

Campaign to Protest Rural England, Warwickshire Branch

SOUTH WARWICKSHIRE LOCAL PLAN

CPRE believes that the South Warwickshire Local Plan proposal for 35,000 additional homes in our area, and the land required to meet these numbers, have not been accurately judged. In February, therefore, we commissioned an independent Report from planning expert Gerald Kells. These are his key points:

1. WINDFALLS

- The South Warwickshire Local Plan assumes that ‘Windfall’ sites (ie unforeseen ones) will provide land for **220** dwellings per annum (DPA) between now and 2050.
- **Actual** average yearly windfall numbers since 2011 have been **901**.
- 69% of Stratford’s housing needs since 2011 have been met from Windfall sites; 44% of Warwick’s.
- If the **actual** yearly average of space for 901 homes since 2011 is used in future, **the plan is in surplus: we do not need to take any more land**. There will be 5,255 excess windfall spaces by 2040; 1965 by 2050.
- Even if only **half** the average number of windfall sites are assumed for planning purposes, we would only need extra space for 1510 homes by 2040. The Plan target by 2040 is 23,000!
- CPRE believes that Plan assumptions seriously distort the need for land. This will mean that local countryside, Green Belt, and farmland are needlessly destroyed.

2. AFFORDABILITY UPLIFTS

- Under the ‘affordability uplift’ formula devised in 2004, housing numbers are automatically increased in more expensive areas, in the belief that building more houses brings down prices.
- **This has nothing whatsoever to do with actual local housing need**.
- The Office for National Statistics assesses the SWLP area **need** as **874** homes each year. The Affordability formula increases this to **1,239** new houses each year.
- This is **42%** more than local **need**. These higher figures are used in the SWLP.

3. INWARD MIGRATION

- Coventry claimed recently that its population would grow by 32%. This encouraged housebuilding locally in South Warwickshire for a need that didn’t exist, which has led to people moving in from elsewhere. The homes built are not a response to local needs or population growth.
- **76%** of Warwick’s estimated population growth for 2018-2028 comes from net inward migration.
- **118%** of Stratford’s is from the same source. (ie. Just on birth rate, without inward migration, the population would decline).
- **This therefore risks becoming a self-replicating cycle. (“We’ve filled more homes, therefore we need more homes, therefore...”)** So, we lose local countryside.

4. DUTY TO CO-OPERATE

- The housing already built in the SWLP area as a response to Coventry's overestimate of 32% population growth, destroyed swathes of countryside and prime farmland.
- This building work is part of the 'Duty to Cooperate' imposed on nearby areas, when the 'growing' area does not have the space it needs for the homes it wants.
- The government has added 35% to assessed need in 20 key cities. (In theory this should mean that more urban brownfield sites are used for housebuilding.)
- Applying this to **Birmingham** gives them **three times their demographic need**.
- Birmingham (for whom CPRE also commissioned an excellent report by Gerald Kells) does not have space for these numbers.
- So this potentially means that over the plan period, under the Duty to Cooperate, South Warwickshire will have to build houses they don't want, for a Birmingham need that doesn't exist.

5. EMPLOYMENT LAND NEEDS

- We are also asking those responsible for the SWLP to reconsider Employment land needs.
- The numbers don't reflect the estimated **30%** reduction in office space post-Covid.
- Or the visible increase in vacant Town Centre retail sites across the region.
- Stratford in particular is estimated to need **132.8Ha** (333 acres) of **Industrial Land**.
- CPRE has questioned the justification for such a high figure.

6. TIMEFRAME

- The SWLP framework extends from **2025 to 2050**, to allow for long-term infrastructure planning.
- This is considerably longer than most planning frameworks.
- Extending the plan by an extra five years from the more usual 15 years, **increases SWLP housing numbers by 50%**. (And therefore countryside blight).
- Retaining a 15-year time horizon, would mean 23,370 houses by 2040. Not **35,000 houses by 2050**.

For the above six reasons, and so that more of our diminishing agricultural and Green Belt land is not needlessly taken out of sustainable use, we are asking that those responsible reconsider the base assumptions underpinning the South Warwickshire Local Plan.

April 2023

Gerald Kells' full report has been submitted to Warwick and Stratford District Councils as part of CPRE Warwickshire's response to the South Warwickshire Local Plan consultation exercise earlier this year. The full report is available from CPRE Warwickshire, 41a, Smith St, Warwick CV34 4JA. Telephone 01926 494597. Email: office@cprewarwickshire.org.uk