

DUNCHURCH PARISH COUNCIL

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Objections to Rugby Borough Emerging Local Plan The Preferred Option consultation

Dunchurch Parish Council would like to point out the definition of a plan is “a set of things to do in order to achieve something, especially one that has been considered in detail in advance” History shows that Rugby Borough Council had not been successful in achieving this aim.

In the opinion of this Parish Council and indeed a significant number of Dunchurch residents the Strategic Housing Market Assessment is not independent and is seriously defective. It is obvious that not all sides of the argument have been considered and that only those with an interest in growth appear to have been consulted. This study fails to adequately explore economic issues e.g. affordable housing, commuting and immigration.

Rugby Borough Council have not established that 12,400 dwellings can be built in Rugby Borough by 2031 bearing in mind the low level of dwellings completed since 2011. To allocate additional housing without exploring what can be done to improve the build rates on the Mast Site and other sites which already have outline planning permission is unwise, however the Rugby Borough Council Sustainability Appraisal does not appear to have considered the consequences of these actions.

A number of the housing proposals cannot be justified and the balance between sites within and outside of the urban area of the town is disproportionate.

We do not believe that the plan complies with government policy on housing development in the Green Belt. Little or no consideration has been given to the necessary infrastructure to support the proposed developments and there appears to be no joined up thinking around the WCC Minerals plan which will present a huge increase in road traffic within the Dunchurch, Lawford Heath and Bourton locations.

Dunchurch Parish Council considers the Strategic Housing Market Assessment [SHMA] to have serious shortcomings which bring into question its overall credibility. We would reiterate the comment that it seems only those with an interest in increasing housing

numbers were consulted not to mention the Company producing the assessment being involved as agents for a planning application of 600 properties within the Borough.

The terms of reference for the SHMA appear impartial however the email traffic between the local authorities and G L Hearn released under the Freedom of Information Act would indicate there was some manoeuvring behind the scenes.

G L Hearn have treated Objectively Assessed Need on population and household projections as forecasts which, of course, they are not. By adopting this approach the SHMA fails to consider how the factors which lay behind the projections may change. In reality changes in social trends and public policy are likely to be far more influential.

The SHMA is based upon the assumption that new dwellings will meet existing and future housing needs; however this seems unlikely as with the exception of starter homes, the great majority of new dwellings are bought by existing home owners trading up. Therefore the market is not effective in ensuring that newly arising housing needs are met.

The study rightly explores a very wide range of scenarios in its attempts to quantify Objectively Assessed Need and comes up with a figure of 4,272 dwellings should be built in Coventry and Warwickshire unfortunately there is no sound theory to back up this figure. The local authorities in their so-called Memorandum of Understanding have taken an approach which is directly at odds with this policy and decided, without satisfactory explanation to increase the housing target figure to 4,408.

The Strategic Employment Land Study has not been subjected to detailed analysis. The employment prospects for Coventry are overstated and this is consistent with the entire OAN giving a very overoptimistic view of the economic prospects for Coventry and Warwickshire. There are also concerns regarding commuting the ratios between jobs and people, commuting patterns change. The objectives should be to reduce commuting wherever possible.

The Parish Council has concerns that the relationship between affordable housing and overall housing need is not convincingly demonstrated by the study. Affordable housing should not be an 'add-on' to overall need, so the upwards adjustment of OAN to take account of affordability appears unfounded. It is also open to question whether 'affordable housing' is affordable to many new households.

We feel the SHMS is a flawed document in many areas and certainly feel it should be resubmitted by a Company that is independent and not involved as Agents for a developer seeking to build a significant number of properties within the Borough.

The Rugby Plan gives no explanation of why Coventry cannot meet more of its Objectively Assessed Need, or how the allocation of the excess to other authorities has been decided. There is no evidence of Green Belt, environmental or policy constraints being considered just a comment that 'whilst there are constraints present within Rugby Borough, these constraints do not significantly limit the ability of the Council to find sufficient land to meet the housing target'.

Government guidance requires the Council to demonstrate the deliverability of the plan. The Council have considered whether it is realistic to expect 12,400 dwellings to be built in Rugby between 2011 and 2031 but their conclusions are profoundly unconvincing for a number of reasons.

If the rate of development seen in the first four years of the plan 2011 to 2015 were to continue through to 2031 only approximately 6800 dwellings would be completed, to meet the targets in the plan the build rate would need to increase significantly.

While we are told Rugby has 9,787 dwellings with planning permission, only 5,565 are expected to be delivered by 2031 so allocating more sites is likely to reduce the take-up rate still further. Over-allocation on this scale would effectively destroy the planning strategy because the Council would surrender control to house builders.

The Council have been struggling to demonstrate a five year supply of land for housing. Logic would indicate that existing planning permissions should be counted as part of this five year supply. Instead the Council are looking to increase their housing provision in an attempt to address the alleged shortfall.

National and regional studies indicate the factor limiting house building numbers is almost certainly due to the sharp decline in public sector house building; there seems almost no prospect of an upturn in this sector. Private sector building has been around 90,000 dwellings per annum nationally since 2008 however housing permissions have exceeded this figure by 50,000 per annum annually.

With a much larger number of planning permissions granted than dwellings built, developers will inevitably choose to develop the sites that will provide the greatest potential profit and this will come from green field sites rather than brownfield sites. The Sustainability Appraisal indicates that the number of brownfield sites being considered for housing within Rugby Borough is negligible. Rugby Borough Council, rather than enforcing planning permissions already granted to the north of Rugby are bowing to commercial pressures to release land to the south of the Borough where potential take-up is more likely. The infrastructure in this area is already struggling to cope with increased traffic, lack of school places, commercial premises etc.

The housing proposals in the Preferred Options Rugby Local Plan are unsustainable and contrary to key elements of government policy. These policies do not take into account the detrimental effect on the quality of life of existing residents in Dunchurch Parish the level of infrastructure planning is minimal and totally unacceptable they are therefore unsound.

Rugby Borough Council has a duty of care to all residents within the Borough. Unfortunately it is becoming increasingly obvious that Dunchurch together with other villages are being sacrificed to

provide an easy option for development on the part of the Borough Council and a cash cow for developers. Finally we need to make it clear this Parish Council does not consider the relationship between Rugby Borough Council and G L Hearn impartial.