs that take account of the views of the community."

Over 4000 people (from 1931 households canvassed) objected to the previous, presumably far less dense, 3500-house estate on King's Hill, proposed in 2009.

Section 70 of the NPPF states:

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities"

Kelly's proposals of 5000 houses on the King's Hill site, rather the 3500 discussed in 2009, would make delivery of shared space and community facilities, most especially parks, that much harder, if not impossible.

Section 73 of the NPPF states:

"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision."

The density of the King's Hill site under Kelly's 5000-house suggestion would make the above recommendation very hard to achieve.

Section 80 of the NPPF states:

"Green Belt serves five purposes

to check the unrestricted sprawl of large built-up areas
to prevent neighbouring towns merging into one another;
to assist in safeguarding the countryside from encroachment;
to preserve the setting and special character of historic towns; and
to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

Building 5000 houses at King's Hill under Kelly's proposals would run a coach and horses through points 1,2,3, and 4 of Section 80.

The Crackley Gap greenbelt between Coventry and Kenilworth is already one of the smallest in the West Midlands, and already scheduled for intrusion from HS2 by 2017.

The setting and character of Kenilworth would also be damaged by King's Hill as it sits on an elevated position, giving views to and from Kenilworth and Coventry.

Section 81 of the NPPF states:

"Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as to retain and enhance landscapes, visual amenity and biodiversity"

Putting 5000 Warwick District overspill houses on King's Hill would not retain or enhance King's Hill's landscape, its visual amenity or its biodiversity.

Section 87 of the NPPF states:

"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

A very-last-minute proposal by a candidate for political office to move 5000 unpopular greenfield build from her potential constituency to King's Hill in no way constitutes 'very special circumstances'.

Section 89 of the NPPF states:

"A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:"

The King's Hill houses proposed by Kelly satisfy none of the criteria listed as acceptable for greenbelt building.

Section 109 of the NPPF states:

"The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes"

The King's Hill landscape is valued by the over 4000 people who signed a petition against possible construction of houses on this site in 2009. Placing 5000 houses, with little room for community sites or parks on elevated ground like this is not enhancing or protecting a valued landscape.