

NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION

PHASE 1, STRATEGIC MATTERS

MATTER 4 – STRATEGIC APPROACH, DISTRIBUTION OF DEVELOPMENT & JUSTIFICATION

ON BEHALF OF RICHBOROUGH ESTATES (SLP430)



Pegasus Group

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

T 0121 308 9570 | **F** 0121 323 2215 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

1. INTRODUCTION

1.1 This statement has been prepared by Pegasus Group on behalf of Richborough Estates who has land interests within North Warwickshire Borough. This statement provides a response to Matter 4 and should be read in conjunction with representations submitted to the Draft Submission Local Plan **[CD1-1]**. Richborough Estates' interest relates to land off Packington Lane, Coleshill, land off Blythe Road, Coleshill and land off Birmingham Road, Water Orton.

2. STRATEGIC APPROACH, DISTRIBUTION OF DEVELOPMENT AND JUSTIFICATION

4.1 Is the LP founded upon a spatial vision and strategic objectives which are effective and justified?

2.1 Richborough Estates supports the spatial vision and strategic objectives as 'sound.'

4.2 Has appropriate consideration been given to commuting patterns and redeveloping previously developed land in establishing the overarching spatial approach to development?

2.2 Richborough Estates contends that the distribution of housing and employment growth proposed by the LP would result in unsustainable commuting patterns.

2.3 PTB Transport Planning Ltd has been commissioned by Richborough Estates to undertake an analysis of the proposed areas of housing growth within the draft Submission Local Plan and how they relate to the proposed and committed areas of employment growth in terms of travel by private car. The outcome of this work is included at Appendix 6 to representations submitted to the Draft Submission Local Plan **[CD1/1, SLP430]**.

2.4 The submitted Local Plan will result in a significant imbalance in the concentration of employment and housing growth; one implication expected to result is an increase in travel to work distances reflecting unsustainable travel patterns.

2.5 The note prepared by the PTB provides analysis of the likely increase in CO2 emissions due to the location of employment growth and housing growth currently proposed within the draft Submission Local Plan and considers the effect of redistributing elements of housing growth to Coleshill (500 and 1,000 homes).

- 2.6 The technical note highlights the disparity between the employment and housing allocations in Coleshill, with a 1:5.62 dwelling to jobs ratio likely in 2033, compared to a ratio of 1:2.33 in Polesworth with Dordon and 1:1.27 in Atherstone with Mancetter.
- 2.7 In addition, the analysis of the 2011 Census highlights that 9% of Coleshill residents travel to work by bus or by train, compared to 4% for Atherstone and 3% for Polesworth/Dordon. Therefore, in simplistic proportional terms, around three times as many residents currently travel to/from work by bus and train in Coleshill compared to Polesworth/Dordon. The modal split data would appear to correlate relatively well with the public transport availability for each of the settlements, which includes 5 bus services and regular train services within Coleshill. By comparison, Polesworth station only provides a single service per day and the Local Plan provides no firm commitment to increasing this service – indeed the Council’s submitted LP describing Polesworth train station as “virtually closed” **[CDO/1, Para 12.11]**. The submitted LP also alludes to consideration as to whether Polesworth station needs to be moved **[CDO/1, Para 12.15]**, however again there is no detail or commitment to this in the LP.
- 2.8 The note demonstrates that by relocating 500 dwellings from Polesworth with Dordon and Atherstone to Coleshill, the overall net impact of the change in both internal and external journey to work trip distances (by private car) is that CO2 emissions are forecast to reduce by 1.3 tonnes per annum. This reduction would increase to 2.6 tonnes per annum if 1,000 homes are relocated to Coleshill.
- 2.9 In addition to this, it is clear that significant housing growth is identified in areas with limited public transport services, and for which service improvements are yet to be identified, including Polesworth with Dordon; whilst restricting growth around Coleshill, which is evidently a more sustainable settlement.
- 2.10 Furthermore, given the Council’s appropriate response to meeting significant unmet needs of Birmingham – 3,790 dwellings / 40% of the requirement – it is sensible to consider the wider implications of the sustainable distribution of growth for both work and social trips, which are more likely to be located in the area from which the housing need originates.

4.3 Would any areas of conflict arise between the spatial vision and strategic objectives of the LP relative to its policies arise? How could any be resolved?

- 2.19 Whilst the Settlement Hierarchy contained within Policy LP2 is supported as sound, there would appear to be a fundamental mismatch between the identified Spatial Strategy and the spatial distribution of housing identified through the proposed housing allocations contained within Chapter 8 of the submitted Local Plan **[CDO/1]**. The allocations proposed within the LP would result in the delivery of a very different Spatial Strategy; an unsound Strategy that would not be aligned to the Vision, with a significant proportion of development being spread around adjoining settlements and disproportionately to a number of lower tier settlements, failing to recognise the needs and opportunities available within the Market Town of Coleshill (a Category 1 Settlement).
- 2.20 Paragraph 7.6 **[CDO/1]** sets out where the broad distribution of development will be directed within the Borough and notes that Coleshill is recognised as a Market Town due to its range of services and facilities. However, it seeks to establish that the level of development will be smaller in scale due to the presence of Green Belt that wraps around the settlement. Coleshill performs an important function for the Borough and its geographical location adjacent to both Solihull and Birmingham is such that it is better located than comparable settlements in North Warwickshire to assist in meeting the unmet needs of Birmingham.
- 2.21 Given the number of services and facilities in Coleshill and the excellent transport links, the settlement is a highly sustainable Market Town. This is not, however, reflected within the level of development that is proposed for Coleshill through the proposed allocations identified within Policy LP39. The LP proposes to only allocate three modest housing sites in Coleshill which are collectively anticipated to deliver approximately 95 dwellings **[CDO/1, LP39]**. This is derisory in comparison to the scale of development that is proposed to be directed to the other two Category 1 Market Towns, with allocations at Atherstone and Mancetter anticipated to deliver 1,859 new dwellings and Polesworth and Dordon proposed to take up to 2,071 dwellings. This distribution between the three Market Towns is unbalanced and unsound.
- 2.22 The proposed allocations would lead to a level of development at Coleshill which would only represent 2.4% of the total Market Town provision and around 1.4% of North Warwickshire Borough overall housing allocations of 6,821 dwellings as

set out in Policy LP39. This lack of housing provision is simply inadequate given the sustainability credentials of Coleshill and will only act to undermine the important role and function that this Category 1 Market Town performs. In addition to the scale of development proposed for Coleshill being completely disproportionate to its Category 1 Market Town position within the Settlement Hierarchy, it is also disappointing that the key strengths of this town have not been recognised, including the significant level of services and facilities that are available within Coleshill, as well as its geographic location which is well placed within the strategic highway network and well placed to benefit from investment at UK Central and the delivery of HS2 and any resultant economic growth.

- 2.23 Similarly, the insignificant quantum of dwellings allocated at Coleshill fails to recognise the significant employment growth that has already been consented at Hams Hall within the Plan period. Failure to support the consented employment growth with residential growth will lead to a geographical imbalance between places of residence and places of work.
- 2.24 Finally, we note that the Council's strategic objectives include providing for the housing needs of the Borough and providing for affordable housing "throughout" the Borough. In this regard it is important to note that the evidence demonstrates that the southern part of the Borough is disproportionately unaffordable compared to the northern part of the Borough and that local housing needs will not be met; the Council's decision to turn its back on this issue and promote such a derisory level of growth in sustainable settlements in the southern part of the Borough will serve only to exacerbate this issue.
- 2.25 Conflict could be resolved by increasing the level of development provided within Coleshill and the Category 3 settlements within the south of the Borough, including Water Orton.

4.5 What reasonable alternatives to the plan strategy have been assessed via the SA, including to the housing requirement and aspiration in respect of the GBHMA?

(a) Have reasonable alternatives to the plan strategy been defined distinctly?

- 2.26 It is recognised that a number of reasonable alternatives have been considered through the SA process [**CD1/2, Table 4.1**]. These alternatives relate to options identified within a Growth Options Report prepared by NWBC [**CD6/6**].

- 2.27 The Growth Options Report identified five spatial distribution options for meeting growth requirements generated from within the Borough and five growth options for meeting growth requirements generated from outside the Borough. Each of these alternatives are defined distinctly, however, the Growth Report did not consider the cumulative growth requirements as part of any comprehensive spatial growth options. Therefore, consideration of how the 'IN' options work in conjunction with the 'OUT' options (i.e. the overall spatial strategy options) have not been clearly defined or assessed.
- 2.28 These options have been considered through the SA process.

4.6 Policy LP2 sets out the settlement hierarchy for the Borough, which seeks to broadly define where development should be located relative to the scale and role of settlements. It appears that the primary changes to the settlement hierarchy since the CS are the inclusion of Coleshill within the Green Belt as a market town, and allowing the expansion of towns abutting the boundary of NWBC's administrative areas. Is the settlement hierarchy justified and consistent with national policy?

- 2.29 The Spatial Strategy is at the heart of managing spatial change within the Borough and is critical to ensuring the Strategic Objectives and the Spatial Vision can be achieved.
- 2.30 The ranking of settlements within the settlement hierarchy is supported in principle, being based on the relative sustainability of settlements. It is considered that this approach provides a sound framework for distributing development needs that are appropriate to the Borough over the Plan period.

(a) I note examination document CD0/2A states that the hierarchy was effectively 'established through previous Local Plans and the adopted Core Strategy.' Is that accurate?

- 2.31 Paragraph 7.6 of the Local Plan reiterates that the settlement hierarchy within the Submission Local Plan is a continuation of that set out in Policy NW2 of the Core Strategy **[CD6/2B]**.
- 2.32 The Core Strategy, at paragraph 6.3 **[CD6/2B]** states that the strategy "*moves forward the settlement hierarchy principles, which were introduced in the adopted Local Plan 2006.*"

- 2.33 Therefore, the hierarchy is longstanding within the Borough.
- 2.34 Both the Submitted Local Plan and the adopted Core Strategy recognises Coleshill as a sustainable Market Town due to its range of services and facilities, however, both documents highlight that development will be smaller in scale due to Green Belt wrapping around the settlement. Richborough Estates considers the presence of Green Belt has no bearing on the sustainability of a settlement and should therefore have no influence on the ranking of a settlement within the hierarchy of settlements within the Borough.
- 2.35 Importantly, previous Local Plans have been prepared for a significantly lower housing requirement and without a specific aspiration to meet unmet needs originating in Birmingham. In this context it is fundamentally flawed to not revisit the role of settlements that benefit from the best relationship with Birmingham in terms of proximity and sustainable transport linkages.

(b) NWBC set out in examination document CD0/2A that alternatives to the scale of housing growth proposed via the LPSP have been considered. Where has such consideration been undertaken? Have other options for levels of employment space also been assessed?

- 2.36 Whilst the Growth Options Report **[CD6/6]** considered spatial distribution options for meeting the growth requirements, it did not consider different scales of housing growth.

4.7 LP paragraph 1.7 explains that the settlement hierarchy is based on 'an assessment of the services, facilities and sustainability of the various assessments.'

(a) Where is that assessment set out specifically?

- 2.37 The Settlement Sustainability Appraisal (2010) **[CD6/3B]** considers the relative sustainability of all settlements and concludes that Coleshill is the second most sustainable standalone sustainable settlement, after Atherstone.

(b) Is each settlement correctly categorised?

- 2.38 Whilst Coleshill is recognised as a Category 1 Market Town alongside Atherstone with Mancetter and Polesworth with Dordon, the reference to Green Belt should be removed. Green Belt is not relevant to Coleshill's ranking within the hierarchy

and is inconsistent with the approach taken to other settlements within Policy LP2, including those within Green Belt.

2.39 Richborough Estates considers the presence of Green Belt has no bearing on the sustainability of a settlement and should therefore have no influence on the ranking of a settlement within the hierarchy of settlements within the Borough. Coleshill should be identified as a Category 1 Settlement alongside Atherstone.

2.40 The Settlement Sustainability Assessment **[CD6/3B]** provides a clear conclusion that Atherstone and Coleshill represent the two most sustainable standalone settlements within the Borough, scoring 144 and 93 respectively.

2.41 The Assessment then appears to link a number of settlements that "*read together as a single network of villages*" **[CD6/3B, Page 95]** including Polesworth and Dordon. The methodology deployed in these conjoined settlements is to simply add the individual scores together, providing a cumulative total. This approach is flawed for a number of reasons:

- Grouping settlements and providing a cumulative score simply elevates the ranking of the less sustainable standalone settlement within the grouping e.g. Dordon and Mancetter.
- The scoring assumes that duplicate facilities, multiplies the sustainability of the conjoined settlements, which cannot be the case. For example, in respect of Public Transport, the Assessment states:

Dordon:

- *Frequent Bus Routes (219 + 765) 4 points*
- *Infrequent Bus Routes (Flexibus 216 Friday, Flexibus 224 Thursday) 1 point*

Polesworth:

- *Frequent Bus Routes (219 + 765 + 785/786) 6 points*
- *Infrequent Bus Routes (Flexibus 216 Friday, Flexibus 224 Thursday) 2 point*

2.42 Collectively these settlements are given a score of 13 for public transport. This cannot be right as both settlements are served by the same bus routes (with the

exception of the 785/786). Therefore, the correct collective score should equate to no more than 7 points. The same general approach is taken in relation to other services and facilities too, further distorting the scoring.

- 2.43 Due to the flawed methodology that artificially inflates the sustainability of grouped settlements, the Settlement Sustainability Assessment should only be relied upon as a robust piece of evidence in respect of standalone settlements.

(c) Should Polesworth and Dordon be identified as separate settlements?

- 2.44 Polesworth as a settlement is clearly more sustainable than Dordon. In light of the response to question 4.7 (b) above, Polesworth and Dordon should be considered as separate and distinct settlements. Individually these settlements would be more appropriately identified as Category 3 settlements.

4.8 Is policy LP2 sufficiently clear to guide decision-taking as to the quantity of development that each settlement is apportioned?

- 2.45 As stated in representations submitted to date, whilst the approach to the Settlement Hierarchy contained within Policy LP2, based on the sustainability of each settlement, is supported as sound, there would appear to be a fundamental mismatch between the identified Spatial Strategy and the spatial distribution of housing identified through the proposed housing allocations contained within Chapter 8 of the LP. The allocations proposed within the plan would result in the delivery of a very different Spatial Strategy; an unsound Strategy that would not be aligned to the Vision, with a significant proportion of development being spread around adjoining settlements and disproportionately to a number of lower tier settlements, failing to recognise the needs and opportunities available within the Market Town of Coleshill (a Category 1 Settlement) and the Category 3 settlements located within the south of the Borough.
- 2.46 As there is such a clear disconnect between the settlement hierarchy identified in policy LP2 and the proposed allocations identified in Chapter 8, LP2 provides a misleading indication of the quantum of development planned for within each settlement. This is particularly the case in respect of settlements within the Green Belt, including Coleshill and Water Orton.

4.9 Is the approach to site allocations overly reliant on the allocations of larger sites to the detriment of supporting thriving rural communities?

- 2.47 The approach to site allocations is not only overly reliant on the allocations of larger sites but is also reliant on a significant proportion of growth being delivered within the north of the Borough around Polesworth and Dordon.
- 2.48 The unbalanced distribution of growth will be to the detriment of supporting thriving rural communities and undermine the future sustainability of settlements within the south of the Borough, including Coleshill and Water Orton.
- 2.49 Evidence, submitted to the Draft Submission Local Plan **[CD1/1, SLP430]** demonstrated that constraining development within Coleshill and Water Orton would result in:
- Locally derived housing needs, in respect to market and affordable housing, not being met locally;
 - Promotion of unsustainable patterns of growth;
 - Prevention of any further economic growth, compromising the sustainability of these settlements;
 - The vitality and viability of existing services and facilities being undermined, compromising the sustainability of these settlements;
 - Unsustainable travel patterns, by directing growth to unsustainable locations that would unnecessarily increase trip generation and also have an adverse impact upon air quality;
- 2.50 The dogged adherence to retaining Green Belt land (save for with the limited exception in respect to the Langley SUE and relocated school site at Water Orton) has resulted in an unsustainable and incongruous pattern of growth across the Borough, which has deprived required growth in key settlements such as Coleshill and Water Orton and will exacerbate existing difficulties in those settlements and across the Borough.