CLAVERDON PARISH COUNCIL

SOUTH WARWICKSHIRE LOCAL PLAN

PART 1 ISSUES AND OPTIONS CONSULTATION

CONSULTATION RESPONSE 2: OVERVIEW AND SUMMARY QUESTIONS [SWLP] RESPONSE

CHAPTER 3 Q-V3. 1 Q-V3.2:

DO YOU AGREE THAT THE VISION AND STRATEGIC OBJECTIVES ARE APPROPRIATE? YES | NO | DON’T KNOW IF NO, PLEASE INDICATE WHY:

Whilst the JPC and the community in Henley support much of the vision and of the objectives put forward, these are undermined by three aspects of the plan. The plan is regarded as unrealistically long given the rate of social and economic change. The plan also has no milestones and is not SMART so that it is not anchored in current reality The very wide scope presented with 16 separate categories and over 100 questions is complex and fragmented. An even more serious problem is that whilst in the infrastructure section there is a strong emphasis on delivering associated infrastructure, the separate elements are not integrated at all. The development options in the plan are not predicated on the delivery of the necessary infrastructure and rely almost entirely on private sector contributions. Development will only be acceptable to the community in Henley if infrastructure needs are identified and committed prior to development commencing. Community opinion in the Joint Parishes is unanimous on this. Third as the merger of Stratford and Warwick councils did not proceed then the relevance of having joint visions and strategies is significantly weakened. In later sections, the JPC response will indicate how some of these issues might be dealt with. One principle which could be adopted from the beginning and possibly added to the vision is that of subsidiarity. If this was adopted any policy 2 decisions or detailed land allocation decisions would be taken at the most local level possible, and top-down policies kept to a minimum. There is no evidence in the vision or objectives of the document that such a principle has ever even been discussed. The JPC is in the process of finalising its NDP and is looking to review once the housing requirement is known in order to control future development from a neighbourhood perspective. We will ensure through the NDP that the minimum housing requirement is met (or exceeded) to meet the Local Plan requirements but of a type, design and in a location that is acceptable locally.

CHAPTER 4 INFRASTRUCTURE

Q. I.1 Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

There should be a presumption against development on land liable to flooding.(see the Landform Analysis P.45) The SFRA highlights that Henley is one of the most sensitive areas in SDC to the fluvial impacts of climate change. There is a contradiction between the HSA and development plans for Henley. The assessment outlines the need for carefully considered development and not that Henley should absorb significant urban expansion as suggested in the Plan

Q I.2 Please select the option which is most appropriate for South Warwickshire Option I2a: Set out infrastructure requirements for all scales, types and location of development If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire. Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy In this option, the focussing only on The JPC strongly supports option 12b.However without a significant change to the approach to funding infrastructure none of the options will be adequate. The JPC has carried out as much public consultation as practicable in the very limited time available. The local community in Henley and Beaudesert has expressed extreme concern about the inadequate infrastructure of the town. The community will oppose any growth option unless there is a realistic infrastructure investment plan The document correctly identifies that provision of the appropriate new infrastructure must underpin this plan in particular identifying the importance of effective communications, especially transport. The provision of adequate utility and Internet services is also deemed essential, as are the public services of health, education and welfare. There is nowhere in the document that outlines 3 infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts . the way improvements in all of these things are to be undertaken. There is also no reference to obtaining funding commitments from statutory providers and the key private-sector agencies involved in public infrastructure/services guaranteeing the investment necessary. This is critical to areas like Henley in Arden/Beaudesert and the surrounding villages, which feature heavily in the growth priorities. It is incumbent on SWLP to make a statement as to how these facilities will be provided well in advance of site allocation and development commencing. It is disingenuous to maintain that the private sector will be able to fill this gap entirely, yet this seems to be the assumption throughout the plan. QI.3 Please select the option which is most appropriate for South Warwickshire Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy. Option I3b: Each District Council to produce its own Levy Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances. The JPC supports 13b on the subsidiarity principle QI.4.1Should we include a policy to safeguard specific infrastructure schemes within the SWLP? Yes | No | Don’t Know 4 QI.4.2 Please add any comments you wish to make about these specific safeguarding provisions QI.5 Please add any comments you wish to make about infrastructure, viability and deliverability The JPC has received views from 2-300 residents in the short time available. The community have made it clear that the infrastructure of Henley Beaudesert is seriously inadequate. There is anger about the quality of the road, rail and bus situation which has been wrongly identified as strengths of the town. There are several other serious concerns relating particularly to antiquated drainage and sewage systems and flood hazards. Unless the chosen option presents concrete proposals to deal with these issues in the early years of the plan none of the growth options will be acceptable. GREEN AND BLUE CORRIDORS/GREEN BELT Q S.1Please select the option which is most appropriate for South Warwickshire Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy. The JPC supports option S1a It is essential that the community has a role in identifying areas in the green belt and green spaces which are proposed to be released for development or retained in green corridors in order to represent its’ wishes in the determination of the SWLP Spatial Growth Strategy .Attention is drawn to the Levelling – up and Regeneration Bill: Reforms to National Planning Policy and the Governments’ intention to amend the NPPF 5 Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy Instead of identifying Green and Blue Corridors within the South Warwickshire Local Plan, this option will rely on the production of the Local Nature Recovery Strategy. The production of a Local Nature Recovery Strategy will likely come after the SWLP Spatial Growth Strategy has been determined, therefore it is likely that there will be a reduced synergy. Q.S.2Please select all options which are appropriate for South Warwickshire Option S2a: Identify areas considered particularly suited to intensification development and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code. Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood. The JPC supports optionS2a 6 Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles. Option S2c: Do not have a policy which encourages intensification This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under -utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower. QS2.3 Please add any comments you wish to make about the Urban Capacity Study N/A 7 Q S3.1Please select the option which is most appropriate for South Warwickshire Option S3.1a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area. Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development. Option S3.1b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location This option looks to prioritise the redevelopment The JPC supports S3.1a 8 of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment. Option S3.1c: None of these QS4.1Do you think that growth of some of our existing settlements should be part of the overall strategy? Yes | No | Don’t Know Yes QS4.2 Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on The document correctly identifies that provision of the correct infrastructure must underpin this plan. The plan identifies the importance of effective communications, especially transport. The provision of adequate utility and Internet services is also deemed essential, as are the public services of health, education and welfare. There is nowhere in the document that outlines the way improvements in all of these things are to be undertaken. There is no indication that the authorities will be approaching the statutory providers and the private sector involved in public services to ensure that they will guarantee the investment necessary. This is obviously fundamental to historic places like Henley in Arden/Beaudesert and the surrounding villages, which might feature heavily in the growth priorities. It is essential that SWLP makes a statement as to how these facilities will be provided. Infrastructure needs to be delivered in advance of the development. It is ludicrous to pretend that the private sector will be able to fill this gap entirely, yet this seems to be the assumption behind the plan. There are many local and national examples that this is simply unrealistic. Recent battles in Alcester, Southam, Studley, and Wellesbourne are the tip of the iceberg of this problem. 9 Without a significant change to the approach to funding infrastructure none of the options will be adequate QS.5.1Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options The JPC does not have access to the expert advice to enable us to respond QS5.2 Do you think new settlements should be part of the overall strategy? Yes | No | Don’t Know Without a significant change to the approach to funding infrastructure none of the options will be adequate. The document correctly identifies that provision of the correct infrastructure must underpin this plan. The plan identifies the importance of effective communications, especially transport. The provision of adequate utility and Internet services is also deemed essential, as are the public services of health, education and welfare. And community facilities and open space? There is nowhere in the document that outlines the way improvements in all of these things are to be undertaken, and whether as part of the SWLP Part 2 the authorities will be approaching the statutory providers and the key privatesector agencies involved in public services to ensure that they will guarantee the investment necessary. This is obviously central to areas like Henley in Arden/Beaudesert and the surrounding villages, which feature heavily in the growth priorities. It is incumbent on SWLP to make a statement as to how these facilities will be provided. Infrastructure will need to be delivered in advance of the development It has happened elsewhere … It would be ludicrous to pretend that the private sector will be able to fill this gap entirely yet this seems to be the assumption behind the plan. QS5.3 In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree? Yes | No | Don’t Know QS5.4 If not, what approach would you take? The SWLP identifies connectivity/transport/communication as the single most important criterion in choosing preferred options. This is not reflected in the analysis within the body of the document. The quality of transport infrastructure is not given sufficient attention in the consultation document. Instead There should be a much more detailed analysis of the quality and usage the road system and rail and bus services in the subregion. No option can be chosen without an assessment of the quality of the services and if and how improvements in those services can be realigned under the growth proposals. 10 The road structure in Henley and Beaudesert has not changed since the 1950’s yet no road proposals affecting Henley Beaudesert are included in the document. Nor is there any mention of necessary and vital improvements to the rail and bus services. This is a crucial omission which needs to be corrected before the preferred option is published. Dissatisfaction was abundantly clear with all aspects of road rail and bus services in responses to the JPC community consultation. QS7.1 Please provide any comments you have on the emissions estimation modelling for the five growth options The JPC does not have access to the expert advice to enable us to respond QS7.2For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:: Option 1: Rail Corridors Appropriate strategy | Neutral | Inappropriate strategy Further comments Option 2: Sustainable Travel Appropriate strategy | Neutral | Inappropriate strategy Further comments Option 3: Economy Appropriate strategy | Neutral | Inappropriate strategy Further comments Option 4: Sustainable Travel and Economy Appropriate strategy | Neutral | Inappropriate strategy Further comments Option 5: Dispersed Appropriate strategy | Neutral | Inappropriate strategy Additional comments The SWLP has effectively offered Henley/ Beaudesert no option. The growth levels in all five options for the town are identical. The outcome for the town in practice could be the same whichever one(s) are supported. The residents therefore would expect to see options which are better defined, more granular and phased in shorter periods. A successful plan is very likely to be a mixture of all of the development options set out. The main problem with the options is that three of the five criteria are tied up with transport and connectivity, but transport and other links are not binary factors. A clear example of this is the difference between a railway service between Henley in Arden and Birmingham and Warwick or Leamington spa and Birmingham. A journey between Henley and Birmingham takes 40 minutes (on timetable) and occurs once an hour but a journey from Leamington or Warwick takes 30 minutes twice an hour and has London services not available in Henley. Similarly there have been recent reductions in bus services between Henley, Coventry and Stratford, which threaten to make connectivity significantly worse. This is not a problem restricted to Henley but also affects other possible growth centres and villages. This fundamental issue must be addressed and fully consulted on before a Preferred Development Option is decided upon. 11 QS8.1 For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward? Yes | No | Don’t Know Outside the settlements the Countryside Policy should prevail. Inside the settlements the size should be in accordance with the Neighbourhood Plan and appropriate to the nature of the specific sites QS8.2 For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites? Limit of 10 dwellings per site A higher limit is appropriate A lower limit is appropriate Outside the settlements the Countryside Policy should prevail. Inside the settlements the size should be in accordance with the Neighbourhood Plan and appropriate to the nature of the specific sites QS9 Please select the option which is most appropriate for South Warwickshire Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP. The JPC supports option 9a QS.10Please add any comments you wish to make about the development distribution strategy for South Warwickshire The JPC has received views from 2-300 residents in the short time available. The community have made it clear that the infrastructure of Henley Beaudesert is seriously inadequate. There is anger about the quality of the road, rail and bus situation which have been wrongly identified as strengths of the town. There are several other serious concerns relating particularly to antiquated drainage and sewage systems and flood hazards. Unless the chosen option presents concrete proposals to deal with these issues in the early years of the plan none of the growth options will be acceptable. (repeat of paragraph SI.4.3) CHAPTER 5 12 QE1.1 Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire? Yes | No | Don’t Know There are many principles in the section on the environment, and the economy, which the JPC endorses. These are in our responses to specific questions. We have two comments about the way the analysis has been carried out. First there is no evidence that the economic proposals will have any benefit in Henley and Beaudesert. All of the specific economic proposals and the Core Opportunity Area are to the South of Stratford and do not reinforce the choice of Henley as a possible area of expansion. This is also a problem in the section on transport improvements. None of the road proposals have significant local impact on the Henley in Arden area despite road and traffic problems being a major local issue. The growth strategy for housing is not being integrated with other essential attributes of the plan. There is a very real likelihood that additional housing will be built in places with no new businesses and vice versa. QE1.2 If your answer to E-1.1 is No, what would be a more appropriate approach to calculating future employment needs for this Local Plan? QE2 Please select all options which are appropriate for South Warwickshire Option E2a: Include a policy which encourages businesses to be low carbon This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low carbon infrastructure such as renewable energy. This would be a new policy in response This issue should be addressed in Part 2 13 to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this. Option E2b: Do not include a policy encouraging businesses to be low carbon It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area. Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy. This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change. Please select all options which are appropriate for South Warwickshire Option E3a: Include a policy expanding on SDC’s current existing policy.. This sets out the principles for economic activity within South Warwickshire and would also include setting out how much employment provision would need to be provided.. Option E3b: Have separate policies for individual sectors. This issue should be addressed in Part 2 14 These would set out criteria for economic activity including how much employment provision should be provided for each sector and may need to be adapted depending on whether the area is urban or rural. Option E3c: Include a policy that secures employment strategies through S106. This would look at a strategy which would indicate how developers would promote employment and skills at certain stages of the development process for local people. For example, it could be a percentage of jobs are advertised to local people only. It would help to retain local skills and provide jobs for local people. Option E3d: None of these Q E 4.1Please select the option which is most appropriate for South Warwickshire Option E4.1a: Include a policy supporting diversification This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford’s Core Strategy and Warwick’s Local Plan. Option E4.1b: Do not include a specific policy on diversification. This would need to be picked up under a much broader policy in relation to diversifying the This issue should be addressed in Part 2 15 economy as it is an important part of the economy given the rural nature of South Warwickshire. Q-E4.2: Please select the option which is most appropriate for South Warwickshire Option E4.2a: Include a policy supporting small - scale employment opportunities in rural areas This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy. Option E4.2b: Do not include a policy supporting small -scale employment opportunities in rural areas This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire. QE5 Please select the option which is most appropriate for South Warwickshire Option E5a: Include a policy which supports a range of business units. This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren’t any specific existing policies in relation to this in either the Core Strategy or Local Plan. The JPC supports option E 5a 16 Option E5b: Do not include a policy in Part 1. This level of detail may be considered beyond the scope of the Part 1 plan. Existing detailed policies may be ‘saved’ and subsequently incorporated into a Part 2 plan and/or other policy documents as appropriate. QE6Please select the option which is most appropriate for South Warwickshire Option E6a: Include a policy which protects South Warwickshire’s economic assets. As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change. Option E6b: Do not include a policy protecting all these economic assets. This could mean that there would be a loss to the economy if some of these assets are not protected and are lost to other uses. It may be that some of these assets would be covered under alternative policies, or the view may be taken that specific protection is not needed. Alternatively, protecting these assets could be seen as beyond the scope of part one of the plan, and instead be considered in part two of the Plan. The JPC supports option E6a 17 QE7.1 Please select the option which is most appropriate for South Warwickshire Option E7.1a: Include a policy directing employment to the Core Opportunity Area. This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment. Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area. This could mean that South Warwickshire fails to capitalise on employment opportunities or that new investment is focused outside of the Core Opportunity Area and fails to capitalise on the connectivity that the core opportunity area brings. The JPC supports option E7.1a This provides opportunity for housing growth in areas with infrastructure to meet the needs of the increasing workforce without the necessity of using green belt land or viable farm land Q7.2Please select the option which is most appropriate for South Warwickshire Option E7.2a: Include a policy relating to additional economic growth at the major investment sites. This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire. Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites. The JPC supports option E7.2a 18 This could mean that South Warwickshire fails to capitalise on employment opportunities. It could also undermine the presence of existing businesses as they find themselves unable to grow in the long-term. This could put existing jobs at risk. Qe8.1Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP? Yes | No | Don’t Know This approach will provide investment certainty and ensure that we can continue to grow the local economy. If existing allocations are not included, we will need to find even more new greenfield sites across South Warwickshire to meet our employment needs. QE 8.2 if, no please list the sites that should be excluded and give reasons. N/A QE8.3 Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests? Yes | No | Don’t Know The JPC supports this proposal as essential to protect assets QE.8.4 Please specify what you consider to be appropriate tests The framework which is currently applied by SDC is generally satisfactory but also flexible to respond to the local situation. The JPC is satisfied to continue with this approach. 19 Q9 Please select the option which is most appropriate for South Warwickshire Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan. In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire. Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2. This may not be considered a strategic matter for Part 1 to address. However, saving existing boundaries would result in an inconsistent approach across the two Districts The JPC supports the option E9a QE.10 Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan? Yes | No | Don’t Know Whilst Tourism is essential to the vitality of South Warwickshire, there are few aspects of tourism that have an effect on the spatial planning of an area. It is therefore proposed that tourism is addressed fully, within Part 2 of the South Warwickshire Local Plan. Tourism is a critical industry in the whole of South Warwickshire. Henley is a tourist magnet for several reasons. In order to capitalise on the potential fully there could be significant changes in land use in the town and therefore to defer policy making is not in the interests or needs of the town. 20 QE.11Please add any comments you wish to make about delivering South Warwickshire’s economic needs N/A CHAPTER 6 QH1.1The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire? Yes | No | Don’t Know The HEDNA is a standard and tried and tested model so the JPC accepts the general approach in the plan. Two points are worth highlighting 1. Since 2014 the total and balance of housing need has changed significantly between Stratford and Warwick Districts and both Councils have exceeded their housing targets in the period. This indicates some caution in future pro