

Representation covering the general shortcomings of the Warwick Local plan that demonstrate its unsoundness: Key areas of concern

	Area of concern	Source of representation I endorse	The case
1.	The overall housing need forecast of 12,900 is exaggerated	Bishops Tachbrook Parish Council (BTPC)	ONS estimates have been revised downwards and suggest only 8,100 houses are needed to meet natural increase and inward migration to Warwick District. The SHMA mysteriously suggests that occupancy rates of houses will fall significantly from 2.2. Such a decrease is unrealistic to expect; by anticipating this, the plan seeks to justify the provision of more houses than will actually be needed to house the target population.
2.	There is already more than a five years supply of land ready for development	BTPC	As ONS estimates have dropped less houses will be needed to meet the requirement for 5 years. Campaign groups claim that the requirement has already been met and this change reinforces their claim
3.	The loss of greenfield land is unsustainable		As only 8,100 houses are needed to meet the needs over the next 18 years we can show that this need can be met from the permissions already granted together with the brown field sites identified in the plan. We would maintain also that the greenfield sites are remote from schools, retail and other services and it has not been demonstrated that the proposals for sustainable transport are going to be practicable or effective. Sadly, much of the land allocated for development in the south of Warwick is some of the highest grade agricultural land, the loss of which we cannot afford.
4.	Greenfield site allocations are excessive and unnecessary as higher densities are achievable on developed sites	BTPC	The garden suburbs beloved by some ministers are luxuries that are extravagant in land and services, and their low densities mean more land than is strictly necessary is being allocated for development

5.	The transport strategy is ineffective and unsustainable	Save Warwick	Our consultants are able to show that the transport assessments which form an important part of the evidence base for the plan are seriously flawed. There are major issues in respect of accommodating traffic through Warwick generated from new estates south of the river
6.	adverse impacts on air quality and health have not been satisfactorily assessed or tackled	Save Warwick	Background evidence to the plan glosses over the importance of the Air Quality Monitoring Areas of Warwick, Leamington and Kenilworth where levels of NOx generated from traffic are at illegal levels with the claim that the problem will be overcome in the future by cleaner motor vehicles. This is disputed by a number of scientists and commentators and would be a risky course of action
7.	the plans for the necessary social infrastructure are not ready and authorities have not committed to them		Assumptions are made that schools, medical centres, hospital beds and other social infrastructure will be provided. We are aware that proposals in the plan for new and relocated schools are not automatically agreed by WCC - the education authority. Similarly other facilities cannot be assumed.
8.	There is a serious funding gap for necessary infrastructure	Save Warwick	Work done by Save Warwick and others some 6 months ago shows that the gap between, on one side of the equation, the contributions from developers and other revenue benefits from the new developments, and the costs of new infrastructure and facilities on the other will be in the region of £50 millions
9.	The plan would be seriously damaging to our environment and heritage assets	Save Warwick	The plan gives insufficient attention to our heritage and is potentially damaging to it in contravention of the provisions of the NPPF
10.	There have been serious shortcomings in the processes the council has used in the development of the plan	Save Warwick	The council has not properly considered the representations on the local plan submitted to them by residents and the community.