

## Consultation Response to Local Plan Revised Development Strategy July 2013

Lapworth Parish Council wishes to record its lack of confidence in the processes and objectives adopted by Warwick District Council in preparing their draft plan as it was not put together in consultation with residents of our parish. Also, despite objections being raised in response to the Preferred Options plan last year to the proposal that up to 100 additional homes be built in Lapworth over the plan period, these objections have clearly been ignored as evidence by the revised proposal that 100 to 150 new homes now be built. The Housing Needs Survey carried out in Lapworth in 2010 only indicated a need for a very small number of houses. Why has this evidence been ignored in the Plan? There is a concern that affordable housing is potentially difficult to sustain in our village due to the poor public transport and cost of commuting as there is very little employment opportunity within the Parish.

Contrary to the 12 principles of planning ('local people to shape their Surroundings') set out in Para 17 of NPPF it is evident from responses made at local presentations to the residents of the parish that to date our local people do not think they have been able to do this as plans have been prepared elsewhere and passed down to them. A 'bottom up' approach should be adopted and to this end we have registered our intention to prepare a Neighbourhood Plan which, on current evidence and responses to our Parish Plan survey in recent months, would almost certainly not align with the draft classification of Kingswood as Category 1 Settlement.

Paragraph 155 of the NPPF states:

'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'

We believe that WDC has fallen short in most aspects of those principles. For a Plan of such importance there should have been much greater involvement before key decisions were taken. When the Plan was drafted it was of significant importance to all residents of the District to justify the cost of printing enough copies for distribution to all households. The notification by 'bin hangers' of open meetings is inadequate to meet the consultation needs of the community, particularly in the absence of a recognised newspaper serving rural areas such as Lapworth. The lessons learned from the poor response rate to the Preferred Options consultation should have alerted WDC to the need to communicate more effectively but it appears not to have done so.

In the NPPF the Local Plan is defined as:

The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community.

As the elected Parish Council we do not believe we were consulted as the plan was being drawn up. We were presented with a plan drafted remotely from our community using assumptions about economic growth levels and sustainability that we were not consulted on at the appropriate time. We do not accept an overall need exists within the District for 12,300 new homes to be provided. We ask that

you go back to basic principals to demonstrate that how such proposals have been reached.

Paragraph 86 of NPPF states:

If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.

Kingswood and Lapworth have been included in the Green Belt for many years for this reason. Any significant number of new homes within the Kingswood settlement area would inevitably affect the open character that now exists and in particular the rural setting of Station Lane north of the railway station.

The development of 100-150 new dwellings in Lapworth/Kingswood is out of proportion to the size of the village. This would result in an increase of almost 40% on the 381 dwellings in Kingswood. This would considerably alter the characteristics and nature of the settlement of Kingswood.

The level and speed of communication from the District Council was not responsive enough to allow residents and the Parish Council to give fully considered responses to the consultation within the timeframe. For example, emails promised immediately after the 18<sup>th</sup> June drop in session in the village were only sent late on 19 July, over a month later and less than 10 days before the consultation responses were requested to be submitted.

The infrastructure of Lapworth/Kingswood is not designed to support a large population. There are not full mains gas services, limited mobile phone reception and no local newspaper. Mains sewage connections are limited outside of the Kingswood settlement. Electricity supply suffers frequent failures as it is dependent upon overhead power line supply.

In the draft plan no allocation for windfall developments has been allocated to villages in category 1. Why not? Over the last 20 years this type of development explains the majority of new dwellings growth reported in the national census data. We believe that windfalls should be counted towards any housing target that may ultimately be established for our parish in the final plan for WDC.

The Parish Council would also like to reiterate its challenge to the inclusion of Kingswood as a Primary Service Village rather than as a Secondary Service Village that we believe is the highest it should be ranked and we wish to challenge the following categories of scoring of Facilities in particular so that you can avoid an unsupported categorisation based upon the proposed overall score of 53:

1. Whilst there is public transport through the Lapworth it is infrequent and limited with one bus per day giving rise to a score of 2 on the grounds that it is 'Daily Service - greater than hourly'. We Object and believe that your selected scoring system is flawed if a once a day service, which is unlikely to meet the needs of more than a few residents going out of the village (or outsiders wishing to come in), as evidenced by the service's usage data which the operator must be able to provide, does not justify a score of 2 if a bus service with an interval of less

than 30 minutes only scores 4. We believe our current bus 'service' deserves a score of 0 or at most 1.

2. Distance to main town/large village - 2 points allocated as it is 4.9 miles to Knowle as measured from the Village shop (allegedly postcoded B94 5NT but it is not, the Post Office is B94 6LU) however had it been anything over 5 miles it would have scored just 1 point. Why should 200 yards make such a difference?

3. Post Office – 3 points. Object - The post office is based in the Wine merchants, which is currently up for sale. If a buyer is not found there is the potential that both the off licence and the post office would close. Will the score be adjusted if this arose? We would demand that it is as this would, on its own, change the village score to 50.

4. The Village Store and Wine merchant are collectively awarded 6 points – Object - on the basis of 3 points each we assume, despite neither shop offering a range of goods that would meet the description of 'Village shop or convenience store within 1 mile'. We believe that collectively they do not even justify a score of 3 for that reason.

5. Place of Worship – Kingswood is awarded 3 points – Object - there is no Church of England building in Kingswood and the majority of Kingswood residents do not attend the Lees Chapel which is stated as giving rise to the score. It is therefore considered that awarding 3 points to anything judged by you as a 'Place of Worship' is ridiculous in its simplicity. How can the theoretical availability of any given denomination of place of worship justify a score equivalent to a (proper) convenience store, or pub or an hourly bus or rail service? We would suggest that no score is awarded in respect of the Lees Chapel despite its laudable stated aims to serve its community.

6. Recreational Open Space – 3 points. Object - There is no central recreational facility for young people to congregate. It appears that the proximity of the canal network adjacent to Kingswood gives rise to this score which we do not accept as reasonable as it is unsuitable for balls games and many other aspects of Recreation.

On all matters set out above we wish to point out that we reserve the right to pursue legal challenge if our concerns are not fully addressed through major amendments to the current draft proposals.