

OBJECTIONS TO NEW LOCAL PLAN REVISED DEVELOPMENT STRATEGY June 2013

The main thrust of my objections to this Strategy, as a qualified planner, is that it seeks to concentrate the majority of an excessive amount of growth into one particular small part of the District i.e. urban fringe areas around the south west of Leamington. Shoehorning this amount of growth into such a location would result in unsustainable over development with all its associated problems including traffic congestion, pollution and overloaded local infrastructure and services, and which cannot be adequately mitigated. It would further increase the existing unbalanced pattern of development across the District between the 'urbanised south' (20%) and 'rural north' (80%) and as such, cannot be justified, certainly not on the grounds of seeking to protect existing Green Belt boundaries.

The 2012 Preferred Options level and locations of growth, whilst not perfect, comprises a reasonably robust, sustainable and balanced basis for future development for the District. Within this document, the Council identified the advantages to locating some development in the Green Belt to the north of Leamington and all four options considered for housing locations, (para. 7.38, Table 3) have significant allocations in this part of the District.

Regrettably and misguidedly, the Revised Development Strategy, June 2013, (RDS), having been previously rejected by the Council for good planning reasons, now marks a significant step backwards compared to the 2012 proposals. Any planning benefits arising from the non development of the relatively small parts of the Green Belt north of Leamington are outweighed by the major planning disbenefits of over development to the south of the town, resulting in a net reduction in planning and environmental benefits across the whole District.

I submit that the RDS does not constitute a basis for a 'sound' Local Plan as defined by the National Planning Policy Framework, para. 182, and I object to it in respect of both the **scale** of growth and its broad locational **distribution** within the District, further elaborated under their respective headings.

Throughout this submission, 'the Council' refers to Warwick District Council (WDC); 'the District' refers to Warwick District; 'Preferred Options' refers to New Local Plan, Preferred Options, May 2012, WDC; 'NPPF' refers to the National Planning Policy Framework, March 2012.

Scale of Growth – Housing & Employment

The Land Use Planning system in England has changed significantly recently.

Under the provisions of the Localism Act, 2011, the Council is no longer subject to the housing growth targets set by the former West Midlands Regional Spatial Strategy, revoked in May 2013.

Whilst the Council is now free to set its own housing target in the Local Plan, it must comply with the provisions of the NPPF - '*to meet the objectively assessed need for new homes.*'

In this respect, the Council has adopted an interim level of growth of 12,300 houses between 2011 and 2029 (683 per annum), representing an increase of 14% over that of the 2012 Preferred Options. This figure may be revised pending the findings of further joint work with Coventry City Council and the resulting co-operation with that Council.

ONS data shows that net migration into the District has very much been the dominant factor in population growth over the past 15 years, and there is no reason to believe that this general trend is likely to change over the next 15 years.

I therefore object to the RDS housing target of 12,300 on the following grounds:

- The case for the significant increase over the 2012 level is not adequately made in terms of both policy and evidence base
- The amount is excessive (and could become even more so when revised), such that '*the adverse impacts.....would significantly and demonstrably outweigh the benefits*' (NPPF, paragraph 14)

- 'Supply creates its own Demand' - an excessive supply of new homes will inevitably lead to an excessive in-migratory population increase. This is explicitly acknowledged by the Council's own consultants - *'It should however be recognised that past migration trends will have been influenced in part by past levels of housing delivery.'* (Strategic Housing Market Assessment Final Report, March 2012, WDC). I have seen this process at work very clearly in Warwick over the last ten years, the various new housing developments continually drawing in new people from outside the District.

A large area of land – 22.5 hectares - is allocated in the RDS for new employment development; indeed it seems the Council is obsessed with economic and employment growth, to the detriment of other planning objectives, in a District with a buoyant local economy and substantial commuter flows.

Moreover, the recent proposal to develop 308 hectares (incidentally all Green Belt land!) near Coventry Airport, already approved by both the Council and Coventry City Council, is forecast to generate up to 10,000 jobs, many of which could be taken by District residents.

The Council seeks to justify the scale of its employment land allocation to meet the future needs arising from its housing growth target, yet the eventual development of that land is beyond its control, and reliant on future market forces and inward investment. The larger the allocation, the greater the chance that it will remain undeveloped, other things being equal.

I therefore object to the RDS employment land allocation on the following grounds:

- It is excessive and dependent on a flawed and excessive housing target
- The case for the allocation is not adequately made in terms of both policy and evidence base
- It fails to take into proper account the possible future employment impact of the Coventry Gateway proposals
- It risks sterilising a large proportion of scarce development land within the Plan period which might be beneficially re-allocated to other uses.

Broad Locations of Growth

Since the summer 2012 consultation on the Preferred Options, the Council has radically revised its proposals for the broad location of new development. In particular, it has switched major housing allocations away from Green Belt land to the north of Leamington and concentrated most housing developments on locations to the south of Warwick, Leamington and Whitnash, outside of the Green Belt.

The Council claims that this is due to the consultation responses opposing Green Belt development, but also as a result of so-called 'new information' on the ability of the land to the south of Warwick/Leamington/Whitnash, and brown field land, to accommodate new development.

It seems clear that the Council has bowed to the well articulated and forceful objections of the North Leamington NIMBY lobby, with the 'sanctity' of the Green Belt providing a convenient 'escape clause' for both parties, but this does not make for sound planning, in fact just the opposite!

It is important to note that Chapter 9 of the NPPF makes it clear that the Green Belt, which covers the northern 80% of the District, does not represent an insuperable barrier to development:

'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' (para. 83).

According to the Council 'exceptional circumstances' can include the need to accommodate housing and employment growth to meet the needs of a community where there are insufficient suitable and available sites outside of the Green Belt.

Furthermore:

'When drawing up or reviewing Green Belt boundaries local planning authorities shouldconsider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary' (para. 84).

The Preferred Options takes on board this National guidance in its Green Belt policy (Section 16), which supports the allocation of housing and employment development on Green Belt land with associated boundary adjustments.

The advantages identified by the Council (Preferred Options, para.7.31) to locating development to the north of Leamington, include:

- *'The possibility of including some employment land within the development - employment areas are currently concentrated in the south of Leamington, leading to many cross town centre trips*
- *Greater choice of location of new homes*
- *The benefits which could be realised from the construction of a northern relief road which would relieve congestion on through routes between Warwick and Leamington town centres.'*

The Council also highlight (Preferred Options, para. 7.30) some of the negative consequences of a large amount of development to the south of Warwick/Leamington/Whitnash, namely:

- *'The reduction in the gap between the three towns and the village of Bishop's Tachbrook and the perception of coalescence between the settlements*
- *the cumulative impact of this level of development to the south*
- *the impact on infrastructure, in particular transport and increased car journeys along the Europa Way corridor; the town centres and the M40*
- *the lack of choice of location of housing.'*

Thus, the above two quotes are a key part of the Council's own case for justifying their 2012 Preferred Options and for rejecting what are now their 2013 RDS proposals!

Moreover, it is clear that locally the RDS proposals would:

- greatly exacerbate existing traffic congestion not just in Leamington but also in Warwick, a town of national historic and cultural importance, both south and north of the river
- degrade environmental amenity, including air quality
- increase atmospheric pollution
- place unsustainable pressure on local services and infrastructure

That all of this amounts to over development is clear from the fact that the Council feels the need to attempt to put in place various 'mitigation measures' in relation to some of the

above problems, notably relating to transport and traffic management via the County Council.

The RDS proposal also conflicts with the environmental principles of the Council's Local Plan Strategy (RDS Appendix 1, para.3.5) relating to key elements of Sustainable Development:

- *'Distributing development across the District.*
- *Avoiding coalescence.*
- *Ensuring new development is based on the principles of Sustainable Garden Towns, Suburbs and Villages.*
- *Protecting biodiversity, high quality landscapes, heritage assets and other areas of significance.'*

Thus it can be seen to be internally inconsistent in policy terms.

Finally, as it is also clear that many District residents have strong objections to the RDS proposals; the RDS can also be seen to fail to comply with the NPPF:

'A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.' (para. 155).

In summary then I object to the RDS proposed broad locations of growth on the following grounds:

- The justification, based largely on protecting the Green Belt, for the significant changes from the 2012 Preferred Options, is inadequate. The Council itself made a good case for rejecting this strategy in making its case for the Preferred Options!
- They would result in an unbalanced and unsustainable pattern of development between the north and south of the District, and a net reduction in planning and environmental benefits compared to the 2012 Preferred Options.
- They would result in overdevelopment of urban fringe areas around the south west of Leamington, with consequential major adverse environmental and transportation impacts for both Leamington and Warwick that cannot be adequately mitigated.
- The proposals are clearly contrary to some of the Council's own key planning and environmental policies and principles, and also to para. 155 of the NPPF.

In conclusion, the Council should to take note of the objections from myself and others to this defective RDS and amend it accordingly – the Preferred Options 2012 being the benchmark.. This should then avoid the Council being obliged to do so by the Inspector at the EIP, with all the reputational; damage that would ensue.



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20 July 2013

cc Chris White MP
Les Caborn, Warwick District Council