

## NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION

### POSITION STATEMENT OF NORTH WARWICKSHIRE LABOUR GROUP

#### MATTER 2

- 1.1 The Labour Group does not wish to appear on this Matter. However in respect of Issue 2.3 we would remind the inspector of the concerns expressed in our representations on the Submission Plan regarding the lack of opportunity given to Members and the public about the proposed scale of housing growth for the borough and the failure to consult formally on strategic options for accommodating this growth . The Council did not properly use its own democratic structures - namely the LDF subcommittee meetings during the period September 2015 to August 2016 [ see attached extracts : Table 1 ] to properly inform Members about the rationale and evidence for choosing to adopt 10% of Birmingham s HMA unmet need figure , did not deliver on its commitment in those papers to “ test this option and its delivery “ before signing up to a bilateral MOA with Birmingham , and never asked for a formal decision by the LDF , Exec Board or Full Council on the incorporation of this figure into the Memorandum of Understanding with Birmingham.
- 1.2 Furthermore the Council failed to take advantage of the formal structures then available for public consultation to promote wider public engagement and consultation on its paper “ Options for Growth “ - namely the Area Forum meetings held during September 2016 - simply placing this topic as "Agenda Item 6 : NWBC Update “ on the meeting agenda . The Council never issued its paper on Options for Growth for public consultation - nor did it conduct surveys or organise questionnaires and thus in our view missed out a crucial stage in the planning process . Furthermore , no evidence of public consultation is cited in the Appendices of the Local Plan - a reflection perhaps of how little store the Council places on this aspect of the planning process.
- 1.3 We are also concerned at the late publication of key evidence documents (notably the Sustainability Appraisal and the Infrastructure Delivery Plan). We are concerned that this has now been repeated with the new Viability Assessment. This document was promised for July 2018 in the Council’s response to the Inspector’s initial questions (para 9.2 of NWBC2), but the date has now slipped to early September (see para 4.1 of NWBC11). This means that it will not be available until after the deadline for these Position Statements, and the Group therefore requests the inspector to allow participants the opportunity to make further written representations on it after its publication.
- 1.4 The Group also remains concerned that the Plan contained no detail of the scale of the highway improvements which will be required to the A5 to enable the proposed housing developments at Polesworth to proceed. These involve substantial widening, new roundabouts and a potential by-pass around Grendon. These proposals only emerged through the publication of the Strategic Transport Assessment, a technical document published at a late stage in the consultation process. This means that there has been no

effective consultation on these proposals with the communities in Grendon and Dordon which they will affect.

**TABLE 1 : Opportunities to comment**

<b>DATE</b>	<b>MEETING</b>	<b>Extract from Sub Committee Papers</b>	<b>Explanations in paper</b>
<b>September 2015</b>	LDF	“It is suggested that officers look at a figure of 10% of the GB HMA shortfall to see how this could be delivered.”	Between 2000/01 and 2010/11 there were 10.9% of out-migration flows from Birmingham into the area.
<b>February 2016</b>	LDF	“It is intended to bring to Members a draft of the MoU at April’s LDF Sub- committee. “	6.2 “At the LDF meeting last year Members agreed to test and look at a potential increase of the housing figure in the Borough of around 10% of the shortfall due to migration and commuting figures that indicate that this is the sort of relationship there is between the Borough and the City in particular. Therefore up to 3790. “  “The figure of 3790 is being reflected in the draft work as a figure that will be tested. If evidence indicates that this is not possible / deliverable then there is the opportunity to go back to the table to discuss alternative figures.
<b>April 2016</b>	LDF	“This has resulted in a draft Memorandum of Understanding to agree the distribution of housing amongst the local planning authorities from both in and outside of the GB & BC HMA. TABLE 3 “To test the potential delivery of up to 3790 for GB & BC HMA (this would include any amount	2.11 Based on migration and commuting patterns it was considered that a figure of 10% of the shortfall should be tested. This would mean a potential additional 3790. 2.12 Since the Borough

		required for TBC	Council took the above decision work has been ongoing with partners across the GB & BC HMA as well as other local authorities beyond the housing market area to agree a redistribution of the housing identified shortfall.
<b>August 2016</b>	LDF	“At the last meeting in April Members considered a paper on Growth Options. The paper set out various options for dealing with growth from within and outside of the Borough. Since that meeting a Sustainability Appraisal has been carried out on these and is attached as Appendix B. “	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 closet to where the need arises) had more positive effects.
<b>September 2016</b>	Area Forums x 4	North Area Forum - agenda Item 6 :“ <b>Update on the new Local Plan for the Borough and an opportunity to ask questions</b> East , West and South Area Forum Agenda Item 6 : <b>Update on local plan NWBC</b>	Options for Growth paper not published on line or made available before these public meetings. Area forum meetings not widely publicised. Stop the Build Groups created in local communities most affected by proposals
<b>November 2016 – March 2017</b>	Public Consultation “drop in”sessions	Draft Local plan was issued without any further debate at LDF subcommittee or at Full Council	Council receives 2300 responses but makes no fundamental changes to additional housing numbers, distribution or proposals on infrastructure
<b>January 2017</b>	Sustainability appraisal received and made available on line		Labour group asks for extension of consultation period [ originally scheduled to end 5th <sup>t</sup> January and publishes itsresponse on line
<b>September 2017</b>	LDF		Draft plan for adoption

			received before STA report available
<b>October 2017</b>	Strategic Transport assessment modelling analysis and overview received	Members given one week to study this 120 page report before plan issued for formal consultation	
<b>18<sup>th</sup> October 2017</b>	Special Exec Board	Exec Meeting convened to approve Draft Plan –	Labour group proposes two Amendments proposing that local plan should not be adopted . Rejected
<b>November – 1<sup>st</sup> January 2018</b>	Formal consultation on final plan November – Jan		Labour asks for extension of 6 week consultation period because of Xmas leave period – not granted
<b>March 2018</b>		Full Council votes to adopt and submit local plan	