

26 June 2014

Mr D Barber
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

Dear Dave

Draft Local Plan Consultation

I was not able to give any assurances to the Special Meeting of the Town Council, that District Councillors were to give any further consideration to the Draft Local Plan, now that the ONS projections had demonstrated that the Draft Local Plan, based upon the Joint Strategic Housing Market Assessment (SHMA) should no longer be considered sound.

The ONS projections do fully justify the question raised by Councillor Richard Edwards, as to what action would Warwick District Council take regarding the Draft Local Plan, if there was any significant deviation from the population projection of the Joint SHMA, and to which the Chief Executive replied, that if there was substantive change, the implication was that the District Council would need to repeat that stage of representation all over again.

The Chief Executive's advice was very sound, for the ONS of projections demonstrate that the Draft local Plan is based upon projections within the JSHMA which are entirely suspect.

The very significant variation entirely mitigates against the District Council being able to provide sound and robust evidence, that the Draft Local Plan can be considered positively prepared, effective, and consistent with National Policy and justified to meet local needs.

For the District Council not to be able to provide justifiable sound and robust evidence must surely invite the Draft Local Plan to be rejected.

The population projection from ONS is 28.7% below the JSHMA and the apparent arbitrary figure of 1.661 persons per household is also incorrect, for household numbers have not reduced from the 2.294 household figures, in the 2011 census.

To submit a Draft Local Plan with a population projection of 28.7% above the ONS projection and a house density, which even based upon 2011 figures, is 27.6% below the likely density, is patently not sound.

Local Councils and local residents have been firm in their assessment that the number of dwellings proposed by the Draft Local Plan, was far in excess of local needs. The views of those Councils and residents have been repeatedly rejected by Warwick District Council and at no time has the District Council shown a willingness to work with this Council or Warwick residents to achieve a Draft Local Plan, which reflected local views and, which in turn could be supported by local residents and the Council. A clear rejection of the principles of the Localism Act, which charged the District Council to work with communities, and a requirement confirmed by Mr Andrew Langley MP. Leader of the House of Commons, whose advice was that Warwick District Council, would apply the National Planning Policy Framework, in the context of decision making by local people.

Bishops Tachbrook, Warwick and Whitnash have been repeatedly told that the green areas within those Councils were the only areas of green field sites that could be developed, for those green field sites were not protected by Green Belt Policies. No matter how important to the local community, the land had to be developed because the District Council had determined that the Local Plan would 'go for growth'.

Growth which clearly does not meet local needs, but seeks to maximise future financial advantage for the Council.

The Town Council's specific comments as to why the Draft Plan is not sound and fails to reflect the views of local people are set out below:

- i) A housing need of almost 13,000 homes, has not been justified,
- ii) Ignores the fact that a five year supply of housing land is available,
- iii) Ignores the importance of retaining green field sites free from development as recommended by the residents of Bishops Tachbrook, Warwick and Whitnash. Dismissed, even though such green field sites allocations, are unnecessary,
- iv) Bases the Draft Plan on a transport strategy which is flawed,
- v) Ignores the impact of air quality and the health of residents, for the development proposals will generate a greater number of vehicles, with more congestion and even more dangerous levels of air pollution in Warwick.

vi) Fails to reach agreement with other public or private sector bodies for education or health care, as to how those services can meet the demand generated by the development included within the Draft Plan.

vii) Accepts, that whilst the District Council would generate high levels of income from the proposals, other public sector bodies, also funded by Council Tax Charge payers, would need to generate over £50 million to meet the gap between developers contributions and funding required.

This would result in reduction in Education, Social and Health Services or increase cost to the Tax Payers. Indeed, the local NHS Hospital Authority has stated publically that it would not be able to provide for the projected population increase.

viii) Ignores the damage to the environment and heritage assets of Warwick and fails to promote Warwick as an attractive place to live in, work or visit. All of which would have a serious impact on the visitor economy.

ix) The District Council consultation ignored the intentions and expectations of the Localism Act 2011, which is that the Local Plan would be fully reflective of decision making by local people.

The Town Council therefore urges the District Council to take this opportunity to review the Draft Local Plan, to fully reflect the 28.7% reduction in the projected population growth.

Additionally, to positively investigate household density and again apply that figure to the assessment of housing need.

Finally to critically examine the population figures for Coventry and certainly any impact can be shared with other adjoining Councils. Large houses will have little relevance, for much of Coventry's needs, will be social housing.

Warwick District Council will be able to defend against unrestrained planning applications, whilst the Plan is reviewed for the District will be able clearly demonstrate a five year housing supply.

Yours sincerely

Derek Maudlin
Town Clerk