

Statement from Bishop's Tachbrook Parish Council relating to the Matters and Issues identified by the Inspector.**Represented by Councillor Ray Bullen Dipl. Arch RIBA.****Matter 4 – The spatial strategy****Issue**

Whether the spatial strategy is justified, effective and consistent with national policy.

Policies DS4, DS10, DS19 and H1 and list of Growth Villages and Limited Infill Villages

Before addressing the questions for this matter the Parish Council would wish to say that the spatial strategy in the draft local plan has been formulated to meet the demand on Warwick District for 16,776 dwellings arising from the MoU. For the reasons explained in the answers to Matter 3, the 2014 household projections show a much reduced demand on Warwick District of 8,054 as compared with 10,800 based on the 2012 household projections, increased without any transparent reason for the reason why, other than to provide an unmet amount of Coventry's unmet need by increasing the Warwick OAN from 600 to 932 dpa.

The 2014 based household projections give the opportunity to change the spatial strategy /by amending the Warwick OAN to 447 plus 269 to meet Coventry's OAN totalling 716 dpa 12,885 over the plan period. This will permit the sites selected to be related to the best location to meet the need driving the development of anywhere that is providing for Coventry within reach of Coventry.

It also needs to be said that whilst the Local Plan has been being developed large numbers of planning permissions have been granted and the current position is that from data assembled by the Parish Council from the WDC website, There are 9,978 planning application in the system for sites that had not completed by 30th March 2011 and are still valid. Of these 2,374 have been completed and 2,697 have started work on site. This leaves 4,907 permissions not started.

WDC produced a Housing Supply Topic Paper(HSTP) in July 2016 and a comparison has been done with the parish assessment. (see Appendix 3). The HSTP finds permissions for 7,574 dwellings, of which 2,102 have been completed according to Appendix 1a. Appendix 1b is erratic in recording starts and completions but from the sites list therein, using the completions from the BT lists, only 737 have completed with 2,593 starts. This leaves 4,244 permissions not started.

This leaves 2,404 planning approvals that are not in the HSTP of which 1,637 have been completed, 104 have started and 663 have not started. Further work is being done to update this data by the council so this may resolve the difference.

Assuming the 9,978 permissions are correct, then to meet the 2014 based OAN including the unmet need portion totalling 12,885, 2,907 more sites need to be found from DS11 listed sites in Appendix B to the Modified Plan that have not yet received planning permission.

Questions

- 1) **What is the basis for the spatial strategy in terms of the location and broad distribution of development set out in Policies DS4, DS10 and H1 i.e. between different parts of the District, between the urban areas and villages and between brownfield, greenfield and Green Belt sites?**

DS4 is a Spatial Strategy that was written for Warwick District. Although parts of the DLP recognise the duty to co-operate with a view to supporting Coventry's unmet need, this is not translated into DS4 Spatial Strategy. It refers to allocated housing... across the District but not to housing to meet unmet needs of other authorities. In effect, there need to be two plans in place, one for the district and one for the Coventry unmet need because the spatial distribution of sites for the one is not the same as the spatial distribution for the other.

The spatial strategy written for Warwick is centered around the fact that about 80% of the district is in Green Belt, stretching from the Coventry boundary southwards around Warwick & Leamington as shown on the Local Plan Policies Map Key Diagram-Proposed Modifications 2016. About 10% is the urban area of the three towns leaving 10% in open countryside. For this reason some 5715 of the District OAN has been included in this 10% located on greenfield sites as being the only space available. This policy has been in operation since the development of the Local Plan began in 2011/12. At the present time, about 64% of the permissions granted are in urban locations, 30% in rural locations, outside green belt, and 6% in villages.

When the duty to cooperate became significant in about 2014, that spatial strategy remained in place. This resulted in plans to provide for Coventry in the south of the District, as being the only place available. This permitted the grafting on of Coventry's need to the local plan being finalised in 2014 leading to the plan at examination being found unsound as the HMA FOAN had not been met and there was not a clear strategy in place to do so. Part of that clear strategy ought to be how it should be done, in other words have a spatial strategy to that effect.

As a significant city, Coventry attracts people for the manufacturing work opportunities and range of facilities it provides. It tends to have a sort of 'flat earth' attitude in that city living stops at its boundary. People wanting to work in Coventry generally expect to be able to live in Coventry. In the past, as Coventry needed to grow, it expanded its size by boundary moves. Green Belts were brought in post war to stop urban areas expanding uncontrollably. Hence a spatial strategy for Coventry's growth needs to address the location of sites that will actually service the city. The Warwick strategy of expansion to the south is not relevant to Coventry's needs, as if it is carried out, few Coventrians will buy there because of distance to work and others commuting south towards Oxford will. Coventry will remain, by and large, as having insufficient capacity for the projected increase. It will be particularly noticeable for the social housing provision as affordable homes built on the south side of Leamington for those working in Coventry who would have the cost and time related to somewhat difficult journeys into the city.

The intervention of the examination in finding that plan unsound should allow Coventry and the other HMA authorities to develop Strategic Spatial Strategies to find sites close enough to Coventry to be practical for Coventry. This is what has led the Parish Council to suggest a simple amendment to DS4b. But this may need to be more specific as it means intrusion into the Green Belt that can only be done in exceptional circumstances. The question is, is the population projection that increases the population of the city by 25% by 2029, in just 13 years from now, sound enough to reverse policy on Green Belt? Or, should or could Coventry show that the full expansion cannot be reasonably accommodated.

The inclusion of Kings Hill and Westwood Heath with a capacity of 2245 immediately and with the potential for 4,900 on their own almost meet the Warwick contribution of 4,831 towards Coventry's unmet need that the Parish Council has suggested. They would also allow a phased implementation that could be dependent on the levels of future projections.

2) How has this been affected by the Council's suggested modifications?

The spatial strategy has hardly been amended at all. The plan is written as an expansion of Warwick District, rather than an expansion of Coventry and Warwick District.

3) Specifically how would the approach to development on the edge of Coventry affect the spatial strategy?

For WDC to respond.

4) What alternative options have been considered in terms of the location and broad distribution of development and why were these discounted?

For WDC to respond.

- 5) **How were different areas of Green Belt assessed and how has this informed the strategy?**

For WDC to respond

- 6) **Is the approach to the location and broad distribution of development appropriate and justified?**

Not yet but it is getting better.

- 7) **What is the basis for identifying Growth Villages and Limited Infill Villages? Is the list of villages in each category justified and appropriate?**

The function of the Town & Country Planning Acts is to plan for both town and country. Through a plan-led system the Acts should ensure that the right development is located in the right place. It is not a function of the Acts to fill the order books of development companies or prevent development where that meets the Local Plan. Growth and limited infill villages are all in open countryside and have settlement boundaries outside of which open countryside prevails. H1(c) implements NPPF55.

The number of villages in para 4.7 is only to be expected in the remaining part of rural Warwickshire that Warwick District is.