

FAO: Forward Planning Team, North Warwickshire Borough Council.

To whom it may concern,

I am writing to object to the draft local plan published by North Warwickshire Borough Council.

The 'draft plan' which is currently out for consultation has, in my opinion, not been positively prepared which is to say I do not believe the plan to be justified, effective or consistent with national policy.

Firstly, the plan must be justified. It must have a robust and credible evidence base.

The plan is based on a 'Settlement Hierarchy' which proposes to place the majority of new homes around the Borough's two market towns (although I do not agree that Polesworth and Dordon should be classed as one market town). This decision seems to have been made on the basis of an options paper presented to the Council in April 2016. This paper, written by Council officers, lists five growth options for both in borough growth and out of borough growth. It lists the pros and cons of different options but does not give any valid reasons as to why the option of a 'Settlement Hierarchy' has been chosen as the policy platform for the 'Draft Local Plan'. In fact, as you read the paper through to the end, it seems that it has been rushed, with the final option listed on page 30, having just one apparent advantage. It suggests to me that this was a document written with a 'Settlement Hierarchy' already agreed as the basis of this 'Draft Local Plan'. There is no justified evidence as to why this approach is more beneficial than other approaches.

The evidence prepared for the number of new properties to be built for in and out of Borough growth is also in doubt. There is a lack of information about where this growth is coming from and why North Warwickshire Borough Council should take the number of homes proposed from Birmingham. Given the significant scale of new homes

proposed from Birmingham, it is unclear as to why the policy of placing these homes in the further possible part of North Warwickshire from Birmingham is sustainable or appropriate.

The evidence to justify this is not clear, especially given the decision to allocate the site on Robey's Lane and sites at Ansley Common within the plan. The allocation of this site seems to be at odds with the decision to follow a settlement hierarchy and calls into question the robustness of evidence and decision making in relation to this plan. In one breath, the Borough Council says that properties have to be built around the main towns and then in the next, it finds sites in Ansley Common (a small village with one shop) to place hundreds more homes. This is not evidenced within the plan.

This provides enough reason to be concerned about the effectiveness of this plan. In order for the plan to be justified, it must be deliverable and it is not clear how the plan will be delivered. The number of homes planned for this plan period, is significantly higher than at any point in this Borough's history. It is not clear how the planning permissions needed for this plan will be delivered or how the number of homes needed will be completed. Only in 1997 has the Borough seen housing completions reach above 260 and only as recently as 2012, the number was as low as 38.

One might suggest that in North Warwickshire, a rural Borough, it is often more difficult to build a significant number of new homes in existing towns and villages because of the rurality.

Rural communities, not used to large scale builds, often react strongly to plans for development. This in turn, impacts on the length of time required for planning permissions to be granted and it almost always results in a developer being required to pay something (often not enough) for infrastructure. Putting this infrastructure in place then reduces the viability of schemes and in turn reduces the number of affordable properties on the sites.

In the accompanying 'Infrastructure Plan', the Borough Council have failed to show how the majority of schemes will be funded, have failed to provide detail for most of the schemes and in many cases, have failed to provide evidence that service providers or agencies with responsibility for said infrastructure, back the proposal put forward in the plan

All of this, leads to the questioning of the effectiveness of this plan to be delivered. If two or maybe even one of the larger sites within this plan 'fell through' then the plan will not deliver the homes required and if the number isn't met, the likelihood is that even basic infrastructure will fall because of a lack of funding as well. This means that the plan isn't flexible enough to cope with just one land owner withdrawing part of all of their land.

The third part of this consultation, asks for comments on whether this 'Draft Local Plan' is constituent with National Policy.

S.157 of the National Planning Policy Framework says that 'Local Plans':

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation

- identify land where development would be inappropriate, for instance because of its environmental or historic significance
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified

The 'Draft Plan' produced by North Warwickshire, fails to 'plan positively' for future housing development. Instead it seems that housing is a negative word used in this plan only to suggest that it is the best way to provide solutions to existing infrastructure problems.

The plan does not positively promote the idea of growth and because of that, the allocation of sites is not flexible, it's use restrictive and the idea of strategic development has been thrown out of the window. Instead, the Local Plan ignores the economic indicators in the region and places growth sites outside of the strategic area of growth identified by the West Midlands Combined Authority and Local Enterprise Partnerships. The decision of the Council in this local plan will not result in positive economic growth but instead will leave people stranded and isolated on the wrong side of the Borough for work, will provide only low paid jobs and ultimately fails to positively benefit from the growth corridor that will now by-pass our Borough.

The Council's lack of imagination and insight into the world of business and its failure to recognise the economic growth potential in the south-west of the Borough, means that the 'Draft Plan' also fails to comply with S. 160 & S. 161 NPPF.

The Council also fails to provide evidence as to why the tenure split proposed in the plan is as it is. This is in contravention of S.159 NPPF.

The Council has also not met S.171 of the NPPF as the Council's own leisure review remains unpublished, despite the consultation having only a few weeks left to run.

So, in conclusion, I oppose this Local Plan and do not agree that it has been positively prepared. It is not justified, effective or consistent with national policy.

Yours faithfully,