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WDC PLANNING
Ref
Officer
27 JUL 2012
SCANNED
CC CR PD MA
PRE GEN DIS

26/7/2012

Dear Sir,

Draft Local Plan

The draft Local Plan published by Warwick District Council is a curious document. It is difficult to know whether the inconsistencies are due to bad editing, a lack of serious thought or the results of a political car crash or indeed perhaps all three.

I shall start with the house building target. The consultant with the crystal ball decided to use the last five years of construction and assume that this level of "demand" would continue. The Local Plan is supposed to be a 20-25 year document so why not look back over the last 20-25 years for the comparison? No justification for selecting the last 5 years has ever been offered, even though it was clearly the hot end of a major credit boom: which has now ended.

The council then "consulted" with three suggested levels of construction and the public overwhelming voted for the smallest figure. In the spirit of EU referendums, this was clearly the wrong answer and the council opted for a higher figure.

The use of the term "evidence" is also interesting. Among the documentation there are historical figures on the rate of building and assuming, as I do, that the numbers are right then this is clearly evidence. The rest of the papers are estimates of future demand. That is all they are: estimates. None of the estimates is qualified with any statement about how accurate the authors think they are. Surely

this is standard practice with any serious kind of statistical projection?

The Local Plan itself states that the council is protecting the Green Belt. Later on, we learn that at least half of the proposed development will be on green belt land. If this is protection then goodness knows what will happen if the council ever decided to attack green belt.

The Local Plan states a policy objective that the existing settlements must remain as discrete entities. The maps showing the location of the developments to the south of Warwick actually show a new suburb swinging round to south Leamington and Whitnash: joining everything up.

The draft infrastructure plan is clearly an unfinished draft and an embarrassment if meant to be taken seriously. The roads section indicates that the Highway Authority is using a different set of growth estimates to the Local Plan, includes a large number of road projects (some quite vague) but there is a budget estimate of £50 million for the lot.

The education section is a bit better in that the extra demand for school places has been determined based on a detailed population profile. However, none of the extra Primary Schools are then costed and no building today comes cheap. So let's assume that these cost us another £20-£25 million?

The rest of the services in the infrastructure plan are just glossed over, with the exception of some (uncosted) statements about the need for extra police and some bases for them.

If all the infrastructure costs are going to be met from a development levy, which is the way that central government seem to be going, each new dwelling is going to have a fairly high premium imposed on

it. Add this to very high land values, high construction costs due to the lack of innovation in the building industry, plus stagnant house prices and I really do wonder if a commercial case for development will actually exist.

The Local Plan, we are told, is all about the future. Unfortunately the people writing and promoting it do not seem to understand what is already happening. The council's support of the Clarendon mall in Leamington ignores completely the impact of internet shopping and the Local Plan fails to consider the impact of mobile working, home working and hot desking. Quaintly, the Plan assumes that work is still somewhere we all go and therefore x hectares of employment land must still be found. Clearly, shops and factories will still be needed: but not so many as we had in the past!

The Local Plan makes some mention of green issues with a vague statement that the council will insist on higher environmental standards for house design. However, this misses the point that even if you make the new stuff less polluting than the old, if you build enough of it then you are still going to be worse off. And we will be.

The guidance from central government says you must look at the demand for development and look at the land available. My conclusion is that the demand has not been properly assessed and the land available clearly does not include the green belt. Which could be why we voted for a much smaller development figure in the first consultation. It will be very interesting to see if the public's views are ignored this time as well. If so, then goodbye localism.

Yours sincerely,

A solid black rectangular box redacting the signature of David M. Adcock.

David M. Adcock