

## NORTH WARWICKSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

### Statement prepared by GL Hearn on behalf of Severn Trent Water Matter 6- Planning and environmental constraints

#### Introduction

1. This position statement is prepared on behalf of Severn Trent Water by GL Hearn and considers specifically the land interests of Severn Trent (ST) located at Coleshill STW, which have previously been the subject of submissions to the Regulation 19 Consultation of the review of the NWBC Local Plan. Our representation reference is SLP442. This statement should be considered in the context of the Document Ref: INSP5.
2. ST supports the designation of Coleshill as a category 1 settlement, however, consider that the level of growth envisaged for this settlement does not reflect its position in the settlement hierarchy nor the sustainability credentials of the wider area. We contend that there are compelling reasons to consider further the potential of the wider land for additional employment development in such a sustainable location. This approach would assist in delivering the necessary employment requirement for North Warwickshire and the GBHMA area as a whole, taking into account the potential issues associated with the housing delivery strategy identified within NWBC11.
3. Whilst recognising Inspector's Introduction and Point 6.4, where consideration of individual sites will fall to Matter 9, GLH would like to respond specifically to points 6.2 and 6.9 in some detail:

#### **6.2 Is the Coventry & Warwickshire Green Belt Study [CD6/9] robust evidence?**

**(a) Have appropriate parcels of land been suitably and consistently assessed relative to the purposes of Green Belt set out in paragraph 80 of the NPPF 2012?**

**(b) Has CD6/9 has suitable regard to any other, subsequent, or wider strategic Green Belt studies?**

**Are its findings consistent with them?**

**(c) Noting LP paragraph 7.14, have exceptional circumstances been demonstrated to justify all alterations to the Green Belt?**

**(d) Have sustainable patterns of development been considered in the approach taken in the LP?**

4. We note that the Inspector has set out (INSP6) that the Plan will be assessed against the 2012 NPPF. However, he stated (paragraph 4) that "*Accordingly I am not intending to invite comments from the Council or from representors on the implications of the NPPF2 in the context of the examination of the plan. I will consider any cases put to me in this regard in the interests of fairness, however any departure from the implementation arrangements set out above will require strong justification*".
5. In terms of Green Belt and the methodology for release of such land, there are changes that have been introduced by the 2018 version of the NPPF, most notably a greater emphasis on brownfield land and access to public transport. Whilst not wishing to challenge the position on the NPPF, we contend that the revised NPPF offers further support for the removal of the site from the Green Belt.
6. In any case, we consider that there is robust evidence that Green Belt land is required to be

released in order to accommodate the growing housing and employment need in North Warwickshire and beyond. This is evidenced by the results of the Greater Birmingham HMA Strategic Growth Study (CD8/23) which sets out that land east of Birmingham was a suitable and appropriate location for employment-led Green Belt release.

7. We refer the Inspector to the findings of the Council's own Green Belt study (CD6/9) which concluded:

- The STW parcel at Coleshill performs less well in terms of the five purposes of including land in the Green Belt than the identified and committed Prologis site at Coleshill;
- The site has defensible boundaries and its removal from the Green Belt would not result in increased urban sprawl;
- If sites are to be removed from the Green Belt for employment purposes, then clearly 'exceptional circumstances' exist for the removal of Coleshill STW site given:
  - The need for employment land to be allocated in North Warwickshire;
  - The importance of Coleshill as a strategic employment location to the economic growth and vitality of the wider region;
  - The high order status of Coleshill as a settlement in the emerging Local Plan;
  - The sustainability of the location;
  - The presence of multi modal transport interchanges in close proximity to the site;
  - The existing highway infrastructure adjacent to the site; as well as
  - The objectives of the Plan to diversity the job creation within North Warwickshire.

**6.9 How have planning and environmental constraints affected the level and distribution of development that the LP proposes to enable? Is the evidence for that balancing exercise clear and robust?**

8. We contend that the planning and environmental constraints have adversely affected the level and distribution of development within the LP so that the Plan is ineffective and does not offer the most appropriate solution having regard to reasonable alternatives.
9. This is because the constraints employed by the Council (and particularly in the SA) are not absolute constraints which should rule out sites from assessment. What this has done has led to suitable sites being discounted from the process of assessment. Whilst we have not assessed whether this has led to unsuitable sites being proposed to be allocated, it is clear that there are discrepancies in the overall assessment that have affected the level of distribution of development.
10. This is particularly relevant to Coleshill where no additional employment allocations are proposed even though this is the most sustainable location in North Warwickshire which is exemplified by the exiting quanta of amount of employment land to be found adjacent to the settlement. Coleshill is clearly attractive to the market and has existing highway and transport infrastructure to support the additional allocation of employment land, contrary to other employment allocations in the Plan which require the provision of new infrastructure to allow new employment land to be delivered.

GL Hearn 30 August 2018