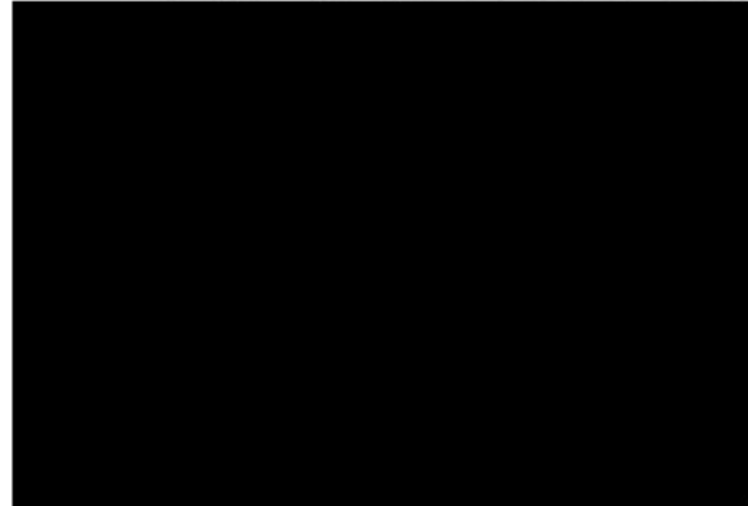




# WHITNASH TOWN COUNCIL



Town Clerk

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27<sup>th</sup> June 2014

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Dear Sir

## Warwick District Council Publication Draft

Whitnash Town Council would like to make the following comments with regard to the soundness of Warwick District Council Publication Draft:

We believe the Local Plan is unsound for the following reasons:

The Local Plan Strategy 1.43 on page 11 says the strategic priorities, are supported by a Spatial Strategy which seeks to:

- *maximise use of brownfield sites;*
- *only bring forward greenfield sites in sustainable locations;*

This is a contradiction of what is actually happening. The majority of the housing developments are taking place south of the River Leam on Greenfield sites.

The following numbers of homes are scheduled to be built in one area on Greenfield sites which seems totally unfair and the figures seem over inflated:

Planning Application	Address / site	Number of dwellings
W 14 / 0661	Land at Lower Heathcote Farm, Harbury Lane, Warwick	<b>785</b> dwellings
W 14 / 0681	Land South of Gallows Hill / West of Europa Way, Warwick, CV34 6SP	<b>450</b> dwellings
W 14 / 0300	Land at Asps Farm, bound by Europa Way and Banbury Road , Bishops Tachbrook, Leamington Spa, CV34	<b>900</b> dwellings

	6SS	
W 14 / 0407 (outline permission W/13/0607)	Land North of Harbury Lane, Heathcote, Warwick. CV34 6TB	<b>220</b> dwellings
W 14 / 0023	Harbury Gardens, Harbury Lane, Bishops Tachbrook, Leamington Spa, CV33 9QF	<b>200</b> dwellings
W 13 / 1207	Woodside Farm, Harbury Lane, Bishops Tachbrook, Leamington Spa, CV33 9QA	<b>280</b> dwellings
W 14 / 0775	Land to south of Fieldgate Lane, Whitnash	<b>111</b> dwellings
	East Whitnash	<b>209</b> dwellings
	Gallows Hill and South of Harbury Lane	<b>1500</b> dwellings
<b>Total</b>		<b>4655</b> dwellings

The Plan has not been '*Positively prepared*' and does not demonstrate effective joint working neighbouring authorities on strategic priorities: Stratford District Council is also proposing a new town of **3000** dwellings nearby. Warwick District Council has not properly consulted with its neighbouring authority. Why has Warwick District Council not considered doing this to alleviate a disproportionate number of houses in one area of the District?

Warwick District Council's total requirement is **12,900** dwellings or **860** per year. On this basis we already have applications in the pipeline for 6.5 years.

Objectors are fully supportive of the need for houses for our local people. However the claimed numbers of houses are considered to be exaggerated and would seek to increase government revenue to Warwick District Council. The types of houses being planned are not aimed at first time buyers, but aimed at mainly 'executive' buyers from outside of the area. With an ageing population there is a need for more bungalows and there is a distinct lack of this type of accommodation in the housing mix.

- *The plan fails to avoid coalescence between settlements;*

One key strategic priority of the Draft Local Plan is to avoid coalescence (see section 1.43 and Strategic Policy DS4 section d). The proposed plan fundamentally fails in this regard. The proposed development sites between Myton Road & Europa Way, land south of Harbury Lane and the allocation east of the railway in Whitnash and south of Campion School coalesces the large part of South Leamington, Whitnash and Warwick into a large urban sprawl."

***The above number of houses in one area is a clear indication that there will be a noticeable coalescence between Leamington Spa, Warwick, Whitnash and Bishops Tachbrook if Warwick District Local Plan is approved.***

- *protect important heritage assets;*
- *protect areas of high landscape value and important natural assets;*
- *focus employment, retail, leisure and cultural activities in town centres; and*
- *only develop sites in the Green Belt where exceptional circumstances can be justified.*

Warwick District Council has not consulted with Local People over the Number of Houses required and the location of 12,900 Houses'. Local people have had no input to the Local Plan.

In the Glossary on page 176 for the section on Delivery and Monitoring it says:

**Local Plan:** *The plan for the future development of the local area drawn up the local planning authority **in consultation with the community**. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004.*

In the same Glossary on page 180 it says:

**Statement of Community Involvement:** *A statement setting out the standards which local authorities will achieve in involving local communities in producing Local Development Documents and planning applications.*

The people of Warwick, Whitnash and Bishops Tachbrook have made comments and suggestions, but these have had very little input to the Local Plan. Any objections and observations have been ignored by Warwick District Council. Proposals were presented to Warwick, Whitnash and Bishops Tachbrook by Warwick District Council, but Warwick District Council failed to reasonably consider alternative suggestions that could have been made.

The District Council have decided to place 4655 of the houses on Greenfield sites in densely packed areas that currently separate the closely linked Warwick, Whitnash and Bishops Tachbrook. The loss of agricultural land has not been adequately considered.

Warwick District Council has not considered any objections of concern with regards to infrastructure, pollution, and loss of Greenfield space.

Warwick District Council has failed to adequately consider employment for the additional residents of the 12900 homes.

Key Land allocations for employment in the plan such as Tournament Fields, Stoneleigh, Honiley and the Coventry airport development are remote from the majority of the housing allocation. This fact will create severe road

congestion and pollution as the road access to and from the employment sites is very limited and already congested.

Alternatives have been put to Warwick District Council including spreading of the housing fairly throughout the district, or a 'New Town' in a more central location with close existing road networks to areas of employment.

**The Draft Local Plan is not '*Consistent with national policy*' (NPPF):**

Warwick District Council have not considered the guidance of the National Policy Planning Framework in the Local Plan by seeking to approve Planning Applications for large numbers of homes that are in the yet to be adopted Local Plan. Warwick District Council is circumventing the Local Plan before the Inspector has even considered it.

The National Policy Planning Framework has considerations that should protect local people from unfair, unjustified and inconsiderate development. Warwick District Council has not followed these considerations as 4655 houses will be built south of River Leam.

Whitnash has an emerging Neighbourhood Plan, but because the Local Plan has already allocated many housing developments sites in Whitnash and around the NP boundary there is little scope for the NP to influence planning policy.

The Whitnash Neighbourhood Plan is running behind the Local Plan and this will ensure that the Local Plan will take precedence. Warwick District Council has not taken into account the Neighbourhood Plan's content or timings. The Neighbourhood Plan should actively help form the Local Plan, but it has been unable to do so.

Section 185 of the NPPF says that "*Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.*" This has not happened.

The Local Plan has failed to adequately consider Gypsy and Traveller Sites as an integral part of its plan. Warwick District Council has deliberately timed that consultation after the Local Plan. This has meant that land that could be used for these sites cannot be considered. Some possible options were Warwickshire County Council owned land.

Gypsy Traveller Sites are also placed south of River Leam and no site visits were undertaken before deciding on these sites. One identified site is a well-established local Football Club.

The Gypsy and Traveller Sites consultation has only just been completed and to date no final report has been published. There is also large opposition to the suggested sites.

There is currently a £50 million gap in funding to implement the infrastructure for these developments. How does Warwick District Council planning to meet the deficit or will local taxpayers end up paying for this? The National Policy Planning Framework focusses unduly on housing and does not address infrastructure issues sufficiently. Why has Warwick District Council not addressed this problem?

Impacts on Air Quality and on Health have not been satisfactorily assessed by the Local Plan. Greater car use and worse congestion, mitigated but not eliminated by the transport strategy, would also worsen air quality.

The Transport Strategy is ineffective and unsustainable. The proposed large-scale use of Greenfield sites will make the occupants of the new housing estates car-dependent. The transport strategy is incomplete and inconclusive. It will undoubtedly result in more congestion in and around the vast developments.

Social Infrastructure needs to be addressed. Have adequate provisions been made for health care and education? Will the NHS and Warwickshire County Council be able to meet the demand for services? Education is also a major concern. Warwickshire County Council has to make cuts to the value of £92 million so where will the money come from for additional schools in our area with 4655 additional dwellings? Schools in our town are already oversubscribed.

## **Local Plan Objectives**

### **Objective 2: Providing well-designed new developments that are in the right location and address climate change.**

1.51 Make sure new developments are appropriately distributed across the District and designed and located to maintain and improve the quality of the built and natural environments, particularly historic areas and buildings, sensitive wildlife habitats and areas of high landscape value. In addition new developments should respect the integrity of existing settlements.

This is another contradiction of the Warwick District Local Plan as the majority of the houses (+-4655) are situated south of the River Leam. This is not an appropriate distribution, this is an unfair distribution.

The population projections in the Local Plan are out of date, which substantially affects dwelling requirements as set out in the plan.

The ONS mid-2012 Population Projections were published on 29<sup>th</sup> May 2014. Analysis of the projection shows that for Warwick District, by mid-2029 the

population predicted is 153,049, based on a mid-2011 population of 137,736. The additional population growth over this 18-year plan period is therefore 15,313 persons. This compares with the joint SHMA, which said that for 20 years the population growth should be 23,858, or, for 18 years the commensurate number being 21,472.

The ONS mid-2012 Population Projection therefore shows a 28.7% reduction in the population that is expected by 2029 and this is a significant material change. Interestingly, we note that there are similar falls in the population projection for the other Warwickshire Districts:

North Warwickshire falls by 25.4%

Nuneaton & Bedworth by 24.3%

Rugby by 39.4%

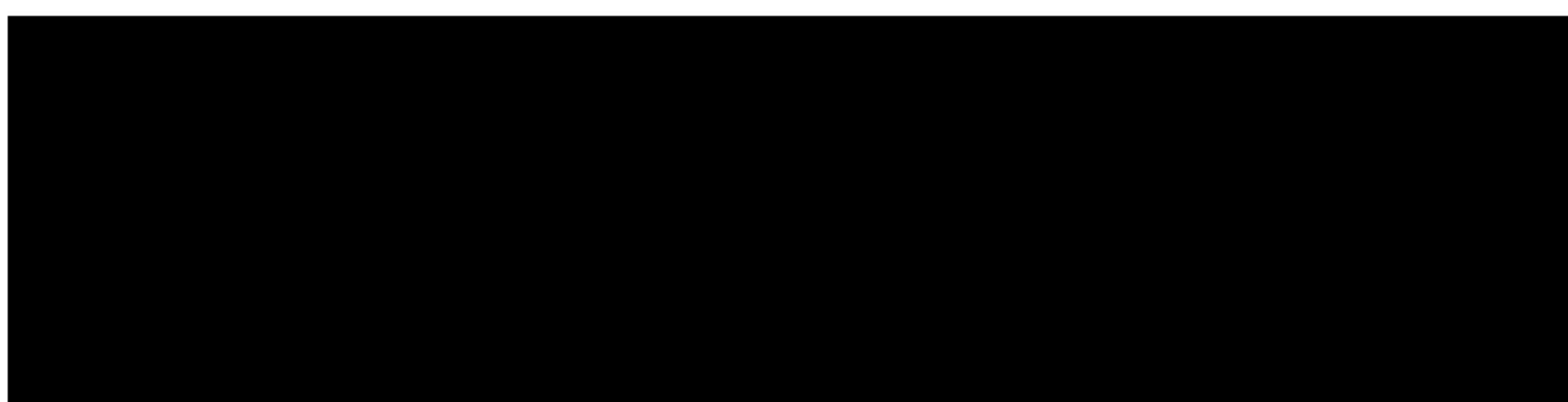
Stratford by 31.4%

Even Coventry sees a population projection reduction after accounting for the student population movements.

The Warwick Local Plan is unsound and it does not meet the requirements of the National Planning Policy Framework.

Please address these issues before submitting the Local Plan to the Secretary of State for Communities and Local Government for independent examination.

Yours sincerely

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Jenny Mason  
TOWN CLERK