

NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION

POSITION STATEMENT OF NORTH WARWICKSHIRE LABOUR GROUP

MATTER 4

- 1.1 The Group has no comments on Issue 4.1.
- 1.2 In relation to Issue 4.2. it is important to recognise that over half of the proposed housing requirement is intended to meet needs arising in adjoining local authority areas and 39% needs arising in Birmingham. However the proposed strategy results in 65% of the new housing allocations being directed to locations which are at a considerable distance from Birmingham, and with poor public transport access to Birmingham.
- 1.3 While it may be argued that the new housing locations are well located to local job opportunities along the A5 corridor, it is important to recognise that many of these are low-paid warehousing jobs and that in the past five years the majority of employment land allocated by the Borough has been used for B8 developments. In reality it is unlikely that migrants from Birmingham purchasing new market housing in the Polesworth/Atherstone areas will be looking to afford these homes on the basis of this type of employment. It is far more likely that they will retain jobs in Birmingham and will choose to commute. The Local Plan strategy is therefore likely to result in more commuting, predominantly by car because of the lack of public transport options. It will further increase the very high levels of car and van commuting (79.9%) already seen in North Warwickshire which ranks 6th nationally among the top ten local authorities for commuting by car or van. This figure is taken from ONS/Warwickshire Observatory/RAC Foundation research. (https://www.racfoundation.org/assets/rac_foundation/content/downloadables/car-and-the-commute-web-version.pdf)]We consider that this issue has not been given sufficient weight in formulating the strategy and that other options (such as a new settlement) could be more sustainable.
- 1.4 The Group has no comments on Issue 4.3.
- 1.4 In relation to Issue 4.4. the Group has a number of concerns over the SA process. We understand that the SA should be an integral part of the process of preparing the plan. It has felt in this case that the SA has been prepared retrospectively to justify a pre-determined strategy. These concerns are set out in our representations on the Submission Plan. The Appraisal of Growth Options only considered alternative strategies for distributing growth, not alternative levels of growth, and was not produced until after the Growth Options were considered by the Council's Local Development Framework Sub-Committee in April 2016. It was available when the Draft Local Plan was approved for consultation, but the full Sustainability Appraisal of the Draft Plan was not published until much later and well after the beginning of the consultation period. The proposed strategy is a combination of elements of different strategies assessed in the SA, but in our view it is not clear how this

strategy emerges from the SA evaluation, and there appears to be no assessment showing how the preferred strategy performs against the other strategies which were considered. These deficiencies seem to us to be serious. We do not feel competent to judge whether they mean that the SA is not legally compliant, and we are content to leave this judgement to the inspector.

- 1.5 The Group's concern in relation to Issue 4.5 relates to the absence of any assessment in the SA of alternatives to the overall housing requirement. This seems to us to be central since the housing requirement is the single most important input to the Plan and effectively shapes the overall strategy. The Council's response to the inspector's second set of questions (NWBC11) confirms at para 4.3 that there was no consultation on alternatives to the chosen figure or on the methodology for assessing it. Para 4.4 confirms that the SA on the Local Plan only assessed a single figure, although this figure changed between the draft and submission plans because of the decision to extend the end-date of the Plan to 2033. The reasons given for this in paras 4.5 and 4.6 of the Council's response do not appear to us to be convincing. The Council's note on the calculation of the 3,790 figure for dwellings to be accommodated to help meet Birmingham's needs (NWBC6) concludes that this is "pragmatic" figure based on an analysis of commuting patterns between Birmingham and North Warwickshire. This analysis is capable of producing varying outcomes. It is clear that this figure is not a 'given' but a judgement based on evidence. We would have expected the SA to have been an important input to the process of assessing this evidence and reaching a conclusion. We are also unconvinced by the suggestion that it was important to avoid delay in preparing the plan. This can hardly be a justification for failing to properly assess a key input to the plan and in any event it is difficult to understand how this assessment would have led to any significant delay if it had been undertaken at the appropriate time.
- 1.6 In relation to Issue 4.6. it is the Group's understanding that category 2 actually relates to development on land adjoining settlements which are themselves outside the Borough (such as Birmingham and Tamworth). It is agreed that the inclusion of this category and the inclusion of Coleshill in category 1 are the only changes to the settlement hierarchy from the adopted Core Strategy. As we noted in our representations on the Submission Plan, the distribution of new housing proposed in the Plan is not well related to this hierarchy. In practice, it is indistinguishable from the distribution contained in the adopted Core Strategy with approximately half the proposed new housing destined for Polesworth/Dordon and Atherstone/Mancetter, even though the overall housing requirement has more than doubled and the Plan now proposes to accommodate substantial development aimed at meeting the needs of adjoining areas. We do not consider that this is justified by the evidence base and we think that a new settlement option has not been given sufficiently serious consideration.
- 1.7 The Group has no comments on Issues 4.7 to 4.9.

