

Submitted brief note

Opportunity to develop and reinforce

Sites H44 & S2 form area of GB previously proposed for development in earlier draft plan

but withdrawn, after consultation

WDC then accepted that this site should not - and need not - be developed to meet Leamington's need.

So what's changed?

Only one material change - WDC is acceptable - under the MOU - of a further 3400 dwellings to help meet Coventry's shortfall

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That - and that alone - lies behind
decision to bring forward ~~ago~~ now this
high-quality GB land for development.

So, this is not about meeting need in
Leamington.

WDC states in its submission on Matter 4

" a significant amount of additional land
needed to be allocated for housing to
meet the needs of Coventry" (para 9.)

Our view is that this site is not the
answer to the problem of the Coventry
shortfall.

The Cov. shortfall does need to be
addressed. We believe there is an
alternative, sustainable solution

All the reasons that WDC previously accepted for this site not being appropriate for Leamington's needs still hold.

'Exceptional circumstances' not met.

So these arguments should still weigh against this proposal



Now, does the need to meet The Gov. shortfall introduce any new factor(s) to outweigh WDC's own previous reasons for not pursuing development here?



We believe not - for four main reasons

1. Difficult to reconcile with steer provided by NPPF
2. " " " " " provided by WDC itself
3. That the 'functional relationship' methodology used to determine the decision is flawed
4. This does not address Coventry's stated needs and objectives

#34: Plans should ensure developments that generate significant movements are located where need to travel will be minimised, i.e. locating homes close to where people work

#37: planning policies should minimize journey lengths for employees

Different to reconcile this proposed development with their objectives

- [housing in Leam -
employment in Coventry

#47: asks local authorities to ensure that proposed developments should meet the needs of the housing market area

we accept that this site ~~does~~ is required to meet needs of the Leamington housing area.

So, how can it possibly fit Cov.?

A totally different housing market

80 - The 5 purposes of GB.

when tested against them before, we accepted that this GB land should not be prepared for development.

That analysis has since changed.

And we completely reject Taylor Wimpey's
altered assertion (4.13 The Development
Framework Document) that this site

"has a greater affinity with the urban
edge than with the open countryside"

That statement has a greater affinity with
the developer's interests than with the
objective truth.

2. Difficult to reconcile with WDC's own ^{stated} planning policies

DST

"when greenfield sites are required for housing they should generally be located on the edge of urban areas in sustainable locations close to areas of employment"

WDC - in their submission on Matter 4 (August 2016) state (para 2 a)

"The spatial strategy in DST remains unchanged"

but then go on to say

"The application of this strategy, in the context of additional housing requirements arising in Coventry, has resulted in changes, albeit with a continued focus on sustainable locations adjacent to built-up areas."

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The trouble is, this site is adjacent to
the wrong built up area.

The additional need — as the sentence says —
is in Coventry, not in Leamington

3. Functional Relationships - a flawed approach

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Refer to report to the Gov, W'shin & S.W. Leics
Shadow Gov Prosperity Board paper, Sept. 2015.

Review how officers/members came to allocate
the 17,800 Gov. shortfall

Para 13 - decision to do it using 'Functional
Relationship Option'

Alternative approach - 'Spatial Options' - not used.

Had Spatial Options been used, paper
confirms, "edge of Coventry" would have
been "the most sustainable approach"

So why the Functional Relationship method?

para 12 explains what it is - "based on existing
migration and commuting trends"

para 13

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"It was felt that this approach best reflected existing patterns of movement."

This is what gives rise to WDC's large share of the Cov. shortfall.

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But this is ^{contra -} planning: ~~in reverse~~

taking existing patterns of movement and then building in a way to reinforce them.

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But current movement patterns indicate the problem - they should be a guide to the solution.

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It very hard to reconcile this approach with WDC's stated planning objectives, as discussed earlier.

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Or with Coventry's needs →

more Coventry

Coventry's needs

fundamentally not met by development on this site.

Why not?

→ New to refer to
Coventry plan -
inextricable from our
1991/2003

- 1.) Coventry's own draft plan tells us that the City's growth is driven by "more local people choosing to stay in Coventry and more people choosing to move to the city to live, work and be educated."

An intra-city housing demand is not sustainably met by extra-city housing provision.

2) The housing market is unique to Cov. city - and is not the same as Leamingtons.

Cov. housing need is "generally focussed towards small, low value properties"

p 44

opposite values.

[71% of Cov. houses are in C-Tax bands A & B
(~~44% of houses are~~)
15 7% in Warwick District

It plans emphasize the need to

p 45

"optimise opportunities for increasing the new affordable homes supply."

N-Leam prices are substantially higher than Cov. (3x)

- Properties built on proposed site will not be for sale at Coventry prices!

21012

3) "in-commuting to Coventry for work has increased substantially in the last decade, placing pressure on sustainable travel patterns and air quality.

p 93

The city must do something to reduce in-commuting and rebalance its housing / employment offer."

—

(to ~~meet~~ ~~Coventry's~~)

Developers on this site -> to meet the Gov.

shortfall - would ↑ in-commuting, not ↓ it

Finally, Coventry's own plan says this -

p 15

" In reflection of the Warwickshire authorities supporting the delivery of the city's wider housing needs, when it is shown to be desirable, appropriate, sustainable and deliverable, The Council will support its Warwickshire neighbours in bringing forward land for housing that is adjacent to the city's existing administrative boundaries."

This site is not adjacent. It is 8 miles away

Leam's needs are not met by development of this site - we do accept that.

Clearly, neither are Coventry's

So is there an alternative for W/DZ to pursue? 15

Yai.

We suggest that Cev's needs - once you take them seriously - can be met by further development of sites at S1 & H42 - primarily Kings Hill

CEG in their submission on March 4, Sept 29th suggest that the current proposed housing allocation on these sites is "fundamentally too low."

not because of shortage of land

Sites can take 1500 dwellings.

Development of these sites - instead of north of Leamington - would be

- consistent with MOU
- consistent with ~~PPS~~ NPPF
- consistent with LDC's planning objectives
- consistent with Gov's stated planning objectives
 - sustainable location
 - adjacent to boundary
 - housing appropriate to local market
 - addresses PC concern about in-commuting

WDC has told you in their matter 4 submission (59) that they have included this high-grade green belt site as "an option of last resort"

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We feel it more last minute than last resort

It feels ^{more} like a hasty fix than anything else.

It isn't right for Leamington

Not for Coventry → because instead of ameliorating their problem, this would exacerbate the

wrong housing - wrong place

We urge an amendment to the WDL plan

- regarding development on SB land north of
Leamy

• suitability

- future development on non SB land adjacent
to the Cor. City boundary

remove a fix

• replace it

with a plan