Barford, Sherbourne & Wasperton Joint Parish Council

**South Warwickshire Local Plan – Part ONE – Issues & Options**

Where to begin? – a pre-amble…

The JPC is disappointed that the current **Issues and Options** consultation has been so short and so poorly publicised – a straw poll found that most residents were almost totally unaware of it and had certainly not engaged. The quotes from the community, whilst a welcome inclusion in the document, also suggest that there was very limited public engagement.

The wisest comment included was one which suggested that the plan **“should not be (so) developer led”** –

HOW TRUE – previous plans have been **“Developers’ Charters”** and given the directions and magnitudes of the SWLP so far we are looking at more of the same. It does not have to be like this!

A new “local plan” should be an exciting opportunity to shape our locality for years to come, but even the official publicity is lacklustre and understated with formats that are hard to follow, with numerous links to other sites or documents and with no clear path through it is easy to get distracted or lost completely.

We are disappointed that there have not been more public engagement events and particularly that there has been minimal engagement with the PC/TC sector, beyond the rather minimal chair briefings, with other councillors specifically excluded.

The Issues & Options document smacks very much of a pre-determined format, populated by a development professional with limited local knowledge, all based on a presumption of ever increasing growth as the only way forward.

It is hard to understand how, in a very low unemployment area, it is not recognised that the concept of attracting in NEW business, investment and jobs MUST mean bringing in more people, who will require more homes, in addition to any that might already be needed for current residents, who will have more cars and/or require more infrastructure, which will NOT BE MET and the situation will get worse, rather than better.

The document states, dismissively, that there is a ***“view that in the past infrastructure provision has not matched the level of growth and/or not been delivered at the right time”***. **HOW TRUE THAT IS**, particularly for WDC where we already have the chaos of Europa Way – once a magnificent gateway to Leamington from the south, being sequentially destroyed to be replaced by a running-sore dual carriageway race-track cum parking lot.

Barford, Sherbourne and Wasperton as a community are universally frightened by the prospect of Warwick and Leamington sprawling over the countryside and now due to occupy all the space beyond the old Banbury Road. We would suggest that there should be a **RED LINE** established preventing new development south of the M40 at the very least and preferably also excluding the triangle of land (Park Fm, Spinney Fm and Red House Fm) bounded by the old Banbury Road A4100 and A425 and Barford Road Warwick – effectively creating a ***“zone of restraint”*** south of the Leamington/Warwick built up area. In particular this would protect Sherbourne from being totally overwhelmed by the threatened industrial development adjacent to J15 of the M40.

Concerning sites offered so far Barford has concerns.

The site off Westham Lane, west of Barford Bypass, should be rejected on multiple grounds including difficulty of access off Barford Bypass, intrusion in the landscape, loss of BMV land and separation from local services. Furthermore, we would suggest another Red Line along Barford Bypass prohibiting significant developments west of that route, with perhaps revisiting the older concept of the **“Avon Valley Area of Restraint”.**

**Land around Barford House** has been offered for residential development and is currently against all local policies, a situation which should persist, unless there is an offering specifically to comply with **Policy B3 of Barford NDP,** which specifically seeks provision for housing for the aged and infirm.

**BROWNFIELD SITES** – The JPC believes that brownfield sites should be subject to much more scrutiny and should be fully exploited, even if they are notionally less sustainable or economic, rather than taking more greenfield sites for ease of development and cost savings. This principle should particularly apply to the numbers we may be expected to take from Coventry, Birmingham and the Black Country where it is known that extensive tracts of brownfield sites are not being utilised.

**HOUSING NEEDS –** There has always been controversy about the magnitude of the numbers for housing needs and we have always known that they are (politically?) manipulated to fund affordable housing and overspill from the conurbations. The numbers deployed in the last Local Plan were repeatedly and credibly challenged, by Ray Bullen of BTPC and others, to little or no avail, and have since been shown to have been excessive. The pattern now looks likely to repeat itself… **The JPC commends proper consideration of the CPRE review** ofthe numbers along with a full review of the obligations to accommodate so many from the nearby conurbations.

And now to answer some of the specific questions:

NB: The JPC has answered those questions deemed to be relevant to our area and left some/many where our interest is less specific or where we deem ourselves to not have adequate expertise to comment.

**Q-V3.1** Answer: No/Don’t know

**Q-V3.2** Answer: Most of this is Motherhood and Apple Pie – ie difficult to argue with, in an ideal world. However we note that only 25% of respondents agreed with your approach to the Vision, clearly many thought Visions should be the remit of NDPs (and we would probably agree!). Does the corollary apply? – ie 75% did not agree? We also note that only 53% of respondents agreed with the Strategic Objectives – disappointingly low for such an important element…

**Q-I2** Answer: Option I2a Set out infrastructure requirements for ALL developments.

**Q-I3** Answer: Option I3b

**Q-I4.1** Answer: Yes

**Q-S1** Answer: Option S1a

**Q-S2** Answer: Option S2a – district-wide or lack of policy is not suitable – it needs to be properly planned and agreed by the community…

**Q-S3.2** Answer: option S3.2b – The JPC considers it absolutely paramount that use of brownfield sites should be maximised. The current situation of such sites lying fallow and developers sprawling over greenfield sites is categorically not acceptable and must change.

**Q S4.1** Answer: YES, but it must be properly planned and agreed by a properly informed community.

**Q S4.2** Answer: It is very confusing, and actually difficult, to use all the multiple links for this section, so difficultv tro comment. We note some transcription error in the Barford Sensitivity assessment and consider the RASG grading far too simplistic for this purpose.

**Q-S5.2** Answer: YES, new settlements should PROBABLY be part of the strategy

**Q-S5.3** Answer: YES – Rail corridors should be the preferred approach.

**S6 – Review of GREENBELT policies** – YOU DO NOT ASK ANY OPINION? Why not? – the GB policy has probably been the biggest blight on WDC and (presumably SDC) areas over the last few local plan periods. Review of GB policy – locally and nationally is well overdue if our non-GB areas are to survive the housing numbers which will seemingly be imposed on our areas. NOW is the time to make the change!

**Q-S7.2** Answers

**Option 1 – Rail Corridors - MOST APPROPRIATE**

**Option 2 – SUSTAINABLE TRAVEL – Appropriate/Neutral**

**Option 3 – ECONOMY – INAPPROPRIATE**

**Option 4 – Hybrid of Sustainable/Economy – Neutral/Inappropriate**

**Option 5 – Dispersed – INAPPROPRIATE** – This would be disastrous, failing to achieve most of the objectives and blighting the whole of both DC areas

**Q-S8.1** Answer: YES, there should probably be a THRESHOLD approach to development outside the chosen GROWTH STRATEGY, however it should have some flexibility built in where really appropriate sites**, welcomed by the community/NDP** come forward at a later date, beyond any adoption of the SWLP.

**Q-S8.2** Answer: Probably a limit of 10 per site

**Q-S9** Answer: S9a – Save ALL existing boundaries unless change is actively driven by their communities.

**Q-E1.1** Answer: **NO, we do not believe that HEDNA evidence provides a reasonable basis for employment (OR HOUSING NEED!)** across SW. It takes no notice of the changes in work patterns brought on by improved technology and post-pandemic changes, principally to remote/hub working and WFH. Such changes are likely to be permanent, should be fully recognised and actively encouraged.

Beyond that full attention should be paid to the CPRE analysis of the HEDNA and the earlier criticisms raised by Ray Bullen of BTPC should be revisited in order to come up with more realistic demands for employment and consequential housing need.

**Q-E5** Answer: Option E5a – Include a policy to support a range of business units – not necessarily new business units – taking full note of the numbers of vacant units which are currently available and which should be preferentially utilised rather than building new, for convenience, on new sites, and also allowing for the reduced demands as discussed in E.1 above.

**Q-E6** Answer Option E6a Include a policy to protect SW’s EXISTING economic assets. NB: We have a particular interest in FULLY protecting Wellesbourne Airfield and its associated businesses – and not losing any of its current functionality to unwanted residential or commercial development. We are also supportive of the Warwick University Wellesbourne Campus but wary that overdevelopment of that site will have significant deleterious impacts across our three parishes through increased traffic on the A429 – which then may not be viewed as Sustainable Development.

**Q-E7.1** Answer E7.1a – Include a Core Opportunity Area policy with the proviso that it does not lead to the whole of that area being over-developed and hence a sprawling “conurbation” over the whole of the COA, so perhaps it needs to be qualified with specific identified sites/areas within the COA.

**Q-E9** Answer: E9b – Save existing retail area boundaries in Part 1 but prepare to relax such policy in Part 2 to allow for the probable/inevitable reduction in in-town retail use; **allowing easier conversion to other uses**, specifically, office or residential or even small scale manufacturing/studios/workshops.

**Q-E10** Answer: YES, leave to part 2.

**Q-H1-1** Answer NO

**Q-H1-2** Answer: Give full consideration to the CPRE assessment of HEDNA and undertake a review of use of brownfield sites, both within WDC and SDC but most importantly within neighbouring areas from which we are seemingly expected to take overflow numbers.

**Q-H2-1** Answer: Part of the answer lies in reconsidering the whole concept of affordable housing. There are currently families with two decent salaries living in “affordable housing”. That cannot be right! Some revision of the whole concept is needed. The pretext of expecting the market homes, in more expensive areas, to directly fund the affordables, which may not be needed in their immediate area**, is fundamentally unfair and unrealistic and clearly unsustainable**. If we changed the system, by building **“truly affordable market homes”** there would be a much smaller demand for affordable/social homes, and people would be much happier. Perhaps those truly affordable market homes would need to be more modest in many ways, but they would find considerable favour and free up affordables for those who really need them. It is time to break some paradigms!

**Q-H2-2** Answer: H2-2c – **A LOCALISED approach, at Parish level IS ESSENTIAL**. It should certainly be applied in terms of the actual building of affordable homes. If it is still desirable to have a SW wide policy then the use of commuted sums would be an innovative way of raising funds which could then be spent nearer to where the affordables are actually required. If you want an example of how the current system does NOT WORK just look at Barford which had c.200 homes forced upon it by predatory developers, due to a lack of a Local Plan. Of those c.40% were built as affordables against a HNS assessment of about 10- 12 houses and that brought in vast numbers of occupants with no local connection and in consequence considerable community disruption which will take decades to stabilise.

**Q-H2-3** Answer: Older People Needs will be best addressed by listening to the communities, and directing developers to respond appropriately, rather than constantly looking to their bottom line. Specifically:

* Build more bungalows – always requested – seldom built – yes, we know they take more land… Perhaps have a fixed percentage for sites of say 10 or more homes?
* Build more, if not all, wheelchair accessible homes.
* Allocate sites specifically for “care facilities” – e.g. land around Barford House in Barford

**Q-H3** Answer – probably Option H3c but consider some flexibility

**Q-H4-1** Answer: No – review the need via the CPRE HEDNA review paper.

**Q-H4-2** Answer: – review the need via the CPRE HEDNA review paper

**Q-H4-3** Answer: - PERHAPS the potential New Settlements would be the most appropriate solution to the need SWLP is finally expected to accommodate? Care would certainly be needed if significant numbers were injected into established settlements.

**Q-H5** Answer: H5c – A case by case approach should be the only way to deal with self/custom builds.

**Q-H6** Answer: H6c – A case by case approach is essential. The allocation of sites early in the SWLP development is actually discriminatory against the G&T community. They must have exactly the same rights, as other members of the wider community, to find suitable accommodation.

**Q-C1.1** Answer C1.1b Support in principle.

**Q-C2** Answer: Option C2b

**Q-C3.1** Answer: NO

**Q-C4.1** Answer: C4.1b – set higher standards.

**Q-C4.2** Answer: C4.2a – requirements should apply to ALL developments.

**Q-C5** Answer: C5a – Require for all new – positively encourage for older buildings

**Q-C6.1** Answer: C6.1b

**Q-C7** Answer: C7a include a policy for adaptation to rising temperatures.

**Q-C8** Answer: C8a Include flood and drought adaptation.

**Q-C9.1**  Answer C9.1a

**Q-C10.1** Answer C10.1a

**Q-C11** Answer C11a

**Q-C12** Encourage water storage, run-off attenuation, and sustainable drainage.

**Q-D1.1**  Yes

**Q-D2** Answer D2b – Perhaps reconsider the concept of Village Design Statements?

**Q-D3** Answer D3a or D3c – **NOT D3b**

**Q-D4.1** Yes

**Q-D5** Yes, but ALWAYS assess balance of public benefit for every proposal, as per NPPF

**Q-W1** Yes, vital.

**Q-W2** Answer W2a

**Q-W3** Answer W3a

**Q-T1** Answer T1b

**Q-T2** Answer T2a

**Q-T3** T3a Any Low Emission Zones should not introduce the closure of any routes. This is self-defeating since it will result in longer journey times, more fuel burn, more pollution, moving the problem elsewhere and more overall congestion. It has also been shown to damage local businesses, increase ambulance attendance times and cause problems for the Police.

**Q-T4** More Automatic Control of traffic is not the only answer. Leaving people greater flexibility in traffic can lead to safer streets with a better traffic flow. Re: European examples.

**Q-B1** Answer: B1a – Give consideration to **areas of restraint** to protect settlements in WDC area – e.g. as suggested to protect Barford from the advance of Warwick and Leamington by having a RED LINE at the level of the M40 or A4100. Also along Barford Bypass to protect land to the west.

**Q-B2** Answer No

**Q-B3** Answer B3a

**Q-B4** Answer B4b

**Q-B5** Answer B5a

**Q-B6** Yes – 30% may be very ambitious, but if we don’t try…

**Q-B7** Yes

**Q-B8.1** Answer: YES, protect BMV land.

**Q-B9** Yes

**Q-P1.1** Answer: No.

**Q-P1.2** Answer: **The plan so far does not take enough note of NDPs,** which were developed at great cost and enormous effort on behalf of communities. They should be given considerable weight when looking at developing policy which will impact NDP communities. The idea that they must be re-written, if ignored for the purposes of SWLP is preposterous and an insult to those that worked so hard to produce such documents in response to HMG and LA encouragement.

**Q-P1.3** Yes

**Q-P2.1** Don’t Know