

Representations on the Draft Submission Version of the North Warwickshire Local Plan 2017 on behalf of the North Warwickshire Labour Group.

Introduction

The North Warwickshire Labour Group comprises the 13 Labour councillors on North Warwickshire Borough Council.

This representation sets out the Group's key concerns in relation to the draft submission version of the North Warwickshire Local Plan (NWLP).

The current North Warwickshire Core Strategy was adopted in 2014, at a time when Labour was the controlling Group on the Borough Council. The strategic vision and objectives of the new NWLP are substantially unchanged from the Core Strategy, and at the outset the Group would like to record its continuing support for these as the starting point for the plan and also its support for the affordable housing policies.

The Group's concerns relate to the scale of the housing growth now proposed for North Warwickshire in the NWLP and the strategy for the distribution of this growth across the Borough. The Group is also concerned at the unresolved infrastructure issues which this scale of growth generates.

The scale of growth proposed in the adopted Core Strategy is 175 dwellings per year, which is broadly in line with historic development rates. The "aspirational" growth rate proposed in the draft NWLP 2016 was 452 dwellings per year, and it is 436 dwellings per year in the draft submission NWLP. These rates are substantially higher than anything previously achieved in the Borough and they represent a "step change" in growth rates in North Warwickshire.

The Labour Group does not question the need for higher rates of house building to address problems of affordability and housing shortages. It also recognises that in recent years land shortages have emerged in adjoining areas, in particular Coventry, Birmingham and Tamworth, and because of its location it is right that North Warwickshire should be considered as a possible location to help meet these shortages. However the Group is not convinced that there is a clear rationale for the scale of growth proposed in the NWLP, nor is it convinced that the strategy proposed in the plan for accommodating a substantially higher level of future growth is the correct one, and finally it is not convinced that there is sufficient certainty over the provision of the necessary transport infrastructure to enable growth to proceed in a satisfactory way.

For these reasons the Group does not consider that the Plan should be allowed to proceed in its present form.

Overall Level of Growth

Table 1 of the submission NWLP on page 32 summarises the overall housing requirement for the Borough, based on the latest update of the Coventry and Warwickshire Strategic Housing Market Assessment. The resulting figure of around 5,800 for the period 2011 – 33 includes provision for North Warwickshire to provide for some of Tamworth's needs and for a modest level of new housing to help meet needs arising in Coventry. The latter is consistent with an agreed approach across the

Coventry and Warwickshire Housing Market Area. The Group accepts that this is the best available assessment.

However the plan then proceeds to add a further 3,790 to the requirement as a contribution to meeting the substantial unmet housing need arising in Birmingham. This is based on a bi-lateral agreement between North Warwickshire and Birmingham and the technical basis for the figure is unclear. There is no wider agreement in place to accommodate the whole of Birmingham's shortfall which stands at 37,900 dwellings. The result is an overall housing requirement for North Warwickshire (see table 2 of the plan) of 9,600 which would require an annual completion rate some 150% higher than that required by the current Core Strategy.

This is a radically different level of growth. The difference arises not because of any fundamental change in North Warwickshire's own demographic needs but from decisions that have been made to make provision within the Borough for some of the housing shortfalls being experienced by the neighbouring cities of Coventry and Birmingham. The evidence base supporting the draft plan contains no rationale for these decisions, it is not clear what (if any) alternatives have been considered and there appears to be no sustainability assessment to demonstrate that the approach being followed is the most appropriate.

This is particularly significant in relation to the provision which is proposed to meet Birmingham's needs, partly because of its size (broadly equivalent to North Warwickshire's total demographic need for the plan period), but also because (unlike the position with Coventry) this provision appears to have been agreed in isolation and without regard to any wider strategy for meeting Birmingham's shortfall. North Warwickshire does form part of the Birmingham Housing Market Area (HMA) and it is clearly right that its potential to help meet Birmingham's needs should be considered. However the Birmingham HMA is large, including Southern Staffordshire, the Black Country, Solihull, Northern Worcestershire and parts of South Warwickshire. Many of these areas have better public transport links to Birmingham and stronger commuting flows than does North Warwickshire. It is therefore by no means clear that the level of provision being proposed for North Warwickshire is the most appropriate. A common-sense approach would be to await the outcome of the ongoing work to agree the distribution of Birmingham's shortfall rather than to pre-empt it, as this plan does.

An uplift of this scale in the Borough's housing requirement inevitably has wide-ranging consequences for local communities. It is therefore a matter of concern that the plan treats the figure as a 'given' and there appears to have been no consideration and no sustainability assessment of possible alternative levels of provision. This is reflected in para 4.4 of the 2017 Sustainability Appraisal which observes "*The Council does not consider that there are any reasonable alternative options to the evidence-based housing figure described above as the expectation is that this amount of homes should be delivered within the Borough.*" The 3,790 figure from Birmingham is not evidence-based – and there clearly are potential alternatives to it which should have been considered and assessed. One potential alternative is to be found in the plan itself, namely the 5,800 minimum provision figure which is included in policy LP6.

To re-iterate, the Group does not consider that it is appropriate to make specific provision for meeting Birmingham's needs in North Warwickshire in advance of a wider agreement on how Birmingham's shortfall should be met and it is also concerned at the failure of the plan to assess

alternatives to the housing requirement included in the submission NWLP even though it is clear that reasonable alternatives do exist.

Overall Strategy

The adopted Core Strategy establishes a settlement hierarchy as follows:

Category 1 Market Towns Outside the Green Belt (Polesworth with Dordon and Atherstone with Mancetter)

Category 2 Green Belt Market Town (Coleshill)

Category 3A Local Service Centres (Outside Green Belt)

Category 3B Local Service Centres (In Green Belt)

Category 4 Other Settlements

The adopted strategy is that over 50% of new housing development will be allocated to category 1 settlements, with the remainder distributed between the remaining categories. This strategy was designed to respond to an overall housing requirement of around 3,500 the majority of which arises from housing needs generated within the Borough. Clearly the circumstances surrounding the new plan are radically different with a housing requirement of 9,600 over half of which arises from needs generated outside the Borough.

The Borough Council's Local Development Framework Sub-Committee considered a report looking at alternative distribution options at its meeting of 25th April 2016. This report contained a brief analysis of a number of alternative approaches, but did not identify a preferred approach. The paper was not subject to general public consultation, but a sustainability appraisal was carried out, and this was available to the Sub-Committee when it approved the Draft Local Plan in August 2016. The report to the Sub-Committee summarised the sustainability appraisal conclusions as follows:

"7.3 For the Options dealing with the majority of growth from within the Borough it is considered that the Options IN2 (Development In and around the Main Settlements including Green Belt Market Town) and IN5 (New Settlement) would have more significant positive effects than the other options. In terms of the options of dealing with growth from outside of the Borough it was considered that in general, the effects of OUT1 (Development adjoining the out boundary of the Borough) and OUT2 (Settlements closest to where the need arises) had more positive effects."

The appraisal assessed a new settlement option. This approach scored relatively well in sustainability terms, but it has been rejected on the grounds that it would have long lead-in times and no site options of sufficient scale had come forward. (see table 4.4 of the 2017 Sustainability Appraisal).

The submission NWLP proposes changes to this settlement hierarchy. Coleshill is included in category 1 and categories 3A and 3B are combined. A new category 2 is added comprising "settlements adjoining the outer boundary of the Borough." This new category does not in reality relate to settlements within the Borough: rather it enables the allocation for new housing of two sites adjoining neighbouring cities/towns, a large site on the edge of Tamworth and a smaller green belt site which forms an addition to a large sustainable urban extension on the edge of Birmingham.

With the exception of these two sites, the strategy for the distribution of new housing continues to be to focus it on the category 1 settlements. In theory the change to the settlement hierarchy to include Coleshill in category 1 enables development to be spread between three rather than two settlements, but this is not carried through into practice since only 95 dwellings are proposed for Coleshill compared to 1,859 in Atherstone/Mancetter and 2,071 in Polesworth/Dordon. Taking account of completions, commitments and windfall sites, it is likely that in practice around 50% of new housing over the plan period will be in Polesworth/Dordon and Atherstone/Mancetter, exactly as proposed in the adopted Core Strategy. With the exception of a modest amount of development on the edge of adjoining settlements, the strategy is therefore unchanged from the adopted Core Strategy, even though the housing requirement is substantially higher and the Council is proposing to make significant provision to help meet the housing needs of adjoining cities.

The chosen strategy is a combination of elements from several of the options considered in the Sustainability Appraisal process, but it is not possible to compare it with these options in sustainability terms because no appraisal of the chosen strategy has been undertaken in the 2017 Sustainability Appraisal.

It is not clear how the Council has come to the conclusion that this is the most appropriate strategy for distributing the additional housing requirement. The evidence base supporting the draft plan contains no analysis or assessment of possible alternative strategies. Road and public transport links to Birmingham which is the source of much of the additional housing requirement, are inferior from Polesworth/Dordon and Atherstone/Mancetter than from many other locations within the Borough. It would have been reasonable for serious consideration to have been given to alternative strategies for the distribution of growth which would aim to relate it more closely to the main sources of demand, but this assessment does not appear to have been undertaken.

In particular the Labour Group considers that more serious consideration should have been given to the new settlement option. The reasons for rejecting this option are not convincing. The Council should itself have undertaken a proactive search for suitable locations rather simply relying on sites put forward through the Strategic Housing Land Availability Assessment process. The Labour Group, with its limited resources, has identified one possible option which would relate growth more closely to Birmingham (see attached). This is not put forward as a firm proposal in this submission, but is an indication that if a proper search is undertaken, new settlement options are likely to be available.

It is accepted that any new settlement option would have infrastructure implications which would need to be addressed – but this is also true of the Council's chosen strategy. This is considered in more detail in the following section.

Infrastructure

Housing growth on the scale proposed in the submission NWLP will inevitably place strain on existing infrastructure in local communities across the Borough which in many cases is already at capacity. The Labour Group believes that it is essential that new or improved infrastructure to meet local needs is provided in advance of the delivery of the new housing growth. Specific needs vary from location to location, but will for example include new school provision, new primary health care facilities, new open space and playing fields.

Some of these requirements are set out in the Infrastructure Delivery Plan, and the Group would urge the Council to continue to work with Parish Councils and local communities to ensure that a complete picture is provided.

It is clear from the Infrastructure Delivery Plan that by far the most challenging aspect will be the delivery of transport infrastructure and the Group is concerned at the lack of detail and firm commitment in terms of the delivery of this.

The chosen strategy has the effect of placing a large amount of new development in the A5 corridor. Routes within this corridor are already experiencing severe congestion as a result of recent developments and this can be expected to become worse as further committed schemes proceed. This is particularly true of the A5, but it is also true of other roads within the corridor such as the B5000 and more local roads. Opportunity to mitigate this through improved public transport is limited, because of the restricted level of public transport provision particularly to Birmingham which is where much of the housing need to be located in this area is generated. These issues are set out in detail in the recently published Strategic Transport Assessment (STA).

The STA sets out the measures which will be required to mitigate this. It identifies that 4,688 new dwellings are proposed within the corridor as a result of the proposals in the NWLP and it identifies mitigation works in three phases – those required by 2021 (when it is assumed that 555 new dwellings will be complete), by 2026 (when it is assumed that 2962 dwellings will be complete) and 2031 (when it is assumed that all 4688 dwellings will be complete). The total number of dwellings appears to be less than is actually proposed in the draft submission NWLP, which includes 224 dwellings in Grendon/Baddesley rather than the 44 identified in table 4 of the STA. The measures proposed in the STA must therefore be considered the minimum required.

The cost of the works to 2021 is estimated at £4.5 million (though this is a minimum figure because it assumes that it will be possible to widen a listed canal bridge in Polesworth). The cost of the works to 2026 is a further £45.45 million with another £2.3 million required by 2031. In addition to this the STA identifies further ‘aspirational’ works including a by-pass on the A5 at Grendon costing £57.5 million. In practice it appears that this scheme is more than simply aspirational since para 5.31 of the STA states that *“It is considered that the full bypass identified within the final phase of the assessment is likely to be critical in enabling the full housing and employment sites to be delivered”*.

As it stands the Infrastructure Delivery Plan includes some, but not all, of the requirements set out in the STA, but it gives no certainty as to costings or as to the source of the funding required to deliver the necessary transport infrastructure, even for the first phase of the developments up to 2021. It is clear that there is currently no firm commitment to provision of the necessary funds. In these circumstances the Labour Group considers that the strategy cannot be considered sound.

In addition to this it should also be noted that a number of the infrastructure improvements involve major engineering works, including dualling the A5 and constructing a by-pass. These will have significant impacts on property in the area, but they have not been subject to any form of consultation as part of the plan preparation process. Neither have they been subject to sustainability assessment.

It appears that policy LP6 of the plan is intended to reflect the uncertainty over infrastructure provision by setting minimum and aspirational levels of new housing. However the policy provides no detail on how this would apply in practice. As such it does not address the deficiencies identified here.

Consultation Process

The Labour Group believes that it is important that planning decisions which will affect the future of an area for a generation should be taken with full public involvement.

While the consultation process for the NWLP may satisfy the letter of the regulations, the Group is concerned that in practice there have been obstacles in the way of full involvement.

At the first consultation stage, key pieces of evidence (the Sustainability Appraisal and the Infrastructure Delivery Plan) were not available at the start of the consultation. This made it difficult for community groups and local people to respond on the basis of a clear picture of the proposals.

The current consultation on the submission plan is programmed to last for just over six weeks. However the consultation began in mid-December, just before the Christmas holiday. The effective post-Christmas consultation period is less than a month. The Leader of the Labour Group wrote to the Council's Chief Executive seeking an extension of the consultation period until mid February to allow a full six weeks post Christmas. Even though this would have resulted in only a small delay to the timescale, the suggestion was not accepted.

The Group would ask the inspector to bear this in mind when considering the extent of the public response to the submission plan.

Conclusion

For the reasons set out above, the Labour Group does not consider that the NWLP can be considered sound in its present form. The extent of provision for additional housing within the Borough to meet unmet needs arising in Birmingham should not be resolved in advance of an agreement on the distribution of Birmingham's shortfall across the whole Birmingham housing market area. The strategy for the distribution of growth should be reconsidered and there should be clarity on the funding of essential infrastructure.