

BISHOP'S TACHBROOK PARISH COUNCIL'S RESPONSE

Section 1

The Proposed Housing Numbers and the Assessment of the Availability of Housing Land.

1. Assessing the housing number to be included in the plan.

1.1 Bishops Tachbrook Parish Council, having studied this issue in great detail, is of the opinion that the 12,300 new homes proposed in the RDS, 1500 more than the number proposed in the May 2012 Preferred Options consultation, is **not an objective assessment** based on the latest projections for the population expected by 2021 and 2029. It is noted that it is more than the number that Coventry thinks it needs (11,373) and this is a city currently with population of over 316,000.

Although the high number might be aspirational it is not realistic, as it is beyond the physical capacity of the usable part of the district to provide it, the infrastructure to support it and the local economy to provide related employment. Because of the large amount of Green Belt in the district (80%) and the limited capability of the urban area to take very much more development, such a large amount of new housing is being allocated to the rural part of the district using greenfield land of equal or better value than the Green Belt. To compare with Coventry again, its area is 9,864 ha and has 132,700 dwellings giving an average of 13.47 dwellings per ha. Warwick has 28,288 ha but 80% is in Green Belt and 9% is part of rural Warwickshire. The remaining 11% or 3,111 ha has 60,427 dwellings, giving an average of 19.42 dwellings per ha. The Warwick figure needs detail adjustment to take out dwellings in the green belt but it shows that the Warwick urban area density is at least equal to or more than a densely populated city.

The district wide community cannot see this is going to achieve the Strategic Vision of the Authority "to make Warwick District a great Place to Live, Work and Visit," but can only conclude that it will be much worse at a range of levels.

The consensus not only within the Parish, but across the district is that this level of population growth, put simply, does not feel right. With census data showing that there has been an 18% population increase over the last 20 years (1991-2011), can a further 20% over the next 15 years really be required? Is a population growth increase from 0.9% p.a. to 1.33% really

likely, particularly with the economy where it is at the moment and a long slow recovery ahead? How has the district arrived at this unrealistically high growth estimate?

- 1.2 We know that NPPF47 requires the number of homes to be provided to be objectively assessed using a proper evidence base. It is therefore important to make sure that the evidence base is up to date. The NPPF6 states that *“The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.”* Therefore, NPPF 54 and 55 regarding housing in rural areas should be part of that objective assessment as well as NPPF 109 regarding the protection and enhancement of valued landscapes.

The Local Plan will have to be sustainable in these terms otherwise it will not be accepted by the Inspector. In our view the current consultation plan is not sustainable as so defined.

The proposed aggressive levels of housing growth proposed will require the loss of large areas of outstanding Warwickshire landscape. The unique value placed upon of this natural environment by previous planning inspectors and the District’s landscape consultants as well as the inhabitants that live in and pass through it, is high and is discussed in Section 3.

- 1.3 It is also a question of the level of housing and population growth that the district can reasonably absorb, without undermining the quality of life for those that live here and irreparably damaging the historic context of Warwick district. In this regard, NPPF 10 requires *“Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”*
- 1.4 Estimates of housing numbers for the future must be based on ONS statistical projections. These are based on historical data, medical records and estimates for migration.

The May 2012 consultation was based on the SHMA dated March 2012. In fact it was finalised in November 2011 and was based on 2001 census and ONS actuals and migration estimates up to mid-2010. The SHMA gave a range of example projections. They were all based on the trend based projection anticipating an average annual increase of 914 in the population over the 20 year period with 2031 population estimate being 156,959. The report showed the ONS 2008 based projection for 2031 as 165,852, a 19.6% increase, (2021 estimate being 152,742), based on the period 2003 – 2008 migration estimates.

- 1.5 The BTPC study took place during July 2012 (see Paper A, appended to this response). It resulted in an average annual increase of 590 estimating the

census result as 136,093, with a 2021 projection of 141,904. When the 2011 census 1st release was available it became evident that ONS projections were high, as they predicted the 2011 census as 138,680, whereas it was 136,000. The statistical data needed review and this was done by ONS in September 2012, reducing the ONS projections to some degree. ONS Sub-regional population estimates and projections only go as far as 2021 and the 2021 projection is now 148,414.

- 1.6 In December 2012, G L Hearn produced an Economic & Demographic Study. This was able to use the mid 2011 data and now the trend based projection was an average of 473 rather than 914 (as para 1.4). The 2021 projection is now 143,270. This study included Coventry but was not the joint study thought necessary by the Inspector of Coventry's proposed local plan, who considered that there was a duty to cooperate over a wider area.
- 1.7 BTPC are monitoring their study in the light of later data as it becomes available. The original study included for a 20 year plan to 2031 with a full 5% contingency, (not a buffer brought forward from later years) rounded up to give 5,400 homes. If the 5,400 homes is kept as a target, spread over 18 years this gives 300 homes a year or a population growth of 695 and a 2021 potential population of 144,686. In the first monitoring year the actual growth was 451, assuming ONS estimates for migration are right. This is 244 less than predicted but is only a 1 year result.
- 1.8 The ONS projections will be updated in due course using the latest data, If Hearn's trend continues, a comparative fall is to be expected in the ONS projections. BTPC estimates that if the latest Hearn rate of change is applied to the last set of ONS figures, then the 2021 estimate will be 145,422.
- 1.9 The conclusion is that since 2011, the statistical data shows a reducing population projection which is hovering around the BTPC study result of 5,400 homes. Given the economic position, the increased control over migration by government, the levelling out of increased births due to mothers delaying families for career purposes and a similar slippage in deaths as people live longer, ONS projections for 2021 on which the District's plan must be based to satisfy the inspector, have come down from 152,742 in 2011, to 148,414 in 2012 and is estimated to fall further to 145,422 in 2013. For comparison, the ONS mid-2011 estimate was 137,736.

Taking the plan period of 2011 to 2029, for a trend based projection, Hearn's Dec 2012 estimate will require 3,708 extra homes for a 146,243 population, BTPC study providing 5,400 homes will give a potential population of 148,356 and the current ONS projection adjusted to Hearn's rate of change would need 5,970 homes for a total population of 151,431 all compared with the 2011 population of 137,648. In terms of housing numbers this reduces the ONS projection from the 2011 estimate of 12,150 homes, to the 2012

estimate of 6,500 homes, which is anticipated, if it falls in line with Hearn's estimate, to drop to about 5,970 homes.

- 1.10 ONS estimates for internal and international migration are based on the best statistical data available. Because there is no count at point of entry to the UK, inward and outward movements can only be estimated from very limited data. The major indicator is the doctors register as it covers both groups, but this tends to take time to catch up with changes and is not complete. It was reported on 28th July 2013 by The Public Administration Select Committee that it had found ONS migration figures are "not fit for purpose". So although it is necessary to work to it, caution must be exercised. The joint SHMA should come up with the most up to date guide.

2. How was the 12,300 target arrived at?

- 2.1 The 12,300 homes target is not adequately explained in the RDS. The conclusion in RDS1.10 suggests that it may be due to the 2011 ONS data (12,130) but it may also have other objectives.

But for very many people in the district it is not believable. They remember that the existing local plan was adopted in 2007 following a Public Inquiry during 2006 into objections to the proposed plan. The Inspector produced a 562 page report. Some of the issues are relevant to the new local plan proposals.

- 2.2 Some senior Planning Officers seem to be of the view that because the current local plan was adopted in 2007 under the 1990 Town & country Planning Act Part II, it is of less value than a plan adopted since 2004. It needs to be pointed out that the Planning & Compulsory Purchase Act 2004, which came into force on 13th May 2004, did, by virtue of Schedule 6 of that Act, amend the Town & Country Planning Act 1990 to take into account changes made by the 2004 Act. So, for the purposes of NPPF214, it was in accordance with the Planning & Compulsory Purchase Act 2004 when the current local plan was adopted in 2007. If it were not so the Inspector would have said so.
- 2.3 The local plan, which is still up to date except where the NPPF is not in agreement with any particular policy, was adopted only 6 years ago. It settled many questions of concern for the community, in effect setting a contract with the community, up on which many people made decisions about their lifestyle arrangements. The Revised Development Strategy, with its dramatic change to the size of the district and the concentration of very large amounts of new housing on land that is currently subject to Rural Area policies, is seen by many as a breach of that contract. As a result there is much concern and indeed, anger, at the proposals being consulted on and in the way that the door has been left open by the District Council for planning applications to be made that negate the purpose of any local plan and the consultation process to establish it.

2.4 Since the Inquiry was only 6 years ago, BTPC would like to draw your attention to certain key findings of the inspector, particularly where he talks about the plan after 2011.

In paragraph 11.3.8, in respect of the housing land supply position and of the need to allocate sites for housing, he finds *“This Local Plan only covers the period to 2011 in the absence of firm housing or employment figures for the period beyond. The housing figures derived from the RSS for 2011-2021 are indicative only. **Nevertheless, the District Council is able to show that there is no need to identify further housing sites.** The balance of 2,210 dwellings to be provided between 2005 and 2021 equates to 138 dwellings per year. The District Council’s estimates of windfall sites (based on past trends and emerging Local Plan policy) equate to an annual average of 282 dwellings in the urban area and 11 dwellings per year in the rural area. On the basis of these figures, I am satisfied that the District Council is justified in not identifying sites to meet the requirement to 2021. “*

In paragraph 11.3.10, in respect of whether the Plan should identify a 10 or 15 year supply of housing, he finds that *“New Table 5 of revised Appendix 2 shows how the residual housing requirement for the period 2005-2021 can be met. This particular objection is therefore satisfied. “*

Table 5 in appendix 2 of the 2007 local plan states the following

source	Dwellings
RSS housing requirement 2001 – 2021	8,091
Dwellings completed 2001 to 2005	3,324
Remaining dwellings to be provided	4,767

By the end of 2011/12 the dwellings completed had increased to 6,084. Deducted from the original requirements this leaves 2,007 remaining to be provided by 2021.

If 2,007 is the plan for 10 years, then for 18 years until 2029 it might be $200 \times 18 = 3,600$.

The December 2012, the Economic and Demographic Forecasts Study prepared by GL Hearn states that for the 18 year plan period a population increase of 8,500 persons is expected (see para 5.52 below) or 3,705 dwellings, so it looks as though we should be getting back the anticipated plan.

5.52 *The projection based on past population trends (PROJ 5) indicates modest population growth of 6.2% over the 18-year plan period – an increase in population of around 8,500 persons. Comparing the trend-based projection in this report with that contained in the SHMA we see that population growth would now be expected to be **lower**. This projection suggests an annual increase in the population of 473 people which compares with a previous estimate of 914.*

This ties in with the census findings

Census	House holds	% increase	Homes built	Running % increase	population	% increase	Running % increase
1991 (to 1995)	48,202		856		116,522		
('96 - '01)			3,537				
2001 ('01 – '05)	53,356	10.69%	3,324		125,931	8.07%	
2011 ('06 - '11)	58,679	9.98%	2,760	21.74%	137,648	9.34%	18.13%

The 21.74% increase in households compares with 15.32% over the whole of England for the same 20 year period. So The District has not been lagging behind but has done more than most.

- 2.5 So how did 2,007 become 12,300 when it may have been expected to be about 3,600? The 2012 Preferred Option document was based on a need for 10,800 homes. We understand that 87% of respondents considered this to be too high. The RDS 4.1.1 describes it as an interim level of growth dependent on the joint SHMA. This should also take into account employment need.

When plan-making, NPPF155 requires *“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”* A wide section of the community is engaged and would wish that it was proactively so. But this requires a listening district council.

- 2.6 NPPF156. *Local planning authorities should set out the **strategic priorities** for the area in the Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area.*

Homes and jobs go hand in hand.

In December 2012, the Economic and Demographic Forecasts Study prepared by GL Hearn updated the forecast for population growth.

4.5 *“The District has a jobs density of 0.95 – this means that for every person of working age (16-64) living in the District there are 0.95 jobs in the District. This is significantly above average for the West Midlands or England (0.75 and 0.78 respectively). Overall there is a relatively good jobs-homes balance currently.”*

The conclusion drawn is that until the joint SHMA is received, the 12,300 household cannot be considered as a valid consultation. Across the neighbouring authorities, jobs ought to follow unemployment so far as it is sensible to do. Since our unemployment count is very low, and job availability is still very fragile, then building a larger volume of homes than we have ever done does not seem to be a good strategy. It could give us a dramatic employment problem.

- 2.7.1 Why are significant new jobs required? The June 2013 figures for Warwick District indicate that there is only 1.6% (or 1,472 persons) of the working population claiming Job Seekers Allowance which is a very low figure. It should be recognised that there will always be a small number of people who are between jobs, or who are long term unemployed.

In other parts of Warwickshire there are significantly higher levels of unemployment. In June 2013, Coventry had 4.42%; Rugby at 2.27% and Nuneaton and Bedworth at 3.53% & North Warwickshire at 2.04%, totalling some 14,345 people, some being due to the closure of the Daw Mill Colliery after a disastrous fire and the winding up of UK Coal. New jobs in the region should be directed towards these more deprived areas.

- 2.7.2 Coventry's employment problem is that in the 1980's/90's it increased housing but changing circumstances meant that its manufacturing base declined dramatically. Although it has reinvented itself quite well, it now does not have enough jobs to support its population. We must not go down the same road by getting incomers living here and then hope new jobs will be generated. That is not a good plan

- 2.7.3 The Parish Council was concerned to witness a statement made by a Warwick District Council planning officer at the Planning Committee Meeting on 23rd July referring to planning application W0607 that house building is a good thing because it generates jobs in construction. Of course employment in construction is a good thing, but it cannot be a justification for approving unnecessary house building, besides which the jobs only last as long as the construction period.

- 2.7.4 On 29th July, the proposed Coventry Gateway Development was called in by the Minister of State for his determination, due to concerns regarding conflict "*with national policies on strategic matters*". Even if this development is approved at Coventry Airport it would only produce about 1,270 jobs for Warwick district residents and some of those may not be new jobs, just a transfer of location.

- 2.8 If 5,400 homes are built, at least one person in that home will require employment. It is possibly closer to 2 persons than one. So jobs for getting on for 10,000 people will still be needed and that is at a time when we may have the employees, we may have the land, but we still need the employers.

2.9 Duty to cooperate implications may be two fold.

2.9.1 In the **Examination of the Coventry Local Development Plan – Core Strategy - Concerning the Duty to Cooperate** the Inspector found *Coventry Council* has not engaged constructively with neighbouring local planning authorities on the strategic matter of the number of houses proposed in the Plan and consequently it has not sought to maximise the effectiveness of the plan making process.

Coventry had a Core Strategy which made provision for some 33,500 dwellings (26,500 of which would have been in Coventry, 3,500 in Nuneaton & Bedworth and 3,500 in Warwick). That plan was withdrawn and a new plan(now being examined) made with a provision for 11,373 houses – a significant reduction in housing numbers. (para 5 of the report). Was this 3,500 in Warwick included in the then 10,800 consultation exercise? If so, it was not obvious in the consultation documents.

In the *“Statement of Common Ground and Cooperation for the Coventry, Solihull and Warwickshire Sub-Region (SOCG)”*, Paragraph 4.2 states that the current interpretation of evidence shows that all member authorities are capable of meeting their housing requirements within their borders and there is no requirement for any local authority to meet any part of its housing requirements in another area. & 4.3 states that local planning authorities in the sub-region will continue to plan to accommodate their own needs. However, if an authority cannot accommodate its own needs (because of an increased housing requirement and because of strong evidence of constraints on the provision of housing sites within its boundaries) then, and only then, would the shortfall be addressed through discussions with neighbouring authorities within and beyond the sub-region. Since the outcome of this situation was indeterminate, the Duty to cooperate was not demonstrated.

It seems that this housing arrangement did not take into account employment need either. Coventry may be right to limit their increased housing requirement because they already have a housing/ jobs imbalance and it would also reduce the risk of not being able to make their provision within their boundary. BTPC would have thought that an essential part of the joint SHMA consideration was establishing the capacity of each area to meet its own need and limit expansion to that capacity. This makes it all the more important to make a realistic assessment of need rather than an aspirational assessment that cannot be made to work.

2.8.2 The joint SHMA is now being carried out. In the last few weeks, Stratford has announced a new Gaydon development to serve JLR. This will have a significant effect on Warwick district and will reduce demand on it for housing but will be the nearest centre for shopping and other services. Stratford are not in the SHMA and do not seem to have cooperated with its neighbours. It would seem that there is a danger that when their plan is examined, it will be similarly rejected. The same could happen to our plan, even though attempts were made to cooperate.

2.8.3 Coming out of this, if there was an initial inclusion of 3,500 housing in the Warwick target to serve Coventry and this remains in the 12,300 then it should be removed to comply with the SOCG agreement.

3. Housing Land Supply

3.1 This consultation concerns the proposed number of houses to be built in the plan period of 12,300. Last year it was 10,800. The BTPC study last year was 5,400 and emerging population projections from the ONS are similar to that and from G L Hearn, are something below it.

The RDS identifies a range of sites to for new housing. The May 2013 HLS document uses the current consultation figure of 12,300 which is not substantiated by the joint SHMA yet and the consultation is not yet ended. Therefore, 10,800 is the figure that has been consulted on and this was objected to by 87% of the respondents. BTPC's calculation shows that the objectively assessed requirement for the locality is 5,400. This gives us 3 options in terms of the housing increase.

This table sets out site allocations for the plan period 2011-2029.

	A	B	C	D	
	Housing provision by 2029				
	RDS	based on Jun 2013 5yrhls			
a	Target	12300	12300	10800	5400
b	sites completed between 2011 & 2013	447	447	447	447
c	Dwelling sites with permission (not started)	1681	1084	1084	1084
d	Dwelling sites with permission subject to S106	0	0	0	0
e	SHLAA sites	300	514	514	514
f	Less 5% non-implementation		-80	-80	-80
g	Windfall allowance (@116 per year)	2800	2808	2808	2150
h	Poseidon Way		50	50	50
i	old town regeneration		750	750	
j	Warwick town regeneration		500	500	
k	Add dwelling sites under construction		506	506	506
l	add since April Sydenham		209	209	209
m	Consolidation of employment +urban brownfield	830	inc	inc	inc
n	Warwick Gates employment land	220	220	220	220
o	add vacant dwelling return 250 @ 50 /year		500	450	250
p	East of Kenilworth	700	700	700	
q	redhouse farm	250	250	250	
r	Villages	1000	1000	1000	300
s	Myton garden suburb	1250	1400	1000	
t	east ofwhitnash AoR	600	400	400	
u	Greenfield	2230	1050		
	Total	12308	12308	10808	5433

- 3.2 Column A sets out the site allocations made in the RDS as closely as possible. The target provision is 12,300. Lines a to g are from RDS 4.2 Table 1. Line m comes from RDS 4.2.5 Table 2 for consolidation of existing employment areas of 450 homes and urban brownfield sites listed in RDS 4.4 Table RDS5 giving 380 homes. Line n comes from para 5.1.2 that was approved in July 2013. Line p east of Kenilworth RDS 4.3.15 Table RDS4. Line q comes from RDS 5.3 Table RDS5 Red house Farm, Cubbington. Line r villages are as Table RDS5. Line s Myton garden Suburb is from RDS 5.1.2. Line t is Whitnash East of 500 plus Fieldgate Lane of 100. Line u is the greenfield sites in 5.1.2 being land south of Gallows Hill (430), land at Lower Heathcote Farm (720), Former Severn Trent Sewage Works (225), Grove Farm (575) and Woodside Farm (280).

Sites p to u are in Green Belt, villages or in rural areas and Area of Restraint. It illustrates that to get to the very high target, very controversial sites have to be listed all of which should not be selected if the NPPF is to be complied with.

The selection of sites mainly to the south of the District because Green Belt covers the land between Coventry and Leamington and Warwick is addressed in Section 2.

- 3.3 Columns B, C, and D select sites to match the 3 option levels of 12,300, 10,800 and 5,400 but adds in other ways of meeting those targets to try to avoid the use of greenfield rural area agricultural land. It is based on the 5yr HLS.
- 3.4 Column B is the 12,300 option. It attempts to improve the plan by identifying other brownfield sites and reducing the amount of greenfield to be taken. Lines c to g and k are taken from the 5Yr HLS. Line h is a change of use of a small piece of employment land off Poseidon Way, south of the AP factory, which has not been taken up and could take 50 affordable homes. Line i introduces a regeneration scheme to improve the land south of the railway and north of the canal from Tachbrook Road in the east to the old market square providing multilevel mixed use shopping, entertainment, apartments, fit for the 21st century whilst respecting the remaining pieces of the past. It would improve the poor aspect of the town from the railway line. Line j includes an allowance for residential arising from the recent Warwick Town plan document. Line l is the housing scheme at Sydenham when the appeal was allowed for 209 dwellings.

Line n is land north of Harbury lane that was recently approved as a change of use from employment land to residential with outline approval for 220 dwellings.

Line o is the inclusion for the return of long term vacant dwellings to residential use. In the past 5 years 300 dwellings have been brought back in to use but there still remains 1,452 vacant properties. The intention is to bring 500 back into use over the 18 year plan period.

The Kenilworth, Red House Farm and villages requirements are retained in the list.

Line s increases the dwellings to 1400 on land west of Europa Way to increase the number of affordable homes at a higher density.

Line t is reduced to 400 because of line l subject to the appeal decision.

Line u reduces the requirement to use greenfield land for 1,180 dwellings equivalent to the sites south of Gallows Hill and Lower Heathcote Farm.

This option still takes Grove Farm, Woodside Farm, the remainder of land east of Whitnash and Fieldgate Lane as well as Kenilworth, Redhouse and the villages and so is still an unacceptable option.

3.5 Column C is an option for 10,800. The differences to the 12,300 option are –

Line o reduces vacant dwelling return from 500 to 450.

Line s reduces the dwellings to 1000 on land west of Europa Way

Line u omits all greenfield land subject to rural area policies.

This option still takes the sites at Whitnash, Fieldgate Lane, Kenilworth, Redhouse Farm and the villages and still requires substantial regeneration schemes lines l & j.

So the option is better but still difficult.

3.6 Column D is an option for 5,400.

It omits Kenilworth and Redhouse Farm, Green Belt sites, Lines p & q.

It omits lines s to t - Myton gardens, East of Whitnash and all greenfield sites.

It reduces line 4, villages to 300 across all villages.

It reduces windfall allowance to 2,150

It reduces the requirement for vacant dwelling return to 250 over the 18 year period.

It omits Old Town regeneration & Warwick Town regeneration.

This is an option with the maximum support of the community, provides the level of new homes that will be needed, and is achievable in the time scales available.

4. The Five year Housing Land Supply

- 4.1 The District has to have a 5 year housing land supply of specific deliverable sites. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
- 4.2 The June 2013 5 year housing land supply shows that the District does not have this supply identified. Of 12,300 said to be required, the 5 year supply is calculated as 4,550 giving a 2.8 year supply. This creates a problem because NPPF 49 states that, *“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”*.
- 4.3 It is essential to choose a strategy that the district can justify and which provides the 5year supply required. BTPC has found that
- a. **The calculation of the 5year supply required for 12,300 is incorrect and**
 - b. **If the 12,300 option is chosen, not only is it way beyond that which an objectively assessed need requires, it is almost impossible to ever get a 5 year supply because of the time allowed for implementation.**
- 4.4 The 5year housing Land Supply for each of the 3 options is calculated as follows –

Requirement 2011 – 2029	12,300	10,800	5,400
Completions 2011 - 2013	447	447	447
Requirement 2013 - 2029	11853	10353	4953
Annual requirement for 16 years	741	647	310
5 year requirement 2013- 2018	3704	3235	1625
Plus buffer of 5%	185	162	77
The 5 Year Requirement 2013-2018	3889	3397	1625
Total deliverable sites as Table 2 in May 2013 5yr HLS	3474	3474	3474
Number of Years Supply	4.47	5.11	10.69

In the list of Components of Supply, the deliverable sites including sites under construction are as follows –

- The dwellings with permission not started, the SHLAA sites and windfall allowance are as the Districts list, but in this calculation, the 5% non-implementation deduction is not applied to the windfall allowance because it already contains a final phase discount.
- Adding the sites not started to the SHLAA sites the number is 91 short of the 1,681 quoted elsewhere. This is added back into the calculation.
- Approvals given since 1st April at Sydenham and land west of Warwick Gates are added in.
- Provision is made for the vacant dwelling return at 50 per year based on past performance and known lists of properties to be brought up to standard. The district has arrangements in place with a Housing Association to implement properties identified as ready to be brought up to standard and with new homes bonus incentives and meet the tests to be included. In addition NPPF51. Requires that *“Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers.”* This makes it a relevant issue as a component of supply
- Studies have been ongoing with villages for the last year as to where the 1000 village sites might be possible. With some application, sites to give 20 dwellings per year for the 5 years can be identified.

COMPONENT OF SUPPLY	12,300 dwellings	10,800 dwellings	5,400 dwellings
Dwelling sites with permission (not started)*	1,084	1,084	1,084
Dwelling sites with permission with S106	0	0	0
SHLAA sites*	514	514	514
Less 5% non-implementation	-80	-80	-80
Windfall allowance (@116 per year)	580	580	580
SUB TOTAL	2,098	2,098	2,098
Add dwelling sites under construction	506	506	506
Add missing commitments (1681- * items)	91	91	91
Add approvals post 1Apr Sydenham May 2013	209	209	209
Ditto Gallaghers triangle 10.7.2013	220	220	220
add vacant dwelling return 250 @ 50 /year	250	250	250
add villages at a nominal 20 per year	100	100	100
Total (deliverable sites + sites under construction)	3,474	3,474	3,474
The 5 Year Requirement 2013-2018	3889	3397	1625
Number of Years Supply	4.47	5.11	10.69

- 4.5 If the correct actions are taken, then the 12,300 still does not give a 5 year supply whereas both the 10,800 and 5,400 options do give a 5.11 and 10.69 year housing land supply. In order to protect the District's ability to produce a plan-led Local Plan by complying with NPPF49, the 5 year plan should be brought up to date without delay.

Section 2

The Balance and Distribution of the Proposed New Housing across the District presents real problems.

1. In addition to the increase in housing numbers the Parish Council is deeply concerned that, because of the unnecessarily high numbers of housing, the focus of new house building has shifted further to the south of Leamington and Warwick, further skewing the balance in the location of new housing. The reasons for this deep concern is as follows.
 - a. Such an imbalance of housing to the south will lead to significant congestion from traffic trying to access the town centres, particularly at the canal, railway and river crossings where there is no practical and economic mitigation option.
 - b. It places significant pressure on the southern landscape and the historic setting of Warwick in particular. These matters are dealt with in more detail elsewhere in this response.
 - c. It adds to the pressure on the coalescence of settlements and in particular threatening the rural identity of Bishop's Tachbrook.
2. Therefore, the high housing numbers proposed must be reduced in order to address this in balance and to meet the NPPF 54, 55, 109..
3. The principle reason for this shift and the discounting in the RDS of significant housing sites to the north of the towns is because of the large amount of green belt (80% of it's area) in Warwick District.
4. The additional status afforded to the green belt has the effect of saying that one area of rural Warwickshire to the north is more precious than another area of at least equivalent landscape worth to the south. This is unreasonable and unfair. Further, it comes as a result of an application of the Green Belt principle that was not intended when green belt was established. Town & Country Planning legislation used rural area policies to control development in designated rural area locations. These were intended to be strong enough to prevent such arguments arising.

5. The Parish Council fully supports Green Belt policy. At the same time we expect that rural areas and landscapes close to urban areas should be controlled by strong rural area policies. The contrast between town and country is important to the well-being of everyone and provides a high value recreational benefit for all, whether they drive, cycle or walk through it – or even take to the air and go by double decker bus to see over the hedges.
6. Green Belt was established to prevent Cities expanding in a uncontrolled way and according the NPPF it serve 5 purposes:
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
7. The West Midlands Green Belt was established to prevent large urban areas such as Birmingham and Coventry expanding uncontrollably into the surrounding countryside. So the fact that the Green Belt touches the north of Leamington and Warwick is incidental because both at that time and now, the real threat of expansion on landscape and coalescence comes from Coventry.
8. The New Local Plan proposals have potentially far reaching affects for the district, with the potentially vast numbers of new homes being proposed. BTPC considers that you have 2 choices, either you distribute the housing through all parts of the district including green belt to satisfy large number of immigrants *or* you reduce the number of houses to that which the locality needs to meet sustainable objectives and respect the long standing purposes of green belt and rural areas.
9. Therefore if the District Council considers that it should ignore the views of the electorate and decide to plough on with an overlarge number of new houses because of a subjective assessment concerning hopes for economic expansion that the market is unlikely to support, it should take a strategic look at the Green Belt to see if the exceptional circumstances prevail to justify redrawing green belt boundaries to distribute the new housing in a balanced way around the district. The NPPF reference is Chapter 9: para. 83 *“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”*

The Local plan Review is the only time when Green Belt boundaries can be changed. New Green Belts can only be established in exceptional circumstances.

10. In considering the impact of increased traffic due to the expansion of the population by some 30,000, a 21.5% increase, officers have concluded that those exceptional circumstances do not exist to develop in greenbelt. It therefore follows that the exceptional circumstances do not exist either to disregard the NPPF112 in its requirement to maintain protection of rural and agricultural areas because the subjective judgement on the level of economic growth cannot be substantiated and therefore demonstrated to be necessary.

112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

11. If the Local Plan eventually decided includes the Myton Gardens as a major urban extension, then the Parish Council urges the District Council to establish a new green belt from Castle Park, along the Tach Brook valley south of Harbury Lane and Gallows Hill too provide long term protection of the landscape from urban sprawl as provided for in NPPF 52. *The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.*

Section 3

Rural Area Policies and loss of landscapes and agricultural land.

- 1 The planning Inquiry in 2006/7 looked particularly at sites both in Areas of Restraint and subject to rural area policies. The decision made then needs to be seen in the context of the NPPF54, 55, 109 to 125. In particular, NPPF54 agrees with the existing local plan rural area policies by requiring that, *“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.”*

NPPF55. Would extend those policies *“ To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”* To do this, the local plan should have specific rural area policies. It may be that neighbourhood plans would customise such policies for particular reasons relevant to that parish.

2. In relation to proposals to select rural areas for development, the NPPF requires the following clauses to be taken into account.
 - 2.1 NPPF109 requires that *“The planning system should contribute to and enhance the natural and local environment by:*
 - *protecting and enhancing valued landscapes, geological conservation interests and soils;*
 - *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*
 - *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*
 - 2.2 NPPF110 requires that In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.
 - 2.3 NPPF111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities

may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

- 2.4 NPPF112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

The sites selected for development to the south of Warwick & Leamington do not appear to meet these requirements.

- 2.5 In particular, the district has not demonstrated that housing at the 12,300 or the 10,800 levels is needed to support the local community. Indeed, as housing projections are updated, the amount of housing needed for both objectively assessed natural and migration projections is reducing. 5,400 homes in the plan period is the best projection available.

- 2.6 *NPPF156. Requires that Local planning authorities should set out the **strategic priorities** for the area in the Local Plan. This should include strategic policies to deliver: climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*

The councils own Landscape consultant in 2009 has some very strong recommendations that should be taken into account. The 2012 “Considerations for Sustainable Landscape Planning” also advises in paragraph 8.8 that

“This landscape is important in perceptions of Warwick and Leamington – especially as it provides a rural buffer between the towns and the M40 and the setting to Castle Park. Future planning must sustain overall landscape character and viable agricultural units whilst creating appropriate portions of multifunctional public landscape. Development design must aim to avoid wider visual impacts (including ‘secondary’ impacts such as might arise from service infrastructure provision and night lighting). It should also be a primary planning goal to avoid creating barriers to non-vehicular movement – e.g. with the increasingly busy local road system.”

And further, it concludes, in paragraph 9 that

“The scale and extent of development presently being considered in Warwick District is possibly unprecedented and will undoubtedly have major implications for the character and appearance of the towns and parishes affected for many decades to come. There is presently considerable pressure on local authorities to act quickly and to facilitate development. However, it is essential that good decisions are made for the long term. There is extensive contemporary guidance highlighting the importance of landscapes, ecology,

historic fabric and all ecosystem services in creating sustainable development.”

3 Looking at the particular sites the inspector at the 2006 Public Inquiry reached the following conclusions.

3.1 Woodside Farm should remain in an area of restraint. In a lengthy and detailed consideration he concluded that

10.11.41 *The AoR designation has been carried forward from the adopted Local Plan. It was established to maintain separation between Bishops Tachbrook and Whitnash. When preparing the earlier Plan the District Council successfully argued that any extension of built development to the south of Whitnash, beyond the ridge line that defines the present edge of the town onto the south facing slope, would create a major incursion into the countryside that would be highly visible and intrusive. Since that time a number of physical changes have occurred in the locality. Extensive housing development has taken place at Warwick Gates on the opposite side of Tachbrook Road. Although anticipated through a Local Plan allocation, this has affected the character of the area by bringing development to the west as far south as Harbury Lane. In addition, playing fields, open space and woodland have been laid out to the east of the objection site giving enhanced public access, and overhead electricity lines have been put underground. The objector argues that in light of these changes the objection site should be excluded from the AoR. The request is supported by a Landscape and Visual Impact Assessment and a Development Principles Plan.*

10.11.42 *I consider that the AoR still performs essential functions. It helps safeguard the character and setting of Whitnash, prevents urban sprawl and assists in maintaining the integrity and separation of Bishops Tachbrook as an independent settlement. The objection site is an important element of the broader AoR. It occupies an elevated position with views of it obtaining from certain directions. They include limited views driving northwards along Tachbrook Road from Bishops Tachbrook, from Harbury Lane to the east and long distance views from public locations on the northern edge of Bishops Tachbrook. From each of these positions housing development would be clearly visible for many years while structural landscaping matures. This would intrude into the rural surroundings and noticeably reduce the open gap that remains between Bishops Tachbrook and the urban area.*

10.11.43 *I conclude that this land should remain open as part of a more extensive AoR and that it should not be allocated for housing development within the Plan period or be identified for longer term development.*

BTPC concur with the Inspectors view. It is an essential part of the distance between Whitnash and Bishops Tachbrook and an important part of the valued change from town to country along the Tachbrook and Oakley Wood

Roads and in particular their junction with Harbury Lane going east rising up through the trees up a double incline hill some 15metres high as the road reaches Mallory Court on the right hand side. Housing on Woodside would be completely counter to the NPPF

3.2 Fieldgate Lane/Golf Lane should remain in an area of restraint. In a lengthy and detailed consideration he concluded that

9.4.16 *I take a rather different view. Looking first at the boundary of the AoR, I acknowledge the previous Inspector's uncertainty about whether the golf course and land to the east contribute to the AoR objective of preventing Whitnash from merging with Bishops Tachbrook. However, the south-western part of the golf course is highly visible from Harbury Lane where it forms a backdrop to the new playing fields and pavilion such that any development there would significantly close the gap between these settlements. Moreover, while the rising nature of the ground at Fieldgate Lane/Golf Lane from north to south means that development would not be visible from Bishops Tachbrook, it would be clearly seen from southern parts of Whitnash where the land contributes to the rural setting of the town. It would also, I feel, be intrusive in long range views from east of the railway line. I find that the whole of the area (that is, the golf course and the land at Fieldgate Lane) contributes to the objectives of the AoR. The land has a role to play in the structure and character of this part of Whitnash, provides open areas in and around the town, safeguards its setting and helps prevent urban sprawl. In addition, the south-western section of the golf course maintains separation between Whitnash and Bishops Tachbrook. Consequently, I see no case for excluding the golf course or the Fieldgate Lane site from the AoR. As regards land south of Harbury Lane, this land forms part of the sensitive gap between Whitnash and Bishops Tachbrook. But I believe it to be less at risk of development because Harbury Lane/Gallows Hill provides a strong boundary to the urban area. In my view, there is no need for AoR designation to extend south of Harbury Lane.*

9.4.18 *Finally, the objector considers that as the Fieldgate Lane site is bordered by housing to the north and south it should be considered as part of the urban area, rather than one where the Plan's Rural Area Policies apply. I do not agree. As the District Council points out, all rural areas have an urban edge. In my opinion, that boundary is properly set by the suburban housing to the north of Fieldgate Lane.*

9.4.19 *The objector's proposals were subject of the Omission Sites Consultation undertaken in January/February 2006. Responses received from Whitnash and Bishops Tachbrook residents, CPRE (Warwickshire Branch) and Whitnash Town Council were against any removal of the golf course or Fieldgate Lane site from the AoR, any residential allocation at Fieldgate Lane and any exclusion of the proposed development site from the application of Rural Area Policies. I note that 251 responses were received against the Fieldgate Lane*

site and 496 objections in relation to the golf course (of which 240 were by way of a petition from members of the Leamington and County Golf Club). This is a clear indication of the strength of local feeling.

Residents of Whitnash agree with the inspector that the site is part of the Golf course, Woodside Farm Area of Restraint set out by paragraph 9.4.19 of the inspectors report. BTPC agrees and objects to this proposal.

3.3 Grove Farm (called Harbury Gardens by the developer) should remain in the current rural area. It is an expansive piece of Grade 2 agricultural land on the northern top of the Tachbrook valley, south of the Harbury Lane & west of Oakley Wood Road.

In the 2012 consultation, this site was described as a green wedge, protected by rural area policies to be considered as part of a possible peri-urban park. Keeping it as a green wedge as part of the separation of Whitnash and Bishops Tachbrook was welcomed. Dismay ensued with the current 2013 proposal for 200+ homes. It is noted that the land allocated for development in the current consultation is much larger than the application currently being considered and takes the whole of the northern side of the Tach Brook reducing the separation of the settlements to an unacceptable low level.

Reacting to an objection seeking this land be included in an area of restraint, the inspector found that

9.4.4 *I agree with the District Council that a cautious approach needs to be taken in respect of the AoRs in order to avoid their devaluation and to ensure that they perform a specific function. Unlike the other AoRs included in the Revised Deposit Plan, much of the land identified by Bishops Tachbrook Parish Council (even with the reductions in area put forward at the hearing) is relatively remote from the urban area and not under immediate threat from urban expansion. The gap between Harbury Lane and Bishops Tachbrook is about 1.4km compared with only 300m or so between Leamington Spa and Radford Semele. Although there are objections before this inquiry that seek to allocate or designate sections of the land in question for other uses, and anecdotal evidence of options taken by developers, this is by no means unusual when a Local Plan is under review. I consider that this extensive tract of open land south of Gallows Hill/Harbury Lane is sufficiently well protected by the Rural Area Policies of the Plan, which are stronger than those in the previous Local Plan, without the need for additional protection. It is not the function of AoRs to give an added layer of protection to open countryside where appropriate policies already exist to control development. Should land have to be released in the future for urban expansion then the District Council says that this exercise would be done by a review of options on all sides of the urban area including sites subject of Green Belt and AoR designation. Land south of Harbury Lane outside an AoR would, it is argued, be placed at no disadvantage.*

9.4.6 *I conclude that while additional development has taken place to the south of Leamington Spa during the last 10 years or so since the previous Local Plan Inspector reported, his findings remain pertinent. **Given the strength of the Rural Area Policies of the Plan**, the current housing and employment land supply position and the degree of protection afforded to the most critical areas by the AoRs already identified in the Revised Deposit Plan, there is no need for a further AoR south of Gallows Hill/Harbury Lane. To designate such an area in the absence of any serious threat would be premature at least and at worst a misuse of policy.*

The Inspector clearly considered that rural area policies were strong enough to prevent such development. Nothing has changed that alters the communities view. Housing in this location will be very visible across the Tachbrook Valley from the south, being on the ridge line as can be seen from this photograph. Housing will be prominent half way down the field in the distance. The top of roofs to Warwick Gates can just be seen behind the hedgerow on the horizon and stretch from the coppice of trees on the left side of the picture to Grove Farm buildings to the right of centre of the photo. The photo was taken from the public footpath to the Asps from St. Chads Church and this is a prominent view along most of the path. The suggested country park to the south of the housing, because it is on the slope down to the brookstray will not hide the housing as it will be the same height as the trees that can be seen running along the Tach Brook from left to right. The NPPF paragraphs quoted at the head of this section are intended to conserve, protect and enhance landscape such as this wonderful piece of Warwickshire.



It is essential that this piece of landscape is protected as there is no credible case for housing in this location. So we object to the proposal in the 2013 consultation and support the 2012 consultation to keep this area as a green wedge. In BTPC's view, however, it does not need to be converted into any sort of country park, at considerable cost no doubt, as it is perfectly acceptable as it is. This would retain a valuable piece of agricultural land, meeting the needs of the present without compromising the ability of future generations to meet their own needs.

3.4 Lower Heathcote Farm should remain in the current rural area. It is an expansive piece of Grade 2 agricultural land on the northern top of the Tachbrook valley, south of the Harbury Lane & east of Europa Way.

In the 2012 consultation, this site was also described as a green wedge, protected by rural area policies to be considered as part of a possible peri-urban park. Keeping it as a green wedge running from Castle Park in the west through to Radford Semele, incorporating paths along the side of the Tach Brook, presents recreational potential for village and urban walkers. Dismay ensued with the current 2013 proposal for 720+ homes.



The photograph shows the view north across the Tach Brook Valley from New House Farm. Housing will come down from the hedgerow on the horizon along the Harbury Lane covering the top half the field between that hedgerow and the trees along the brookstray, the tops of which can just be seen. The undulating form is a ‘trademark’ of the rolling Warwickshire countryside that is part of the tourist attraction experience on the approach to Warwick Castle from the south and is seen as a backdrop along the Banbury Road. It is highlighted in the Morrish Landscape consultants report of 2009.

4.4 Paragraphs 109–125 of the NPPF outline conserving and enhancing the natural environment. They state that the planning system should contribute to and enhance the natural and local environment by protecting / enhancing landscapes; by recognising ecosystem services; by protecting/improving biodiversity; by avoiding pollution or environmental degradation and by remediating degraded land. LPAs should set criteria-based policies by which to judge potential impacts to wildlife, landscape, etc. and set out a strategic approach to green infrastructure in local plans.

This requirement expects that the new local plan will have such policies and implement them.

The landscape consultant also advises

5.1 Some of the elements that contribute to landscape character include the shape and scale of topography, the presence and pattern of natural geology, outcrops, water bodies and vegetation and, the patterns and features of man's intervention – including land management and settlement.

How and from where the landscape can be viewed greatly influences how it is perceived – so that the availability of access becomes influential in determining landscape character. A variety of views (long vistas, wide panoramas, framed focal points) generally adds to our enjoyment of a landscape. Landmarks are of particular value/interest in any landscape – even if they have disputed amenity value (e.g. Eden Court flats at Lillington).

This paragraph describes exactly the situation with this site. The landscape value of this area is very high. It has a large variety of views, long vistas wide panoramas and framed focal points. It shows an interesting shape and scale of topography. The brutal insertion of the development proposed is totally insensitive, tantamount to municipal vandalism. The existing landscape is an asset that everyone in Warwick District can enjoy and is part of the package that makes Warwick District a Great Place to Live, Work and Visit.

The Inspector *“consider(ed) that this extensive tract of open land south of Gallows Hill/Harbury Lane is sufficiently well protected by the Rural Area Policies of the Plan, which are stronger than those in the previous Local Plan, without the need for the additional protection of an Area of Restraint.* This set of policies should be included in the new local plan to meet the NPPF clauses referred to above.

11.4 The former Severn Trent Sewage Works between Lower Heathcote Farm and Grove Farm to the south of Heathcote Park is listed in RDS 5 and shown on Map 3. It claims to provide 225 homes.



This photo shows the site from the site across the Tach Brook Valley. It is the central greener area. At the top of the hill on the skyline there is a mature area of trees which provides a wildlife oasis to a number of mammals including deer, birds and woodland insects. The former sewage tanks are, according to old plans, many and closely aligned. The tank depths and ground

contamination is likely to make this a difficult site to develop for housing and add to that the steep fall as the ground slopes down towards the brook it is unlikely to provide any practical housing land at all.

The site would however be an ideal site to develop as woodland as part of the low carbon environmental sustainability objective of the Councils Corporate Development Strategy. Carbon dioxide sequestration of woodland is calculated on the basis of 25m² absorbs 1 tonne of CO₂ per annum. If a normal house produces 4 tonnes of CO₂ per annum, this provides sequestration for about 1000 of the homes to be built. Bishops Tachbrook Neighbourhood Plan is seeking sites of this nature within its boundary and will be including this site in discussions with neighbouring towns and parishes as part of its duty to cooperate with them. AS far as the NPPF is concerned paragraph 109 requires development to conserve and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

11.5 Land south of Gallows Hill between Europa Way and Banbury Road, north of the Tach Brook.

The northern section is the other half of the Tachbrook Valley and to build upon it would detract from the southern part which it has been accepted should be kept. Given that the RDS does accept that the Asps is an important part of the Warwick Castle approach, so is this northern section. it can be seen from the Warwick Castle Towers and the mound. Any development on this site will have a direct impact on the views available to visitors to the castle.

This photograph was taken from the top of Guys Tower in Warwick Castle, looking south-east, earlier this year and shows the site south of Gallows Hill in the foreground with two oak trees in the centre of the field and the hedgerows running along Europa Way. Behind the hedgerow there are fields of yellow oil seed rape which is the site south of Harbury Lane in 3.3 at Lower Heathcote Farm. To the right of the poplar tree on the left of the photo is the farm cottage to the former Heathcote Farm with, to its right, the roofs of the bungalows in Heathcote Park, mostly hidden in the trees. Beyond that are the trees bordering Oakley Wood Road with the hill rising behind them, through the Grove Plantation rising to Highdown Hill Plantation on the skyline. This is a view that has been available to Kings, Earls and visitors since 1395 when the Tower was constructed, so is significant for Tourism and should not be lost to development. No amount of landscape 'mitigation' will compensate.



The 2009 Landscape area statement by the councils Landscape Consultant Richard Morrish clearly concludes that

This study area is principally well preserved farmland that creates an attractive rural setting for the south side of Warwick and should be considered an important part of the setting for Castle Park. Any development that ‘jumped’ the Heathcote Lane / Gallows Hill frontage would set a major landscape precedent in extending the urban area so far south. Although it is considered that the Warwick Technology Park has possibly diminished the value of the Area of Restraint north of Heathcote Lane, its general style of low density development in a strong landscape setting makes for a reasonably successful transitional environment on the urban fringe – as do the adjacent school sports fields. To extend the urban area beyond these sites would make for a disjointed urban structure and possibly encourage intensified development at the Technology Park and around the schools. Smaller blocks of isolated development are also likely to be incongruous in this landscape. Our conclusion is that this study area should not be considered for an urban extension and that the rural character should be safeguarded from development.

The Inspector at the 2006/7 Public Inquiry considered this site for employment purposes. In a lengthy and detailed consideration he concluded that

10.3.49 *The objectors maintain that the Gallows Hill site would provide continuity in the forward supply of employment land beyond 2011. However, I believe it would be inappropriate to identify such sites now when the future employment requirements of the District are uncertain pending completion of the sub-regional employment land review and the partial review of the RSS. Until then, the RSS requires that greenfield sites, like this land at Gallows Hill, should only be released when there is no alternative previously developed land available. The WMRA, commenting on the Omission Sites Consultation, remarked that new sites being promoted involving the development of greenfield land “appear to be inconsistent with the principles of the RSS” and requested that the Inspector rigorously scrutinise such proposals. I agree with the District Council that as and when further greenfield land releases are necessary this should be done through a DPD where a full comparative assessment of all potential sites can be made in the context of a sustainability appraisal and following a process of public consultation. In this regard, I note that the objection site is classified as very good (Grade 2) agricultural land and that a full Transport Assessment would be required in respect of development on this scale. I believe that the ad hoc release of a large greenfield site like this located on the urban fringe and currently in agricultural use would not be in the best interests of the District. The Council’s Local Development Scheme commits it to begin preparation of a Core Strategy DPD immediately following adoption of this Local Plan. That will tie in with completion of the partial review of the RSS, enabling up-to-date employment requirements for the District to 2021 to be accommodated.*

10.3.50 *I conclude that land at Gallows Hill should not be allocated under Policy SSP1 for employment (Class B1) purposes, nor should the site be excluded from the rural area defined on the Proposals Map. To do so would result in an over-provision of employment land relative to the Structure Plan requirement, at the expense of the surrounding countryside.*

The site is shown in the RDS as residential and employment but this we believe is wrong because all the advice is that it should be retained as agricultural land with a high landscape quality, hidden for the most part behind hedges on Harbury Lane but with occasional glimpses through it at gates and breaks in the hedge. It is on the only high quality approach road to the Castle.

12 Separation of settlements.

The District Council to date has rigorously resisted any development that reduced the gap between Bishops Tachbrook and Whitnash/Warwick. We believe that the NPPF requires the district to continue to implement those policies as part of the social role within sustainable development, supporting strong, vibrant and healthy communities.

Section 4

Traffic and pollution

BTPC has serious concerns that the 12,300 homes proposal the largest part of which is in one concentrated area to the south of the urban area of Warwick and Leamington will have serious traffic implications. This must be correct because the traffic engineers advise that 24 or more large junction improvements must be made to reduce the effect of this proposal estimated at this stage to cost £39,000,000 but likely to exceed that when all the problems are known.

Even then, we are advised, at peak periods due to the high traffic volumes, the myriad traffic light junctions are unlikely to speed things up very much. Traffic is bad now and will continue to be so.

The problem is the historic road layout and the combination of rail, rivers and canals requiring bridges that give a very limited number of north south routes for road traffic and because of concentrated development in the towns it is not possible to find a new route through, the problem is difficult to resolve.

But Warwick is an old town most of which was built for horse powered traffic. Many roads are narrow and restricted and the buildings are close to roads some with narrow pavements. The paraphernalia of signalled junctions, multiple lanes and traffic signs for every purpose, as well as the high levels of road lighting do not fit well with the elderly buildings and character of the town. The increased traffic arising from developments south of the town will have a severe and unacceptable impact on the town, which can be avoided by accepting that the objectively assessed level of local housing need amounting to 5,400 homes. As these will be better distributed around the district, major traffic concentration would be avoided. Depending on where development are located, some traffic junction improvements may be required but not on the scale being proposed.

Air pollution is also a concern, particularly for those properties that line the roads and ventilate into the narrow streets. No reassurances, with independent continuously measured air pollution levels, have been provided by the District to indicate whether this is a real concern or not. It must be assumed therefore that such measurements would show that the problem is real and from time to time at unacceptable levels. If that is shown to be the case, then any development as included in the consultation would not be in compliance with NPPF 109•4 *“The planning system should contribute to and enhance the natural and local environment by: preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.”*

Section 5

Housing and Rural Settlements

We reject the proposed Settlement Hierarchy because it uses the wrong criteria to decide what each village might be able or want to do. Careful change to the Limited Growth Villages policy, could identify sympathetic housing developments in rural areas which the local community would support.

The tone of the suggested policy is contrary to the spirit of the Localities Act and seeks to impose from above rather than be formulated by the residents who live there.

- 1 RDS 5 categorises 5 villages as Primary Service Villages and another 5 as Secondary Service Villages. But, apart from a checklist of facilities, nowhere is the logic set out to explain the distinction. Many residents would argue that Barford is better served with facilities than Bishop's Tachbrook, and other awkward comparisons can be made.
- 2 Nor is it clear why a further 14 Smaller Feeder Villages could not be included in the first 2 categories.
- 3 It is not necessary or fair to exclude Smaller and Very Small Villages from having the opportunity to grow organically. All might benefit from some new housing, provided it is built in small numbers of units and phased over the period of the plan; and of course sensitively designed to harmonise with the existing settlement in terms of topography and landscape. We agree with points made in 4.4.5

We recommend that new housing in rural areas should be dispersed evenly across the District.

- 4 We agree therefore with the tenets set out in 4.4.3, but these should be applied to all rural communities equally. We reject the concept that villages in Green Belt have different needs and ambitions to villages in other rural areas. Village life needs to be nurtured and allowed to evolve in an even handed manner, across the whole District.
- 5 WDC Planning should encourage parish councils, with the support of their community, to suggest to property owners where they might bring forward plots within and adjacent to village envelopes. Confidence in the process will be established provided policy states that schemes should be no greater than for, say, 20 units (this would enable up to 8 affordable dwellings).
- 6 Green Belt policy does not debar some new housing, because it is possible for the green belt to "wash over" a settlement. There is some land in the green belt which does not contribute to the quality of the environment or landscape, where appropriate schemes would be beneficial and would improve unkempt parts.
- 7 "Sustainability" is a prerequisite not just for villages with shops and pubs. Most smaller settlements will have WIs, allotments, churches, and a range of groups and activities which ensure a thriving community life. Planning policy should underpin this.

- 8 As per 4.4.3 most PCs and Neighbourhood Plan teams will respond positively to close working with WDC Planning. Stephen Hay has started the process well.

We reject the proposal that Bishop's Tachbrook has to have 100-150 new houses.

- 9 No clear reasons are set out why PSV's should have 100-150 new houses and SSVs 70-90. If it is based on population it could as well be argued that smaller and medium sized villages should be allowed to grow more in order to balance up with larger villages. There is no intrinsic merit in large villages getting much bigger whether absolutely or in proportion to their existing size. It cannot be the intention that large villages become the size of small towns.
- 10 Bishop's Tachbrook village consists of about 750 houses, so that the additional number would represent a 13 - 20% increase. Such incremental growth would be excessive and dilute the village atmosphere.
- 11 Time and again residents have stressed that their reason for choosing to live in BT is that they wish to enjoy village life. In our Parish Plan survey residents emphasised that they are passionate to retain the rural setting of the village; and in this regard consider the agricultural land that currently separates us from the southern edge of Leamington and Whitnash as critical. (Happily people living in Warwick Gates and Whitnash share the same view!)



- 12 The aerial photo shows clearly the compact form of the village. There are no obvious spaces to accommodate 100 plus new houses. New residents living on a

periphery estate would feel remote from the village centres and may find it difficult to integrate with existing residents.

- 13 The community's view is that the school, shop, club and pub do not require sustaining by population growth - and given the propensity of estate dwellers to jump into their cars, our shop and hairdresser would not expect to derive much additional turnover.
- 14 The Housing Needs Survey conducted in 2008 resulted in 14 new dwellings being required to meet local needs - on the basis that 10 of these were affordable and using the 40% norm that infers a top line figure for new housing of 25.
- 15 We were able to test this figure in June as part of our Neighbourhood Plan engagement. Of 189 residents responding at a public exhibition, 68% felt that the village need was for 0-14 houses, with the balance of respondents suggesting higher figures, but declining markedly over 100.
- 16 We urge WDC Planning to trust this community via its on-going Neighbourhood Plan process to arrive at a realistic figure; and to continue its discussions with owners of property both within the village boundary and adjacent to the envelope.

This less rigid approach is essential if the Council's Strategic Vision "to make Warwick District a great place to live, work and visit" is to be achieved.

Section 6

Sustainability

The purpose of the planning system is to contribute to the achievement of sustainable development. The broad principles of sustainable Development are to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The UK Sustainable Development Strategy *Securing the Future* set out five 'guiding principles' of sustainable development:

1. living within the planet's environmental limits;
2. ensuring a strong, healthy and just society;
3. achieving a sustainable economy;
4. promoting good governance; and
5. using sound science responsibly.

In plan-making it is essential to ensure that plans meet all the relevant NPPF requirements and in particular

*150. Local Plans are the key to delivering **sustainable development that reflects the vision and aspirations of local communities**. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.*

151. *Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of **sustainable** development.*

152. *Local planning authorities should **seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.** Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.*

So, is the consultation plan sustainable in the terms laid down by the NPPF?

Is the assessed housing need at 12,300 assessed objectively for the District?

Are the sites selected for development acceptable in principle and compliant with the NPPF?

Is the effect on the environment, taken as a whole, of enlarging the population by another 20% in 15 years necessary and acceptable?

Does the development require associated infrastructure other than provided in the housing development and are the costs of their provision covered by the proposed developments?

Are there any significant adverse impacts from the development?

What are the social impacts of the plan?

From the content of this response, it is clear that BTPC consider that none of these requirements pass the test of the NPPF and that the plan is non-compliant. The base problem is the housing number which is excessive for the needs of the population and the recent trends in migration. But the additional 30,000 if they were to arrive as planned would change the District dramatically and reverse the strategic vision promoted by the Council. The plan will result in making Warwick District a less good place to Live, work and Visit.

Nor do we think that the District will become known as a place of sustainable "Garden towns, suburbs and villages". It will still, if we don't ruin it, still be famous for its castles, history, spa town regency layouts, and rolling countryside but we don't think these developer led estates are likely to join them .

What would make the plan better? The single most effective way to take all the communities forward together, without splitting north from south, green belters from rural folk and making happy people sad to see the place destroyed, would be to adopt the objectively assessed number of new homes as 5,400 as it would

- be achievable within the terms of the NPPF and so get an examiners approval rather than rejection
- use sites that are uncontroversial and fit in from the outset
- provide all the housing requirements needed by the people in the locality and give a reasonable margin to allow trend based migration to occur

- Provides a good set of affordable homes more quickly into urban locations with existing services and communities giving organic growth of the towns
- Reduce car travel miles by using urban locations closer to facilities
- allow a 5year housing land supply to be established forthwith and remove the impediment of developers usurping the local Plan process
- Be economically viable for all the public bodies that would otherwise be left with having to find the costs of additional infrastructure from the 12,300 plan, as with the 5,400 plan the effect would be spread wider and be largely met by existing provision. This is an important point since public sector funding is set to get less and less and CIL (the WDC paper acknowledges will leave a funding gap unspecified but an educated guess indicates something in the region of £100,000,000) and 106 agreements will be insufficient to meet all the costs that the 12,300 proposal will engender. We have not found a business plan for the Local Plan yet.
- Retain rural area policies intact into the new local plan, retaining agricultural land and high visual quality landscapes, which tend to get taken for granted but are only there because previous council members have ensured the right policies to do so
- Retain green belt which is so valuable in differentiating the character of Warwick district from the surrounding conurbations
- Retain the attractiveness of the district that is basis of our thriving tourism industry
- Retain the good jobs homes balance that we have, despite the continuing economic situation, which although it is gradually improving, is thought to be a long repair job
- Be aspirational but also realistic because 5,400 homes still produces 10,000 employees that will need employers, which, short of a miracle will be hard to find.
- Be better to grow more slowly and controllably than rashly and eratically
- Regain the trust in our elected representatives which in the last few years has suffered due to the assault that people feel has been made on their lives by threatening circumstances.

Bishop's Tachbrook Parish Council hopes you find this response helpful. If there are any aspects that you would like further information about we would happy to work with you.

02/08/2013

Bishop's Tachbrook Parish Council