

WARWICK LOCAL PLAN EXAMINATION 2016

Matter 4

STATEMENT ON MATTER 4 BY THE CAMPAIGN TO PROTECT RURAL ENGLAND

MATTER 4 - THE SPATIAL STRATEGY

This response is in addition to earlier responses to consultations on the proposed local plan.
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

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?
- 2) How has this been affected by the Council's suggested modifications?
- 3) Specifically how would the approach to development on the edge of Coventry affect the spatial strategy?

The proposed policy (DS4) on Spatial Strategy proposes Green Belt locations for development on the edge of built-up areas - this is contrary to established Green Belt policies. A key purpose of the Green Belt is to curb urban sprawl but the proposed policies include 'urban extension' which is another way of saying urban sprawl. The Sustainability Appraisal Addendum recognises that proposed urban extensions south of Coventry would have cumulative and potentially major negative effects on landscape, visual amenity and openness through loss of Green Belt and that these would remain even after so-called mitigation. The proposed policy is unsound when it is applied within the Green Belt.

The proposed policy (DS10) on the Broad Location of Allocated Housing Sites conflicts with national Green Belt policy. In particular, the addition of green field sites on the edge of Coventry conflicts with the purposes of the Green Belt south of Coventry and would cause great harm. Harm would be magnified when cumulative impact is properly assessed: the combination of the unjustified sub-regional employment site (Policy DS16) and the excessive housing proposals would together devastate the Green Belt south of Coventry, extending the sprawl of Coventry around Baginton towards Stoneleigh and Bubbenhall. There are non-Green Belt alternatives available for housing within the Strategic Housing Market area and for sub-regional employment land in the wider sub-region.

The cumulative impact on roads in the area would also be unacceptable. There is no evidence that mooted transport improvements are viable and would resolve the issues.

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

The proposed policy (for example, DS NEW1- Directions for Growth South of Coventry) is based on Warwick District providing in full so-called unmet needs arising from Coventry and the sub-regional. The Proposed Modifications claim that meeting Coventry's needs "is an important aspect of creating a sustainable and secure base for the growth of the city".

The National Planning Policy Framework requires plans to take into account broader policies and explicitly excludes Green Belt from its presumption in favour of sustainable development (NPPF paragraph 14 and footnote 9). Unmet needs from neighbouring authorities should be met 'where it is reasonable to do so and consistent with achieving sustainable development' (NPPF paragraph 182). Green Belt is explicitly cited as a policy indicating that there can be exception from the need for plans to meet objectively assessed needs (NPPF paragraph 14). The Government has consistently committed to protect the Green Belt and has repeatedly confirmed that the single issue of unmet demand is unlikely to outweigh harm to the Green Belt.

The cumulative impact of meeting in full sub-regional needs for both housing (Policy DS NEW1) and employment (DS16 Sub-Regional Employment Site) would be very harmful. These demands are excessive and not justified.

In order to progress at the rate of expansion it feels necessary to achieve its own ambition, Coventry has to require its neighbours to provide both housing and employment land to meet its alleged needs. When a city cannot accommodate either sufficient housing or sufficient employment within its own area or means, its plan is not sustainable. It might be justified for a city to request its rural neighbours to contribute either housing or employment in order to help it balance its urban plan; it is certainly not justified to demand that rural neighbours provide both housing and employment in order that urban Coventry can grow at a rate that is clearly beyond its means and capability. Coventry living beyond its means is not sustainable and it is unreasonable to expect Warwick District to meet Coventry's excessive demands to the severe detriment and amenity loss of its own residents and businesses. The proposed plans are unsound and unsustainable: the appropriate alternative is that external demands on Warwick District should not be met in full. There is no evidence that this reasonable alternative has been evaluated properly.

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

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

The changes now proposed to the Green Belt (Policy DS19, Ref Mod 16) represent a very substantial departure from previous plan proposals. This adds greatly to the concerns previously submitted about the impact on the Green Belt. The proposed new and amended housing applications amount to an additional 500 hectares of Green Belt land to be taken in addition to earlier proposals such as the 124 hectares to be removed from Green Belt for the proposed Sub-Regional Employment Site. Even more land is proposed for removal through policies DS NEW1, DS NEW2 and DS NEW4. The cumulative impact of this excessive development in the Green Belt would be immense and is not justified.

Although the Joint Green Belt Study of June 2015 ('JGBS') is listed in the Evidence Base, its findings are effectively ignored in the Proposed Modifications and the Local Plan now proposed. The associated Sustainability Assessment Addendum ('SA') makes a single mention of the JGBS with reference to Baginton as a growth village. In Baginton, the SA recognises that the JGBS "found that the parcel of land represents the principal protector of the countryside from further encroachment" and consequently the SA concluded that development in Baginton would have "major negative effects on SA Objective 5" (Prudent Use of Land and Natural Resources). This valid conclusion relates to a site of 4 hectares for 80 dwellings in Baginton.

The same JGBS finding applies to other Green Belt sites which have much greater impact than a 4ha site. For example, the proposed Sub-Regional Employment Site in Baginton is 235 hectares, over 50 times the size of the proposed housing sites in Baginton, so it is of much greater impact but the JGBS's conclusions have effectively been ignored in the proposed Local Plan. This issue is explored below through two examples, showing that the proposed plan is unsound because it has not taken the Joint Green Belt Study properly into account.

The Joint Green Belt Study assessed parcels of land for their performance in terms of the national policy, specifically rating them against the five purposes defined in the NPPF. These parcels were also grouped into broad areas which were assessed for their strategic Green Belt designation. The proposed sub-regional employment site covers parcel C10 and the proposed King's Hill housing site covers parcel C14, all within Broad Area 3. Broad Area 3 is assessed as making a considerable contribution to all the purposes of the Green Belt.

All parcels scored full marks against the objective to assist urban regeneration by encouraging the recycling of derelict and other urban land. Parcel C10 (the proposed sub-regional employment site) is rated as a higher-performing Green Belt parcel and is cited as an example of land bordering the southern edge of Coventry as contributing significantly to the purposes of the Green Belt. It highlights the good 'intervisibility' with the historic core of Coventry, contributing to the visual setting of the historic city. The study notes that the A45 "represents a significant boundary helping to protect the countryside within the parcel from encroachment from Coventry" and "the Green Belt within the parcel represents the principal protector of the countryside".

Parcel C14 (the proposed King's Hill site) is similarly rated in the JGBS as a high performer against the objectives of the Green Belt. This land is assessed as having the characteristics of the countryside, contributing to the setting of the historic city of Coventry. The SA acknowledges that the proposed urban extensions south of Coventry would have cumulative and potentially major negative effects on landscape, visual amenity and openness through loss of Green Belt and that these would remain even after so-called mitigation.

The Joint Green Belt Study concludes that the West Midlands Green Belt continues to meet the purpose of encouraging recycling of urban land, "noting that there remain some significant areas of previously used land in the urban areas." Development in the Green Belt is excessive and is not justified, particularly when the chosen sites are some of the most sensitive - highest performing - parts of the Green Belt around Coventry.

The Joint Green Belt Study confirms that the proposed developments would cause immense harm to the Green Belt. It would need incredibly strong exceptional circumstances to clearly outweigh such harmful and inappropriate development. There is no evidence that these sites, driven in part by excessive demands arising outside Warwick District, have been selected as the best available after a top-down sustainability assessment for the whole Coventry and Warwickshire Local Enterprise

Partnership area and the whole Strategic Housing Market area. Brownfield sites and other sites outside the Green Belt are suitable alternatives.

Both of the above examples, which are very substantial areas, were first proposed for removal from the Green Belt in late stages of the development of the emerging Local Plan. Public consultation on these proposals has been constrained solely to issues of soundness. There has been no adequate public consultation on these key proposals at a stage when the Council was open (in theory) to considering changes to its proposals. The consultation process has not allowed effective engagement of interested parties. This process is seriously flawed and does not comply with the necessary procedures for preparation of a Local Plan. Lack of adequate consultation renders the plan legally non-compliant.

The recent Joint Green Belt Study has confirmed that the proposed Green Belt changes would cause immense harm to the purposes of the Green Belt. The cumulative impact of the proposed changes would devastate the Green Belt south of Coventry. There are no exceptional circumstances that justify exceptional harm.

The proposed policy is unsound. The Green Belt should be protected and development that is really justified - not excessive - should be directed towards urban areas and land outside the Green Belt.