***Cotswold District Council - South Warwickshire LOCAL PLAN PART 1***

*Please see below officer comments. These are provided without prejudice to the ability of the Council or its individual members to express different views.*

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

CDC is supportive of the rail based growth strategy (Option 1), which would reduce the dependence on road transport and enable local working. This is particularly important in order to enable the South Warwickshire Local Plan to respond to the climate emergency.

The Long Marston and Quinton / Meon Vale sites lie nearest to the CDC border. The CDC Local Plan and its supporting evidence, including the Gloucestershire Local Transport Plan, identify highway capacity is highly constrained at Moreton-in-Marsh. There is a limited scope for highway upgrades in the town and this issue constrains further growth in Moreton and the wider area.

The proposed quantum of development at Long Marston and Meon Vale may have a highway impact on Moreton-in-Marsh and other settlements / roads in the North Cotswolds. Cross-border analysis of the transport impacts of the proposed option is therefore required.

CDC is supportive of the reinstatement of the railway line between Long Marston and Stratford-upon-Avon, which would enable the reintroduction of direct train services between Moreton-in-Marsh and Stratford-upon-Avon. This would help to reduce highways impacts in Moreton-in-Marsh and deliver modal shift towards rail transport. The Council supports working with partner organisations to plan for and support the delivery of this scheme.

There is a proposal to refresh the Strategic Outline Business Case for the reinstatement of services between Honeybourne and Long Marston. Most of this route passes through Stratford-on-Avon District and Option 1 and the proposal for a new settlement at Long Marston would be predicated on this evidence. We gather that a procurement authority is required for this piece of evidence. Given the strategic importance of this infrastructure to the South Warwickshire Local Plan, would Stratford-on-Avon be willing to take a lead as the procurement authority for the Strategic Outline Business Case?

The hybrid rail-bus strategy (Option 2) is, to a lesser degree than Option 1, also supported. However, bus services have seen a significant reduction in recent years, especially since the pandemic. There is uncertainty about future projections because the market is still volatile and has not yet settled into an established pattern. We therefore consider the hybrid rail-bus strategy to have a higher degree of risk of generating / relying on more private car journeys should bus services be cut further in future.

Should Option 2 be chosen, we would hope that the aspiration would be zero emission buses. This will require new infrastructure for charging of vehicles, which will need to be appropriately sited in a location that has sufficient capacity in the power grid. The services should also be operational before people move into new homes so they do not develop car-based travel habits. This will require subsidisation from the beginning of the development(s).

It is hoped that the reinstatement of the Stratford to Honeybourne line could deliver modal shift from existing and new development and take traffic off the already congested Fosse Way (A429) corridor. However, CDC needs to understand the transport impacts of the chosen Option on Cotswold District. From what we already know, there would likely be an issue with any proposal that causes a net increase to vehicle movements on the A429 corridor, especially in Moreton-in-Marsh.

**Q-W2: Please select the option which is most appropriate for South Warwickshire**

**Option W2a: Include a policy on Health Impact Assessments. Developers would be required to submit a Health Impact Assessment/Screening report for all major developments. This would ensure that health impacts have been adequately considered and if required mitigation measures are in place and would align with current national government guidance. A threshold of what constitutes a major development would need to be agreed.**

 **Option W2b: Do not include a policy on Health Impact Assessments. Although any major health impacts such as noise and pollution are likely to be picked up at the planning application stage it may not capture the cumulative health impacts in as much detail. There could also be the missed opportunity for addressing issues such as loneliness and isolation which is critical for rural communities.**

CDC supports a policy or clause on HIA for major development **Option W2a**. Given our generally ageing population, rise in obesity and dementia as causes of ill health, and the recent pandemic, it seems prudent to use this tool to help inform decisions[[1]](#footnote-1) and predict health consequences of development proposals. HIA can identify opportunities such as ‘more and better active travel infrastructure in areas of poor air quality will lead to improved cardiovascular health; safer and more inclusive spaces for older people as well as those with a mental or physical health problem will deliver benefits to individual quality of life…. By bringing such health considerations to the fore, HIAs add value to the planning process’[[2]](#footnote-2).

National guidance (PPG) on healthy and safe communities also suggests the use of HIA can be beneficial “where there are expected to be significant impacts”.

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

*If neighbouring authorities removed the policy designation then there would be little merit in South Warwickshire continuing with it in isolation*

CDC does not object to the removal of the Vale of Evesham Control Zone. The policy has not been used once since it was adopted in the Cotswold District Local Plan in August 2018. The majority of the Control Zone is also beyond Cotswold District.

Given the Zone is maintained through a co-operative approach including with the three Highways Authorities it would seem logical to get most direction on the matter comes from the Local Transport Planning authorities.

Please note, although Cotswold District is partially updating its Local Plan, the Vale of Evesham Control Zone is outside the scope of this update. This policy will instead be reviewed as part of the next full update of the Council’s Local Plan.

***Q-B3: Please select the option which is most appropriate for South Warwickshire***

***Option B3a: Introduce Special Landscape Areas across all of South Warwickshire***

***Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don’t introduce them within Warwick District***

***Option B3c: Discard Special Landscape Areas and bolster general landscape policy***

Cotswold District already maintains its six Special Landscape Areas (first adopted in 1982) covering some 6% of the District. This policy has worked successfully for many years and we can recommend it to other local planning authorities. In CDC’s most recent Local Plan examination in 2018, the Planning Inspector agreed the Special Landscape Areas were justified in the relevant policy[[3]](#footnote-3). They have their own particular intrinsic character and key landscape qualities. The Local Inspector requested that these should be set out in the reasoned justification and illustrated in the key diagram of the Local Plan. Policy EN6 of CDC’s Local Plan refers to development not having a significant detrimental impact on the special character.

Cotswold District supports a landscape-led approach to plan-making and the use of Special Landscape Areas. It makes sense for plan-making and determining planning applications (both for developers and officers) to have a consistent policy across the South Warwickshire Local Plan area. Such a policy would also be consistent with that used in Cotswold District.

1. The Planner, 11/02/2021 Healthy outlook: How health impact assessments can deliver better health outcomes [↑](#footnote-ref-1)
2. Health Impact Assessment in spatial planning, PHE, 2020 [↑](#footnote-ref-2)
3. CDC Inspector’s Report 2018 <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-2011-to-2031/> [↑](#footnote-ref-3)