Chapter 3

**QV3.1 Do you agree that the Vision and Strategic Objectives are appropriate?**

No.

**QV3.2**

The vision and strategic objectives are idealistic. There is no detail on how these are to be achieved. For instance, “ensuring new development does not cause a net increase in carbon emissions” is highly unrealistic even if there is significant change in new housing policy. How would this be achieved through the whole supply chain? Steel and concrete are carbon intense materials, trucks will be needed to deliver building materials, trees and green land will be destroyed to make way for housing. Even attempts to make the houses sustainable such as the production of heat pumps, creates carbon in the supply chain as well as the fall-out from mining for the components. Creating new developments causes significant carbon emissions whether we like it or not. Of course there are ways to minimise this but to suggest development will be carbon neutral is green washing even with proposed use of off-setting schemes which are often not effective.

Comments such as “providing infrastructure in the right place at the right time” and “design of developments to…cater for the needs of all users and which respect the setting of many settlements” sounds good but is not followed through in the rest of the plans. To respect current settlements there would be no talk of relaxing current green belt rules or overriding current neighbourhood plans, and there would be emphasis on ensuring the infrastructure is present or developed to support the planned growth in communities. At present there is no obvious plan/funding to provide infrastructure and this seems left to private developers who have a poor track record in providing such facilities and may not have the correct information regarding what is actually needed. “A healthy, safe…Warwickshire – enabling everyone to enjoy safe and healthy lifestyles and a good quality of life” will not be possible if there are not enough school places/GP surgeries, increased congestion and pollution on our roads and no substantial green spaces left.

The plan to achieve a net increase in biodiversity across South Warwichshire is at odds with the extensive plans for development and current strategy to relax green belt rules. We are extremely concerned that the Plan doesn’t include the 20% biodiversity net gain that the Warwickshire Wildlife Trust advocated for, that the Green Infrastructure study is now 10 years old, that your growth and new settlement locations don’t consider local biodiversity and river habitats and you don’t go far enough in tackling the climate emergency.

So whilst superficially the vision and objectives look good we find them to be unrealistic and disingenuous, without proper backing in the rest of the plans.

**Chapter 4.**

**Q I1 Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on**

The Beaudesert and Henley-in-Arden JPC have informed us that the SWLP are considering 500-2000 houses in Henley-in-Arden. Why is this the case when the sustainability appraisal has identified Henley as a small settlement location for between 50-500 homes? There is nothing in the sustainability appraisal which supports Henley being singled out for growth comparable to a broad location.

On a map from a distance Henley looks to have good connectivity with access to bus stops and railway station but these services are poor with infrequent and unreliable train and bus service. Henley has been shown to actually have poor connectivity (5.13.4) thus car usage would increase on the already very congested road. Due to the local topography, railway, river, and listed buildings there is little opportunity to improve the road layout. SWLP has no apparent plans to improve infrastructure, leaving this on a local level or to the developers which is not adequate.

Henley is the only small settlement shown to have more that 50% of land within flood zone 2. (5.4.2). Being in a valley, Henley already flash floods with the roads becoming impassable frequently in winter months. Risk of flooding will likely increase due to global warming with more extreme weather events. The heavy clay soil bakes hard in summer and completely saturates in winter with a high-water table, creating perfect conditions for increased surface run off year-round. Development would increase surface run off, particularly development of proposed site currently used for growing Christmas trees which of course creates natural flood defence. How would developers prevent increased flood risk? Existing drainage is not sufficient to accept further volumes, the river frequently bursts its banks already and use of soakaways is ineffective due to the nature of local heavy clay soil and high water table, retention ponds would fill in winter and then be ineffective. Increasing building in Henley will certainly contribute to adverse events.

2.9.7 Acknowleges water quality will be affected if infrastructure is not put in place and yet the SWLP has no plan to put infrastructure in place. This is at odds with your vision and objectives.

2.6.10 Protected species survey information has not been used and there is no plan to assess this in more detail until after the plan has been adopted. How then does the SWLP think it can decide where to build the most houses in the most sustainable way for biodiversity if it had no information of where endangered species are. 2.9.6 admits development near watercourses will potentially impact the banks and water quality with the suggestion in 2.9.7 that developers can voluntarily provide additional measures to protect water quality. Given developers focus on profit this is not good enough. The river Alne which runs through Henley has a population of endangered white-clawed crayfish.

Sustainability appraisal has failed to recognise Henley has a local nature reserve 5.5.4 – Henley sidings nature reserve would likely be impacted by some of the proposed sites for development.

Based on the evidence Henley is not suitable for growth over 500 houses. More information is needed about the local services and environment to establish appropriate lower numbers of proposed development.

I am concerned that NOT reviewing the green belt hasn’t been considered as an option.

**QS1 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

South Warwickshire Councils need a clear policy to protect important environmental assets, designated and non designated sites including potential local wildlife sites. As well as a policy to enhance and restore wildlife sites. Without watering down the policy with wording such as ‘where appropriate’ and in line with the priorities of the Biodiversity Action Plan.

The Councils need to plan in line with the legal requirements set out in the National Planning Policy Framework (NPPF), 25 year Environment Plan, the Governments commitment to 30% land in nature recovery by 2030, COP 27 and COP 15 and the Councils declared climate change emergencies.

National Planning Policy Framework Paragraph 20d) requires ‘conservation and enhancement of the natural...environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation’

Paragraph 175. Requires Councils ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’.

**QS3.1 Please add any comments you wish to make about the Urban Capacity Study**

As a theoretical exercise and not one to establish the true urban capacity of south Warwickshire I fail to see the usefulness of this study. The true urban capacity of South Warwickshire needs to be established and the viability of developing these sites must be prioritised before even contemplating developing green field sites

**Q S3.2 Please select the option which is most appropriate for South Warwickshire**

Option S3.2a: 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.

Brownfield site should be given the upmost priority and areas should only be proven to be an unsustainable location if regeneration projects of the area to make it a sustainable option is not viable.

**Q S4.2 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**

Henley in Arden apparently has a projected 500-2000 homes in the SWLP. This growth is very much out of proportion with the existing size of the local population. Henley is certainly unsuitable for growth over 500 houses due to flood risk, poor infrastructure (sewage and drainage at capacity, schools and GP services full, congested road, scanty train and bus services) additionally Henley has already far exceeded the projected settlement growth planned up to 2031 in the Henley Neighbourhood Plan. More information needs to be collated to inform the SWLP how much additional housing Henley could reasonably absorb, with or without improvements in infrastructure

**Q S5.3 & 5.4 In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?**

Depends on the location. Warwick and Leamington have regular, reliable, rapid train services to Birmingham and London. The Henley railway line has an infrequent slow service to Birmingham with trains often cancelled. For this reason, we rarely now get the train from Henley to Birmingham with preference for car usage, I know we are not alone in this. It may look good on a map that Henley has a train station but in reality the service is poor, an unreliable service should not be the main basis for a potential location of growth. More information needs to be collated about local services prior to basing housing strategy on them.

**Chapter 5**

**Q E 10 Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?**

Yes

**Chapter 6**

Q H4.1 **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?**

No

South Warwickshire should under no circumstance choose to take more additional growth, this would put additional serious pressure on services, infrastructure, important habitats and environments in the area. The other Councils need to legitimately look to find land/ increase housing densities in their local areas. Especially as it would appear Birmingham has copious brown field sites which could be utilised which would be preferable to using green belt land.

**Q- H4-2**

Under no circumstance should Warwickshire take on the shortfall off other areas.

**Q H4.3 If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?**

We should not and appropriate strong objection is needed against this. If Stratford Council fails in this and is forced then more high quality duplex flats should be built with decent sound proofing, balconies, roof terrace/garden space. As we do not have enough land in the UK to allow for agriculture, wild space and enough housing we need to be utilising our air space more. Flats would be more desirable in the UK if they were built properly. We can not continue with everyone’s wish for a 4-bed detached house with a garden. There is not enough room.

**Chapter 7**

**Q-C1.1: Please select the option which is most appropriate for South Warwickshire**

Option C1.1c: None of these

Policy should ensure roof space is allocated for renewable energy production. Large warehouses have huge unused roof spaces for example which, with government led policy, could be utilised for green energy. This would mean space which could be allocated to agriculture/green belt/housing can be used for such rather than large solar/wind farms. Where land/space is in demand we need to utilise our roof and air space more effectively.

**Q C3.1 Do 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?**

Don’t Know – Entirely depends on the nature of the offsetting scheme. Is this just green washing such as planting trees in the wrong site which will then not be looked after and not flourish or is this an offsetting scheme which actually makes a true beneficial impact?

**Q C4.1 Please select all options which are appropriate for South Warwickshire**

Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.

**Q C 5. Please select all options which are appropriate for South Warwickshire**

Both Option C5a and Option C5b

**Q C6.1. Please select the option which is most appropriate for South Warwickshire**

Option C6.1a:

**Q C7.**

Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures

**Q C 9.1 Please select the option which is most appropriate for South Warwickshire**

Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity

**Q C 9.2. Please add any comments you wish to make about climate responsive development design in South Warwickshire.**

Climate responsive development is obviously needed to safeguard our housing stock for future but more importantly efforts to reduce climate change are more important. We should not just focus on adapting.

**Q – C12**. Must not build in areas at risk of flood and development must not exacerbate surface run off. Appropriate infrastructure needed to ensure water quality maintained. Houses should have water collection/filter provision for anything use other than drinking water. Rivers and their tributaries must be protected.

**Chapter 8**

**QD2**: 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.

**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, the heritage assessment is very important. I am not certain the Heritage assessment to date for Henley is sufficient to show that large scale development in the area would be highly detrimental to historic heritage and environmental heritage and feel of the Henley area.

It is important that Local communities are able to work with the SWLP to meet their local needs and for the SWLP to accept that local residents will often understand their local area more comprehensively than the SWLP or developers, to that end NDPs should be respected.

**Chapter 9**.

**Q W.1 Should the Part 1 plan include a policy on pollution?**

Yes. In August last year, the United Nations General Assembly declared that everyone on the planet has a right to a healthy environment, including clean air, water and a stable climate. The Clean Air (Human Rights) Bill is being considered by the UK government to ensure the government takes action to bring air quality in every community up to World Health Organisation minimum standards

PM 2.5 Air Pollutants on Henley High street already exceed WHO guidelines. Further development will increase congestion and pollution. Uptake of electric vehicles is slow so it is questionable that this will significantly mitigate this in our lifetimes.

So yes, pollution should absolutely be taken into account.

**Q W.2**

Option W2a: include a policy on Health Impact Assessments,

**Q W.3**

Option W3a: Include an overall policy on health.

**Q4**

**W4** There is great concern that there appears to little reassurance in terms of planning, resources and funding that shows local authorities will meet the additional needs of local populations where significant expansion of these populations are made. This will result in the reduction of access to preventative medicine at both a personal and population level. On top of this on-going care of chronic disease will be negatively impacted. These services would need to be in place prior to any planning consideration. There appears to be no identification of access to A&E or minor accident units. Henley residents are required to make over 30 minute car journeys to reach any facility.

**Chapter 10**

**Q.T.1**-

option T1C Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.

**Q.T.2-**

Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure. However, in reality the problems faced by rural communities is that environmentally friendly, sustainable options are few. At present in Henley the available transport services are poor- in terms of frequency, reliability and connectivity. Our main hospital services are Warwick, with some in Stratford but there are no direct links to the general District Hospital of Warwick. Ideas around use of e-scooter etc would not be an option for the Henley area. There is and will continue to be a reliance on cars which the current road infrastructure can not support significant further increase.

**Q.T3** -option T3a: Include a policy encouraging more sustainable road-based transport for businesses. But these expectations and costs should not be pushed onto employees and residents

**QT4: Please provide suggestions for how smart cities technologies could be supported in South Warwickshire**.

It is an unrealistic expectation for general public to answer this. However, basic provision such as high speed broad band and good mobile phone coverage, both of which are not available in Henley would be a start

**QT5: Please add any comments you wish to make about a well-connected South Warwickshire.**

Much presented to date is ideology. It is clear from living or driving through Henley and the surrounding villages that connectivity is a problem and that there are few road options. Despite the presence of a railway and a bus route residents have difficulties using public transport on a daily basis due to poor timetables and cancellations. Any move to expand Henley or any of the areas locally will draw pressure on poor services and inadequate road systems which could only be improved with additional road which is an unacceptable option.

**Chapter 11.**

**Q.B1 –** option a: : Maintain Areas of Restraint and identify appropriate areas within Warwick District

**Q.B2- Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?**

NO

**Q.B3** opinion B3b.

**Q- B.5 Please select the option which is most appropriate for South Warwickshire**.

Option B5a: Explore and pursue an integrated Environmental Net Gain Policy. I am disappointed to see such a low minimum target for proposed biodiversity net gain. Other councils such as Greater Cambridgeshire have been more ambitious requiring 20% Biodiversity net gain. This would be more in keeping with mitigating our environmental state of emergency

**Q B.6 Should the South Warwickshire Local Plan introduce Wildbelt designations?**

Yes, absolutely but this should not push development to the North of South Warwickshire, instead all areas have wild belt designations.

**Q B8.1 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?**

Yes. The country needs to have capacity to feed the nation so such land should be held forthis but each area needs to be assessed on all aspects and a recognition that lower quality farming land should not automatically be pushed into development.

**Q- B8.2 When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?**

Yes, we need additional protection and buffers on the river Avon, Leam and their tributaries, Local Wildlife Sites and PLWS’s, Local Nature Reserves, SSSIs, Ancient woodland, Local Green Spaces, Ecosites etc.

Councils need to reassess their Potential Local Wildlife Sites as a matter of urgency, as particularly in the south there are huge gaps in this very important evidence base and this information should be used in the plans as well as information on protected species.

Brownfield sites and areas with poor biodiversity should be prioritised for development

**Q B 9 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.**

Yes. In order to meet national requirements and targets set out in the 25 year Environment Plan, COP15 biodiversity framework targets, and the Governments commitment to have 30% more land In nature recovery by 2030, and Councils NERC duties there clearly needs to be a specific policy protecting biodiversity and importantly other non-designated sites such as Potential Local Wildlife Sites, Nature Reserves and Ecosites.

It is also very important to include a policy on enhancing these sites, the words ‘unless clearly outweighs..’ should be removed as this waters down the requirement, and will greatly affect the Councils ability to achieve the Government and COP targets.

**BQ. 10. Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire**

The biodiversity and environmental assessments for Henley presented in the current consultation documents are inadequate and have not identified a number of considerable environmental areas of conservation and protected species, along with a lack of understanding about the geology of the Henley area which leaves it open to flood related issues which are unlikely to be fully addressed by developers. In Henley the infrastructure in general including the sewer provision is not able to meet the needs of large scale development in the area.

**Section 12:**

**Q P1.3**

It would appear that necessary policies have been included, but is not clear where the policies on ensuring provision of services and infrastructure pertaining to specifics such as agreements with local authorities for provision of healthcare, schooling, roads and transport and utilities such as sewage centres.

The plan presented does not appear to give specifics about cost models that will be applied to the developments nor is there an indication of time or phases to development and reassessment points over what is a 30 year period. There appears to be no policy on how cost appropriate social housing will be achieved.

**QP 2. 1 : Are there any areas where equality and inclusivity in planning needs further attention?**

Yes, the advertising of this consultation process has been appalling at best. There is a heavy reliance on the public being able to access the online process and document, which prevents a number of resident groups from participating. The accessibility of the consultation document has been extremely hard to find and ability to fill in on line with out having to cut and past onto word documents despite registering is not acceptable. Whilst there have been consultation events they have been centred in a hand full of large towns, the smaller towns and villages have had nothing and so have not been adequately consulted.