Barford, Sherbourne & Wasperton Joint Parish Council

The Council (JPC) wishes to respond to the WDC Local Plan – Publication Draft April 2014 as follows:

The JPC challenges the SOUNDNESS of the Draft Plan on the following issues -

1 - Housing Numbers and Level of Growth

The JPC has always considered the proposed housing numbers to be in excess of realistically assessed requirements.

The first round of consultation – "Options fro Growth" showed a clear residents' preference for lower levels of growth accepting any allied limitations to infrastructure improvements.

Whilst the JPC accepts that there is a current and ongoing need for more homes in the WDC area we have never believed that there should be such an extreme "growth agenda" to impose such enormous numbers. Specifically, given the current very low unemployment in our area we contend that the actual need for new employment provision is actually very low and any higher provision must inevitably draw in inward migration and hence produce further housing pressures.

We welcome the mid-2012 ONS figures which show much lower growth predictions for the WDC area (along with the rest of Warwickshire).

We believe that the current Draft New Local Plan based on the previous significantly higher figures is therefore **UNSOUND.**

Clearly the situation must be reviewed and we believe that the major options are:-

- (i) A total review of proposed numbers and their allocation across the district
- (ii) Retain the current land allocations and implement them in a much more imaginative way, by for example:
 - (a) a pro rata reduction in numbers thereon creating a better, lower density environment for all
 - (b) Incorporating Gypsy & Traveller provision within the Strategic Urban Extension sites – see JPC submission G&T Preferred Options and ref meetings with Ms Tracey Darke (Head Planning), Dave Barber (Head Development) and Ms Lorna Coldicott (G&T Lead Officer)
 - (c) Retaining areas of "Reserve Land" for use to meet provision shortfalls or if unused to kick-start the next Local Plan period.
 - (d) Reduce the numbers currently imposed on Growth Villages in recognition that whilst Growth Villages are the most sustainable settlements in the

rural areas they are not as sustainable as the urban areas and their extensions and with particular reference to the obligatory 40% Affordable Homes provision can be considerably less well suited due to their relatively remote locations and inherent car-dependency.

2 – Greenbelt Issues

The JPC is disappointed that WDC have not seized the opportunity to re-evaluate the Greenbelt within its area in a realistic and imaginative manner.

An aggressive "growth agenda" in a district of c.80% Greenbelt, with a near sacrosanct approach to Greenbelt puts unrealistic and unsustainable pressure on the remaining non-Greenbelt area, south of Warwick and Learnington, and renders this Draft Local Plan UNSOUND.

Given that we are/are likely to be expected to accept overflow from Coventry (See 2012 ONS figures) it would be most appropriate to look at some Coventry "urban extension" into WDC Greenbelt as a priority and not to expect to re-locate such overflow to the south of Warwick and Learnington.

Similarly imaginative use of pockets of relaxation immediately adjacent to other settlements could dramatically improve capacity and relieve some of the pressure currently focussed on the area south of Warwick and Leamington.

Removal of Greenbelt status to facilitate the Gateway project (Sub Regional Employment Allocation DS16) shows that it can be done where there is a political will so why not extend the concept to accommodate some of the housing need and a significant proportion of the G&T provision.

3 – Gypsy & Traveller Issues

The JPC was surprised that the otherwise extensive GLOSSARY provided no references of definitions relating to Gypsy and Traveller matters.

As discussed under the above two sections and in extensive discussion with Tracey Darke, Dave Barber and Lorna Coldicott (22 May 2014) the JPC believes the Draft Local Plan and the G&T Preferred Options fail to address adequately the best interests of both the settled community and the G&T community.

The JPC considers that imposing G&T Permanent Sites on mature and settled communities and a parallel failure to incorporate them into the larger strategic sites is fatally flawed and neglectful, rendering this Draft Local Plan UNSOUND.

Furthermore the reluctance to address the Greenbelt in any imaginative way concentrates the G&T impact into an unrealistically small part of the WDC disregarding both existing residents' and G&T community wishes.

G&T provision should be properly planned, from scratch, on the strategic urban extension sites and the gateway area and only located elsewhere When there is explicit community and landowner support.

4 – Specialist Housing for Older People

The JPC welcomes WDC's recognition of the Ageing Demographic but does not believe that proposals are adequate for the challenges we all face.

In light of the 2012 ONS results figures and percentages quoted in 4.53 and 4.55 may well understate the proportion of our population requiring or potentially benefiting from Age Related Housing.

We note that 4.51 recognises that in 2011 "22% of households in the district contained someone with a long-term health problem or disability" but goes on to require only 10% provision of "Lifetime Homes Standard" or other adaptable homes and then only in the Strategic Urban Extension sites. Clearly a gross under-provision.

Whilst the emphasis on Primary Health Care is understandable there is a lack of clarity (H5(b) and 4.57) of how criteria might be interpreted and provision for alternative solutions.

H5 in particular would seem to limit provision to the urban areas (including the strategic urban extension sites) and hence preclude most of the rural areas, including preclusion of the more sustainable rural villages (ie most Growth Villages and specifically Barford)

H5 (b) and H5(c) are currently too restrictive. The JPC suggests the addition of "in Growth Villages and other sustainable locations where rural local initiative has demonstrated local need (eg through Neighbourhood Development Plans and/or Housing Needs Surveys etc) and a community will to address that need along with needs of adjacent areas and such need may be met through a broader range of models than might be required in an urban setting.

The above proposal recognises that whilst rural living has changed considerably over recent times – not least by development driven mostly by developers and higher authorities rather than by indigenous rural dwellers – the single common strand is that most rural dwellers choose to live there and wish to remain there for as great a part of their life as possible. The current and Draft Local Plan models do not permit this and at times of increasing dependence distract the elderly (and otherwise infirm) from their communities through "distress relocation" based on clinical need alone. The JPC contends that communities should have a mechanism to rise to the challenge of allowing their elderly to remain within their rural community for the whole of their lifetime with all the many benefits to the elderly and their relatives and friends.

5 – Sherbourne Issues

<u>Local Plan Policies Map 19 (Sherbourne</u>) - The JPC requests that the Limited Infill Village boundary east of the northern section of Vicarage Lane, between Benedict

House and cottages to the north should be aligned with the eastern edge of Vicarage Lane.

John Murphy Chairman – Barford , Sherbourne & Wasperton Joint Parish Council

June 16th 2014