



09 July 2014

Development Services  
Warwick District Council

Dear Sirs

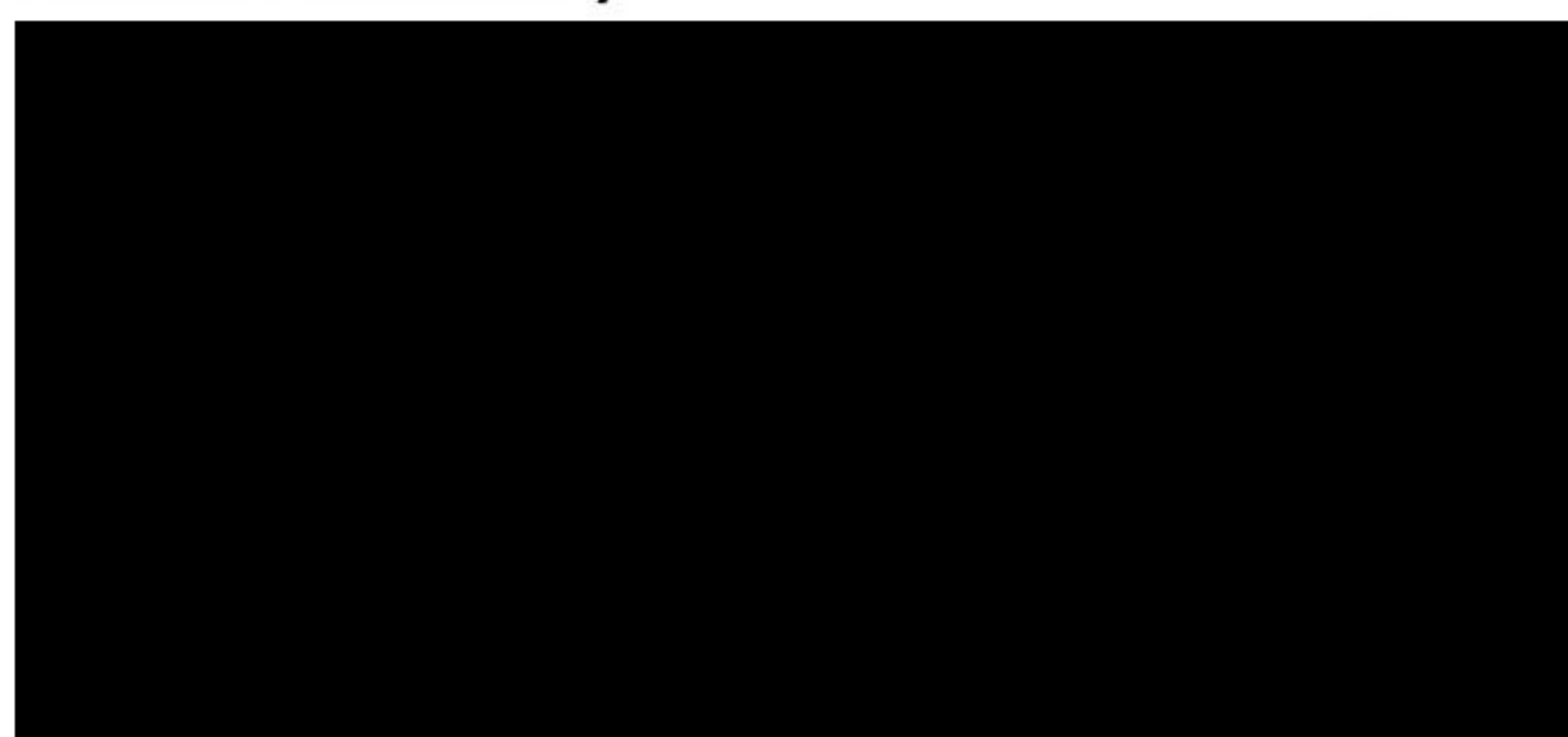
**Warwick District Local Plan 2011 – 2029**

I have seen the proposed Local Plan, and have a number of concerns about the soundness of the assumptions on which it is based. These are:

- The very definite numbers of houses required over a period of 18 years. Calling something an Objectively Assessed Need does not make it any more firm a prediction than an informed guess – and experience elsewhere shows that such estimates can be inaccurate by considerable margins in either direction. Over a period of 18 years the potential changes in demography, ways of working through increased use of telecommunications and policy changes by three Governments make the prediction to the nearest ten houses either cynical or an indicator of naivety.
- The Plan has a number of internal inconsistencies, the most glaring of which is the proposed provision of new retail facilities while expressing the need to retain and develop the retail elements of the town centres, and the express mention of limiting development in *existing* retail parks for this purpose.
- The Plan makes assumptions about the provision of services which are not within the power of either the Council or the Developers to ensure. Will shops in the new areas be profitable enough to attract retailers? Will any necessary increase in public transport be financially viable? In the light of recent reports from the BMA will there be sufficient doctors to staff a medical centre – and will it too be financially sustainable?
- There appears to be an implication – again an indication of naivety – that housing south of the river will be occupied by people working in the same area, and that the new industrial estates will largely employ only people from those areas. Human nature suggests otherwise. Yet despite the brave words in TR2 about not generating further congestion it seems unlikely that the congestion on the Myton and Banbury Roads, funnelling as they do into a single-lane river crossing, can be anything but worsened.

For these reasons, I believe that the Plan as it stands is intrinsically unsound, and is in need of substantial and realistic revision before it submitted to the Secretary of State.

Yours faithfully



(Dr) Ian Lovecy  
(Former Planning Officer, Bangor University)