

BEAUDESERT AND HENLEY IN ARDEN JOINT PARISH COUNCIL

SOUTH WARWICKSHIRE LOCAL PLAN PART 1 ISSUES AND OPTIONS CONSULTATION

CONSULTATION RESPONSE 2: OVERVIEW AND SUMMARY

QUESTIONS [SWLP]	RESPONSE [JPC]
CHAPTER 3	
<p>Q-V3. 1 Q-V3.2: DO YOU AGREE THAT THE VISION AND STRATEGIC OBJECTIVES ARE APPROPRIATE?</p> <p>YES NO DON'T KNOW IF NO, PLEASE INDICATE WHY:</p>	<p>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</p>

	<p>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.</p>
CHAPTER 4 INFRASTRUCTURE	
<p>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.</p>	<p>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</p>
<p>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</p>	<p>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</p>

<p>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</p> <p>.</p>	<p>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.</p>
<p>Q1.3 Please select the option which is most appropriate for South Warwickshire</p> <p>Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan</p> <p>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.</p> <p>Option I3b: Each District Council to produce its own Levy</p> <p>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.</p>	<p>The JPC supports 13b on the subsidiarity principle</p>
<p>Q1.4.1 Should we include a policy to safeguard specific infrastructure schemes within the SWLP?</p> <p>Yes No Don't Know</p>	

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

<p>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.</p>	
<p>Q.S.2 Please select all options which are appropriate for South Warwickshire</p> <p>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.</p>	<p>The JPC supports option S2a</p>

<p>Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes</p> <p>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.</p> <p>Option S2c: Do not have a policy which encourages intensification</p> <p>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.</p>	
<p>QS2.3 Please add any comments you wish to make about the Urban Capacity Study</p>	<p>N/A</p>

Q S3.1 Please 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

<p>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.</p> <p>Option S3.1c: None of these</p>	
<p>QS4.1 Do you think that growth of some of our existing settlements should be part of the overall strategy? Yes No Don't Know</p>	<p>Yes</p>
<p>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</p>	<p>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.</p>

	Without a significant change to the approach to funding infrastructure none of the options will be adequate
QS.5.1 Please 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	<p>Without a significant change to the approach to funding infrastructure none of the options will be adequate.</p> <p>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 private-sector agencies involved in public services to ensure that they will guarantee the investment necessary. This is obviously central to areas like Henley in Arden/Beaundesert 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.</p>
<p>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</p> <p>QS5.4 If not, what approach would you take?</p>	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.

	<p>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.</p>
<p>QS7.1 Please provide any comments you have on the emissions estimation modelling for the five growth options</p>	<p>The JPC does not have access to the expert advice to enable us to respond</p>
<p>QS7.2 For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire::</p> <p>Option 1: Rail Corridors Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 2: Sustainable Travel Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 3: Economy Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 4: Sustainable Travel and Economy Appropriate strategy Neutral Inappropriate strategy Further comments</p> <p>Option 5: Dispersed Appropriate strategy Neutral Inappropriate strategy Additional comments</p>	<p>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.</p>

<p>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</p>	<p>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</p>
<p>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</p>	<p>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</p>
<p>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.</p>	<p>The JPC supports option 9a</p>
<p>QS.10 Please add any comments you wish to make about the development distribution strategy for South Warwickshire</p>	<p>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)</p>
<p>CHAPTER 5</p>	

<p>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</p>	<p>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.</p>
<p>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?</p>	
<p>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</p>	<p>This issue should be addressed in Part 2</p>

<p>to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.</p> <p>Option E2b: Do not include a policy encouraging businesses to be low carbon</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>Please select all options which are appropriate for South Warwickshire</p> <p>Option E3a: Include a policy expanding on SDC's current existing policy..</p> <p>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..</p> <p>Option E3b: Have separate policies for individual sectors.</p>	<p>This issue should be addressed in Part 2</p>

<p>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.</p> <p>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.</p> <p>Option E3d: None of these</p>	
<p>Q E 4.1 Please select the option which is most appropriate for South Warwickshire</p> <p>Option E4.1a: Include a policy supporting diversification</p> <p>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.</p> <p>Option E4.1b: Do not include a specific policy on diversification.</p> <p>This would need to be picked up under a much broader policy in relation to diversifying the</p>	<p>This issue should be addressed in Part 2</p>

<p>economy as it is an important part of the economy given the rural nature of South Warwickshire.</p> <p>Q-E4.2: Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p> <p>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.</p>	
<p>QE5 Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p>	<p>The JPC supports option E 5a</p>

<p>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.</p>	
<p>QE6 Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p> <p>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.</p>	<p>The JPC supports option E6a</p>

<p>QE7.1 Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p> <p>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.</p>	<p>The JPC supports option E7.1a</p> <p>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</p>
<p>Q7.2 Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p> <p>Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites.</p>	<p>The JPC supports option E7.2a</p>

<p>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.</p>	
<p>Qe8.1 Do 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.</p>	
<p>QE 8.2 if, no please list the sites that should be excluded and give reasons.</p>	N/A
<p>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</p>	The JPC supports this proposal as essential to protect assets
<p>QE.8.4 Please specify what you consider to be appropriate tests</p>	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.

<p>Q9 Please select the option which is most appropriate for South Warwickshire</p> <p>Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan.</p> <p>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.</p> <p>Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2.</p> <p>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</p>	<p>The JPC supports the option E9a</p>
<p>QE.10 Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?</p> <p>Yes No Don't Know</p> <p>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.</p>	<p>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.</p>

QE.11 Please add any comments you wish to make about delivering South Warwickshire's economic needs	N/A
CHAPTER 6	
QH1.1 The 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	<p>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</p> <ol style="list-style-type: none"> 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 projections and a significant need for flexibility in local targets. 2. There are no major proposals for economic development or transport links centred on Henley/Beaundesert which casts doubt on the ability of the plan to deliver sustainable growth.
QH1.2 If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?	N/A
QH2.1 What is the best way to significantly increase the supply of affordable housing across South Warwickshire?	<p>The problem of providing affordable homes in high land and house price areas has proved intractable nationally so that affordable and social housing numbers have declined sharply. In Henley and the surrounding villages it would have to be by discounted land price (unlikely) or public subsidy. When the SWLP announces proposed targets it must indicate the level of subsidy Homes England will allocate to areas such as the JPC .</p>

QH2.2 Please select the option which is most appropriate for South Warwickshire:

Option H2-2a: A single South Warwickshire wide affordable housing requirement

A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.

Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts

Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.

JPC supports option H2.2c The HEDNA analysis indicates that half of all housing growth results from a shortage of affordable homes. Henley is one of the most expensive towns in the region. Achieving a higher number of affordable homes, suitable for younger people and families in particular is a major challenge. The plan is very long on aspirations, but very short on practical steps and the way these homes are going to be made more affordable, as well as increasing in quantum has to be a central part of the next phase of the plan. No housing target should be ratified without a fully funded strategy for affordable homes in high price settlements. If this is not possible the housing target for Henley/Beaudesert should be reduced accordingly.

<p>Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire</p> <p>A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the Districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial growth strategy.</p>	
<p>QH2.3 How should South Warwickshire best address the specialist needs for older people?</p>	<p>The comment in section H2.1 applies equally to the provision for elderly people</p>
<p>QH3 Please select all options which are appropriate for South Warwickshire</p> <p>Option H3a: Do not seek to include minimum space standards in a policy in the SWLP. It may not be considered strategically important, across the entirety of South Warwickshire. In this case, minimum space standards could be considered in a Part 2 plan.</p>	<p>This policy should be dealt with in Part 2</p>

<p>Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.</p> <p>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</p> <p>Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.</p> <p>This would be dependent on being able to evidence a need for these requirements across South Warwickshire, without having an unacceptable impact on affordability of properties. It may be considered strategically important when considering the capacity of strategic sites.</p> <p>Option H3d: None of these</p>	
<p>QH4.1 Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District? Yes No Don't Know</p>	<p>We recognise that SWLP has a duty to collaborate with the neighbouring authorities. The demand and need which comes from Birmingham and the Black Country is mainly for affordable homes. The problem of providing affordable homes in high land and house price areas has proved intractable nationally so that affordable and social housing numbers have declined sharply. In Henley and the surrounding villages is by discounted land or public subsidy. When the SWLP announces proposed targets it must indicate the level of subsidy Homes England will allocate to areas such as the JPC .</p>

	<p>No housing target should be ratified without a fully funded strategy for affordable homes in high price settlements. If this is not possible the housing target for Henley/Beaundesert should be reduced accordingly.</p>
<p>QH4.2 Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan</p> <p>QH4.3 If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?</p> <p>You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question</p>	<p>The scale of homes which the JPC area can absorb is dependent on affordability problems being addressed. However the scale is also dependent on adequate modern infrastructure being provided. Without a significant change to the approach to funding infrastructure none of the options will be adequate. 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 Beaundesert 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. (Repetition of response I.4.3)</p>
<p>QH5 Please select all options which are appropriate for South Warwickshire</p> <p>Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.</p> <p>This would group this type of housing together in small sites in various locations, and whilst it</p>	<p>Premature defer to part 2</p>

gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not be appropriate.

Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. However, some people looking for self and custom build homes may not wish to live on the edge of a large housing site. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.

Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability. This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for self and custom build homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it

<p>impossible to ensure that sufficient numbers of self and custom build home are made available</p>	
<p>QH6 Please select all options which are appropriate for South Warwickshire</p> <p>Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes. This would group this type of housing together in small sites in various locations, and whilst it gives certainty as to where this type of housing will be provided, it is dependent on landowners putting sites forward for this type of housing. This approach would not allow for individual plots in other locations that some people might prefer, although it should be borne in mind that the provision of such homes in open countryside would not likely be appropriate.</p> <p>Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site. This would provide more certainty of delivery as it would be a requirement of the larger development sites across the area and could provide a wider spread of this type of home across South Warwickshire. Whilst this option has the potential to build positive relationships between the settled and travelling communities and enable both communities to benefit from</p>	<p>The JPC supports option H6c but that detailed policies are premature so should be deferred to Part 2</p>

<p>sustainable infrastructure that is provided as part of a large development, measures would likely need to be put in place to manage and foster these relationships. This approach may not be suitable for Travelling Showpeople yards which are typically larger in order to accommodate circus and fairground equipment. It will be necessary to establish what an appropriate proportion of such homes should be on such sites.</p> <p>Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.</p> <p>This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Showpeople homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on this option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.</p>	
<p>QH7 Please add any comments you wish to make about delivering homes in South Warwickshire</p>	<p>The demand and need in the plan is 50% for affordable homes. The problem of providing affordable homes in high land and house price areas has proved intractable nationally so that affordable and social housing numbers have declined sharply. In Henley and the surrounding villages is by discounted land</p>

	<p>or public subsidy. When the SWLP announces proposed targets it must indicate the proportion of affordable homes associated level of subsidy Homes England will allocate to areas such as the JPC . A number of residents have also noticed that there is no reference at all to social housing.</p>
CHAPTER 7	
<p>QC.1.1 Please select the option which is most appropriate for South Warwickshire</p> <p>Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes</p> <p>Allocating suitable land would set the groundwork for future renewable energy proposals. The details of any such proposal would be further assessed through planning applications. Allocating land would also help prevent schemes coming forward in less suitable locations.</p> <p>Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.</p> <p>Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy</p>	<p>The JPC supports the priority being given to climate change and option C1.1b. The JPC in particular supports the monitoring of emissions and the proposals for retrofitting dwellings. There are local concerns about flooding in the area and the risk that more new developments might bring more regular flood damage to the town. Renewal of the Victorian water and drainage system would therefore need to go hand-in-hand with the development of any additional homes and commercial properties</p>

<p>would show general support but would not identify specific locations. Proposals would therefore be considered on a site- by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.</p> <p>Option C1.1c: None of these</p>	
<p>QC.1.2Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?</p>	<p>The JPC does not have expertise to respond to this point</p>
<p>QC2.Please select the option which is most appropriate for South Warwickshire</p> <p>Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable</p> <p>Decentralised energy schemes are typically only viable for developments of a significant size – for example in the region of 2,500 or more dwellings, or 10 hectares or more of employment land. In order see a benefit from this option, much of the planned growth would need to be concentrated into a smaller number of larger developments.</p> <p>Option C2b: Have a policy encouraging the consideration of decentralised energy systems</p> <p>Option 2 allows for greater flexibility, but is a weaker policy that may result in opportunities being missed.</p> <p>Option C2c: None of these</p>	<p>The JPC does not have expertise to respond to this point</p>

<p>QC 3 .1Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site? Yes No Don't Know</p>	<p>Too often a false economy and not effectively delivered.</p>
<p>QC32 Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?</p>	<p>The JPC does not have expertise to respond to this point</p>
<p>QC3.3 Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire</p>	<p>The JPC does not have expertise to respond to this point</p>
<p>QC4.1 Please select all options which are appropriate for South Warwickshire Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time. Without a policy in the plan we would be tied in with national minimum requirements and have no control over changes to these standards over time. Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.</p>	<p>The JPC supports option C4.1a</p>

This would require all new development to achieve net zero carbon from adoption of the plan, expected in 2025. However, it would be at a cost as the development industry may not be ready to viably deliver this and as a consequence we may see less affordable housing built and maybe fewer other social and community benefit from development to offset the cost of achieving net zero carbon. Viability work would be needed to establish the impact of this approach.

Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards.

This would require all new development to achieve net zero carbon from a future date and this would be set out in the plan. It could allow time for the development industry to adjust to the higher standards, give time for the cost of achieving these standards to come down, and may mean that we can secure more affordable housing and community benefits from development. This could be 2030 in line with the ambitions of the South Warwickshire Climate Action Plan.

Option C4d: None of these

<p>What scale of development should the requirements apply to? Option C4.2a: All new development Including for example residential extensions Option C4.2b: Development over a certain size For example all developments of 1 dwelling or more, or 100+ square metres?</p>	<p>The JPC does not have expertise to respond to this point</p>
<p>QC5 Please select all options which are appropriate for South Warwickshire Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications Achieving net zero carbon requirements on existing buildings that are converted or change use is a great way to be able to retrofit climate change adaptation and mitigation measures into South Warwickshire’s existing building stock. However, the ability to make changes to existing buildings can be more restrictive and expensive than on new builds and may result in some developments becoming unviable. Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas A policy that proactively encourages the retrofitting of climate change measures into existing buildings, within certain parameters,</p>	<p>The JPC does not have expertise to respond to this point</p>

<p>can make it easier and provide more certainty for property owners to be able to tackle climate change. In sensitive locations this approach may be more challenging and if taken forward it will be important for solutions to be sought to minimise any adverse impact on local surroundings.</p> <p>Option C5c: None of these</p>	
<p>Q6.1 Please select the option which is most appropriate for South Warwickshire</p> <p>Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business-as-usual' approach to construction</p> <p>A policy requiring reductions in embodied emissions of 100% would have a significantly positive effect on reducing carbon emissions from new development. There are challenges that would need to be overcome in terms of validating and assessing emissions data to ensure its robustness. There may be implications for the viability of some developments following such a policy and this would need to be tested.</p> <p>Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.</p>	<p>The JPC supports option C6.1b</p>

<p>A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area's development needs.</p> <p>Option C6.1c: None of these</p>	
<p>QC6.2.1 If a phased approach is used, what dates and thresholds should be used?</p> <p>For example, achieve 80% reduction by 2030 and 100% reduction by 2040.</p>	<p>The JPC does not have access to the expert advice to enable us to respond</p>
<p>QC6.2.2 Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire</p>	<p>The JPC does not have access to the expert advice to enable us to respond</p>
<p>QC7 Please select the option which is most appropriate for South Warwickshire</p> <p>Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures?</p>	<p>The JPC does not have access to the expert advice to enable us to respond</p>

<p>This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.</p> <p>Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures</p> <p>Not having a policy requiring developments to adapt to higher temperatures would result in new building stock not being designed to deal with this effect of climate change.</p> <p>Option C7c: None of these</p>	
<p>QC8 Please select the option which is most appropriate for South Warwickshire</p> <p>Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events</p> <p>This would include SuDS and water efficiency requirements</p> <p>Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events</p> <p>Without a policy in the plan we would be tied in with national minimum requirements, and have no control over changes to these standards over time.</p>	<p>The JPC supports Option C8a</p>

Option C8c: None of these	
<p>QC9.1 Please select the option which is most appropriate for South Warwickshire</p> <p>Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity</p> <p>This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.</p> <p>Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity</p> <p>Opportunities for biodiversity enhancement may be lost without a policy in the plan requiring biodiversity measures to be incorporated into development. Option C9.1c: None of these</p>	The JPC supports Option C9.1a
QC 9.2 Please add any comments you wish to make about climate responsive development design in South Warwickshire	None
<p>QC 10.1 Please select all options which are appropriate for South Warwickshire</p> <p>Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment. This could this be in line with RCP</p>	The JPC does not have expertise to respond to this point

8.5 in order to maximise the level of interventions incorporated?

RCP 8.5 is a 'business-as-usual' scenario in which emissions continue to rise throughout the 21st century and climate change continues unabated. This scenario is suggested as a baseline as if new developments assess risks related to this scenario a more comprehensive approach to incorporating adaptation and resilience interventions can be achieved than applying a lower RCP scenario.

Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated?

Once an assessment has been undertaken, checklists are a useful way in enabling developers to identify which interventions they will incorporate into a new proposal. Stratford-on-Avon District Council's Development Requirements SPD Part V on Climate Change Adaptation and Mitigation is a way in which checklists can be applied in this way. Alternatively, there may be other tools or guidance that could be developed.

Option C10.1c: None of these

Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire

<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option C11a: Do not include a policy on water quality in the SWLP Part 1 ‘Save’ existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.</p> <p>Option C11b: Include policy along similar lines to the existing policies, where supported by up-to-date evidence Prioritise water quality as a strategic issue, and develop a new policy based upon up-to date evidence.</p> <p>Option C11c: None of these</p>	<p>The JPC does not consider this is material for the part 1 plan</p>
<p>QC12.2 Please add any comments you wish to make about water management or flood risk in South Warwickshire</p>	<p>Development on the flood plains of the numerous watercourses in the SWLP area should not be permitted and surface water run off controlled by attenuation measures to avoid surge flooding and contamination of the watercourses. Minimum use of impervious materials to be used in development locations to aid natural absorption.</p>
<p>CHAPTER 8</p>	
<p>QD1.1 Do you agree that this is an appropriate range of topics for a strategic design policy? Yes No Don't Know</p>	<p>The JPC strongly endorses proposals to protect and enhance the historic and environmental quality of the town and the steps to be taken by the partnership to achieve that. This level of proposal, however, appears to JPC to be far too</p>

	<p>detailed and is an example of excessive scope/detail in the consultation. These are all issues that are being delegated to NPs and there needs to be some reference in the document to encouraging Neighbourhood Plans to undertake this activity and guidance as to appropriate approaches.</p>
<p>QD1.21 If no, please indicate why</p>	<p>See above</p>
<p>QD2 Please select all options which are appropriate for South Warwickshire Option D2a: Develop a South Warwickshire Design Guide</p> <p>A single reference document. However, given the large geographical area this would cover, it would be challenging to tailor to the specifics of individual</p>	
<p>settlements or places, or guide significant change. This would need to be led by the Local Planning Authorities.</p> <p>Option D2b: Develop design guides and/or design codes for specific places (e.g. existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change. This option could take a more comprehensive view of areas of change identified in the SWLP, rather than focussing on a development site or sites (which it could do in addition), with a view to guiding all development proposals. These would expand upon the place-based principles approach in the Stratford-on-Avon District Core Strategy and would be led by the Local</p>	<p>The JPC supports option D2c</p>

<p>Planning Authority (or both authorities if relevant), in collaboration with local communities. There may also be potential for some or all of this work to come forward through Neighbourhood Development Plans.</p> <p>Option D2c: Develop design guides/codes for strategic development sites/locations. Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.</p> <p>Option D2d: None of these</p>	
<p>QD.3 Please select all options which are appropriate for South Warwickshire</p> <p>Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.</p> <p>This would be similar to the current approach in Stratford-on-Avon. It may facilitate a more locally tailored approach to density, though there may be a risk that in some locations that the efficiency of the land use may not be as high. This approach would not prevent specific design guides, codes or masterplans from guiding appropriate density ranges in areas of</p>	<p>The JPC supports options D3b and D3c</p>

<p>change, as advocated by Paragraph 125 of the NPPF.</p> <p>Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.</p> <p>This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding</p>	
<p>the NPPF.</p> <p>Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places. This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis)</p> <p>Chapter 8 – A well-designed and beautiful south Warwickshire</p> <p>South Warwickshire Local Plan</p>	

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and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.

Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places. This approach would be different to recent local policy approaches, where the emphasis would be on accessibility to infrastructure including transport infrastructure. This approach would align with the suggestion in Paragraph 125 (e) of the NPPF. If a growth strategy focussed around sustainable travel were to be taken forward, there would be a clear synergy with this option. This option could also have a greater role in examining opportunities for densification in appropriate locations, and in determining the approach to any potential new settlements. The challenge of this approach is that it may result in a different density range in

<p>some places across South Warwickshire compared with the conventional approach. Option D3e: None of these</p>	
<p>QD4.1 Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets? Yes No Don't Know Q-D4.2: If no, please indicate why</p>	<p>Too detailed for this stage of the plan</p>
<p>QD5 Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2? Yes No Don't Know Heritage assets are undoubtedly important to the character of South Warwickshire and should be considered at a strategic level within Part 1 of the South Warwickshire Local Plan, helping inform the strategic growth strategy. Detailed heritage policies are will be deferred to part 2.</p>	<p>The JPC supports heritage assessments</p>
<p>QD6 Please add any comments you wish to make about a well-designed and beautiful South Warwickshire</p>	<p>Not at this stage</p>
<p>CHAPTER 9</p>	

<p>QW1 Should the Part 1 plan include a policy on pollution? Yes No Don't Know</p> <p>This policy would cover all pollution and would ensure that any development that would result in a significant impact on the health and wellbeing of people in an area as a result of pollution will not be permitted unless effective mitigation can be achieved. This policy should also look to protect those areas which are within Air Quality Management Areas by requiring air quality assessments and where necessary a mitigation plan to demonstrate practical and effective measures have been taken to avoid any adverse impacts</p>	<p>This is a national and regional issue</p>
<p>QW2 Please select the option which is most appropriate for South Warwickshire</p> <p>Option W2a: Include a policy on Health Impact Assessments.</p> <p>Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.</p> <p>Option W2b: Do not include a policy on Health Impact Assessments.</p> <p>Although any major health impacts such as noise and pollution are likely to be picked up at</p>	<p>The JPC does not support work on this as it is inappropriate for a sub-regional plan</p>

<p>the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural</p>	
<p>CHAPTER 10</p>	
<p>QT1 Please select all options which are appropriate for South Warwickshire</p> <p>Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.</p> <p>It might be considered more appropriate to consider such matters in the context of specific locations and places, but in this scenario it would not apply consistently across South Warwickshire within the Part 1 SWLP.</p> <p>Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g. Building for a Healthy Life) within a broader overarching policy. This would recognise its relevance to the overarching principles of the SWLP, but suggest it doesn't warrant a bespoke policy. Alternatives may also be offered. This would raise the profile but not guarantee that a single approach would be consistently adopted across South Warwickshire.</p> <p>Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to</p>	<p>The JPC supports the items highlighted but is extremely concerned about the status of this section.</p> <p>The JPC considers that the transport section as the single biggest criterion in choosing preferred options should have had a significant larger part of the consultation. It seems to be buried among the later sections which have less immediate impact on local communities .This should be treated as an infrastructure issue There should be a much more significant discussion about the rail and bus services to the subregion including an assessment of the quality of the services and how improvements in those services can be realigned. As mentioned above there are no road proposals affecting Henley in Arden in the document and there are no discussions about the improvements to the rail and bus services to the town.</p>

<p>be included within development proposals. This would set out very clear the vision and expectations for new developments and places, to ensure early design incorporation.</p>	
<p>QT2 Please select the option which is most appropriate for South Warwickshire</p> <p>Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure. This would be based on those living in rural areas, urban areas etc. It could include making changes to car parking standards and lowering them in areas where there are good active/public transport links in place such as in main urban centres. The policy would explore opportunities to use existing green and blue infrastructure as potential active travel options. The policy should also ensure that proposals are in line with the priorities as set out in the Local Transport Plan such as promoting and looking at alternative options for sustainable travel, e.g. car club initiatives, e scooters etc.</p> <p>Option T2b: Do not include a policy which takes a hierarchical approach. There could be a general policy on sustainable transport which requires the necessary infrastructure and services (including the use of existing green and blue infrastructure) in place to allow both existing and new communities to become more sustainable and to have much easier access to key services and facilities. This</p>	

<p>would be regardless of whether residents live in rural or urban areas and could be an expansion of Policy CS.26 in the Core Strategy. This could also include a section on ensuring that proposals are in line with the priorities as set out in the Local Transport Plan. If a hierarchical approach is not taken it may still lead to those residents who have good access to public transport still continuing to use their cars for everyday use as there would be little incentive to change travel habits.</p>	
<p>QT3 Please select the option which is most appropriate for South Warwickshire Option T3a: Include a policy encouraging more sustainable road-based transport for businesses. It is acknowledged that employment and businesses will still need to operate using roads as their predominant form of transport particularly for the distribution of goods. This policy would encourage businesses to become more sustainable such as by using electric vehicles, introducing low emission zones, workplace evies, looking at the possibility of 'last mile' freight journeys (the very final stage of delivery) or driverless delivery pods whereby battery powered autonomous vehicles will be used to deliver goods. This could also include measures required in order to mitigate against any unacceptable impacts that road-based travel from business/employment may have on</p>	<p>The JPC supports the items highlighted but is extremely concerned about the status of this section. The JPC considers that the transport section as the single biggest criterion in choosing preferred options should have had a significant larger part of the consultation. It seems to be buried among the later sections which have less immediate impact on local communities .This should be treated as an infrastructure issue There should be a much more significant discussion about the rail and bus services to the subregion including an assessment of the quality of the services and how improvements in those services can be realigned. As mentioned above there are no road proposals affecting Henley and Arden in the document and there are no discussions about the improvements to the rail and bus services to the town.</p>

<p>the environment such as poor air quality. This will help in meeting the climate change aspirations of the plan.</p> <p>Option T3b: – Do not include a policy encouraging more sustainable road- based transport for business. This may be beyond the scope of the Part 1 plan as it could be picked up under a more general sustainable transport policy rather than specifically for business and employment. If it is not considered to be a strategic issue for Part 1, a detailed policy could be developed as Part 2 of the plan.</p>	
<p>QT4 Please provide suggestions for how smart cities technologies could be supported in South Warwickshire</p>	
<p>QT5 Please add any comments you wish to make about a well-connected South Warwickshire</p>	<p>The JPC supports the items highlighted but is extremely concerned about the status of this section.</p> <p>The JPC considers that the transport section as the single biggest criterion in choosing preferred options should have had a significant larger part of the consultation. It seems to be buried among the later sections which have less immediate impact on local communities .This should be treated as an infrastructure issue There should be a much more significant discussion about the rail and bus services to the subregion including an assessment of the quality of the services and how improvements in those services can be realigned. As mentioned above there are no road proposals affecting Henley and Arden in the document and there are no discussions about the improvements to the rail and bus services to the town.</p>

CHAPTER 11	
<p>QB1 Please select the option which is most appropriate for South Warwickshire</p> <p>Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District</p> <p>Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed.</p> <p>Option B1b: Remove Areas of Restraint designations</p> <p>Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.</p> <p>Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.</p> <p>This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.</p>	<p>The JPC strongly endorses option B1a and proposals to protect and enhance the historic and environmental quality of the town and the steps to be taken by the partnership to achieve that. This level of proposal, however, appears to JPC to be far too detailed and is an example of excessive scope/detail in this consultation. These are all issues that are being delegated to NPs and there needs to be some reference in the document to encouraging Neighbourhood Plans to undertake this activity and guidance as to appropriate approaches.</p>

<p>QB2 Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward? Yes No Don't Know</p> <p>The Vale of Evesham Control Zone relies upon collaboration between local authorities and HGV Haulers to work effectively. If neighbouring authorities removed the policy designation then there would be little merit in South Warwickshire continuing with it in isolation. Do you agree that if Wychavon and Cotswold District Councils remove the Vale of Evesham Control Zone, that South Warwickshire should follow suit?</p>	<p>This is a matter for the local councils and their residents</p>
<p>QB3 Please select the option which is most appropriate for South Warwickshire</p> <p>Option B3a: Introduce Special Landscape Areas across all of South Warwickshire</p> <p>Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA's refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA's within</p>	<p>The JPC supports Option B3a</p>

<p>Stratford remain relevant and where any SLA's within Warwick should be located, an updated study would need to be undertaken.</p> <p>Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.</p> <p>Option B3c: Discard Special Landscape Areas and bolster general landscape policy Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.</p>	
<p>QB4. Please select the option which is most appropriate for South Warwickshire</p> <p>Option B4a: Maintain the current policy approach, without the use of a buffer Maintaining the current policy approach in line with National Planning Policy Framework would result in little to no change in the level of protection afforded to the Cotswold AONB.</p> <p>Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this</p>	<p>The JPC believes that in general our environmental quality needs to be protected and maintained and although the ideas are sound this might have a negative impact on areas to the North depending on the scale of the buffer. However, these are issues to be debated with local communities and the relevant statutory agencies involved and the Local Plan part 1 does not seem to be the correct place to have this debate.</p>

<p>buffer zone may have on the National Landscape</p> <p>Creating a buffer zone around the Cotswold AONB would help ensure regard is given to the potential impacts of development outside of the National Landscape, on the natural beauty of the National Landscape. It is possible that a distance based buffer is used around the entirety of the special landscape area (e.g 3km), or alternatively a sinuous buffer based on landscape sensitivity in different areas is created in consultation with the Cotswold Conservation Board. This would mean that the buffer is thicker in some areas than others, and could be identified as a special landscape area. Details of the buffer would be considered as the plan progresses should this option be preferred. However, it is worth noting that the level of protection afforded to the Cotswold AONB would not change. Such an approach may simply help officers when determining planning applications.</p>	
<p>QB5 Please select the option which is most appropriate for South Warwickshire</p> <p>Option B5a: Explore and pursue an integrated Environmental Net Gain Policy</p> <p>To consider Environmental net gain as a new and pioneering approach to support nature's recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice.</p>	<p>The JPC supports option 5a. The core idea is sound, but we have concerns that this might push more development further to the North.</p>

<p>However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.</p> <p>Option B5b: Explore environmental net gain through separate policies</p> <p>A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate policies for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.</p> <p>Option B5c: None of these</p>	
<p>QB6 Should the South Warwickshire Local Plan introduce Wildbelts designations? Yes No Don't Know</p> <p>Designate areas of Wildbelts across the Local Plan Area to support nature's recovery and the Wildlife Trust's goal to have 30% of our land and sea managed for nature by 2030.</p>	<p>The JPC does not have expertise to respond to this point</p>

<p>QB7 Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?</p> <p>Yes No Don't Know</p> <p>Where possible, the SWLP will seek to signpost to relevant policies in other documents, rather than duplicating or paraphrasing these policies. It is not within the scope of the SWLP to produce its own distinct policy regarding minerals. This approach also avoids difficulties of varying plan periods for different plans.</p>	
<p>QB8.1 Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?</p> <p>Yes No Don't Know</p> <p>Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The 'best and most versatile' land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.</p>	
<p>QB8.2 When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?</p>	<p>The JPC does not have the expertise to respond at this stage</p>

<p>QB8.3 Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites</p> <p>yes No Don't Know</p> <p>Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non-designated biodiversity or geodiversity assets, and there are variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.</p>	<p>The JPC supports the proposal, but it still seems doubtful that the duplication is essential at this stage.</p>
<p>QB10 Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire</p>	<p>The JPC does not have expertise to respond to this point</p>

CHAPTER 12	
QP 1.1 Do you agree with the proposed broad content of the Part 1 plan? Yes No Don't Know	
QP1.2 no, please indicate why	<p>The JPC has had difficulty assessing the volume and detail of the plan in the timescale. We realise that some difficulties are inevitable but there are in reality only a few key issues in the plan and they are lost in the excessive detail. It would be better if several of the policy areas were dealt with in a separate consultation probably reserved to the individual District authorities in line with the subsidiarity principle. The JPC considers that the Part 1 plan should be a high level strategic plan which contains the issues which are central to the long term settlement pattern of the sub Region. The plan is also unrealistically long given the rate of social and economic change. There should be intermediate 5 year time periods with milestone and SMART targets. In addition the plan should be backed by a financial analysis of the cost of different options and a risk assessment of affordability of the different approaches. The failure to include a major set of options about the green belt in the consultation indicates a lack of appropriate focus. It essential that the Preferred Option stage is far more focussed and cogent with these intermediate stages and targets.</p>
QP1.3 Do you agree with the selection of policies to be addressed in the Part 1 plan? Yes No Don't Know	
If not, please indicate why	<p>Throughout the document we have identified policies which are inappropriate or being addressed in the wrong place . Part 1 Preferred Options should be radically shortened. There is a plethora of policy options which are not central to the political decisions to South Warwickshire's future or are duplicating national legislation or policy.</p>

QP.1.4 Are there any areas where equality and inclusivity in planning needs further attention? Yes No Don't Know	
If yes, please give further details	This area seems to be almost totally absent from the document.
For Henley and Beaudesert JPC Neighbourhood Development Plan/ South Warwickshire Local Plan Working Group 26 th February 2023	



Ray Evans – Parish Clerk to Beaudesert & Henley in Arden JPC Date 1st March 2023