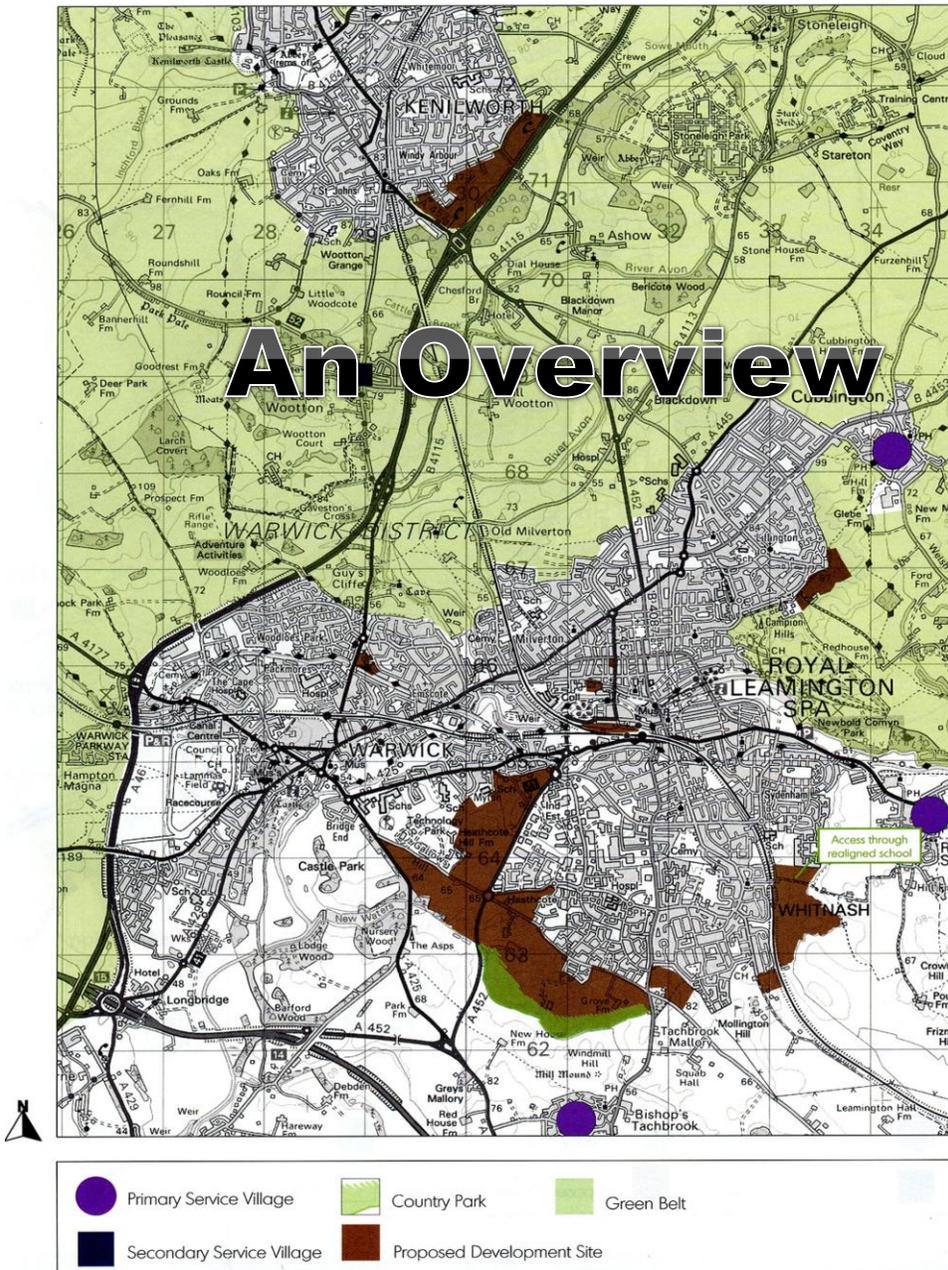


ADDENDUM No. 2

Map 1: Development sites on the edge
of the urban area



Addendum to Representation on the Warwick District Council Local Plan 2014

Please consider this addendum as supporting my full representation

And both must be read in conjunction

This addendum is an expansion of the requirements set out in Greg Clark's Introduction to the NPPF that aim to explain why the WDC Local Plan does not follow the guidance of the NPPF.

They are included in my full representation but with hindsight I consider they should be a major consideration of 'The Local Plan'. If it is considered they have not been complied with then The Local Plan will not have fulfilled its purpose and should fail.

Greg Clark's words can be considered as the very aim of the NPPF without the detail. The NPPF is the interpretation of his introduction.

**The Following Paragraph Highlights Are In My Opinion Core
To The Very Existence of the Local Plan.**

There are, or should be, three major players in the Local Plan.

- ❖ **Warwick District Council.** Their responsibility is to ensure that the principles of the NPPF are complied with.
- ❖ **The Developers.** Their responsibility is to provide the means of supplying the necessary houses to satisfy Local Needs.
- ❖ **The Existing Local People.** They will be required to accept the consequences of the above players. They should be involved in the preparation of the Local Plan to identify any problems at an early stage to ensure it proceeds smoothly.

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Now let us examine more closely how each of the players has fulfilled their responsibilities. I have used Greg Clark's introduction as the aim of his objective in arriving at a Local Plan that suits local needs. If this could be seen as a mathematical solution, then the introduction could be considered as an equation. In mathematics, if you use the wrong equation or you enter incorrect data you will arrive at an answer that is essentially 'rubbish'. As a mathematician when dealing with complex formula involved with Aeronautical and Structural analysis I would run the formula in a computer and examine the answer. Experience would tell me if the answer was about what I expected. If not I would tell myself "That is rubbish, so recheck every parameter."

That is precisely what I am doing when I find myself trying to understand the WDC Local Plan. Because it is not as simple as checking the formula we have to be subjective in our analysis. Nothing could be more relevant than checking responsibility against the points that make up Greg Clark's introduction that were carried forward in the NPPF.

Proceeding with each player in the WDC Local Plan: - In the following analysis the **highlighted sections are extracted from Greg Clark's introduction to the NPPF.**

❖ **Warwick District Council.** Their objective is to prepare a Local Plan that will conform to the NPPF but not forgetting the introduction references. WDC's preparation should incorporate in principle the highlighted references.

"It provides a framework within which local people and their accountable councils can produce their own distinctive local and Neighbourhood plans, which reflect the needs and priorities of their communities".

Authors Note:

The Local Plan. This implies that the Local People were involved in the preparation of the Local Plan. They were not involved throughout the process until the public (the Local People and their accountable Town and Parish councils) had first sight of the WDC Draft. In this draft there were all the detailed areas and number of houses allocated therein. It was clear from that stage that WDC intended to have the majority (75%) of all houses in a dense consolidation to the south of the towns of Warwick, Whitnash & Leamington Spa, and between the parish of Bishops Tachbrook. This draft has carried through with only minor changes. It has survived despite tremendous objections from local organisations and their accountable councils and groups.

Neighbourhood Plans were not on the agenda, and it was at some much later stage that these would be prepared by the individual communities. I am involved on the Steering Committee for the Whitnash Town Neighbourhood Plan. It has become clear that any plans we have brought forward will be effectively negated because the Local Plans has allocated for houses all possible land that is within the vision of the Neighbourhood Plan. Continued on Page 4.

REPRESENTATION ON THE WARWICK DISTRICT COUNCIL LOCAL PLAN 2014

Continued from Page 3.

Warwick District Council cont.

“Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.”

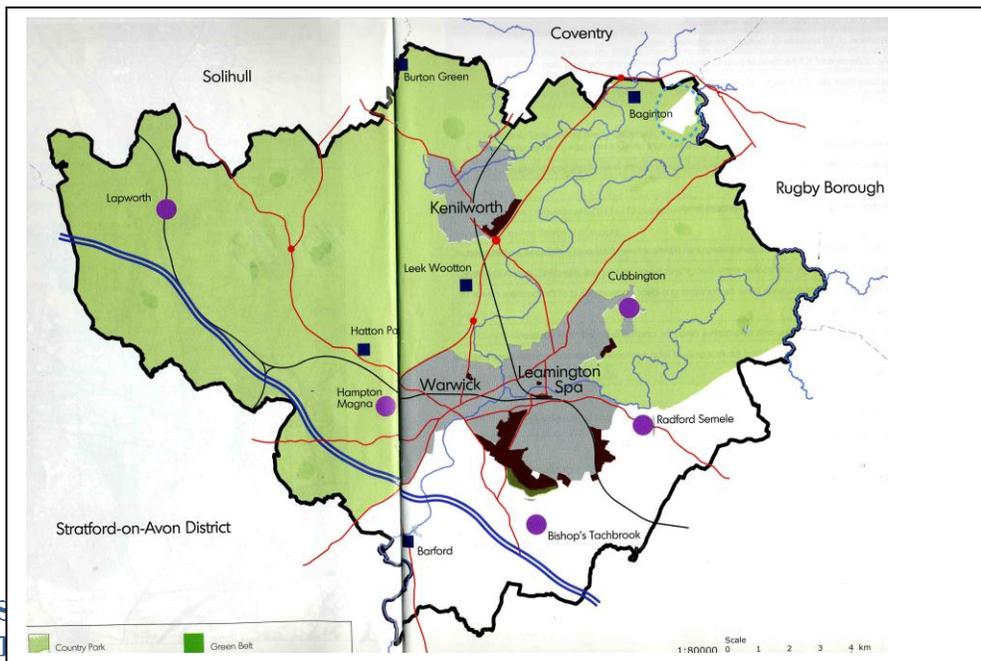
Authors Note: The Front Cover is an extract from the WDC Local Plan.

This illustrates the density of the proposed siting of approximately 75% of all houses in the South of the District. This will destroy the green field separation that currently maintains the identity of the three towns of Warwick, Whitnash, Leamington Spa and the village of Bishops Tachbrook. These communities will be fused into a large dense mass of housing with inadequate transport links that will not be able to maintain traffic flow. The result will be long delays and unacceptable pollution in the low lying areas. No mitigation measures will be able to prevent this – despite the claims.

The Overview Map shows the location of all houses allocated by WDC. Bearing in mind that the total number of houses in the Local Plan is for the whole of Warwick District.

I cannot see why all houses in the Local Plan are consolidated into a very small part of the District. Houses for Local People should include the total population of Warwick District but the Local Plan does not indicate any housing throughout the majority of the District. Continued on Page 5

Overview of Development – Whole District Map (Extracted from the ‘Revised Development Strategy’)



**REPRESENTATION ON THE WARWICK DISTRICT COUNCIL
LOCAL PLAN 2014**

Continued from Page 4.

This implies that any future growth in population in the District will be only from the areas where they are allocated by WDC. This cannot be true, or it means that any growth in population in the majority of the District will have to be housed in the south of the District as shown in the Local Plan. The reality is that WDC have not considered any housing requirements on the basis of Local People within their own locality. It is as if there are no communities outside of the densely populated areas in the south of the District.

Warwick District Council cont.

Therefore WDC have other reasons for choosing the south of the district to accept the majority of the housing. They have given the reason that it is because the District is mostly Green Belt (This is 82% as shown in green on the above WD Map). The conclusion of that reason is that WDC does not have sufficient Green Field land to accept the number of houses claimed to be needed, and thus creates a special reason to use Green Belt instead. To use the dwindling 18% of Green Field is irresponsible. Currently it serves to separate the three towns of Warwick, Whitnash and Leamington Spa, and the village of Bishops Tachbrook. The Local Plan is taking a giant step to amalgamate all these communities into one large housing estate without any cultural or leisure land that they currently need for future generations

Logically in consideration of this argument, the houses should have been distributed evenly throughout the District to accommodate each local group of people. This ensures that everyone has the choice of where to live in the District. This encourages families to lay down roots and not move away to where there are available houses.

The reason for the WDC choice of sites is simple but unacceptable. Certain developers own considerable tracts of land in the Green Field areas adjoining the three towns of Warwick, Whitnash and Leamington Spa and the village of Bishops Tachbrook. There was no consultation with local people and their elected councils over where WDC intended to locate houses. The consultation that did take place was between WDC and developers and landowners. The deal had been made before the public had any chance of being part of the Local Plan.

The developers involved in the Local Plan have speculated on being able to obtain planning permission when they acquired rights to the land they are now planning to develop. The sad truth is that they own vast areas of land not yet identified in the Local Plan. If this is allowed to continue unchecked there will be no Green Field to separate communities.

Developers have colluded with WDC at an early stage when they gave assurance that the land was available. At that time local people had they known would have protested that it was unsustainable to continue using the remaining Green Field without consideration of the existing community. Continued on Page 6.

**REPRESENTATION ON THE WARWICK DISTRICT COUNCIL
LOCAL PLAN 2014**

Continued from Page 5. The solution should have been to treat the housing needs as a special case to use Green Belt and spread the housing growth proportionally to the existing population in the District.

Warwick District Council cont.

"Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs".

Authors Note: Sustainable development in the Local Plan is not meeting present needs of the Local population but more on a highly questionable estimate based on unreliable information. It will result in stand-alone developments by individual developers that do not integrate with each other or with present communities. There is no overall vision of the end result except it will be a massive sprawl of housing without a hub into which they will fit. The present communities of Warwick Whitnash and Leamington have a close knit relationship that all can enjoy. The housing values are well above the average for England so that does not bode well for local buyers who cannot afford the 4 and 5 bedroom homes that form the majority of the Local Plan housing. The outcome of this is that the needs of local people will not be met, and the houses will be on the open market to outsiders of the District. The indication that this is true is evidenced by the number of home extensions that are continuing to emerge in the south of the district. The home owners would no doubt prefer a nice new 4 to 5 bedroom home that will be what the developers have in mind. So again I question who is the massive number of homes intended for? Note: After exhaustive attempts to bring to the attention of WDC planners that their estimates for future housing needs are exaggerated, the latest ONS figure have confirmed this. This fact should result in a revised Local Plan before it is examined by the inspector.

Warwick District Council cont.

"Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

•making it easier for jobs to be created in cities, towns and villages; •improving the conditions in which people live, work, travel and take leisure;"

Authors Note: The Local Plan has not included any improvements in the quality of what will be seen in the environment. It lacks vision in that it only includes housing that threatens heritage areas with too many houses close to existing communities. The people's quality of life will suffer from overcrowding of all facilities that barely manage to cope at the present, including roads, hospitals, schools, doctors and dentists and jobs. Presently employment in the south of the district is in fine balance with low unemployment - especially of young people. The massive influx of housing will upset that balance and require and encourage high numbers of car users to places of work and facilities including schools outside of the area

**REPRESENTATION ON THE WARWICK DISTRICT COUNCIL
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Warwick District Council cont.

“Local and Neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.”

The Local Plan is the main focus of people’s attention, but little is said about Neighbourhood Plans that are included in the NPPF. In fact it is this element that will have much more influence on peoples own neighborhoods.

My own town of Whitnash is busy preparing its own Neighborhood Plan and is frustrated that all remaining Green Space that is within its boundary has been allocated large numbers of houses. WDC has also facilitated a move to move and reduce the Whitnash boundary and include it in the boundary of neighboring Leamington Spa for more housing. The said Green Space is identified by the Neighbourhood plan for leisure and cultural use in its future plans. Included is a proposed ‘Whitnash Wood’ with links to its ancient well, and wheelchair access to pathways and cycle routes around the boundary of Whitnash. WDC Local Plan has effectively prevented this from ever happening. Instead we will be completely surrounded by new houses. Over the years Whitnash has been targeted to accept the nuisance of very high numbers of houses that have been built within and around its boundary. The town of Whitnash gets no benefit from most of these houses, just the nuisance and loss of amenity. Fairness is not in the vocabulary of Planners but it should have moral obligations to protect existing communities.

Warwick District Council cont.

“Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community.”

If this is interpreted correctly it implies that future development will be to satisfy the necessary growth of each community in the District. It does not condone the concentration of houses in such density in one relatively small part of the District. There is only one reason for this and that is because all development is developer led. Developers have the confidence that they will be allowed to continue building on land they acquired without any interference from the community that has to suffer the consequences of their thoughtless use of Green Field space that is now only 18%. The Local Plan will take a further 3%, leaving only 15%. It is time this was capped to maintain the balance between Green Belt and Green field.

❖ **The Developers.**

Their objective is to continue to exploit the land they have acquired. Since they do not have a moral obligation to protect communities from over development, this has to be applied by the only other body that can protect local people. i.e. Warwick District Council Planners. The local people and their elected representatives cannot see any evidence this has been applied throughout the Local Plan.

There does not appear to be any control that is working to prevent land banking, and there is clear evidence in WD that this is happening on a large scale. Furthermore it is confined largely in the south of the District. This causes great concern to the public and their elected councilors for their future. This fact is covered in the NPPF but is ignored.

Developers were well acquainted with the NPPF when they consulted with WDC planners. They did not question the fact that there were no members present of the public or their elected representatives. This is considered to be unreasonable conspiring to exclude interested local people.

WDC regard developers as their colleague's. They do not regard the local people with the same respect, and this has been evident in any attempts to negotiate with officers to try and moderate the extent of the massive expansion of houses around our existing communities. It seems the only hope we have is from an independent examination of the Local Plan to consider if it is sustainable and complies with the guidance of the NPPF. Objectors believe there is no way the Local Plan can proceed without drastic changes to the distribution of houses and the number of houses as forecast in the latest figures from the ONS.

The Front Cover is an extract from the WDC Local Plan.

This illustrates the density of the proposed siting of approximately 75% of all houses in the South of the District. This will destroy the green field separation that currently maintains the identity of the three towns of Warwick, Whitnash, Leamington Spa and the village of Bishops Tachbrook. These communities will be fused into a large dense mass of housing with inadequate transport links that will not be able to maintain traffic flow. The result will be long delays and unacceptable pollution in the low lying areas. No mitigation measures will be able to prevent this. This illustrates precisely the areas of land that developers control and is the chief reason why we cannot see an even distribution of housing to suit local people in their own community. The growth of small villages in the greater part of WD is ignored. With increase in population this will affect all areas yet the housing is concentrated mainly in the south of the District.

❖ **The Existing Local People.**

The communities in the South of the District who will face considerable and unacceptable change to their environment have not been considered in the Local Plan. WDC have conspired with land owning developers to satisfy their own agendas. This is without any consideration of the harm to existing communities.

A well organised and responsible committee of concerned councillors and leaders of other groups have been engaged in meetings to try and bring about changes they see as being necessary to bring about acceptable changes to the Local Plan. There has been little co-operation by WDC who regard objectors as just a nuisance.

Bogged Down With Detail

The Local Plan has been effectively controlled by a failure by WDC to keep developments under control when they are clearly part of the housing numbers included in the Local Plan. This has caused a very considerable strain on local residents and their representatives, who have been obliged to raise a large number of objections as each and every application goes through its stages and subsequent appeals.

This has resulted in all the effort being funnelled into the detail of each application. Objectors have become bogged down with this effort instead of being able to oppose the Local Plan as an entity. The public are still very concerned that these applications will continue non-stop and result in overwhelming destruction of our community.

There has never been an opportunity to be involved in the principles of the Local Plan such as being able to discuss the number of houses and their location before they had been finalised with developers.

The Mockery of the Local Plan

From the beginning of the Local Plan there has been a succession of planning applications that have been instigated by developers involved with WDC and Local Plan. These applications have been recommended by WDC and have resulted in large numbers of housing developments being approved. Each of these developments is included in the Draft Local Plan that is now with the Inspector.

The situation that now exists is that already WDC have allowed applications to proceed without waiting for the Local Plan to be approved or otherwise by the inspector.

These applications are now at an advance stage and work will shortly commence unless it is prevented.

It has been suggested to WDC that these applications being part of the Local Plan cannot proceed and should be withdrawn pending inspection and public enquiry. WDC have made no attempt to control this situation. I consider this to be a mockery of the Local Plan

❖ Conclusion.

The Local Plan is unsound because it does not consider the needs of the Warwick District as a whole.

There are too many houses in the forecast that needs to be modified in the Local Plan. The concentration of housing in the South of the District is disproportionate to the overall needs of the District, and should be distributed throughout the District in order to cover the needs of the district as a whole.

WDC have now approved a large number of houses that are part of the Local Plan. I consider this to be a violation of the Local Plan and any approvals withdrawn.

The fact that land is owned by developers should not be the prime reason for locating houses.

Ray Steele – Chartered Engineer M.I.Mech.E

Whitnash Resident

The Whitnash Society Representative

Joint Administrator of the Facebook Groups against the Local Plan