

## **Local Plan Key Issues**

### **Submission Draft Local Plan: Key Issues Arising from the Publication Draft Consultation undertaken in May and June 2014**

#### **Key Issue 1: The Housing Requirement**

Policy DS6 sets out a housing requirement of 12860 new dwellings over the Plan Period (2011-2029) or 714 per annum

##### **Nature of the issue**

- a) Has the Council had sufficient regard to the 2012 ONS population projections? Do these projections justify a lower objectively assessed need (OAN) for the District?
- b) Is the methodology used in the Joint SHMA reasonable and robust?
- c) Has the Council had sufficient regard to environmental and viability constraints in setting the housing requirement? Does the extent of the green belt and other constraints such as heritage, landscape and the cost of infrastructure suggest that it is reasonable for the Council to plan for a lower requirement for the District?
- d) Should unmet housing need arising elsewhere (in particular Coventry and Birmingham) be further addressed within the District? As a result, should the proposed housing requirement be higher than set out in Policy DS6?
- e) Has the Council had sufficient regard to employment projections? Does the proposed housing requirement provide for the projected growth in jobs particularly in light of the CWLEP's growth ambitions and the proposed sub-regional employment site?
- f) Has the Council taken account of market signals in setting its housing requirement, or is there a case for a higher requirement to take these in to account?

#### **Key Issue 2: Duty to Cooperate**

The Council has prepared a Duty to Cooperate Topic Paper which sets out its activities and the agreements that have been reached to demonstrate fulfilment of the Duty to Cooperate.

##### **Nature of Issue**

- a) Has the Council met the legal requirements of the Duty to Cooperate?
- b) Has the Council identified the correct strategic issues on which cooperation needs to focus?
- c) Have the Council's Duty to Cooperate activities been effective in planning for issues with cross boundary impacts?

### **Key Issue 3: Meeting the Housing Requirement**

Policy DS7 sets out how the Council has proposed to meet its housing requirement including windfalls, small urban SHLAA sites, consolidated employment land and allocated sites

#### **Nature of the Issue**

- a) Is the Council's overall approach to meeting the housing requirement justified?
- b) In particular, has the Council allowed for an appropriate number of windfall developments?
- c) Is the Council's approach to allowing for the development of small urban SHLAA sites and consolidated employment areas reasonable?
- d) As a result are the proposed site allocations appropriate to meet the District's housing requirement?

### **Key Issue 4: Distribution of Development**

Policy DS4 sets out the Council's Spatial Strategy for the Local Plan. This is delivered through Policy DS10 which indicates the broad location of allocated housing sites and Policy DS11 which sets out the housing site allocations.

#### **Nature of the Issue**

- a) Is the Council's spatial strategy reasoned and consistent with the NPPF?
- b) Has the Council done enough to take account of opportunities to bring forward previously developed land for development?
- c) Is too much development concentrated in the areas to the south of Warwick?
- d) Should more development be located in the green belt on the fringes of Coventry?
- e) Have the proposed exceptional circumstances to release land from the green belt for development been sufficiently justified?
- f) Has the Council identified the right amount of the development for growth villages and have the right villages been identified for growth?
- g) Has the Council allocated the right sites? (numerous issues have been raised with regard to whether specific sites are appropriate)

### **Key Issue 5: Employment Land Provision**

Policy DS8 sets out a requirement for 66 hectares employment over the Plan Period and Policy DS9 indicates that in addition to the employment land already available, 21 hectares should be allocated, split between Thickthorn, Kenilworth and Stratford Road, Warwick. (NB: Sub Regional Employment Site is dealt with separately in issue 6)

#### **Nature of the Issue**

- a) Does the Plan make the right level of provision for employment land over the Plan period?
- b) Are the proposed employment allocations appropriate to meet the needs of business?

### **Key Issue 6: Sub Regional Employment Site**

Policy DS16 make provision for a sub-regional employment site in the vicinity of Coventry Airport.

#### **Nature of the Issues**

- a) Is there a need for sub-regional employment site or is existing provision adequate?
- b) Is the proposed location the best location to meet sub-regional employment needs?
- c) Does the evidence of potential employment creation outweigh the loss of green belt?

### **Key Issue 7: The Provision of Infrastructure**

The Draft Infrastructure Delivery Plan sets out the infrastructure needed to support the growth proposed in the Plan. The Plan includes costs and sources of funding

#### **Nature of the Issue**

- a) Is the proposed infrastructure set out in the IDP adequate and appropriate?
- b) Can the proposed infrastructure be delivered and is the Council's approach viable?

### **Key Issue 8: Traffic and Transport**

This issue is closely linked to issues 1,3, 4, 7 and 9. It has been an

area of significant concern in representations. The IDP sets out proposals for transport mitigation to support the proposed level and location of growth, whilst Policies TR1 and TR2 provide the policy framework for new development.

**Nature of the Issue**

- a) Is the proposed transport mitigation strategy (as set out in the IDP) effective in mitigating the impacts of growth?
- b) Does the proposed approach place too much emphasis on car-borne transport and insufficient emphasis on other forms of transport?
- c) Are the proposals set out in the IDP deliverable and viable?
- d) Have the potential impacts on air quality, community cohesion and air quality been effectively addressed?

**Key Issue 9: Historic Environment**

The District has a rich variety of heritage assets. In this context the development proposals and site allocations set out in the Plan will have an impact. Policies HE1 to HE6 set out policy framework for protecting and enhancing heritage assets in the District.

**Nature of the Issue**

- a) Have impacts on heritage assets been adequately considered in assessing sites and making allocations?
- b) Have indirect impacts such as those resulting from transport mitigation, been adequately considered and addressed?
- c) Is the policy framework sufficiently robust to ensure the District's heritage assets will be adequately protected and enhanced?

**Key Issue 10: Health**

The Plan seeks to place health at its heart and includes a range of policies (for example SC0, HS1-HS6, BE1, TR2) which seek to ensure health is an important factor in taking planning decisions.

**Nature of the Issue**

- a) Does the Plan effectively address air quality concerns?
- b) Should more be done to understand the health impacts of developments when planning applications are being assessed?
- c) Could more be done to address concerns around obesity in the District?

**Key Issue 11: Affordable Housing and Housing Mix**

Policies H2 and H3 seek to ensure an adequate supply of affordable housing is brought forward, whilst policies H4, H5 and H6 seek to ensure that right mix of housing is achieved to meet the needs of the community

**Nature of the Issue**

- a) Will the plan's policies and proposals deliver the affordable housing that the District needs?
- b) Is the proposed housing mix reasonable, or should this be determined by market forces?
- c) Has the right balance been struck between providing for student accommodation and minimising the impact this can have on established communities?
- d) Will these proposals undermine the viability of housing sites and/or undermine the contribution that site can make towards infrastructure?