

Cllr Philip Morris MRICS ACI Arb



29 July 2013

**Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH**



Dear Sir/Madam,

RE: WARWICK DISTRICT COUNCIL NEW LOCAL PLAN CONSULTATION RESPONSE

I am a (co-opted) member of Barford Sherbourne and Wasperton Joint Parish Council. I wish to provide my response to the proposals being put forward in the new local plan for Warwick DC. These are my personal opinions but also largely reflect those of the residents of Barford as I'm sure you will find from other responses to the new local plan consultation.

The plan is currently very ill thought out and not capable of standing up to scrutiny.

The number of new homes proposed to be built between 2011 and 2029 has been greatly over-estimated at 12,300. These numbers place an unreasonable burden on Warwick District and assume only a significant net immigration from surrounding cities such as Coventry and Birmingham. They are not designed to accommodate core growth of Warwick District itself. As such the development is unsustainable and contrary to good development as required by the NPPF.

Too little attention has been paid to expanding the Green Belt to the south of the District. According to NPPF, the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The NPPF directs that Green Belt serves five purposes:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The proposals in the draft new local plan would be contrary to 1, 3, 4 and 5 of the above purposes. The Green Belt should be extended to include large areas in the south of the district and not zoned for residential development.

Too much priority has been on providing new homes on greenfield sites, simply because they are preferred "easy to build" options by the major house builders. Not enough has been focused on developing genuine brownfield sites. There is too much building outwards proposed and insufficient building upwards, not making use of potential mixed use urban design schemes which would generate sustainable economic growth to the urban centres of Warwick and Leamington.

NPPF places significant emphasis on good design and sustainable development. The draft new local plan places no importance on good design and only cursory weight on sustainable development.

Insufficient numbers of windfall development sites are allowed for in the new local plan. Taking past trends in to account (which is one of the key indicators when predicting windfall sites), an average of 377 new homes per year came forward on windfall sites from 2001 to 2011. The new local plan only allows for 142 per year for the 18 years from 2011 to 2029.

Infrastructure development has been under allowed. The number of new homes proposed will place huge pressure on existing and proposed infrastructure. The infrastructure improvements required will be unaffordable and make the proposed developments unsustainable. The WDC Draft Infrastructure Plan published in May 2012 allows for only 8250 new homes over the 18 years to 2029. The new local plan proposes another 50% on top of this. Where are the infrastructure improvements which are required to make the development sustainable going to come from?

The proposed gypsy and traveller sites are unnecessary and a terrific waste of public money, heavily and undemocratically skewed in favour of a tiny minority. The study behind the need for the sites claims to have interviewed 85% of travellers and gypsies in Warwick district, yet this figure cannot be accurate. Travellers are by their very nature transient and don't stay in one place for long, so how can a definitive fixed figure be arrived at? This shows the survey and the study emanating from that is flawed at its core.

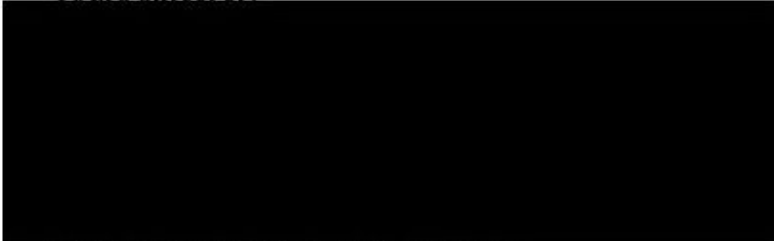
The proposed traveller sites have overwhelming public opposition. To force any of the sites on the district's electorate and population will be undemocratic and contrary to the very European laws that putting the sites forward in the first place are being seen to address. The study also concludes that many gypsy and traveller households now live in conventional housing and between just 23 and 43 households have a need for accommodation in the District. If this is correct (and there is little weight to be placed on the accuracy of the figures) the sites should be located close to existing or proposed major developments of conventional housing i.e. within the major residential development sites which the new local plan should be bringing forward in a sustainable manner.

There has been a lack of consultation with rural communities, which are quite separate from the main urban areas. A three size fits all rule was initially applied to outlying villages in the district such as Barford, Sherbourne & Wasperton. This resulted in Barford being considered as having the same characteristics as all the other category 1 villages. This sweeping generalisation was brought about from a lack of resources and familiarity of the villages.

The NPPF places significant importance on localism and development meeting local need. Barford Sherbourne and Wasperton have carried out several housing needs surveys in recent years, none of which gets genuine need to anywhere near the levels proposed in the initial consultation and the latest new local plan draft.

The new local plan should be heavily revised to reflect more conservative development proposals which can be sustainably met. To do otherwise will risk the plan being challenged at a number of levels. It should also balance national needs for development and economic growth with reflect local need and desire to embrace that. What is currently proposed is simply being thrust on the district at the whim of the District Council's executive committee. It is doomed to fail without improved levels of involvement of the local community and reductions in and changes to the levels, types and locations of proposed developments.

Yours sincerely



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