**CLAVERDON PARISH COUNCIL**

**RESPONSE TO**

**SWDP**

**6TH MARCH 2023**

**CLAVERDON PARISH COUNCIL**

**SOUTH WARWICKSHIRE LOCAL PLAN (SWLP)**

**OVERVIEW AND SUMMARY QUESTIONS**

CHAPTER 3 Q-V3

1 Q-V3.2:

DO YOU AGREE THAT THE VISION AND STRATEGIC OBJECTIVES ARE APPROPRIATE?

YES | NO | DON’T KNOW IF NO, PLEASE INDICATE WHY:

*Whilst Claverdon community understands much of the plan’s vision and objectives, it points out that the plan is unrealistic in duration given the rate of social and economic change. It has no milestones, and its scope is much too wide. Additionally, relative to infrastructure, separate elements are not integrated and rely entirely on private sector contributions.*

*Decisions about land allocation must be taken at parish level, with top-down decisions kept to a minimum. Claverdon will ensure through its NDP that the minimum housing requirements are met in ways that are acceptable to Claverdon parishioners.*

**CHAPTER 4 INFRASTRUCTURE**

Q. 1.1

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

*The assessment appropriately discusses the need for carefully considered development.*

Q I.2

Please select the option which is most appropriate for South Warwickshire.

*Claverdon would support option 12b provided infrastructure funding is adequate. There is no support for any proposal without a meaningful infrastructure investment plan. It makes no reference about funding commitments from statutory providers and the key private-sector agencies involved in public infrastructure/services guaranteeing the investment necessary. We question whether the private sector will fill this gap as assumed throughout the entirety of the plan.*

Q1.3

Please select the option which is most appropriate for South Warwickshire

Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan A single Levy for the whole of South Warwickshire could provide developers with greater certainty regarding likely development costs. It is possible to charge different rates of CIL in different zones within a single Levy.

*Based on the principle of subsidiarity, Claverdon supports Option 13b.*

Option I3b: Each District Council to produce its own Levy Separate Levies could have the potential to better respond to different conditions in different areas of South Warwickshire, with the potential that reviews could be undertaken more easily to react to changing circumstances.

Q1.4.1

Should we include a policy to safeguard specific infrastructure schemes within the SWLP? Yes | No | Don’t Know 4

*Yes*

Q 1.4.2

Please add any comments you wish to make about these specific safeguarding provisions.

*None*

Q 1.5 Please add any comments you wish to make about infrastructure, viability and deliverability.

*Claverdon has addressed this point earlier.*

GREEN AND BLUE CORRIDORS/GREEN BELT

Q S.1

Please select the option which is most appropriate for South Warwickshire Option

*Claverdon supports option S1a. It is essential that Claverdon has a role in identifying areas in the green belt and green spaces which are proposed to be released for development or retained in green corridors.*

S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced Utilising Information from the soon to be updated, Sub-Regional Green Infrastructure Strategy and additional evidence obtained in consultation with Green Infrastructure Stakeholders, should the South Warwickshire Local Plan identify Green Infrastructure corridors which can be used to help determine the growth strategy.

Q.S.2

Please select all options which are appropriate for South Warwickshire

*Claverdon supports option S 2a.*

Option S2a:

Identify areas considered particularly suited to intensification development and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code. Considering whether an area is particularly suited to intensification is likely to take into account a number of factors. These could include proximity to services (for example, streets within half a mile of a town centre or train station); and the existing built form and character of an area. Identifying areas in this way is likely to encourage intensification developments to take place, and a design code would ensure that such developments make a positive contribution to the neighbourhood.

Q S2.3

Please add any comments you wish to make about the Urban Capacity Study

*N/A*

Q S3.1

Please select the option which is most appropriate for South Warwickshire Option

*Claverdon supports S3.1a*

S3.1a:

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. Dependent on the results of the urban capacity study, it could be that brownfield development forms a part of our development strategy. Brownfield sites are frequently found within towns and can therefore often accommodate a higher development density. Prioritising development on brownfield land, especially at higher densities, might reduce the need for greenfield development. However, instead of developing all brownfield sites, this option looks to prioritise brownfield redevelopment in line with the identified growth strategy, where it can be proven the site is in a sustainable location, or when the development can show that it would have a positive impact on the sustainability of the area. In some instances, brownfield redevelopment can exacerbate issues and result in development occurring in unsustainable locations. This option aims to reduce such development.

Q S4.1

Do you think that growth of some of our existing settlements should be part of the overall strategy?

*Yes*

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.

*The plan correctly identifies that provision of the correct infrastructure needed to underpin it. It does not set out how all this will be done particularly regarding investment.*

Q S.5.1

Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options.

*Claverdon does not have access to the competences that would enable it to respond to this question meaningfully.*

Q S5.2

Do you think new settlements should be part of the overall strategy?

*It is essential that the SWLP sets out how these facilities will be provided. Infrastructure must precede development.*

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?

*Yes*

Q S5.4

If not, what approach would you take?

*Transport infrastructure is not given sufficient attention in the consultation document. There should be a much more detailed analysis of the quality and usage the road system and rail and bus services in the subregion.*

Q S7.1

Please provide any comments you have on the emissions estimation modelling for the five growth options.

*Claverdon does not have access to the expert advice to enable us to respond.*

Q S7.2

For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire::

Option 1: Rail Corridors Appropriate strategy

Option 2: Sustainable Travel Appropriate strategy

Option 3: Economy Appropriate strategy

Option 4: Sustainable Travel and Economy Appropriate strategy

Option 5: Dispersed Appropriate strategy

*Claverdon would need to see options which are better defined, more granular and phased in shorter periods because a successful plan is very likely to be a mixture of all of the development options set out. Three of the five criteria are tied up with transport and connectivity, but transport and other links are not binary factors.*

Q S8.1

For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?

*Outside the settlements the Countryside Policy should prevail. Inside the settlements the size should be in accordance with the Neighbourhood Plan and appropriate to the nature of the specific sites*

Q S8.2

For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?

*Outside the settlements the Countryside Policy should prevail. Inside the settlements the size should be in accordance with the Neighbourhood Plan and appropriate to the nature of the specific sites*.

Q S9

Please select the option which is most appropriate for South Warwickshire Option

*Claverdon supports option 9a*

S9a:

Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.

Q S.10

Please add any comments you wish to make about the development distribution strategy for South Warwickshire.

*Claverdon simply reiterates that the associated plan infrastructure is inadequate.*

**CHAPTER 5**

QE1.1

Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?

*Claverdon subscribes to a number of principles in the section on the environment and the economy. It would like to see the evidence that economic proposals will benefit measurably. The Core Opportunity Area is to the South of Stratford and do not reinforce the choice of Claverdon as a possible area of expansion.*

*It’s important that additional housing aligns with business and vice versa.*

QE2

Please select all options which are appropriate for South Warwickshire.

*This should be addressed in Part 2.*

Q E 4.1

Please select the option which is most appropriate for South Warwickshire Option

*This issue should be addressed in Part 2*

QE5

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option E5a*

Option E5a: Include a policy which supports a range of business units. This policy would encourage business units of differing sizes including smaller units for those businesses looking to start up. It is often difficult for small businesses to find affordable and available premises. This would be a new approach as currently there aren’t any specific existing policies in relation to this in either the Core Strategy or Local Plan.

QE6

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option 6a*

Option E6a: Include a policy which protects South Warwickshire’s economic assets. As these assets are a major contributor to the economy, it may be appropriate to protect their current use to support them and ensure that the right investment is made in these areas. However, such a policy might hinder alternative uses if the current needs change.

QE 7.1

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option E7.1a as that provides opportunity for housing growth in areas with infrastructure to meet the needs of the increasing workforce without the necessity of using green belt land or viable farmland.*

Option E7.1a: Include a policy directing employment to the Core Opportunity Area. This policy would look to direct employment growth to the Core Opportunity Area with areas outside of this, providing opportunities for more local investment.

Q 7.2

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports option E7.2a*

Option E7.2a: Include a policy relating to additional economic growth at the major investment sites. This policy would seek to allocate additional land for specific employment uses at the major sites, including a list of development principles in order to create the right environment to secure major inward investment into South Warwickshire.

QE 8.1

Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?

*Claverdon would need more time to consider this so, it’s a don’t know*

This approach will provide investment certainty and ensure that we can continue to grow the local economy. If existing allocations are not included, we will need to find even more new greenfield sites across South Warwickshire to meet our employment needs.

QE 8.2

if, no please list the sites that should be excluded and give reasons.

*N/A*

QE8.3

Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests?

*Claverdon supports this proposal as essential to protect assets*

QE.8.4

Please specify what you consider to be appropriate tests The framework which is currently applied by SDC is generally satisfactory but also flexible to respond to the local situation.

*Claverdon is content with the current framework.*

Q9

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option E9a*

Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan. In order for the hierarchical approach to be implemented effectively it may be useful to identify retail areas within each of the Town Centres as well as Town Centre boundaries. This would follow the current Warwick District Local Plan approach whereas currently Stratford does not currently identify these. It would allow consistency across South Warwickshire.

QE.10

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

*Yes*

QE.11

Please add any comments you wish to make about delivering South Warwickshire’s economic needs.

N/A

CHAPTER 6

QH1.1

The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

Yes *The HEDNA is a standard and tried and tested model so Claverdon accepts the general approach in the plan subject to infrastructure as set out earlier.*

QH1.2

If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?

*N/A*

QH2.1

What is the best way to significantly increase the supply of affordable housing across South Warwickshire?

*Subsidy from Homes England.*

QH2.2

Please select the option which is most appropriate for South Warwickshire:

*Claverdon supports option H2.2c Achieving a higher number of affordable homes, suitable for younger people and families in particular is a major challenge. No housing target should be ratified without a fully funded strategy for affordable homes in high price settlements.*

Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire A more localised approach could reflect with greater accuracy the variations of value, or variations in affordable housing demand, in different areas of the districts. This may mean fewer challenges on viability grounds. However, having different requirements in different localities adds a level of uncertainty – it makes it harder for developers to anticipate their costs, and it makes it harder for Councils to anticipate delivery of affordable homes. There could also be unintended consequences if it makes certain areas more attractive to developers than others, with the potential that this makes it more challenging to deliver the chosen spatial growth strategy.

QH 2.3

How should South Warwickshire best address the specialist needs for older people?

*The comment in section H2.1 applies equally to the provision for elderly people.*

QH 3

Please select all options which are appropriate for South Warwickshire

*This policy should be dealt with in Part 2*

QH 4.1

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?

*Claverdon recognise that SWLP has a duty to collaborate with the neighbouring authorities. The demand and need which comes from Birmingham and the Black Country is mainly for affordable homes. The problem of providing affordable homes in high land and house price areas has proved intractable nationally so that affordable and social housing numbers have declined sharply. When the SWLP announces proposed targets it must indicate the level of subsidy Homes England will allocate to areas such as Claverdon.*

QH4.2

Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan

AND

QH4.3

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

You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question.

*The scale of homes which Claverdon can absorb is dependent on affordability problems being addressed. However, the scale is also dependent on adequate modern infrastructure being provided. Without a significant change to the approach to funding infrastructure none of the options will be adequate.*

QH5

Please select all options which are appropriate for South Warwickshire

*Premature defer to Part 2*

*Claverdon supports H6c but it should be deferred to Part 2*

Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Show people homes will be assessed against a range of criteria to determine their suitability. This option depends completely on the private sector in terms of the quantity and suitability of any submitted planning applications for Gypsy and Traveller and Travelling Show people homes. Whilst this approach may be useful in conjunction with either Options 1 or 2, relying on his option alone would make it impossible to ensure that sufficient numbers of these type of homes are made available; in the past this approach by itself has not delivered sufficient new provision to meet the need.

QH7

Please add any comments you wish to make about delivering homes in South Warwickshire.

*We have already commented on the subject of affordable land.*

CHAPTER 7

QC.1.1

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports the priority being given to climate change and option C1.1b. In particular it supports the monitoring of emissions and the proposals for retrofitting dwellings.*

Option C1.1b: Do not allocate land but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.
Choosing not to allocate land for renewable energy generation would in effect rule out onshore wind projects, unless land was allocated for this purpose in a Neighbourhood Development Plan. Solar developments are not bound by the same restrictions as onshore wind, so these could still come forward without land having been allocated. This type of policy would show general support but would not identify specific locations. Proposals would therefore be considered on a site- would show general support but would not identify specific locations. Proposals would therefore be considered on a site- by-site basis at planning application stage rather than a more planned-for approach. The policy could encourage this use on certain grades of agricultural land.

QC.1.2

Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?

*Claverdon is certain that there are such criteria but does not have the expertise to respond to this question.*

QC2.

Please select the option which is most appropriate for South Warwickshire

*Claverdon does not have the expertise to respond to this question.*

QC 3 .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?

*Yes but it needs to be delivered effectively.*

 QC 3.2

Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?

*Claverdon does not have the expertise to comment.*

QC3.3

Please add any comments you wish to make about renewable energy generation or carbon sequestration in South Warwickshire

*Claverdon does not have the expertise to comment.*

QC4.1

Please select all options which are appropriate for South Warwickshire

*Claverdon supports option C4.1a*

Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time. Without a policy in the plan we would be tied in with national minimum requirements and have no control over changes to these standards over time.

Q CA 4.2

What scale of development should the requirements apply to?

*Claverdon does not have expertise to respond to this point.*

QC5

Please select all options which are appropriate for South Warwickshire

*Claverdon does not have expertise to respond to this point*

QC6.2.1

*Claverdon supports Option C6.1b*

Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods. A phased and more flexible approach to embodied carbon emissions would slow down the rate at which South Warwickshire can drive down its carbon emissions and could be more complicated to administer if different types of developments have different requirements. However, the approach would allow more time for the development industry to take account and adapt to these requirements and ensure that development are fully viable so that they can come forward to meet the area’s development needs.

QC6.2.1

If a phased approach is used, what dates and thresholds should be used?

For example, achieve 80% reduction by 2030 and 100% reduction by 2040?

*Claverdon does not have expertise to respond to this.*

QC6.2.2

Please add any comments you wish to make about Net Zero Carbon buildings in South Warwickshire

*Claverdon does not have expertise to respond to this.*

QC7

Please select the option which is most appropriate for South Warwickshire

Claverdon supports Option C7a

Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures? This would include the application of the cooling hierarchy, the use of cool materials and provision of green infrastructure to create cooling.

QC8

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option C8a*

Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events. This would include SuDS and water efficiency requirements.

QC9.1

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option C9.1a*

Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity
This could include a requirement for larger developments to have less than 50% of the wider site (excluding buildings) to consist of paved/hard surfaced areas.

QC 9.2

Please add any comments you wish to make about climate responsive development design in South Warwickshire

*None*

QC 10.1

Please select all options which are appropriate for South Warwickshire

*Claverdon does not have expertise to respond to this.*

QC 11.1

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports C11a*

Option C11a: Do not include a policy on water quality in the SWLP Part 1
‘Save’ existing policy content in this regard from existing plans and take forward through subsequent policy documents as appropriate. The spatial strategy should take account of the impact of strategic growth on relevant watercourses.

QC12.2

Please add any comments you wish to make about water management or flood risk in South Warwickshire

*Development on the flood plains of the numerous watercourses in the SWLP area should not be permitted and surface water run off controlled by attenuation measures to avoid surge flooding and contamination of the watercourses. Minimum use of impervious materials to be used in development locations to aid natural absorption.*

**CHAPTER 8**

QD1.1 Do you agree that this is an appropriate range of topics for a strategic design policy?

*Claverdon supports proposals to protect and enhance the historic and environmental quality of the village; however, some of the scope of this consultation should be undertaken at NP level.*

QD 2

Please select all options which are appropriate for South Warwickshire

*Claverdon supports option D2c i.e., develop design guides/codes for strategic development sites/locations. Like the existing policies within Warwick District, this would seek to produce specific briefs for individual large scale development sites. These could be produced or led by the respective Local Planning Authority and/or by the developer(s) bringing forward the site.*

QD.3
Please select all options which are appropriate for South Warwickshire

*Claverdon supports options D3b and D3c i.e. Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e. minimum 30d.p.h.*

*This would be similar to the approach of the current Warwick District Local Plan. It would set a minimum expectation across the whole of South Warwickshire irrespective of context, but in anticipation that this minimum is likely to be exceeded where context allows, for example in more urban areas. This approach would not prevent specific design guides, codes or masterplans from guiding the NPPF and, the NPPF.*

*Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places. This would draw upon the evidence base of existing density ranges across South Warwickshire (for example those ranges indicated in the Urban Capacity Study or the Settlement Design Analysis) Chapter 8 – A well-designed and beautiful south Warwickshire South Warwickshire Local Plan 142 and seek to replicate this. This might offer a more responsive approach to density, though it might not tackle matters of accessibility to public transport modes or other infrastructure referred to above. It also has the potential disadvantage of perpetuating patterns of development which could be considered less sustainable. For example, density is commonly reduced toward the edges of development sites and therefore the edges of settlements. This can make it more challenging to increase the density of extensions to those sites/edges.*

QD4.1 Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?

Q-D4.2:

*Claverdon believes that this is too detailed for this stage of the Plan.*

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*

QD6

Please add any comments you wish to make about a well-designed and beautiful South Warwickshire

*None at this stage.*

**CHAPTER 9**

QW1

Should the Part 1 plan include a policy on pollution?

*Yes*

QW2

*Yes*

**CHAPTER 10**

QT1

Please select all options which are appropriate for South Warwickshire

*Claverdon considers that the transport section should be the single biggest criterion in choosing preferred options should have had a significant larger part of the consultation.*

*This should be treated as an infrastructure issue There should be a much more significant discussion about the rail and bus services to the subregion including an assessment of the quality of the services and how improvements in those services can be realigned.*

QT3

 *As per comments for QT1*

QT4

Please provide suggestions for how smart cities technologies could be supported in South Warwickshire

*No suggestions*

QT5

Please add any comments you wish to make about a well-connected South Warwickshire

*As per comments for QT1*

**CHAPTER 11**

QB1

Please select the option which is most appropriate for South Warwickshire

*Claverdon endorses option B1a and proposals to protect and enhance the historic and environmental quality of the village and the steps to be taken by the partnership to achieve that. This level of proposal, however, appears to Claverdon to be far too detailed and is an example of excessive scope/detail in this consultation. These are all issues that are being delegated to NPs and there needs to be some reference in the document to encouraging Neighbourhood Plans to undertake this activity and guidance as to appropriate approaches.*

Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District

Maintaining Areas of Restraint as a strategic policy approach will help protect parcels of land that help preserve the structure and character of settlements within the plan area. As part of identifying areas in Warwick Stratford designations would be reviewed.

QB2

Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation.

*This is a matter for local councils and people.*

QB3

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports Option B3a*

Option B3a: Introduce Special Landscape Areas across all of South Warwickshire Introducing Special Landscape Areas across all of South Warwickshire would see existing SLA’s refreshed/maintained and areas of Special landscape quality introduced within Warwick District. Developments within Special Landscape Areas would have to respect the current and historic relationship of that settlement within the surrounding landscape. To determine whether the existing SLA’s within Stratford remain relevant and where any SLA’s within Warwick should be located, an updated study would need to be undertaken.

QB4.Please select the option which is most appropriate for South Warwickshire

*Claverdon believes that in general our environmental quality needs to be protected and maintained and although the ideas are sound this might have a negative impact on areas to the North depending on the scale of the buffer. However, these are issues to be debated with local communities and the relevant statutory agencies involved and the Local Plan part 1 does not seem to be the correct place to have this debate.*

QB5

Please select the option which is most appropriate for South Warwickshire

*Claverdon supports option B5a. The core idea is sound, but we have concerns that this might push more development further to the North.*

Option B5a: Explore and pursue an integrated Environmental Net Gain Policy To consider Environmental net gain as a new and pioneering approach to support natures recovery. Should this approach be taken, further work will be required to determine how environmental net gain will work in practice However, it is expected that it will allow more flexibility for developers, and result in more tangible environmental, social and economic improvements. This approach will not be to the detriment of Biodiversity Net Gain, of which a minimum 10% net gain will still be required under the Environment Act, the flexibility will be made around this legal requirement to enhance the natural capital of an area.

QB6

Should the South Warwickshire Local Plan introduce Wildbelt designations?

*Claverdon - Yes you should.*

QB7

Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?

*Yes*

QB8.1

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*

QB8.2

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

*Yes*

QB8.3

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 geo-diversity; unless the benefits of the proposal clearly.

*Yes*

**CHAPTER 12**

QP 1.1

Do you agree with the proposed broad content of the Part 1 plan?

*Claverdon has had difficulty assessing the volume and detail of the plan in the timescale. We realise that some difficulties are inevitable but there are in reality only a few key issues in the plan and they are lost in the excessive detail.*

*It would be better if several of the policy areas were dealt with in a separate consultation probably reserved to the individual District authorities in line with the subsidiarity principle.*

*Claverdon considers that the Part 1 plan should be a high level strategic plan which contains the issues which are central to the long term settlement pattern of the sub Region. The plan is also unrealistically long given the rate of social and economic change. There should be intermediate 5 year time periods with milestone and SMART targets.*

 *In addition the plan should be backed by a financial analysis of the cost of different options and a risk assessment of affordability of the different approaches. The failure to include a major set of options about the green belt in the consultation indicates a lack of appropriate focus. It essential that the Preferred Option stage is far more focussed and cogent with these intermediate stages and targets.*

QP1.3

Do you agree with the selection of policies to be addressed in the Part 1 plan?

Throughout the document we have identified policies which are inappropriate or being addressed in the wrong place . Part 1 Preferred Options should be radically shortened.

QP.1.4

Are there any areas where equality and inclusivity in planning needs further attention?

*Not many were raised in the plan.*

*We need much less content and much more time to consider and debate it.*

***Claverdon Parish Council 6th March 2023***