

**NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION
STATEMENT ON BEHALF OF STOFORD DEVELOPMENTS – ID SLP335**

MATTER 4 – STRATEGIC APPROACH, DISTRIBUTION OF DEVELOPMENT AND JUSTIFICATION

Barton Willmore are instructed by Stoford Developments Ltd in connection with their land interests at two sites south of Coleshill: (1) Land at Brickhill Farm and (2) Land at Stonebridge Road and their promotion for employment development through the North Warwickshire Local Plan.

Our Statement below addresses the need for the draft Plan to identify additional land or provide another suitable mechanism to meet wider than local employment needs.

Issues and questions:

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

1. As set out in our response to Matter 1, the submitted Plan fails to address wider than local employment needs, especially for large-scale logistics developments. Consequent to this omission, its spatial vision and objectives must be flawed.
2. The implications of continuing to not address this, despite the commitment to do so within the adopted Core Strategy, is a continuing shortage of readily developable employment sites to meet the need with significantly detrimental impacts on both the wider and local economies.

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

3. The Sustainability Appraisal [CD1/2] supporting the Regulation 19 (Submission) Plan discusses commuting patterns for employment land at paragraph 4.5. It acknowledges the benefit of co-locating employment close to neighbouring authorities, e.g. the 14 hectares of employment land to meet Tamworth Borough Council's unmet needs. However, it fails to take a similar approach to the needs and opportunities in the adjacent West Midlands conurbation, notably Birmingham and

Solihull, including the forthcoming development of the HS2 Interchange Station adjacent to the Borough boundary at Stonebridge, and the M42 corridor.

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

4. We have no comments to make in response to this question.

4.4 Including in respect of its timing, and the consideration of growth options [CD6/6, CD6/7], was the sustainability appraisal process legally compliant [CD1/2]?

5. As the wider than local employment need has not been considered, despite the acknowledgement of evidence to support its inclusion within North Warwickshire Borough, the implications for environmental, social and economic effects have therefore not been considered, including the opportunities for benefits which may arise. As a result, the reasonable alternatives have not been given full consideration and therefore the approach is not demonstrated to be the most appropriate.

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 GBHMA?

6. There are alternatives to the current Local Plan approach, namely the identification of employment sites, especially for large-scale logistics floorspace within the area of highest demand, i.e. along the M42 corridor as identified as Area A within Figure 4.10 of the 'West Midlands Strategic Employment Sites Study'. This option, and the evidence supporting it, do not appear to have been properly considered by the Local Plan or the Sustainability Appraisal which accompanies it, and as such, it cannot be considered to be justified, as required by paragraph 182 of the 2012 NPPF.

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?

7. We have no comments to make in response this question.

(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?

8. We have no comments to make in response to this question.

(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?

9. Wider than local employment needs are not addressed by the submitted Local Plan.

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’.

10. We have no comment to make in response to this question.

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

11. We have no comment to make in response to this question other than to highlight the need for the Plan to provide for wider than local employment/business needs which would necessitate developments additional to local needs as set out in the policy.

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

12. We have no comment to make in response to this question.