



## **Long Itchington Parish Council**

### **Response to Regulation 18 Consultation – South Warwickshire Local Plan (Issues and Options Stage)**

#### **Introduction**

Long Itchington Parish Council welcomes the opportunity to comment on the Issues and Options Regulation 18 consultation stage of the emerging South Warwickshire Local Plan (SWLP). The production of a new statutory development plan that includes the Stratford-on-Avon District Council area is a significant undertaking and the Parish Council commends the authors on the comprehensive nature of the plan.

The resources available to the Parish Council make it difficult for us to be able to comment effectively on all aspects of the SWLP. We have therefore focused our comments on specific areas within the SWLP, in particular Chapter 4 (Meeting South Warwickshire's Sustainable Development Needs), Chapter 6 (Delivering homes that meet the needs of all our communities), and Chapter 10 (A well-connected South Warwickshire). Where possible we have attempted to provide a more general response to other issues and questions within the plan.

We have tried to directly address some of the questions highlighted within the consultation document. Where direct answers have been provided we have identified the specific question or section being responded to. However, we have also included some general text to highlight specific issues or concerns. Where possible we have identified the section of the plan (and supporting studies) to which our comments are directed.

We acknowledge that this stage of the exercise is to set the overall policy framework at a strategic level and that the selection of individual sites will follow in the future. However, our previous experience of development planning leads us to seek reassurance that the process to select individual sites will take full account of all available evidence regarding those sites.

We have identified a number of flaws in the supporting studies accompanying the SWLP itself and are concerned that these documents will be heavily relied upon for the justification for the future selection of specific development sites. We request the opportunity to provide comments (in particular our local knowledge) on any proposed development sites prior to their publication in the Preferred Options version of the development plan.

## Heritage and Settlement Sensitivity Assessment

The Heritage and Settlement Sensitivity Assessment (HSSA) produced by Place Services at Essex County Council for the SWLP is clearly intended to be relied upon in the next stage of the process when individual development sites are selected.

The HSSA study states that it is designed to assess the sensitivity to new development on the existing heritage and landscape character within a number of settlements within South Warwickshire.

However, despite including the reference to “landscape”, the text of the HSSA consistently gives considerably more emphasis to “heritage assets” than to landscape. In places there is no mention of the landscape aspect at all. This is emphasised by the RAG rating definitions where the “green” rating states;

*“Green defines areas where there is little known heritage impact, or it is thought that the heritage assets present can be incorporated into any development proposal with appropriate mitigation resulting in no harm to their significance”.*

According to the HSSA definition a “green” rated area or zone may therefore contain sites that have high levels of landscape sensitivity but are nevertheless afforded little weight by the HSSA study.

The HSSA includes a note highlighting;

*“This assessment is a high-level desk-based assessment. Once areas for development have been identified there will be a requirement for further in-depth assessment, including site visits, of the impact of each individual development on the heritage assets and their setting”.* (Again, no specific reference to landscape impact).

We fully accept that a statutory development plan should be policy led and not site-led. However, it is essential that, as highlighted by the above note, the selection of sites should take account of a wide range of relevant evidence and should not be over reliant on high level desk-based studies.

The shortcomings of a desk-based study are highlighted in the detail provided for Long Itchington. The HSSA document states in section 10.7 (page 150) that the River Itchen; *“flows into the Grand Union Canal 400m to the south of the village”*. This is clearly an error resulting from misreading the relevant Ordnance Survey map. The River Itchen clearly flows **under** the Grand Union Canal and this error highlights that landscape impact can only be properly assessed by landscape experts who include site visits when undertaking their assessments.

We therefore seek reassurance that the HSSA will not become a “tablet of stone” and used as a prime justification for the inclusion of proposed development sites. We expect that any sites included in the Preferred Options version of the SWLP are assessed on all evidence currently held by the District Council, including all previous landscape evidence.

## The South Warwickshire Settlement Analysis

The South Warwickshire Settlement Analysis (SWSA) is a high-level desk-based analysis examining connectivity, accessibility and density. We acknowledge that such studies can provide useful comparative data when assessing and comparing different communities or settlements. However, we are also concerned that the study should not be over relied on as representing “hard evidence” when selecting sites for inclusion in the next stage of the SWLP process.

The desk top nature of the SWSA inevitable results in a number of flaws. The study records two of the assessed areas in the Connectivity analysis (14 and 15) as having access to healthcare services. This is clearly not the case, there are no healthcare facilities in Long Itchington whatsoever. In the Landform Analysis map a large area in the centre of the map is shown as “green corridor” – which it is not. The identified area when viewed on Google Earth will appear as woodland, however, this is farmland that was planted 20 years with poplar trees under a subsidy scheme. The trees are able to be felled from 2025 and the land returned to general farmland.

The model may provide comparative data regarding connectivity and accessibility; however, it contains no assessment of the relative **levels** of facilities that are being measured in terms of their connectivity and accessibility.

Long Itchington is not very well served in terms of infrastructure and facilities and over recent years these have decreased in number (e.g. the closure of the newsagent in The Square and reduction in Post Office facilities). Since 2016 Long Itchington has experienced a significant increase in the overall number of dwellings, rising from approximately 900 in 2015 to the current total of over 1200, an increase of over 33%.

The resulting increase in population has not been accompanied by any increase in either infrastructure/facilities or employment opportunities.

The SWSA highlights the principle of the “20 minute neighbourhood” which is stated to be where residents can:-

*“Meet their regular day-to-day needs near to where they live (and/or work), and to do this within a reasonable distance of their homes (and/or workplace)”*

Residents of Long Itchington can meet some of their “day to day needs” within a 20-minute walk of their home (or workplace), however, many of their needs cannot be met without travelling to another community. The vast majority of such journeys are made by car.

The infrastructure and facilities available in Long Itchington are in marked contrast to those available to other nearby comparable communities. Harbury and Kineton both have a significantly greater number of facilities, for example more general shops, doctors’ surgeries and libraries.

In terms of population size all three communities are directly comparable. The 2011 census data reveals the population of Harbury as 2,420, the population of Kineton as

2,337 and the population of Long Itchington as 2,013. While all three communities have seen an increase in housing numbers since the 2011 census the increases in Kineton and Harbury are nowhere near the level of that in Long Itchington.

Long Itchington currently has 2,100 voters registered on the electoral register and there estimated to be over 300 children within the community. Long Itchington therefore has a population approaching 2,500 and the limited infrastructure and facilities have not increased in line with the significant increase in population. There are very limited employment opportunities within the village and a significant number of residents commute by car to destinations outside the village.

Given the current level of infrastructure and facilities available within the village the "20 minute neighbourhood" model is not sustainable – and is unlikely to be so in the near future. This relative lack of infrastructure and facilities must be taken into account when assessing the allocation of further housing numbers for Long Itchington. The models proposing up to 350 additional houses would be completely unsustainable for the village and a much lower cap must be set for the number of additional dwellings to be built during the entire plan period to 2050.

We are acutely aware that the current Core Strategy set an indicative target of 113 houses to be built during the lifetime of that plan (to 2031). By 2021 over 300 additional houses had been completed with 10 years of the plan period remaining.

#### **Chapter 4 – Meeting South Warwickshire’s Sustainable Development Needs**

We are unable to comment on every issue within this chapter due to the technical nature of some of the issues. We have focused on those issues that appear to have the greatest impact on our community.

*Question S4.1: Do you think that growth of some of our existing settlements should be part of the overall strategy?*

Answer: Yes – but adequate safeguards must be put in place regarding amount and phasing. We have highlighted in our overall response the issues that must be considered for any further growth in Long Itchington.

*Question S4.2: Comments regarding the Settlement Analysis?*

Answer: See section (above) headed “The South Warwickshire Settlement Analysis”

*Question S5.2: Do you think new settlements should be part of the overall strategy?*

Answer: Yes

*Question S5.3: In response to the climate emergency, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?*

Answer: Yes

*Question S7.2: For each growth option please indicate if you feel it is appropriate for South Warwickshire.*

Response Option1 (Rail Corridors): Yes, this is generally appropriate.

Response Option 2 (Sustainable Travel): Yes, this is generally appropriate, however, it is reliant in part upon the bus service which is currently inadequate.

Response Option 3 Economy: This may be appropriate for some areas of South Warwickshire, however, this is not appropriate for Long Itchington due to both the limited number of jobs available within the village and the lack of capacity for additional new employment. This model is only appropriate where jobs and homes can actually be located together.

Response Option 4 (Sustainable Travel and Economy): This hybrid model is more appropriate than Option 3 (Economy). However, the same issues apply regarding bus services. In addition, a reasonable level of employment must be available in those communities where housing growth is proposed. This model may therefore not be appropriate for Long Itchington.

Response Option 5 (Dispersed): This option is not appropriate for either South Warwickshire generally or Long Itchington specifically. This would not encourage sustainable travel and more people would be using their cars. The requirements for new infrastructure would be too great for most of those settlements experiencing an increase in growth.

QS.9 (*Settlement Boundaries*).

We agree with the option (S.9.a) that all existing settlement boundaries should be saved and retained in the SWLP where they are defined (e.g. through a Neighbourhood Plan).

## **Chapter 6 – Delivering Homes that meet the needs of all our communities**

### **Overall comments on the HEDNA**

Much of this analysis is based on the assumption that we move away from the 2014 analysis of household projections and adopt the HEDNA [Housing and Economic Development Needs Assessment \(HEDNA\)](#).

We don't feel enough evidence for the South Warwickshire Plan has been provided to make an informed decision on the validity of the HEDNA analysis. There are several points of confusion:

1. You state that *“Coventry and Warwickshire can be regarded as a coherent housing market area,..... albeit that that there are differences in the economic characteristics between the north and the south of the area”* We would say the differences have been under emphasised.
2. We are not sure why an analysis which includes Coventry is being so heavily relied upon to make housing projections for south Warwickshire.

3. One of your most compelling reasons for adopting the HEDNA approach rests on the belief that the 2014 analysis significantly over estimated population projections for Coventry. This may well be true but your figures then increase projections for Stratford and Warwick Districts. It is not completely clear what the justification for this is.

### **Issue H3: Providing the right size of homes**

We welcome the emphasis on and recognition of the need for inclusion of more smaller dwellings - 2/3 bedroom, and the acceptance of the need for specific housing types, such as bungalows, homes for the disabled and homes for an ageing population. However, we see no evidence of how you might achieve this when it is clear that developers prefer to build larger, more profitable dwellings on larger estates. In relation to bungalows in particular we urge you to consider a tighter definition so that developers cannot build dormer bungalows to fulfil this criterion. This has been a particular issue for Long Itchington.

We ask that immediate thought is given to reduction in large scale developments which pay lip service to genuine housing needs. We urge you to make a more marked distinction between “affordable” homes – rented and shared ownership - and homes which are affordable (market homes of a smaller size). In our experience many young people want to get on the property ladder by buying small market houses, not shared ownership.

### **Issue H4: Accommodating housing needs arising from outside South Warwickshire**

*You say “Certainly, there is a strong argument that if homes are being provided to meet needs arising in Coventry and Birmingham, then those homes should be located as close as possible to the source of those needs in order to minimise travel.”*

We are very concerned that Long Itchington is one of the closest northerly places outside of the West Midlands Green Belt and we could envisage that it is proposed to put the over-spill housing need from Birmingham and Coventry within our parish and/or Southam. This is particularly concerning as both Long Itchington and Southam are situated with good road links to Coventry and Birmingham. We urge you not to do this. Southam has experienced the second largest growth in a town (second only to Stratford itself) and Long Itchington has taken the largest proportion of housing of any LSV1.

### **Issue H5: Providing custom and self-build housing plots**

In our opinion it is not sustainable to allocate small plots solely for SCB housing because of the very real risk that, should they not be sold, they would revert to market housing. We favour the option of identifying plots within a larger development so that unsold SCB plots can more easily be absorbed. However, since we do not wish to see any more large-scale development plots in Long Itchington, we would only support single plot SCB housing endeavours.

## **Chapter 10 – A Well Connected South Warwickshire**

### **Issue T1: 20-minute neighbourhoods**

We have addressed some issues regarding the “20 minute neighbourhood” concept in our comments (above) regarding the South Warwickshire Settlement Analysis. We also consider that a great deal more work needs to be done to identify what it is about village/rural life which people value and to impose an over-arching 20-minute neighbourhood concept on all places regardless of size or type is over-simplistic and mis-guided.

In our experience and reflected in our Neighbourhood Plan is the desire of most Long Itchington residents to live a quiet, tranquil life in a rural setting. Clearly there are some infrastructure needs which would be valued, e.g: all-purpose shop or GP surgery / chemist, for example, but we do not feel it is either sensible or desirable to attempt the “20-minute” neighbourhood in villages which are striving to preserve tranquillity and their own identity.

### **Issue T2: Sustainable transport accessibility across South Warwickshire**

We support Active Travel options and see the value of this with the development of the Lias Line. In addition, anything which improves bus transport into main town centres, notably Leamington Spa, would be supported.

### **Other Issues**

We have the following points to make regarding other sections of the SWLP:-

#### *Q-11: Comments regarding the Sustainability Appraisal*

We fully support the authors of the Sustainability Appraisal (Lepus Consulting) view that it would be useful to undertake a landscape evaluation to better inform the sustainability appraisal process. This should be undertaken and available before sites are selected for inclusion at the Preferred Options stage.

*In Chapter 7 (page 120) the SWLP states; “There is significant opportunity to enhance carbon sequestration through protection, restoration and appropriate management of green land uses”.*

We are fully supportive of this statement and suggest the SWLP should include a policy that requires the assessment of the carbon impact on any land used for development. With 30% of the worlds land carbon held in undisturbed grassland, planning approvals should be withheld on such undisturbed grassland sites where other suitable sites are available.

#### *Q-C4.1: (Policy on building regulation standards regarding net zero carbon)*

We are supportive of option C4.1b – Set a higher local standard beyond national building regulations requirements to achieve net zero carbon in all new developments – regardless of the scale of the development.

*Q-C5 (Policy on zero carbon requirements on the conversion of existing buildings)*  
We are supportive of option C5b that encourages the retrofit of measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas.

*Q-C6.1 (Policy requiring 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)*

We are supportive of option C6.1a requiring a whole lifecycle emissions assessment.

*Q-C6.3: comments regarding net zero carbon buildings in South Warwickshire*

We consider that both the planning approval and buildings regulations processes for South Warwickshire should set the highest possible standards for carbon reductions for all new build properties. Standards for extensions and conversions should encourage re-to-fitting and carbon reduction measures.

*Q-C7 (Policy on measures regarding adaption to higher temperatures)*

We are supportive of option C7a for the inclusion of a policy that requires developments and changes to existing buildings to incorporate measures to adapt to higher temperatures.

*Q-C8 (Policy on measures to adapt buildings to flood and drought events)*

We are supportive of option C8a for the inclusion of a policy that goes beyond existing building regulations and requires new developments and changes to existing buildings to incorporate measures to adapt to flood and drought events.

*Q-C9.1 (Policy on the requirements for the incorporation of measures to increase biodiversity)*

We are supportive of option C9.1a for the inclusion of a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity.

*Q-C11 (Policy on water quality)*

We are supportive of option C11b for the inclusion of a policy on similar lines to existing policy and the prioritisation of water quality as a strategic issue.

*Q-W1 Should the Part 1 plan include a policy on pollution?*

Response: yes

*Q-W2 (Policy on Health Impact Assessments)*

We are supportive of option W2a, that developers would be required to submit a Health Impact Assessment/Screening report for all major developments.



*Q-W3 (Overall policy on health)*

We are supportive of option W3a that an overall policy on health should be included in the SWLP.

*Q-B5 (Integrated policy on Environmental Net Gain)*

We are supportive of option B5a to consider Environmental Net Gains as a new and pioneering approach to support nature recovery.

*Q-B6 (Introduction of “Wildbelts” designations within the SWLP)*

Yes, we are supportive of “Wildbelts” designations

*Q-B9 (Policy requiring the safeguarding of sites (national, local, other) known to make a contribution to biodiversity and geodiversity)*

Yes, we are supportive of the inclusion of such a policy in the SWLP.

### **The protection of rural character and the need to ensure organic growth**

When taking forward the growth strategy for South Warwickshire we feel it is essential that the SWLP process ensures that the rural nature of many of the villages and communities within the plan area are protected.

In 2016 when we commenced the process to develop our Neighbourhood Plan we conducted a detailed survey of all residents. The survey achieved a response rate of over 74% and is therefore highly representative of the views of our community. An overwhelming majority of residents considered that protecting the rural nature of our village was a key priority. This became the key theme underpinning our Neighbourhood Plan.

As we have repeatedly made clear, we are not against housing development in our village per se and we recognise that some additional housing will be required during the life time of the SWLP. Our concern is to ensure that the rural nature of our community is protected and that housing growth is organic in nature.

We suggest that the site allocation process stage of the SWLP can achieve this in two ways. Firstly, by ensuring that any development sites allocated to our village are limited in size, for example no more than 30 - 40 dwellings as an absolute maximum to be allocated to a single site. Secondly, by ensuring the development of any sites is phased over a longer period. We wish to avoid a repeat of the experience of 2016 – 2021 when over three hundred houses were constructed in just 5 years, one of the sites concerned containing over 150 houses.

Over-rapid growth has a significant negative impact on a village community and we request that the SWLP site allocation process ensures that sites are therefore limited in size and brought “on stream” in a phased and controlled way over the lifetime of the plan period. This will help to protect the rural nature of our community and ensure any growth that does occur is more organic in nature.

## **Overall Conclusion**

Long Itchington Parish Council is broadly supportive of the SWLP and believe the policies are well considered and appropriate. We recognise that this stage of the consultation process is to look at high level strategy and that the development of the plan should be policy driven rather than site-led.

We also recognise that significant further growth is required during the plan period and that, despite the recent significant level of house-building, Long Itchington cannot be complete insulated from any additional housing during the 25 year lifetime of the plan (to 2050).

We therefore accept that this stage of the process should not involve any detailed discussion regarding the selection of sites as this will follow at the next stage of the process. We also acknowledge that planning authorities need to develop and apply a consistent framework when selecting sites for development. However, we remain concerned about an over-reliance upon high level desk-top studies to justify the selection (and retention) of sites within the plan without adequate weight being attached to other available evidence.

Our most recent experience of the site selection process was unfortunately not a very positive one. We discovered that once a site had been included within the plan (the SAP) the District Council consistently ignored both our arguments and the evidence that clearly demonstrated the unsuitability of the site for development. We do not wish to dwell on this situation but we consider this adds validity to our request to be fully engaged in the process at the stage sites are selected for development.

Finally, as stated, we accept that Long Itchington may need to accept further housing development during the lifetime of the South Warwickshire Local Plan. All we wish to influence is the overall number of houses that should be built, their type – and the location of where they should be built.

Long Itchington Parish Council  
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