

Part B - Commenting on the Revised Development Strategy

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

REVISED DEVELOPMENT STRATEGY

Paragraph number / Heading / Subheading (if relevant)

ROSS + RELATED PARAGRAPHS

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

SEE ATTACHED NOTE SH3

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Ref:

Rep. Ref.



Note SH3 - Representations relating to RDS5 and related paragraphs

1 THE STRATEGY

1.1 Section 4.1 sets out the process by which the Strategy provides for 12,300 dwellings for the plan period 2011-2029.

1.2 RDS2 sets out how this is requirement to be achieved:

“Sites completed between 2011 and 2013	447
Sites with outstanding planning permission at 1 April 2013	1,681
Small urban SHLAA sites which are assessed as being potentially suitable	300
An allowance for windfall sites coming forward in the plan period	2,800
Consolidation of existing employment areas	450
Sites allocated in this Plan	6,622
Total	12,300”

1.3 Policy RDS5 identifies the sites and locations that are proposed to be allocated to provide enough new homes to meet these requirements including the following villages:

“Site No. of Dwellings

Primary Service Villages

Bishop’s Tachbrook	100-150
Cublington	100-150
Hampton Magna	100-150
Kingswood (Lapworth)	100-150
Radford Semele	100-150

Total c600

Secondary Service Villages

Barford	70-90
Baginton	70-90
Burton Green	70-90
Hatton Park	70-90
Leek Wootton	70-90

Total c400

2 NATIONAL POLICY FRAMEWORK

2.1 The NPPF requires local planning authorities to prepare Local Plans that contribute to sustainable development and that avoid adverse impacts on any of the three dimensions of sustainability. Alternatives should be pursued that reduce or eliminate such impacts. Relevant paragraphs include:

“151. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.

152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued...”

3 SUBMISSION

3.1 We submit that the process used in the Strategy for identifying the priorities for the location of development, insofar as it relates to the District’s villages, gives undue priority to locations in Green Belt before the potential for non green belt locations has been fully



explored, indeed in some cases the priority has actually been reversed (see point 3.7 below). The effect of this is that over 50 % of the development allocated to the villages is intended to take place in Green Belt, even before the further evaluation process set out in paragraph 4.3.16 of the strategy has begun:

“Further site evaluation work is required in order to establish the exact location of sites to be allocated adjacent to villages.”

- 3.2 The process by which the strategy reaches the conclusions about the allocation of development to settlements is contained in the Draft Settlement Hierarchy Report 2013. Paragraph 4.3.13 of the Strategy refers to this report as **“a robust and justifiable approach to the establishment of a settlement hierarchy”**
- 3.3 With respect, it is neither robust nor justifiable. We will use the village of Barford as an example to demonstrate this, but we make the point that we believe that the whole process is at fault.
- 3.4 The previous process that led to the identification of Category 1 and Category 2 villages in the 2012 Preferred Option Report was, indeed, robust and justifiable. It was based on a process that had its roots in the research carried out for the Structure plan, supported by Area profiling based on appropriate statistical indicators. We supported that process and, whilst we submitted at Preferred Options stage that the local planning authority had underestimated the capacity of the various villages, the categorisation was justified.
- 3.5 However, the process set out in the settlement report is a curious mixture of objective statistical analysis overlain with subjective (and often preconceived) conclusions. It is based on what is known as the ‘Blaby Model’ which is a straightforward statistical model used to create a classification of settlement hierarchies. Applying this model to the higher orders of settlement in Warwick District, the local planning authority concludes that Barford is the fourth most sustainable settlement in Warwick. Using the Blaby Essential services test, the following classification was reached:
- Hampton Magna 24
 - Radford Semele 23
 - Kingswood/Lapworth 22
 - Barford 21
 - Cubbington 21
 - Bagington 18
 - Bishops Tachbrook 17
 - Burton Green 15
 - Leek Wootton 14
 - Hatton Park 12
- 3.6 In respect of Hampton Magna, Radford Semele, Kingswood/Lapworth and Barford, the Blaby Model validated the Preferred Options Report – the categorisation of these as Category 2 Villages was correct.
- 3.7 However, as a result of objections from a number of organisations complaining about the consequences of this process for development in the various villages, the process has been – shall we say’ “adapted”. The effect is to change the classification to that now found in RDS5,¹ in which Barford, in particular has arbitrarily been changed in classification, even though, in Test 2, it is a mere 2 ‘points’ different from Bishop’s Tachbrook. In contrast, the village of Cubbington has actually been upgraded in classification despite being entirely washed over by Greenbelt. The ‘switch’ of classification of these two example villages is counter-intuitive to NPPF policy as set out above.

¹ Illustrated in Detail in Appendix 4 of the Strategy



- 3.8 We submit that this is unjustified and materially unsound for a number of reasons, as set out below.
- 3.9 First, there are mathematical discrepancies in adapting the Blaby Model (Test 1) to Warwick's model (Test 2)
- 3.10 Second, the introduction of subjective views into what is essentially a mathematical model is completely unjustified. In order to be robust, the process of adapting Test 1 to Test 2 results should be separated and explained in clear detail. Otherwise, the Test 2 results have no validity. The two greatest inputs of subjectivity are the introduction of Parish Council etc comments and SHLAA evaluations into the Model.
- 3.11 Third and finally, the process ignores completely the greatest policy impediment to development around many of the villages. This is, of course the Green Belt designation. Many of the settlements have been designated as 'washed over' villages in the Green Belt and this is the default position unless 'exceptional circumstances' are identified to warrant amendment of Green Belt Boundaries. Thus, the starting position for Village Categorisation Model must be that the Green Belt villages are not available for development. The local planning authority must
- Either demonstrate that the required exceptional circumstances exist before including these villages in the Model or
 - Include a factor in the Model that – in accordance with the NPPF - favours non-Green Belt locations over Green Belt villages. (It may be said that the 'Environmental Impact' element in the Test 1 – Test 2 conversion includes this, but this appears not to have been applied consistently or rationally)

4 CONCLUSION

- 4.1 Until the classification is demonstrated to be objective, robust and justified, the Strategy is unsound as set out in the NPPF as:
- It has not been demonstrated to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not, therefore, 'justified'.
 - It does not enable the delivery of sustainable development in accordance with the policies in the Framework – in this case, specifically, sustainable development and Green Belt policies. It is not, therefore, consistent with national policy.
- 4.2 On the basis of the above, we place on the record our strong objection to the classification set out in RDS5.
- 4.3 We suggest that, in order to be made sound in accordance with the NPPF, one of three things should happen:
- Revert to the original Structure Plan based classification as set out in the Preferred Options Report, or
 - Use the Blaby Model as it was designed to be used – as a statistical model, or
 - If subjective elements are to be incorporated, expose them separately, along with the weighting and reasoning. This must incorporate a heavily weighted element in favour of non-Green Belt locations, and appropriate re-classification of the villages.

Graham Parker

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