

**SUMMARY OF COMMENTS MADE ON THE EXECUTIVE AGENDA FOR 4 JUNE
2013**

4. Revised Development Strategy

The Joint Finance and Audit & Overview and Scrutiny Committee were impressed with the amount of work that had been put in to producing the revised strategy and agreed that their congratulations should be passed to all of the officers for their hard work.

In addition, they agreed that the following comments be passed to the Executive:

- a) Members had concerns about the decreasing strength of the Council's existing Local Plan and the effect of this being thrown out at appeals. Members were mindful that it was important to have a strong Local Plan that would stand up to inspection.

Response: The existing Local Plan is out of date in terms of housing supply policies and in the context of the NPPF and not having a 5 year supply of housing land, it can only be given "due weight" according to the degree with which it is consistent with the NPPF. For this reason, it would help our Planning Policy framework to progress the new Local Plan as quickly as possible so that it can be given weight even prior to adoption.

- b) There was concern regarding the definition of affordable housing against social housing – although Members welcomed the 40% target, they would have liked it to be even higher.

Response: The 2012 SHMA suggested that the right mix of affordable housing should be 50% social rented (significant below market rents); 30% affordable rented (below market rents) and 20% shared ownership. This is the policy that is being applied. A higher overall percentage of affordable housing is likely to affect viability and CIL.

- c) Regarding the Community Infrastructure Levy, Members had concerns that some villages seemed to have differing rates to others. It was suggested that the Executive may wish to look at this issue more closely. Officers advised that the CIL study would be published before the Executive meeting.

Response: The CIL charges and CIL Zones are based on evidence pulled together as part of the CIL viability study (essentially looking at land prices and houses prices). The zones have been proposed to reflect differentials in development viability. It would be possible to redraw the zones following the consultation if evidence supports doing that. However we need to guard against having too many different zones as this makes CIL very difficult to manage.

- d) There was strong support for a Park & Ride system and some Members felt that the Strategy should include a more definite idea as to how this could be provided. Concerns were raised regarding the transport details in the strategy including the Strategic Transport Assessment – it was felt that a Park & Ride System may help alleviate already congested areas of the District.

Response: For park and ride to have an impact on traffic flows its provision needs to be combined with a wider set of policies including town centre parking policies (pricing/supply), employment parking standards etc. It also needs to not only to link with public transport bus services but work needs to be done to explore how it can support "shuttle" services to main employment areas. As yet there is no joint approach agreed between WDC and WCC on the policy context and operating framework for a Park and Ride. The Chief executive is pushing t progress over the coming month.

With regard to the Strategic Transport Assessment as a whole, this is based on a well-established model using nationally recognised principles. WCC officers have done a thorough job in running the model in response to various development patterns including the Revised Development Strategy. This has shown the transport network can cope with the increased traffic if the right mitigation is put in place. It is the most robust evidence that we have. It should also be noted that the mitigation is focused predominantly on junction improvements rather than carriageway widening (there are exceptions to this such as Europa way). This is because the model has shown that congestion arises not as a result of carriageway widths (eg at pinch-points over rivers, canals and railways) but as a result of junction capacity and efficiency.

- e) Members were very much in support of renewable energy resources being an integral part of the Council's planning policy & believed that WDC should strive to be a leader in this area.

Response: A new policy based on Code for Sustainable Homes is being developed for the new Local Plan. This will focus on carbon impacts rather than renewable energy and development will therefore be expected to meet energy efficiency standard as well rather than just renewable energy. The code, at higher levels, also includes requirements for grey water recycling, building materials etc.

- f) Members felt that it was important that all Councillors were able to feed their thoughts on policy into the Policy Review Group, and were reminded that this could be achieved via their Group's representative and lead officers.

Response: We are in the process of fixing dates for the next Members Policy Review Groups. We are proposing a meeting in June and another in July. Further meetings can be set as required.

- g) Members were mindful that the Sub-regional Employment Site had been based on evidence from the Regional Spatial Strategy which had now been abolished. Queries were raised as to whether this meant that this could weaken the Local Plan before a planning inspector. Officers advised that the Employment Land Review would be published before the Executive meeting.

Response: The evidence for the sub-regional employment site is primarily based on the work GL Hearn have done during 2012 and 2013 as part of their independent assessment of the Gateway planning application. It is also linked to the City Deal and LEP in unlocking investment in sites and improving choice. The RDS does refer to the evidence that underpinned the RSS (but not to the RSS policies which have now been abolished). This demonstrates that the need for a sub-regional employment site is not a new one.

- h) It was agreed that Ward Councillors would be fully consulted regarding the consolidation of employment land.

Response: Agreed

- i) Air quality was a major concern & Members felt it was important that it was looked at closely throughout the District. The Committee welcomed the proposal of further work between lead officers & Environmental Services.

Response: This is an issue that needs further work in conjunction with ES colleagues

- j) Members felt strongly that Town Centre Policies needed to protect and enhance the District's town centres, making them viable and vibrant. Concerns were raised that some issues had the potential to override others.

Response: The Members Policy Review Group has already seen early thoughts about Town Centre Policies. In line with the NPPF, the policy will be based on an approach that puts town centres first and seeks to resist significant out of town retail. This will form part of the draft Local Plan but is not in the scope of the RDS.

- k) Members were mindful that full account needed to be taken of the NPPF & all available evidence.

Response: Agreed. This is important in achieving a sound Plan as quickly as possible. This includes the need to take account of NPPF green belt policy which only allows development in exceptional circumstances.

- l) Members felt that there was a need to consider the total impact of any development on infrastructure and not just on the area nearest and local to any development.

Response: Agreed. The Strategic Transport Assessment does this and provides the evidence for developer contributions to the wider transport network. The proposals set out in section 5 of the RDS also cover the wider impacts for education and green infrastructure. This will also need to apply to health, emergency services etc, though more work is still to be done on these areas.

- m) It was felt that officers should contact the local network of secondary schools head teachers as well as Warwickshire County Council to discuss the potential provision and location for secondary school(s) within the Local Plans life time.

Response: We are already in regular contact with secondary school heads. They have been part of the process to date and will continue to be.

- n) Members felt there would be a need to clarify the times for infrastructure development in relationship to any building schemes to ensure the necessary infrastructure is in place. For example sites might be completed in phases but by half way through the development the impact on undeveloped infrastructure could be so substantial as to cause harm to the community as a whole.

Response: Agree. This is an important point and one that we will address fully in the Infrastructure Delivery Plan which accompanies the Draft Local Plan. The Chief Executive is directly involved in moving this forward including consideration of some creative ways of bringing infrastructure forward at an earlier stage in the development process. We are also working with senior colleagues at the County Council to plan infrastructure delivery.

It should also be noted the view of some members but not all was that the draft local plan had changed significantly from its original aspiration with regards to housing allocation.

Response: The RDS does change the distribution of housing in comparison with the Preferred Options by taking to some of the green belt site and increasing the allocations to the south of the towns. It should be noted that the NPPF makes no provision for a development strategy which is based on "fair distribution" and if we put forward a strategy based on that approach it is likely to be found unsound, particularly where we have part of the District in the Green Belt and parts outside the green belt (this context make even distribution impossible to justify). We have to rely on the evidence and we have no evidence to support any more green belt allocations.

In addition, there is a danger that if our Plan is found unsound or is significantly delayed then it will be harder to control the location and nature of development. This will not be a threat to green belt sites which are protected by the NPPF, but will be a threat to the same non-green belt sites that we are trying to bring forward in a coordinated way through the RDS.