

To: Programme Officer, Warwick District Local Plan Examination
newlocalplan@warwickdc.gov.uk

WARWICK DISTRICT LOCAL PLAN EXAMINATION MAIN MODIFICATIONS

RESPONSE BY C P R E WARWICKSHIRE

CPRE Warwickshire has already written to the Chief Executive of the Planning Inspectorate to draw attention to the extreme difficulty we and other participants have in responding to these so-called main modifications. No justification for any of the main modifications has been provided, either by the Inspector or by the Council. There is no indication of the Inspector's overall conclusions on the plan, or why he has reached them.

Notwithstanding these very severe general problems, which mean that we are being asked to respond in a vacuum, we have the following objections and comments. Because of the lack of information and justification, it is inevitable that some of them go over similar ground to the evidence we put before the Examination. It is not clear whether the inspector has rejected our evidence (and if so why), or simply ignored it.

The following responses are submitted because the Modifications would not make the Local Plan sound. The major proposals of the Plan are for a large amount of new housing, and this is increased in the Proposed Modifications. The justification for this scale of new housing is very badly flawed and based on incorrect projections of population and household numbers. The evidence submitted with this response and by other parties shows that a Plan adopted on the basis of Warwick District Council's figures would be unsound.

CPRE asks for further sessions of the Examination to be held to examine the up to date information on the projections of population and households that should be being used to produce the housing requirements for the Warwick District Local Plan.

CPRE would ask that consideration now be given to a joint session conducted by the Inspectors examining the Warwick District Local Plan and the Coventry Local Plan Inspector. At such a session the complete picture for the HMA and the Housing and Employment Land Memorandums of Understanding (MOUs) can be scrutinised and representations on these heard and tested. If this is not done there will be no overall scrutiny of the population and household projections which form the basis of the housing and employment policies and allocations in both Local Plans.

Response to the revised Sustainability Appraisal

The SA concludes that increases and decreases in housing provision are not significant. We question this conclusion. While there appears to be no change in overall provision, the effect on a number of individual sites is significant and needs to be reappraised. In particular we draw attention to the increase of 500 homes in overall provision south of Coventry. The SA's dismissal of this as 'not significant with regard to strategic allocations' is complacent in the extreme.

As with previous Sustainability Appraisals, this one merely takes the local authority Memorandum of Understanding on housing as a given, not subjecting it to any critical appraisal. This is nowhere near good enough because it allows a crucial element of policy to escape sustainability appraisal altogether. The MOU has massive implications for sustainability and cannot escape unscathed.

Responses to the Main Modifications

MM1 – We object to the phrase 'where this has been agreed'. The agreement referred to was between the Coventry and Warwickshire local authorities behind closed doors. The agreement (the 'Memorandum of Understanding') is not accompanied by any explanation or reasoned justification. It has never been subject to consultation, scrutiny or sustainability appraisal. By basing itself on this agreement, the plan is by definition unsound. It does not appear that as yet the Inspector has failed to consider whether the share of Coventry's alleged unmet housing need to be met in Warwick District is either reasonable, justified or in accordance with the principles of sustainable development.

MM2 – We object to item (g) because this element of policy has not been followed in arriving at the plan's housing proposals. Over 50% of the housing on named sites is in the Green Belt. This cannot by definition meet the exceptional circumstances test and the Government has said that housing need alone is not sufficient to constitute exceptional circumstances. The four specific tests listed in (g) have not been properly applied and are potentially inconsistent with government policy.

MM3 – We object to the figure of 16,776 new homes. This is not only far too high (see comments elsewhere) but is also unconvincingly precise. No evidence has been provided that the annual average housing requirement can be raised by 83% between the first and second part of the plan period, or by 62% between 2016/18 and 2020/22. CPRE offered evidence on constraints to house-building but there this has been taken into account. Similarly we object to the Housing Trajectory and the table giving housing figures for each year of the plan period. During the Examination, house builders themselves cast severe doubt on the feasibility of the huge increase in house building suggested for the early years of the plan. Although the Council have offered further evidence on 2016/17, this does not address the big increases suggested for subsequent years.

We object to the phrase 'objectively assessed future housing needs' in the explanatory text. CPRE's evidence, supported by a consultancy study, showed that the Strategic Housing Market Assessment on which the Memorandum of Understanding is based was neither objective nor independent. We also object to the phrase 'Coventry City Council is unable to accommodate its housing needs in full'. This is an assertion, not a fact supported by evidence, and it has not been subjected to adequate scrutiny. Neither has the figure of 332 dwellings per annum towards meeting Coventry's housing needs been justified or adequately tested. Simply quoting the MOU is nowhere near good enough.

Mr Merle Gering of Coventry has submitted detailed evidential material as a representation on these Modifications. CPRE Warwickshire has assisted Mr Gering with some of his work and fully

supports both the evidence he has present and his conclusions. The main material submitted by Mr Gering is attached to our response as well.

MM4 – Delete '16,766 new houses'. Delete or modify line in table 'Sites allocated in this Plan,,,,,6454'. The inclusion of these numbers is wholly unjustified on the basis of the new evidence now submitted about the population and household projections for Coventry.

MM7 – We object to the increased provision on greenfield sites on the edge of Kenilworth, Warwick, Leamington Spa and Whitnash and sites within the growth villages and the rural area. No justification has been provided for these major increases other than the general explanatory text in 2.37ff which is little changed from the plan.

Paragraph 2.52b – This skates over the increases in the number of dwellings and land area at Kings Hill. No justification is given for these. As a matter of principle, we object to 'provision beyond the plan period' and we object to a similar reference in **MM12**. Future reviews of the plan should be able to take decisions on this unfettered by the present plan.

MM8 – CPRE supports the proposed deletion of the housing proposals in what is now Green Belt at Red House Farm, Leamington Spa and North of Milverton (Location H44). (The location of the MM that proposes deletion of H44 and the proposal to remove Green Belt status from land between Old Milverton and Leamington Spa for long-term housing needs cannot be located in the long list of Modifications, but it is known from the Warwick District Council public statement that H44 and the associated proposed removal of land from the Green Belt is proposed to be withdrawn from the Plan.)

CPRE opposes as not sound the continued inclusion in the Plan as Modifications of the housing proposals H40, H41, Greenfield site south of Coventry, H42, H43 and H48.

MM13 – Our evidence showed that

- no exceptional circumstances had been demonstrated for the development of the sub-regional employment site in the Green Belt
- the proposal was contrary to evidence from the Green Belt Study
- there was no evidence that other potential locations in the sub-region had been considered
- there was little convincing evidence of need or demand
- the development would set a precedent for further erosion of Green Belt in this area.

We are therefore extremely surprised to find that this proposal remains in the plan. This proposal should be deleted from the Plan.

MM16 and 17 – We object to policies DS20(d) and DS NEW 1. There is no reason to treat the area south of Coventry in this special way. We also object to large parts of the so-called Vision for Land South of Coventry in Appendix B. Much of this is manifest nonsense. In particular it is not credible to suggest that the HS2 high speed rail line, which will pass through, but have no station in, the area will stimulate economic opportunities and open up markets. It is also wholly unconvincing to assert that the landscape and biodiversity value of this area will be enhanced by massive housing development.

References to infrastructure in DS NEW 1 are far too vague and open-ended – little more than thinking aloud. Any such schemes should be brought forward as proposals of the local plan, either now or later, not 'by the back door'.

MM18 – we object to the whole policy DS NEW2. It is not clear that this land will be required

for development – much depends on the rate of take-up within the plan period. Whether exceptional circumstances will exist for its removal from the Green Belt cannot be assessed at this stage.

MM19 – CPRE does not believe that there should be housing development at the location of the former Warwickshire Constabulary headquarters at Leek Wootton. Green Belt policy should continue to apply, with conversion of existing buildings to residential permitted within the existing building footprint. No new-build on what is now greenfield land around the former Police buildings should be permitted. MM19 should state that.

MM22 – We object to the wording of 3.43a. There is no ‘compelling and clear evidence of an employment land need’. Even if there was, no evidence has been provided that alternative locations in the sub-region have been adequately considered.

MM31 – Policy MS1 for University of Warwick should make clear that any further development should be in accordance with other policies of the plan. The University should not be given an open-ended right to build on what is now Green Belt. We strongly object to the reference in para 3.146 to ‘a recognition that development in the Green Belt will be necessary to allow the university to expand’. This appears to be contrary to Government policy. We object to the statement in heavy type in this paragraph.

MM32 – We strongly object to new policy MS2. Any future development proposals should be judged on their merits against Government Green Belt policy, which has recently been reaffirmed in the Housing White Paper. Meeting the objectives of the LEP and proposals in City Deal are material considerations but cannot in their own right constitute ‘very special circumstances’. This is the tail wagging the dog.

MM33 – We object to overarching policy H0. This is unnecessary and begs too many questions. There should be no implication that need for housing will override other planning policies and considerations.

MM34 – We object to policy H1 which is far too open-ended, particularly with respect to development in open countryside. It is also not clear why Kings Hill and Westwood Heath have been singled out for special mention.

We object to **paragraph 4.6**. It is factually incorrect to say that the development strategy directs most new housing development towards built-up areas. In particular it is wholly invalid to define South of Coventry as ‘built up’.

MM42 – We object to policy H11 on Limited Village Infill.Housing. It is much too open-ended as regards development in the Green Belt and is potentially at odds with national policy.

MM44 – The phrase ‘materially larger’ in policy H13 is vague and requires proper definition.

MM51 – The phrases ‘large scale development’ and ‘significant traffic movements’ in policy TR2 are vague and require proper definition.

CPRE Warwickshire
41A Smith St, Warwick CV34 4JA
mark@cprewarwickshire.org.uk

