

Key Facts and Arguments about the Council's HQ Relocation

See also the "Objections" section of our website: <http://saveleam.com/objections/>

(numbers and sections marked with [?] are currently provisional whilst we double check the figures)

Parking and town centre chaos for businesses and their customers

The proposed displacement parking scheme, with approved capital spending of £674K, is wholly inadequate in terms of both the scale and distance of the sites involved from local businesses, which will suffer serious risk to their income. Strong concerns have already been voiced about the parking scheme by Friends of Victoria Park, BID Leamington and The Royal Leamington Spa Bowling Club.

Recent findings have also shown that the proposed addition of 202 parking spaces across Court Street, Archery Road and Princes Drive have now been reduced in number to just 80-100 spaces (depending on whether you believe the council or current users as to the capacity of the informal parking currently available at the Archery Road site).

WDC claim that the Covent Garden car park has 'concrete cancer', is falling down and needs replacing urgently. However, a report to the council executive in February 2016 estimated its lifespan could be extended by 20 years for under £3m over that period (an upfront cost of around £800K, followed by £2m over the next 20 years). This is compared to the council paying almost £8.5 million to rebuild it. When looking at potential sites in December 2014, officers also commented that building the new HQ at Covent Garden would mean "the ability to build a new replacement multi storey car park (whilst the existing one was still in operation) would be lost"; suggesting that, otherwise, the multi-story carpark could remain open whilst a new one was built, presumably on the surface portion of the site, and so would massively reduce the need for displacement parking.

The car park is a separate issue, in any case; funded independently, and which could (and to support our Town Centre probably should) be replaced without the HQ office build. By careful planning this could be achieved with far less disruption whilst providing more parking for future growth.

Inadequate parking provision

Few, if any, additional parking spaces, despite council and Conservative party claims to the contrary. Claims have been made *in writing* on the front page of the Conservatives' 'In Touch' North Leamington newsletter, that the "new car park will have 50% more spaces". This was partially corrected to 32% in later leaflet distributed to Leamington residents, however the car park arithmetic from those promoting the scheme is at best faulty, at worst disingenuous.

The current car park has 469 spaces in operation and 592 in total. 50% more spaces, based on these figures, would total either 704 or 888. The more realistic figure of 32% appears more plausible, if you only consider the currently operational spaces at Covent Garden, as that would leave the new carpark needing 619 spaces, which is fairly close to the 615 that will be provided.

This *still* isn't the full story, though, as of those 615 *total* spaces, 56 will be reserved for the proposed apartments to be built on the Covent Garden site with 57 spaces allocated for council employees during the week, bringing the total down to 558, well below the 592 spaces that would be provided if the current carpark was restored, or replaced, at *full* capacity.

There is then no mention made of parking for council visitors, for whom around 40 spaces are allocated, and heavily used, at the current offices. That could leave as few as 462 spaces in total available to the general public. In other words, the real picture could be between 1.5% and 20% *fewer* car parking spaces available for general use, depending on the total number of spaces counted prior to development.

On top of all that, there is also the matter of increased pressure on parking around town in general, caused by a staff of some 300 council employees moving from a site with adequate provision of staff parking, to a site with just 57 staff spaces.

It is also not clear how these plans fit into a wider car parking, or broader economic, strategy for Leamington, if at all.

Lack of infrastructure contributions

There will be an almost £3 million shortfall in Section 106 infrastructure investment that would otherwise have been used to augment local services to meet the increase in demand from new residents. By far the largest part of the requested contributions, £1.6m, came from education, a sector already struggling on reduced budgets before having to accommodate increased, and unfunded, demand. Requests came from other already stretched services included health (£438K), policing (£33K), and libraries (£4K), as well as for open spaces (£439K), bus stops (£216K) and sports facilities (£205K).

These requests for contribution were not challenged, but instead were discarded on the grounds of the marginal viability of the combined schemes. Though a CIL (Community Infrastructure Levy) payment will be made, planning policy is clear that this does not replace section 106 contributions.

This effectively means this £3m either has to be met from taxes (cancelling out the council's claimed 10 year savings) or a cut in services per capita, or funding needing to be found from other means, as local provision struggles to keep up, which sets a very bad precedent for future developers on other sites.

A recent report to council also revealed that, across the district as a whole, there was an infrastructure funding gap of almost £70m, which was not being adequately met by section 106 contributions.

Zero affordable housing

The scheme will not provide any affordable housing, contravening WDC's own planning policy of 40% affordable homes on all new developments of 11 units or more. This sets a very bad precedent indeed, when the council should be setting an example at a time when affordable housing is a major issue for the district. The local plan makes it very clear that it applies to *every* site, surely this should be especially the case when the sites are *council-owned*. The viability

assessments make it clear that affordable housing could be built at the Riverside site, if it wasn't subsidising the new offices.

A "clawback" was added to the section 106 obligations for the site, so that if the scheme is reassessed as viable for providing affordable housing once nearing completion, then a contribution towards affordable housing *at a different, and unspecified, site* will be made. Though better than nothing, this again sets a bad example, as the local plan itself discourages contributions for off-site provision, as such sites are difficult to find, and it does not help to encourage integrated communities with a mix of housing. It also still allows the developer a get-out on planning commitments based on the viability of the scheme, which is easily gamed (which is why even central government is now opposed to this practice).

Financial risk and alleged savings

It is claimed that the scheme will save council taxpayers £3 million over ten years. However, this figure is based on purely aspirational and very questionable assumptions about savings, especially when the £3 million infrastructure funding shortfall is taken into account. It's also important to note that annual savings of £300K would represent *less than 1%* of the council's overall annual spending of £35m.

The much hyped claim that the project is "broadly cost neutral" cannot be sustained when the costs of parking displacement (£674K), lost parking revenue whilst Covent Garden is closed (£665K), extra staffing (£385k[?]), tree loss (amenity value of £500k - £1m+ across affected sites - assessed using the CAVAT methodology), and the one-off costs of moving, contract management etc., are added. In addition, the council's own viability reports identify a potential £3 million funding gap for the project. If a new unitary authority is likely, the new HQ will be a superfluous 'white elephant' anyway - half the size of the current offices, and on a much smaller site, with considerably less staff parking, it would likely be of less use to the county council, and potentially have a lower market value.

The £300,000 p.a. of alleged savings as a result of the relocation can only be calculated on the basis of a building less than half the size of the current accommodation with a cost per sq. m that is actually higher than is currently the case. Most of the alleged savings are in the form of lower business rates to central government, in other words a 'wooden dollars' saving. This is a highly risky marginal saving given the scale and complexity of a project with projected overall costs of £50 million.

Where is the independent financial and risk assessment – and public consultation - which a project of this scale surely merits? We call for the council to undertake both before committing to the scheme.

Adapting the existing building[?]

Everyone accepts that the current state of the existing building is unsatisfactory, with only emergency maintenance carried out for the last five years or more, but it is only 30 years old and the proposed scheme has not been adequately demonstrated to be the best solution. It is claimed that the current offices are twice as big as needed with prohibitive upkeep and utilities costs. Yet utilities are only 16% of current running costs and will still be budgeted at 13% in the new building.

If the problem is overcapacity, why has a proper assessment to adapt the existing HQ building not been carried out? Such an assessment is crucial in discovering whether adaptation would cost less than building new offices, and have fewer detrimental impacts on the town, its heritage, its infrastructure and its residents and businesses.

Council officers estimate that refurbishing the 'shell' of the existing building to an acceptable standard will cost £1.07 million. And upgrading 25% of the office space to top commercial letting standards, will cost up to a further £1 million, according to estimates by a local commercial property firm. Subletting these offices will yield at least £450,000 p.a. in income and savings. With this option, risk is lower, income higher, and all planning policies followed. Other options may be assessed as equally or more attractive.

Riverside House has an independently assessed value of £8.2 million, shown on the council's balance sheet, despite its questionable valuation of £3.44 million, provided in support of the viability assessments.

Offices for incoming and/or expanding local businesses are in short supply in the district (information from WCC, local commercial agents and WDC's own statements). Why is the council proposing to remove over 40,000 sq. ft. of gross internal area (Riverside House minus the new Council offices)?

Overdevelopment and environmental damage

The Riverside development represents a 70% increase in housing over that indicated in the local plan and will be detrimental to the conservation area. The local plan set out 100 units for this site, whereas the outline planning approval was granted for 170 units, with many feeling this is likely to be increased further at the reserved matters stage. Other developments in the district were refused based on much smaller increases over local plan numbers, leaving residents to feel that planning judgement is not being exercised consistently at this site.

The constraints of the site, with the lower half being in the flood plain, and a culverted stream running through it, mean that the development is crammed into the top half of the site, with proposed buildings up to 6 stories high, dwarfing the current building, and looming over the conservation area and Victoria Park.

The development will lead to the destruction of many mature trees – a great loss of public benefit, and with an amenity value (at the Riverside site alone) put at between £360k and at least £850K (using the widely accepted CAVAT methodology). The true losses will not be immediately known, as it depends on how many of the retained trees will actually survive long term; the council's own tree expert stated, shortly after the planning committee approved the application, that the development would likely cause the demise of several of the retained trees, with an independent expert, who visited the site with the Coventry and Warwick Tree Wardens training group, feeling the losses would be higher still. It will also serve to exacerbate already high volumes of traffic, with consequent deleterious effects on air quality, which is already a serious problem in the town centre; as well as adding to the pressures on resident parking in this area.

Offices with car parking on the flood plain now seems a far better fit for this site – and open space – given the constraints, i.e. making best use of the existing building and facilities. Priority should be to resolve the car parking issue at Covent Garden, after Linen Street in Warwick (which surveys revealed to be in a much worse condition), and without causing the same levels of disruption.