

Development Policy Manager,
Development Services,
Warwick District Council,
Riverside House,
Milverton Hill,
Leamington Spa,
CV32 5HQ

24th July 2013

Dear Sir

Response to Warwick District Revised Development Strategy

Oxalis Planning represent Roxhill Developments Ltd. Having read the Revised Development Strategy, we wish to raise a number of fundamental issues which sit at the heart of whether the emerging Warwick Local Plan meets the requirements of the NPPF, and whether it represents a sound approach.

We note that an adopted housing requirement of 12,300 homes between 2011 and 2029 is presented as an interim policy position in the consultation document. We welcome the recognition (at **para 4.1.1** and elsewhere) that the Revised Strategy may change following the ongoing evidence gathering, and cooperation with neighbouring authorities. However we would also support the retention of the current methodology applied by Warwick District to informing and establishing housing requirements. As described in the Revised Development Strategy (Section 4.1, pages 10 – 13) it appears the approach has been based around a desire to directly translate local economic aspirations and ambitions into a housing and development strategy. This includes explicit recognition of the economic and job creation opportunities presented by the 'Coventry Gateway' employment development, including a technology park, recently positively considered by both Warwick District and Coventry City Councils. Similarly, the employment land policy approach proposed with regard to this sub-regionally significant employment site is also supported (**Policy RDS8**). We note that the text in **para 5.5.5** which refers to the planning application for the site not having been formally determined can now be updated to reflect the positive resolution by Warwick District in June 2013 to approve the application.

Warwick District clearly forms part of a wider housing market with neighbouring authorities, reflected in the fact that various shared evidence and technical work has historically been undertaken jointly between Warwick District, Coventry City, and Nuneaton & Bedworth Councils. Roxhill Developments Ltd supports such an approach which helps ensure that plans:

[are] "based on joint working and co-operation to address larger than local issues"

and

"identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth".

(National Planning Policy Framework, para 17).

The Warwick District Strategic Housing Market Assessment (SHMA) of March 2012 appears to have been undertaken in isolation of any consideration of the wider housing market. It was also published in advance of the publication of the final National Planning Policy Framework (NPPF). We therefore welcome the references to a joint SHMA now being undertaken by Coventry City, Warwick District, Rugby Borough, and Nuneaton & Bedworth Borough Councils which we understand will report later this summer. That work was specifically required by the Inspector during the examination of Coventry City's Core Strategy as a response to the significant deficiencies and weaknesses identified in the approach taken by Coventry City. In the absence of the joint approach now being taken to understanding the housing market, it seems likely that Warwick District's Local Plan would too have faced similar criticisms and questions by an Inspector at examination. Being seen to plan coherently and positively across local authority boundaries is vital in the context of the NPPF, and in terms of delivering sustainable development. It will also be essential if the Council is to demonstrate that it has met the requirements of the Duty to Cooperate. We therefore welcome and support in principle the apparent desire to ensure cross-boundary issues are addressed properly, and a shared evidence base exists to inform aligned policies and strategic choices made by Warwick District with its neighbouring authorities. As referred above, we also welcome the explicit recognition and understanding that the Revised Development Strategy may change once the up to date shared evidence base is in place.

The emerging shared SHMA evidence base is likely to have direct implications not only for the quantum of development required to meet housing needs across the housing market, but also the distribution of development within the component local authority areas. The Warwick District Revised Strategy as presented seeks to focus development in and around the largest urban areas (Leamington and Warwick), with less but still significant development elsewhere, including Kenilworth, as well as some development in the smaller urban areas and villages. In the context of a shared understanding of housing needs, particularly in light of the strong likelihood that Coventry City will increase its housing requirement from the very low levels proposed in its submitted plan, we would anticipate this having implications for the development strategy in Warwick.

In particular, building on the earlier shared evidence base such as the Joint Green Belt Review, there is likely to be a need for strategic residential development within Warwick District to help meet shared needs generated by virtue of the strong functional relationships with Coventry City. The Joint Green Belt Review of 2009 undertaken by Coventry City, Warwick District, and Nuneaton & Bedworth, identified a number of parcels of Green Belt land which scored poorly against an assessment of their contribution to the purposes of the Green Belt, and scored highly in terms of their relative lack of environmental and other constraints to development. We note no explicit reference to that work in the Revised Strategy document, and would welcome confirmation from Warwick District Council that this existing element of the evidence base remains a key shared resource to inform strategic policy choices.

However, we note the reference in **policy RDS3** to “*protect the Green Belt from development where alternative non-Green Belt sites are suitable and available*” (our emphasis), and read this as a positive sign that the Council will consider Green Belt locations where no other suitable options exist to ensure housing needs in the housing market area are fully met. In the context of the NPPF’s requirement to plan positively to deliver sustainable development, this policy should be amended to explicitly refer to ‘...*alternative sustainable non-Green Belt sites are suitable and available*’. Such a change would recognise, as reflected in earlier Preferred Options and other work published by Warwick District – see below – that Green Belt locations are often more sustainable and suitable development locations than non-Green Belt locations.

Having been involved in earlier stages of the Warwick District (and Coventry City) Core Strategy preparation process, we are aware that the introduction of changes to accommodate growth to meet development needs in sustainable locations close to the urban area of Coventry would be very well aligned with the clear local preferences expressed during the Council’s ‘Options’ consultation exercise¹. Similarly, we are aware of the subsequent ‘Core Strategy Preferred Options’ of June 2009 which also reflected the need to identify sites and locations close to the urban area to accommodate the development needs of Coventry. While we understand further work has subsequently been undertaken on the capacity of non-Green Belt locations south of Leamington and Warwick, we believe that the imperative to produce ‘joined-up’ and coherent plans which meet wider needs across boundaries will require such previously preferred options to be revisited.

In conclusion, it’s clear that there have been efforts made earlier in the plan-making process to ensure cross-boundary issues and opportunities are positively and coherently reflected in the emerging Warwick local plan. An evidence base already exists to help inform decisions about the suitability of strategic development locations south of Coventry. It is vital, particularly in the context of the recent approach taken by the Inspector at Coventry City’s examination, that Warwick District Council is proactive in considering the needs arising in the wider housing market area, and is able to demonstrate effective cooperation and joint working to meet development needs across the local authority boundary.



John Holmes

¹ Consultation results as presented in the ‘Warwick Core Strategy Options Paper Report of Public Consultation’, January 2009.