



# THE WARWICK SOCIETY

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from The Chairman, 4 St John's WARWICK CV34 4NF

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## Warwick District Local Plan 'Focussed Consultation' and Gypsy & Traveller Sites Preferred Options

### 1 Introduction

- 1.1 In its *Statement of Representations Procedure*, the Council invites representations on the 'Focussed Changes' that it proposes to the draft Local Plan and on the evolution of the evidence supporting the Plan. Separately, it invites representations on the proposal to allocate land off Stratford Road Warwick as a Gypsy & Traveller site. These are the representations, comments, and objections put forward by The Warwick Society.
- 1.2 The Warwick Society, the town's civic society, was founded in 1951. It has as its first aim  
to conserve, for the benefit of the public, or to encourage the conservation of,  
the natural, artistic and cultural amenities of Warwick and its neighbourhood.  
It seeks to improve standards of new development to benefit both the setting of the old buildings and the life of the town and its people. The history and the architectural character of Warwick, which make it one of the most distinctive towns of its size in Britain, were summarised in the Society's letter of 27 July 2012<sup>1</sup> The Society enjoys the support of some 380 members, probably twice as many as subscribe in the town to the three established national political parties added together.
- 1.3 Please acknowledge receipt of this letter, confirm that it has been submitted to the Secretary of State for Communities and Local Government and inform the Society when each of the subsequent stages of the Local Plan is reached. The Society has already expressed its wish to participate in the Oral Examination of the Plan, and this applies also to the 'Focussed Changes' and their deficiencies and the Stratford Road proposals.

### 2 Level of Housing Growth

- 2.1 In the draft Plan, Policy DS6, para 2.20 remains unsound because it is even less justified by the evolving evidence than it was in June 2014. The Joint SHMA Amendment published in September 2014 with the title '2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire' did not reflect the reduction of 29% in the population of the District in 2031 that the ONS now projects. It also maintains the unsupported projection of a substantial fall in average household size.
- 2.2 Both these defects in the basis of the draft Plan were fully explained in our representation of 27 June 2014. Between then and the publication of the 'Focussed Changes', in the light of that and many other

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<sup>1</sup> in its para 1.4, page 13

similar representations, the Council has had the opportunity to update the Plan to reflect the significant change in the evidence supporting it.

- 2.3 It has not done so, and the Plan continues to propose the allocation of some 4,900 plots on greenfield land, unjustified by evidence and contrary to the NPPF.

### **3 Transport Strategy**

- 3.1 Further work carried out by Warwickshire County Council and its consultants has failed to resolve the inadequacy of the phase 4 Transport Strategy. Its effect, with the proposed development on greenfield land, will be to increase congestion and worsen air quality in Warwick and Leamington town centres.
- 3.2 The Plan remains unsupported by a sustainable transport scheme. On this ground too it fails, therefore, to comply with the NPPF.

### **4 Historic Environment**

- 4.1 The damage done to the historic environment by the inadequacy of the transport strategy and its 'mitigation' measures remains unresolved. No Heritage Impact Assessment of the Transport Strategy and its 'mitigation' (of traffic flows, not of environmental impact) on Listed Buildings and the Conservation Area of Warwick Town Centre has been carried out.
- 4.2 The recent response of English Heritage to a planning application for the demolition of a 1960s house<sup>2</sup> in the Conservation Area demonstrates the threat to the character of the Conservation Area and its Listed Buildings should the proposed 'mitigations' be carried out. They would, at Bridge End, Castle Hill, St John's, Eastgate, and probably at Northgate, cause immediate visual damage. In the longer term, the economic impact of failing to protect and enhance the settings of buildings affected by increased traffic throughout the town centre would place at risk the maintenance and condition of over two hundred Listed Buildings.
- 4.3 Again, the failure of the Plan to comply with the requirements of the NPPF for the historic environment is a deficiency of the 'Focussed Changes'.

### **5 Land off Stratford Road**

- 5.1 The proposal to allocate greenfield land at Longbridge for employment use, and part of it as a Gypsy & Traveller site, is unsatisfactory. This land represents, on a very small scale, the informal 'green belt' of the ancient hamlet of Longbridge. The harm done to the setting of the hamlet by the adjacent M40 and its junction makes it all the more important, not less, to protect the remaining green setting, and to maintain as far as possible the rural approach to the historic county town.
- 5.2 Considerable allocated employment land remains undeveloped on the other side of the Stratford Road, near to the proposed site. There is therefore no evidence of demand for further employment land in this area.
- 5.3 The proposed Gypsy & Traveller site would not provide satisfactory amenity for its occupants. It is close to the River Avon, and therefore both liable to flooding and unsafe for children. It is severely affected by the noise and air pollution of the M40, and the impact on health as well as the level of amenity of its residents would be unacceptable.

### **6 'Opus 40', Birmingham Road**

- 6.1 The Society welcomes the allocation of this brownfield land for housing.

James Mackay, Chairman

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<sup>2</sup> W/14/1555, 98 Bridge End, Warwick