

THE WARWICK SOCIETY

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

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1 Introduction

- 1.1 In its *Statement of Representations Procedure (etc)*, May 2014, the Council invited representations on the legality and 'soundness' of its *Warwick District Local Plan Publication Draft* and the supporting *Sustainability Appraisal*. These are the representations, comments, objections and suggested modifications put forward by The Warwick Society. To facilitate consideration by the Council and by the Inspector carrying out an independent examination, cross-reference is made thus: [0] to the paragraph numbers of the Council's Representation Form¹. The required personal details are at the head of this page [1].
- 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 2012² 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 Annexes B and C, pages 8 to 18, contain the representations that the Society made in response to the *Local Plan Revised Development Strategy* in July 2013 and to the *Local Plan Preferred Options* in July 2012. These provide supporting arguments for many of the Society's current representations.
- 1.4 [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.

¹ These representations are made under the provisions of the Town & Country Planning (Local Planning) (England) Regulations 2012, of which an extract is reproduced at Annex D, page Z. The Regulations do not lay down a given format for responses. All of the information sought in the Council's *Representation Form* is given in this letter, but in a format which communicates more clearly the basis and nature of the Society's representations than the structure of the *Representation Form* permits: they concern not just the wording of individual policies but many interconnected elements.

² in its para 1.4, page 13

2 Level of Housing Growth

[4] Policy DS6, para 2.20 [5] is not sound because [6] it is not justified.

2.1 Household Size

2.1.1 [7] **The JSHMA³ ‘objective assessment’ of housing needs assumes a rapid decrease in average household size which is not supported by evidence.**

2.1.2 Its Appendix A ‘Projection Methodology’⁴ provides a partial analysis of past and projected trends in household size. No data are given, just charts. The base data are themselves questionable, perhaps because people living in communal establishments are included. Other sources suggest a rise in average household size in Warwick District between 2001 and 2011. The data require verification.

2.1.3 Figure P suggests that average household size in Warwick District fell between 2001 and 2011 from 2.36 to 2.34. Para I assumes that for the whole sub-region average household size will fall between 2011 and 2031 from 2.40 to 2.36. This suggests that the trend between 2001 and 2011, a reduction of 2 points per decade, will continue between 2011 and 2031. As the average household size in Warwick District is a little lower than that of the sub-region as a whole, the 2031 average household size in Warwick District would be projected to be 2.30.

2.1.4 However, para lii states that ‘a number of sensitivities have been applied ... to take account of possible suppression in household formation over the past decade’. This leads, in Table 107, to a ‘midpoint’ projected average household size in Warwick District falling between 2011 and 2031 from 2.35 to 2.22, a reduction of 6 points per decade, about three times the rate projected before the application of ‘sensitivities’.

2.1.5 This as an abuse of the concept of sensitivity testing, which is intended to clarify which are the factors which are particularly influential in their effect in either direction, up or down, on an outcome. But what has actually been done is to take one supposed influence on the trend between 2008 and 2011, to ignore all others, and to apply that evidenceless variation to the projection for the next 20 years. There is, acting in the opposite direction to the supposed ‘suppression in household formation’, another trend, towards households which accommodate three generations: home extensions have helped to meet this demand. But no allowance has been made for this.

2.1.6 The projected fall in household size is based not on evidence but on assumption. **The effect of departing from the evidence is to exaggerate by some 2,000 the number of new homes needed.**

2.2 Projected Population Growth

2.2.1 [7] The JSHMA objective assessment was based on outdated ONS projections which were superseded on 29 May 2014 by the 2012-based projections. The new projections reduced by 29% the population growth to the end of the Plan period. The 2029 population of Warwick District is now projected to be 150,000, not the JSHMA figure of 156,200. **The effect of the lower projected population growth is to reduce by some 2,800 the number of new homes needed.**

2.2.2 It has been suggested by the Council that the number of new homes required should not be reduced to reflect the lower projected population growth, because of higher projected growth in Coventry. This argument is spurious: the projected growth in Coventry is an artificial projection over two decades ahead of high growth in the numbers of incoming young adults in the 5/6 base years of the ONS projection. This was a result of the universities’ response to changes in their funding régime. But the projections do not allow fully for the departure of these students at the end of their courses. Incoming students are repeatedly added to each year’s projection, but outgoing students are largely omitted. The overall effect is to increase the projected population of Coventry by some 50,000. Without this

³ Coventry and Warwickshire Joint Strategic Housing Market Assessment Final Report November 2013

⁴ Paras xlvi to liii, pp215-217, under the misleading heading ‘Headship Rates’

spurious increase, the population of Coventry is projected to grow in line with that of the sub-region as a whole.

- 2.2.3 Annex A (page 7) contains our own calculation of the impact of the revised ONS projections and of correcting household size⁵. It has been supplied to the Council, but, at the time of writing, the Council's only response has been to state that it will take some weeks to make its own appraisal.
- 2.2.4 The effect of the revised projections and corrected household size (and that of recent planning permissions granted but not counted) on the five-year supply of housing sites is very significant. Together, they ensure that the land supply considerably exceeds five years.

2.3 Number of new homes required

- 2.3.1 **8** The modification necessary to make the Plan sound in respect of the number of new houses required is therefore to reduce the provision from 12,860 to 8,100. The difference of 4,800 is made up of 2,800 fewer new homes because of the lower projected population growth, and 2,000 fewer new homes because of the evidence, as opposed to assumption, on average household size.
- 2.3.2 A side effect of the application of a much lower household size at the end of the plan period would be that the new homes which would be built would have to have a very much lower average household size than the present housing stock: there is a geared effect, as the rate of occupancy of the whole housing stock is reduced by the addition of new homes. If the Plan's household size were applied, the average household size of the new homes would have to be as low as 1.5 persons. This is inconsistent with the proposals for meeting the housing requirement and for the proposed density of development of greenfield sites. This inconsistency contributes significantly to the unsoundness of the housing need calculation.

3 Plan Period

- 4** Para 1.29 **5** is not sound because **6** it is not consistent with national policy.
- 3.1 **7** The NPPF, quoted at para 1.7, prefers that the Plan should be drawn up over a 15 year period. This Plan (para 1.29) covers the 18 years 2011 to 2029.
- 3.2 **8** The modification necessary to make the Plan sound in respect of its time period is for it to cover the 15 years 2011-2026.
- 3.3 This modification would enable the Plan to be updated in the light of circumstances over the years ahead in plenty of time to react to those circumstances and alter the Plan. Making provision now for growth which may or may not happen late in the Plan period misdirects development to sites which should have a lower priority, in particular encouraging the development of greenfield sites and inhibiting the release of windfall and other brownfield sites
- 3.4 Correcting the Plan period to match national policy would cause a further reduction in the housing need of some 1,300. This would give a comfortable margin for all of the necessary new homes to be built without using any greenfield sites, and such sites would still be available should growth late in the Plan period require their future allocation.

4 Impact on the rest of the Plan of updating the housing need projection and correcting the household size assumption

The remaining representations mainly concern elements of the plan which are only required because of the exaggerated housing need projection. Each of these matters contributes to the unsoundness of the plan, but almost all would be corrected if the housing need projection was corrected. Attention is nevertheless drawn to them here, as representations must relate to the *Publication Draft*, however unsound it is.

⁵ It is based on different absolute levels of household size, probably caused by the exclusion of residents of communal establishments, but the relative data and projections are comparable to those of the JSHMA.

5 Allocation of Greenfield Land

[4] Policies DS10 and DS11 [5] are not sound because [6] it is not justified.

- 5.1 [7] Policy DS10 proposes to locate 4,900 sites on greenfield land at the edges of the District's four towns and in Growth Villages and the rural area. Policy DS11 proposes specific allocations for these sites. The NPPF requires greenfield sites to be the lowest priority for development. Almost none of these allocations is needed.
- 5.2 The tabulation in policy DS7 shows that 3,600 new homes have been completed since 2011 or had planning permission by 31 December 2013, that a further 3,100 sites will become available as windfalls, as Small Urban sites in the SHLAA and through the consolidation of existing employment areas and canal side regeneration; urban brownfield sites allocated in policy DS10 provide 1,300 new homes. The total without any use of greenfield land provides for 8,000 new homes.
- 5.3 This necessary change in the plan could be achieved very quickly: removing from the plan the greenfield allocations almost in their entirety would be a very quick task, much quicker than proposing new greenfield sites. While parties with interests in land and developments would doubtless require a rigorous examination of the corrected projections, the consequence of correcting them is not just to remove from the development allocations the greenfield land but to remove the consequences of greenfield development which make the plan in many other respects undeliverable and unsustainable.
- 5.4 The requirement for substantial expenditure on healthcare and education infrastructure would be very much reduced, and the needs of the growing population met by incremental expansion of existing facilities within the existing built up area.
- 5.5 The transport infrastructure requirement would be heavily reduced. The need to accommodate traffic growth, especially from greenfield developments south of Warwick, would disappear. Development sites within the existing built up areas would create much less demand for transport: local educational, healthcare, retail and leisure facilities would be largely within walking or cycling distance of the new homes.
- 5.6 [8] **The modification necessary to make the Plan sound in respect of the allocation of greenfield sites is for them all to be withdrawn from Policies DS10 and DS11.**

6 Transport Strategy

[4] Policies TR2, TR3 and TR4 [5] are not sound because [6] they are neither justified, effective nor consistent with national policy.

- 6.1 [7] The strongest negative effect of allocating greenfield land south of Warwick for extensive housing development is to make it impossible to meet its transport needs sustainably. The NPPF requires that 'developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes maximised'.
- 6.2 The proposed location of this development and its nature – so-called 'garden suburbs', with relatively low densities and a large proportion of the gross area devoted to roadways and to parking – both fail to achieve this policy objective. The location will create substantial transport need for journeys to work, for shopping and to leisure facilities: few of these destinations will be within walking distance; the local road network, regardless of provision made within and for the access to the new developments, is unattractive for cycling; and buses cannot provide a quality of service even nearly comparable to the car in convenience and journey time.
- 6.3 The section of the Plan dealing with transport (paras 5.28 to 5.59) pays lip service to the requirement for sustainable transport policy. The actual strategy is to increase dependence on and the domination of the car. The evidence for this is the expenditure proposed in the *Infrastructure Delivery Plan* to be funded by developments:

Sustainable Infrastructure – walking, cycling and bus: £2.0m⁶
Initial operating subsidies for bus services: £1.7m
Highway Infrastructure: 26 schemes totalling: £33.6m: this is 90% of the total.

There are also partly specified amounts for Park + Ride and associated bus infrastructure, should their viability be established – and no evidence is given that this is likely.

- 6.4 The *Strategic Transport Phase 4* and *Cumulative Assessments* which support the *Infrastructure Delivery Plan* contain significant flaws. They describe schemes which have not been prepared in detail. Their costs, feasibility, deliverability, and impact are uncertain. Their effect on traffic is questionable: work carried out under the management of the Save Warwick Group, which is making its own representation, raises numerous doubts about the quality of the modelling and the realism of its conclusions.
- 6.5 These conclusions nevertheless indicate increased journey times, worse congestion, and air quality within the Warwick and Leamington AQMAs being worse than it would be without the ‘mitigation’ schemes.
- 6.6 There are differences between the schemes contained in the three documents, and these differences emphasise that no coherent traffic plan, let alone a transport strategy, exists. It is unclear to which ‘improved’ network modelling results apply. No dependence can be placed upon them.

For example:

Infrastructure Delivery Plan ref T29:

‘Priory Road / Smith Street / St Nicholas’ Church Street: Provision of a signalised junction with the timings synchronised with the A445 Coten End / A429 Coventry Road signalised junction. The right turn from Smith Street to St Nicholas’ Church Street is retained.

STA Phase 4 para 4.8:

‘The Butts has been reverted to one-way westbound. The signals at the Priory Road / Smith Street junction have been removed and the junction configuration is in line with the current layout. The only exception to this is the Priory Road to St Nicholas’ Church Street movement has been restricted.

The routes through the eastern end of Warwick town centre are thus different in the two documents, and the latter, by The Butts being made one-way and the flow down Priory Road to St Nicholas’s Church Street being restricted, appears to give no southbound route east of Northgate Street and Church Street for vehicles between Northgate and Banbury Road.

The *STA Phase 4* report continues, quoting the *Phase 3* report:

Without the schemes in place it appears impossible to ensure an acceptable level of network operation can be delivered, particularly when considering the areas around Warwick town [centre].

The conclusion that WCC’s consultants, Arup, appear to have reached is that any Plan which depends on increasing the flow of vehicles through Warwick Town Centre is undeliverable.

- 6.7 **8** **The modification necessary to make the Plan sound in respect of sustainable transport is for the allocation of greenfield land to be withdrawn and for a new transport strategy which respects the policy priorities to match the changed pattern of development.**
- 6.8 We draw particular attention to paras 4. to 4. our letter of July 2014 (appended on page), which made clear at that stage that the proposed transport strategy conflicted with transport policy, had strong negative effects, and was infeasible as a way of meeting the transport demand generated by development on the proposed sites. The Plan has taken no account of those well-founded objections.

⁶ Much of this is actually designed to facilitate vehicle flows by, for example, ‘crossing facilities’ whose effect is to inhibit the free flow of people on foot and cyclists and accelerate car journeys

7 Historic Environment

[4] Policies HE1 and HE2 [5] are not sound because [6] they are neither effective nor consistent with national policy.

- 7.1 [7] The Plan is not accompanied in its ‘evidence base’ by a Heritage Impact Assessment, except for drafts concerning greenfield sites at Gallows Hill and the Asps that are not allocated for development. The effect of the Transport Strategy and its ‘mitigation’ schemes on Listed Buildings and the Conservation Area of Warwick Town Centre has not been considered.
- 7.2 Such an assessment should cover not just the direct impact of development on adjacent heritage assets, but the effect of the Transport Strategy on those assets, directly and indirectly. This assessment is conspicuously absent from the STA reports.
- 7.3 The direct effects of the transport strategy, intensifying the use of the existing road network, which, in Warwick Town Centre and Leamington Old Town, forms part of the setting of numerous listed buildings, are damaging. Vibration immediately affects such structures, and air pollution from vehicle exhausts is particularly damaging to structures built of fragile Warwick Greensand.
- 7.4 Indirectly, by making historic streets primarily conduits for heavy through traffic, the Plan puts at risk the listed and conservation area buildings which line them. Buildings, many in ancient materials which have poor sound insulation, will be less attractive in residential use the more intrusive traffic is upon them. Businesses will not thrive in streets where people on foot feel uncomfortable and unsafe because of the constant flow of traffic. The permeability of the town centre would be reduced by the priority given to vehicles. All of these effects would depress the town centre economy, reducing its attractiveness to both residents and visitors. Over time, property prices would fall relative to others, and the commitment of owners to the standards of maintenance of the buildings would be prejudiced.
- 7.5 The effect of excessive traffic on town centre streets has already been recognised by condition attached to recent and current developments. The South West Warwick development has been required to make s106 payments to reduce the impact of traffic on town centre streets. The measures to achieve this have been implemented with awful dilatoriness by WCC. The absence of such provision from the new Plan represents a major reduction in the protection offered to heritage assets and to the townscape. As we wrote a year ago,
‘there is a real risk of the town centre hollowing out, in a miniature echo of the great American cities, becoming a poor quality zone in a car-based suburban sprawl’.
- 7.6 The Plan therefore fails to meet the NPPF requirement for a ‘positive strategy for the conservation and enjoyment of the historic environment’.
- 7.7 [8] **The modification necessary to make the Plan sound in respect of the Heritage Environment is for a full assessment to be made of its impacts.**

Oral Examination [9] The Society wishes to participate in the oral examination.

[10] This is necessary because the content of its representations may require clarification, may in parts require emphasis in the light of the Council’s response to them, and because they make fundamental criticisms of the soundness of the Plan.

Declaration [11]: I understand that all comments submitted will be considered in line with this consultation, and that the Society’s comments will be made publicly available and may be identifiable to the Society.

James Mackay, Chairman

Annex A: Effect of Revised ONS Projections and of correcting household size / density

Warwick District	Population	Homes	PopIn/Homes= Household Size
mid 2011 estimate (=actual)	137,736		
less residents of communal establishments *	3,058		
population living in households *	134,678	58,679	2.295
mid 2029 projection:			
old ONS 2011-based, Plan 23 April			
increase from 2011 (JtSHMA proj 1A)	21,472	12,924	1.661
population 2029 *	156,150	71,603	2.181
new ONS 2012-based 29 May			
increase from 2011	15,313		
population 2029 *	149,991		
new ONS 2012-based 29 May:			
2029 homes:			
at Plan density		68,779	2.181
at 2011 density		65,351	2.295
at 2001 density		66,811	2.245
new homes required by 2029:			
at Plan density		10,100	1.516
at 2011 density		6,672	2.295
at 2001 density: central estimate		8,132	1.883

* the same number is subtracted from all subsequent population figures, also asterisked

Household size / density:

It is generally noted that more people live alone or in smaller households; but less widely noted that more people also live in bigger households: the number of home extensions, and multi-generation families in the same home, provide evidence of this.

The combined effect of the two opposing trends has, contrary to predictions, since 2001 increased the average household size from 2.245 to 2.295. The Plan assumed a steep fall, reversing this trend and reducing the average household size to 2.181. We have conservatively assumed that the average will return to its 2001 rate.

If a smaller average household size were assumed and more new homes planned for the same population, the average size of the new homes needed would fall steeply, from 2.295 at the 2011 density to 1.516 in the Plan.

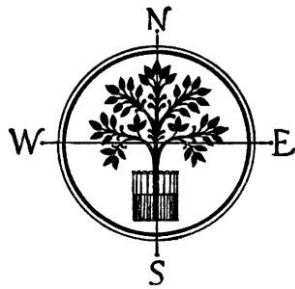
Coventry Population Projection:

The ONS 2012-based projections are higher for Coventry than were the 2011-based figures, but lower for all of the other Districts in the SHMA. The lower projections for Warwick and the other Districts are unsurprising, the higher growth in Coventry was less expected.

But detailed analysis of the projected growth in Coventry shows that it arises from a methodological peculiarity and from growth in the city's student population during the six years 2007-12 which form the basis of the projections. New students joining courses were counted, but their departure a few years later was not.

The ONS has projected this growth in incoming people in the 18 to 25 age group to continue each year till 2029 and beyond. It has not recognised that, at the ends of their courses, most of these students will move away from Coventry, nor that the growth is a one-off impact of the change in the universities' funding and their action to increase their intakes of higher fee-paying international students.

This spurious projection of growth in the international student population does not create a need for more homes, let alone for building houses on greenfield sites in Warwick District. Reliance on this anomaly in the Coventry projection would contribute to a finding that the Plan is unsound.



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29 July 2013

1 Introduction

1.1 In its *Local Plan Revised Development Strategy*, May 2013, the Council [in para 2.2] invites comments on the proposals. Here are the comments of The Warwick Society.

While the Society's main concern is that a better Plan must and can be proposed, these comments are necessarily framed as objections, to make it clear that the present proposals are unacceptable to many residents of Warwick and its neighbourhood as well as to the Society.

Just as the *Revised Development Strategy* [its para 1.4] focusses on the main changes since the *Preferred Options* proposals, so this response is to be read alongside the Society's letter of 27 July 2012 commenting on the *Preferred Options*, of which a copy is annexed, pages 6-10.

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 2012⁷.

1.3 The Plan and its Development Strategy give an opportunity to make the town and the district around it a finer place, and a better place to live in, to be educated in, to work in, and to visit. It is well-placed at the south-eastern corner of the West Midlands for sustainable development, prosperity and continuing attractiveness. The requirements for a Plan pursuing these ends were summarised in the Society's letter of 27 July 2012⁸. That letter continued⁹:

⁷ in its para 1.4, annexed here on page 6

⁸ in its para 1.6, annexed here on page 7

⁹ in its para 1.7, annexed here on page 7

The *Preferred Options* fail by a long way to achieve this. The Issues identified in the earlier consultation correspond quite closely to those that we have emphasised. But the preferred options focus heavily on growth and new development, disregarding the relatively low priority given to them by those who responded to the earlier consultation, and disregarding the negative effects of excessive growth and development on the matters that residents consider important.

1.4 We greatly regret that, in the face not just of the Society's objections but also of strong criticism from the overwhelming majority of respondents to that consultation, the Council proposes an RDS which would do even greater damage to Warwick and its neighbourhood.

97.5% of respondents objected to development of the land south of Warwick. The Council's retort has been to increase substantially the number of houses proposed for that area, postulating that public opinion carries little weight in such decisions.

The arrogant disregard of the Council for the views of residents and other interested parties is itself cause for objection to the RDS.

1.5 The RDS has many accompanying documents. It is a further sign of the attitude of the Council to public involvement that all have been issued simultaneously, giving residents and other interested parties only six weeks during the summer holiday period to understand, discuss and respond to material which has taken well over a year for many council staff and consultants to produce.

As well as much more material in the 'evidence base', these accompanying documents include:

Sites for Gypsies and Travellers, raising concerns for residents adversely affected by the RDS by proposing a majority of the twenty potential locations for the three sites needed throughout the District in the same concentrated area close to Warwick;

The *Community Infrastructure Levy Preliminary Draft Charging Schedule*, which is not referred to on the Council's webpage notifying us of the consultation on the RDS and G&T sites but only on a later, subsidiary page;

The *Final Interim SA Report*, which disguises its purpose - Sustainability Appraisal - behind its acronymous title, is neither notified on the webpage outlining the two 'main' consultations, nor referred to at any point in the RDS which it purportedly supports; and

The *Warwickshire County Council Warwick Strategic Transport Assessment - Phase 3*, which proposes the reversal of existing policies to reduce the impact of traffic in Warwick Town Centre but is not itself the subject of 'consultation'. The County Council unilaterally abolished the Town Centre Forum late in 2012 and has done nothing in the intervening eight months to implement the new but less effective process of discussion with which it proposed to replace it.

1.6 We explain hereafter as briefly as we can our main objections to the *Revised Development Strategy*. We do not comment on the *Final Interim SA Report* nor the *Warwickshire County Council Warwick Strategic Transport Assessment - Phase 3* or the other accompanying documents, but have many observations on their assumptions, analysis and conclusions which we will make separately.

2 Housing Need

2.1 The criticism of the methodology and the outcome of the housing need projections made in our objection to the *Preferred Options*¹⁰, stands. The proposed figure of 12,300 new homes to be built is much too high. We note that it is a provisional figure, pending completion of the joint

¹⁰ in paras 2.1 to 2.6 of the Society's letter of 27 July 2012, annexed here on pages 7/8

assessment being carried out with councils in Coventry, Rugby and Nuneaton & Bedworth. It must also be dependent on co-operation with Stratford District Council over its proposal for a new settlement at Gaydon, which might be superior to much of the proposed development south of Warwick in meeting housing needs for employment there.

2.2 You have yourself stated, at the Community Forum meeting held at Warwick Gates on 13 June, that half of those new houses would meet local needs and half would be for incomers¹¹. In our view, even less than half of 12,300, under 6,000, will be sufficient to meet local needs, and we refer to the analysis carried out and discussed with you by Ray Bullen for Bishop's Tachbrook Parish Council which supports our conclusion.

2.3 Forecasting as far into the future as 2029 is clearly very uncertain. By fixing now a single end figure, based on assumptions and trends and 'compound interest' - incurred by repeating small percentage differences over many years - the RDS projections can only have one certainty - that they will be wrong. Worse, by taking this single long-distant future figure and giving it short-term weight, in allocating greenfield land for development now, the damage of error will be immediate. This approach is akin to having no plan at all, allowing uncontrolled growth, leaving developers to decide what to build when, with our towns, villages and countryside blighted by the effects of false certainty and a National Planning Policy Framework which seeks development at all costs.

2.4 While the NPPF requires 'sustainable development' which meets an 'established housing need' to be approved, planning applications already made or imminent for much of the land south of Warwick meet neither of these criteria. A realistic forecast of housing need is that the District already has the required five-year +5% supply of sites. Using the exaggerated and uncertain RDS projections in support of short-term, expedient planning applications - which could over-ride the Plan process before it reaches Examination in Public - would open the Council to legal challenge.

3 Prudent use of Land and Natural Resources and Protection of the Natural Environment and Landscape

3.1 The agricultural land between Warwick, Whitnash and Bishop's Tachbrook is an 'Area of Restraint', designated at the time of the construction of the Warwick Technology Park, and intended to give permanent protection to this vital green gap. The Society has repeatedly suggested that it should be designated as Green Belt, but the Council has refused to implement this.

3.2 Building on it would merge the built-up areas, turning them into a single suburban sprawl. This would conflict directly with one of the principles of the Local Plan Strategy, 'avoiding coalescence'¹². The green space between the built-up areas to the south is as important as the Green Belt to the north of Leamington and Warwick, and it should be safeguarded as strongly.

3.3 Once developed, this green land could not be reclaimed. Its development would conflict with the basic principle of sustainability, 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'¹³

¹¹ We use the term *incomers* as being less ugly than the technical term *in-migrants*, regretting that there seems to be no expression which is not pejoratively confused with the word *immigrants*; we refer to people moving into Warwick District from other areas, noting that encouraging the movement of better-off people from the West Midlands conurbation and Coventry may be one of the objectives of developers in Warwick District, and perhaps of the Plan.

¹² Your word not ours; *Revised Development Strategy*, page 8, third point from bottom

¹³ *Report of the World Commission on Environment and Development* to the General Assembly of the United Nations, 11 December 1987

4 Sustainable Transport and Reducing the Need to Travel

4.1 Sprawling development is inevitably car-dependent. The transport strategy is car-based, just squeezing more congested traffic on to the existing road network. While the Local Transport Plan gives priority to sustainable means of transport in the hierarchy - walking, cycling, public transport - the Transport Strategy assumes that these developments would have the same ratio of peak hour car use to housing numbers as every other development of recent decades.

4.2 Development at relatively low density cannot effectively be served by public transport. The low concentration of the population does not provide sufficient volume for a bus service to run viably at a frequency which makes it an attractive competitor with car use. The limited influence which the County Council has over operators of unsubsidised commercial routes make it unlikely that a bus service would survive after the first few years of developer subsidy, as has been seen at other sites including the Hatton hospital redevelopment.

4.3 Whatever the fine words about walking and cycling routes within the suburban developments, these sustainable modes will not make a significant contribution to meeting transport needs. Distances will be too long for walking, for example from the areas south of Warwick to the town centres or railway stations; and cycling will be very unattractive as soon as cyclists reach the road network on which the use of cars has been intensified. The putative designs of new junctions in the Transport Strategy make it clear that the design priority would be to maximise the flow of vehicles, with people on foot and cyclists diverted to circuitous routes, with secondary priority at traffic light controlled crossings.

4.4 The Transport Strategy concludes that the existing level of congestion on the urban road network in Warwick, and elsewhere, will be worse than now for longer each day. The infrastructure plan proposes spending almost all of the potential developers' funding contributions on intensifying the use of the existing road network. The schemes that it labels 'junction improvements' and 'mitigation' would be improvements only in maximising the flow of vehicles; and mitigation only in reducing the increase in congestion, while increasing not reducing the impact of traffic on town centre streets. They would both make sustainable modes less usable and damage the historic and natural environment with the intrusive impedimenta of the highway engineer.

5 Air Quality and Climate Change

5.1 The already illegally dangerous pollution in streets in centres of Warwick and Leamington would be made worse by the increase in traffic. Noise and vibration would be constant and business and residential amenity would be damaged.

5.2 No attention has been given to the requirement to reduce the impact of traffic on Warwick town centre, and in particular to reduce the level of noxious emissions. This failure invalidates the infrastructure plan. The health of residents, as well as the town centre economy and the conservation of its historic buildings, all require air quality to be given absolute priority.

5.3 It has been suggested by the Council's Chief Executive that the air quality requirement could be met after development has been approved by then considering ways in which traffic through Warwick town centre could be reduced. This approach would invalidate the Transport Strategy, as the only way to reduce the volume of traffic would be transfer to other modes or other routes, neither of which has been assessed in the Strategy. A transport plan which meets all the objectives, including protecting the historic environment and assuring air quality, must be agreed before development is allocated.

6 The Historic Environment and the existing built environment

6.1 Warwick's historic environment is vital both to the social goals of the plan, to give people a sense of place and belonging, and to the economic goals as the basis of its visitor economy. It would be directly damaged by the increase in traffic and by building wide new junctions cluttered with traffic lights and signs at beautiful places: at Bridge End, over the Castle Bridge, on Castle Hill, and at St John's.

6.2 Development on the land between Europa Way and the Banbury Road would extend sprawl beyond the natural existing edge of the built-up area, taking development over higher ground and visible from long distances. It would directly damage the Castle Park, Grade 1 registered landscape; and the 'junction improvements' on the Banbury Road would damage its rôle as part of the Castle Park planned landscape.

6.2 The historic environment would also be indirectly damaged by the effect on the economy of the town centre streets being primarily a conduit for through traffic, constantly full of fumes and noise, and with their commercial premises split from each other by queues of vehicles. The damage to the commercial success of the town would lead to a longer term indirect effect of reducing the demand for such premises, residential and commercial, and a fall in their maintenance funding. There is a real risk of the town centre hollowing out, in a miniature echo of the great American cities, becoming a poor quality zone in a car-based suburban sprawl.

7 Other Infrastructure

7.1 While in theory development would be conditional on it funding schools, and healthcare facilities, strong concerns remain that the funding and provision would be inadequate, and that there would be risks to water supply, sewage and drainage.

8 Alternatives to this Plan and Development Strategy

8.1 Lower housing numbers which meet local needs, especially for affordable housing, instead of encouraging in-migration; the gradual release of land for development as demand grows; giving absolute priority to using brownfield and infill sites; building homes close to jobs and not mainly within 20% of Warwick District ... many options exist but have not been given proper consideration in the preparation of the RDS.

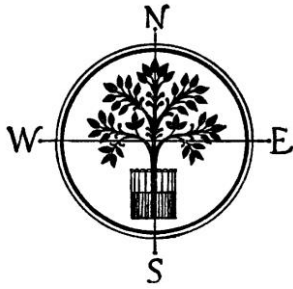
8.2 Absolute priority should be given to brownfield sites, with greenfield sites only being allocated when there is a proven immediate need. This will ensure that more brownfield sites become available, their value increased by the non-availability of easy, profitable alternatives for the mass housebuilders.

8.3 While a year ago the IBM/Opus 40 site on the north-west edge of Warwick was to be used for office development, it is now likely to be proposed for housing. It provides a good example of the way in which long-term plans are by their nature crude, and that housing sites can be found on brownfield sites well-connected to the transport network.

9 Conclusion

9.1 In objecting on these strong and numerous grounds to the Revised Development Strategy, the Society offers its assistance to the Council in the necessary task of devising a better alternative, with the full involvement of a wide range of residents and business interests.

James Mackay, Chairman



THE WARWICK SOCIETY

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1 Introduction

1.1 In its document *Local Plan Preferred Options*, May 2012, at para 3.3, the Council invites the views of all interested parties to help shape a draft Local Plan.

1.2 Here are the views of The Warwick Society. They refer to the *Full Version*¹⁴ of the Preferred Options and in some cases to some of the supporting documents made available on the Council's website. The Response Form, which we have not found effective for structuring our comments, uses the words 'support or object' rather than the *Preferred Options*' 'the Council is keen to hear the views'. While we have phrased our comments as views, it will be clear that many would be objections to firmer proposals, and will become formal objections if the next stage of the plan-making process does not respond satisfactorily to them.

1.3 The Warwick Society, the town's civic society, was founded in 1951, and 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.

1.4 Warwick is no stranger to development. The mediæval town was largely destroyed by fire in 1694, though many timber-framed buildings at its fringes survived. Rebuilding followed a plan to widen the streets and to improve fire-resistance with stone and brick walls. It took place at the start of the Georgian era. So the High Street, the Cross, Church Street, St Mary's Church and Northgate Street form an elegant and coherent architectural ensemble. It is the juxtaposition of the mediæval with the Georgian which makes Warwick distinctive. More recently, C19 industrial development based on the canal and then the railway has been followed by more extensive C20 sprawl based on the car and the road network. In the decade 2001-2011, the population of Warwick grew from 23,000 to 30,000, a rate of increase of 30%, among the very fastest rates of any town in the UK. Assimilating this growth and building new communities takes a generation.

¹⁴ Though the document itself does not have this title, it is referred to by it in the abbreviated booklet given wider circulation.

1.5 The new Local Plan gives a new opportunity to make the town, and the district around it, a finer place, and a better place to live, be educated, and to work in. Its population may grow, because it is attractive, and well-located at the south-eastern corner of the West Midlands. Its future residents, and those who work here or visit, need a vision which ensures that it continues to be attractive, and to function well.

1.6 This means:

- 1 Developing the local economy sustainably, both facilitating growth in jobs and income and reducing the impact of climate change;
- 2 A pattern of development which reduces dependence on the car, congestion and pollution;
- 3 Transport and social infrastructure which enables people to live sustainably and economically;
- 4 Walking routes, cycle routes, schools, health centres and shops which allow people of all ages and capabilities easy and healthy access to them;
- 5 A mix of housing which meets local needs, especially affordable housing for families;
- 6 A rate of development which allows the towns and their communities to absorb change and make each a socially and personally contenting place to be; and
- 7 Protecting the natural and historic environment, especially the green hinterland of towns, green spaces within them, and the historic buildings which make them special places.

1.7 The *Preferred Options* fail by a long way to achieve this. The Issues [para 4.8] identified in the earlier consultation correspond quite closely to those that we have emphasised. But the preferred options focus heavily on growth and new development, disregarding the relatively low priority given to them by those who responded to the earlier consultation, and disregarding the negative effects of excessive growth and development on the matters that residents consider important.

1.8 In the following sections, we consider the three main ways in which the preferred options fail to meet the expectation of those who live in the District, and suggest changes which, if introduced to the draft Local Plan, could make it a very much better direction for the District to follow.

2 Population Growth and the Demand for Housing

2.1 The Preferred Options' emphasis on growth in jobs and housing, each matching the other [para 4.10], is founded on a circular argument and on mere assumptions.

2.2 The Strategic Housing Market Assessment [para 5.13] 'projects' (not forecasts) future growth in the District's population. It explains [SHMA figs 2.13 and A2.4] that 'in-migration' has been much the most important cause of population growth in the fifteen years 1996-2010. Of a total population increase of 18.9k (from 119.8k to 138.7k), 16.5k has been net in-migration, and only 2.4k the natural change. The report notes [para 2.33] that 'past migration trends will have been influenced in part by past levels of housing delivery.'

2.3 The SHMA assumes¹⁵ the average rate of in-migration of the last five of those fifteen years, 2006-2010, and projects it for the next twenty. There is no quantified analysis of the causes of the in-migration, nor any quantified forecast of its future level. It is simply an assumption.

2.4 The SHMA goes on to assume an age profile for the in-migrants, again basing its projection on neither evidence nor analysis, but on assumptions, in this case those of the ONS [SHMA para

¹⁵ [para 2.34] 'Our main trend based migration assumption therefore assumes ...'

2.17]. The projection of net in-migration is the difference between two much larger numbers, gross in-migration and gross out-migration, and the in-migration figure is produced only by adding that assumed net projection to the ONS assumption of out-migration. The projection is not a forecast, just an arithmetical exercise, and its predicted growth in population is no more solid than the assumptions and extrapolations on which it is based.

2.5 The extrapolations have as their base the after-effect of rapid housebuilding in the years before the market collapsed in 2008. All that they show - as described at the end of para 2.2 above - is that if houses are built, people will move into them; in a second circularity, if the mass housebuilders do not believe that their output will be sold, they build little. A third circular argument then enters the Plan as it stands: if the population rises, employment will rise, as those who buy and occupy the new houses are very likely to have jobs - without which they do not have the means to buy the houses.

2.6 We conclude that the preferred level of 'growth' is simply a bid for growth, rather than a forecast for which there is either evidence or action plan, other than almost free-for-all development with all of the negative impacts on existing residents and the environment that that will bring. The alternatives of more modest levels of growth, in both housing and employment, with much lower damaging impacts, would be equally valid for the Council to choose. We urge that it should reconsider its preference in the light of the absence of evidence in support of it, and take a broader view of both growth and all its consequences.

3 Infrastructure

3.1 The infrastructure proposals do not provide for sustainable development. The modelling of the existing network against possible locations for development consists only of modelling vehicle flows. It does not reflect the national policies and Local Transport Plan which require priority to be given to reducing the demand for transport, and to walking cycling, and public transport.

3.2 Except for the possibility of Kenilworth station (which would have a negligible impact on demand for road use in the peaks) all of the significant infrastructure proposals are for increases in the road network. They have been selected to deal with some of the local congestion created by increase in demand of the various housing site options. They do not provide a coherent transport network for Leamington, Warwick and Kenilworth, rather a continuation of the existing mismatch between traffic and the capacity available to accommodate it.

3.3 Good railway services are already provided at Leamington and Warwick Parkway stations. The level of service at Warwick station is significantly inferior to that of Warwick Parkway, even though it serves a much more substantial population within walking distance. Conversely, almost all access journeys to Warwick Parkway are by car. For journeys to and from work, Birmingham and London are significant destinations and there is some commuting in to Warwick and Leamington which is badly served by Warwick Parkway. The basis of a sustainable infrastructure plan should be to improve train services at all three of these stations, and especially at Warwick station, and to concentrate development close to them, minimising car use. This possibility does not appear to have been considered.

3.4 The conclusion of the modelling is that the existing level of congestion on the urban road network in Warwick, and elsewhere, will be worse than now for longer each day. No attention has been given to the requirement to reduce the impact of traffic on Warwick town centre, in particular to meet the Air Quality Management Area requirement to reduce the level of noxious emissions. This failure invalidates the infrastructure plan. The health of residents, as well as the town centre

economy and the conservation of its historic buildings all require that the legal requirement to restore air quality should be given absolute priority.

3.5 Instead, the infrastructure plan proposes spending almost all of the potential developers' funding contributions on major expansion and 'improvement' of the road network. The lesson was learned decades ago that changes of this kind, increasing capacity on some congested sections, simply increases congestion on adjacent parts of the network, through the traffic that the improvements generate.

3.6 We are disappointed and concerned that the preferred options do almost nothing to allow transport demand to be met more sustainably, rather simply try to accommodate it at the expense of the environment and of existing residents and road users. We consider that the whole emphasis of the plan should be above all on sustainability of transport, not just for its environmental impact but also because the prosperity of residents of the district depends on accessibility to services without having to meet the increasing costs of car use.

4 Locations for Development

4.1 Much of the criticism of the Preferred Options has been directed towards the allocation of particular areas of greenfield land at the fringes of the urban area on which large-scale house building is proposed. These sites represent a major misdirection of development. We consider that, rather than the strategy of the Preferred Options, the pattern of development in the district should be dramatically different.

4.2 The total level of development should be substantially lower, of the order of 250 dwellings per annum, Option 1, which is sufficient to meet local needs and not to encourage in-migration.

4.3 Unbuilt existing permissions themselves provide nearly five years' supply to meet this level of requirement.

4.4 Beyond these absolute priority should be given to brownfield sites, as provided for by the NPPF. The Preferred Options propose only that brownfield sites should be used at the end of the plan period, the effect of which would be to consume greenfield sites rather than to bring forward brownfield sites by increasing their value. Some brownfield sites may provide for small numbers of dwellings, but these should not be dismissed: there are potentially many of them.

4.5 Brownfield development should include the intensification of existing development within the urban areas. We do not rule out 'garden development', which can often be in locations close to existing facilities and employment and easily served sustainably. There are extensive areas of development carried out mainly in the second half of the twentieth century where more intensive use of existing housing and employment land would be entirely feasible - were the market signals to encourage it. The proposals for much more intensive office use of the IBM/Opus 40 site on the north-west edge of Warwick go too far in this direction, but demonstrate that intensifying development on a site well connected to the transport network can be attractive to developers.

4.6 Only as a last resort should greenfield land be allocated. The suggestion that it can produce high-quality environments by applying the principles of the garden cities is spurious. The garden cities were planned around local employment and services (in the era before the car, competing supermarkets, choice of school admissions, and two-income households became the societal norm): that is not how we live now. All of the greenfield sites at the urban fringe would be largely car-dependent. As well as their damaging impact on infrastructure and on existing settlements, they would not produce stable, happy communities of their own. The rapid growth in population of

Warwick in the last decade requires a period of much gentler growth while the new communities gel.

4.7 The allocation of land south-east of Warwick between the Banbury Road and Europa Way does exactly what the Preferred Options say that they wish to avoid, merging the built-up areas to their east and west. The northern part, north of Gallows Hill, would make Warwick, Leamington and Whitnash into a continuous, sprawling urban area. The southern part, between Europa Way and the Banbury Road would extend this sprawl beyond the natural existing edge of the built-up area, taking development over higher ground and visible from long distances. It would have a directly damaging effect on Castle Park, Grade 1 registered landscape.

4.8 The Green Belt was established to end the outward sprawl of the major conurbations. Circumstances change and there may be exceptional reasons for declassifying Green Belt land: the expansion of Warwick University may be a virtuous case of this. But it is essential that its edges should not be eaten into by extending urban sprawl, for example at Loes Farm and north of Leamington, in the opposite direction from that which it was originally intended to prevent. Similarly, when the Green Belt was designated land south of Warwick and Leamington was not seen as threatened by sprawl from the conurbation simply because the towns stood in the way. Now, that land requires the same level of protection as the post-war Green Belt gave to the edge of the Birmingham and Coventry built-up areas.

4.9 Instead, the Green Belt has become the guarantor of favourable surroundings for the few residents in and outside villages scattered across it. Given the severe damage to the existing urban areas that would follow from their outward extension, an entirely different approach is required to find acceptable greenfield sites. The possible 'Gateway' development around Coventry Airport is an example of this approach: it must concentrate employment and housing close to good transport links without creating undue pressure on the existing urban areas. Planned new or enlarged settlements outside Warwick, Leamington and Kenilworth, and in some cases outside the district - delivered through cooperation with neighbouring authorities - should also be preferred. The substantial employment at Gaydon is not matched by housing provision in the locality, rather met by car-borne commuting to it. Warwick Parkway station and the nearby A46 provide an opportunity not for an urban extension but for a new settlement outside the existing urban boundary, which would not damage what lies within it. Hatton and Lapworth, with existing railway stations, could also be the focus of much more extensive development than is proposed.

5 Conclusion

5.1 We have concentrated on the three main ways in which the preferred options would both worsen the quality of life of the district's residents and damage the historic environment.

5.2 In the copious supporting documentation, there are many more details of the proposed policies which we cannot support.

5.3 But we have limited our comments to these three main issues to try to persuade the Council that the eventual draft Local Plan must be very different from the Preferred Options now proposed.

5.4 We urge the Council to reconsider its preferences and to recognise its long-term responsibility to both the environment and the quality of life of Warwick district.

James Mackay,
Chairman

Annex D: extract from Town & Country Planning (Local Planning) (England) Regulations 2012

Preparation of a local plan

- 18.** (1) A local planning authority must—
- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
 - (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.
- (2) The bodies or persons referred to in paragraph (1) are—
- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
 - (b) such of the general consultation bodies as the local planning authority consider appropriate; and
 - (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Publication of a local plan

- 19.** Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—
- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
 - (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Representations relating to a local plan

- 20.** (1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.
- (2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.
- (3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

Availability of documents: general

- 35.** (1) A document is to be taken to be made available by a local planning authority when—
- (a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and
 - (b) published on the local planning authority's website,
- (2) In relation to any document made available under these Regulations, except a local plan or supplementary planning document which has been adopted or approved, the local planning authority may cease to make the document available once the period specified in paragraph (3) has expired.
- (3) The period mentioned in paragraph (2)—
- (a) where the document relates to a supplementary planning document or to the local planning authority's statement of community involvement, is 3 months after the day on which the supplementary planning document or statement of community involvement is adopted;
 - (b) where the document relates to a local plan, is the 6 week period referred to in section 113(4) of the Act that applies as regards the local plan concerned.
- (4) Where a local planning authority adopt, or the Secretary of State approves, a revision to a local plan or a supplementary planning document, as soon as reasonably practicable after the revision is adopted or approved, the local planning authority must incorporate the revision into the local plan or the supplementary planning document made available in accordance with this regulation.