



Response to Issues and Options Consultation

We have responded online but all formatting was removed by the website. For ease of reading / analysis this is our formatted response.

Text in blue = our free text responses. **Highlighted** = options we have selected.

Chapter 3	
Q-V3. 1	<p>Do you agree that the Vision and Strategic Objectives are appropriate?</p> <p>Yes No Don't Know</p>
Q-V3.2:	<p>If no, please indicate why:</p> <p>The development of the SWLP to date has clearly involved a huge amount of work. However there is a fundamental flaw in the process which has been amplified by the publication of the draft revised National Planning Policy Framework (December 2022).</p> <p>The current direction of policy is that Green Belt land should be protected and does not have to be released to meet housing need. SWLP Strategic Objectives 4 and 5 seek to promote health and environmental resilience, much of which we know can be gained from protecting and enhancing Green Belt land. This is evidenced by numerous comments from local people who use the Old Milverton footpaths for recreation and exercise (see Supporting Document A uploaded at S12).</p> <p>This is why Old Milverton & Blackdown Parish Council are so dismayed to see Green Belt development assumed in all five of the 'spatial growth options' here. Doing this is more than just being "blind" to whether proposed locations are in the green belt (Section S6, line 37). By offering no alternatives it suggests that the planning team has already assumed that it is necessary to remove land from the Green Belt.</p> <p>This is contradictory to national policy for three reasons:</p> <ol style="list-style-type: none"> 1) The Government has asserted that local planning authorities are not expected to review the Green Belt to deliver housing. <i>See letter from the Secretary of State for LUHC to MPs on 5.12.22</i>. This is now reflected in the draft NPPF (paragraph 142). 2) It does not take into account the views of local communities. The Secretary of State said that local authorities would "work with their communities" to determine "how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets." <i>See written statement from SS LUHC, 6.12.22</i>. 3) It ignores the existing protections for Green Belt land as outlined in (new) paragraph 143 of the NPPF which states: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority

should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development... [including whether it]

(a) makes as much use as possible of suitable brownfield sites and underutilised land;

(b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

As we will set out in the remainder of our response, this 'full examination' has not taken place and the result is that the consultation document presumes that there will be Green Belt development, even though: i) no Green Belt review has taken place and ii) options for non-Green Belt development have been explored in SWLP workshops yet no weight or visibility has been given to these in the consultation document.

This situation gives rise to some key questions:

(i) Why is there no option to comment on Section 6 ("A review of green belt boundaries")?

(ii) What would the timetable be for a review of the Green Belt? The West Midlands Land Commission (2017, p63) has cautioned against reviews being done piecemeal, so it should be part of a joint exercise. The results would then need to be known before spatial growth options can be firmed up, yet current timescales indicate that the preferred option will be put out for consultation in just four months' time (July 2023).

(iii) Even if such a review were to take place in time, the Green Belt around North Leamington fulfils all of the stated purposes. There are no exceptional circumstances to justify its removal as the Secretary of State has made clear that housing need figures do not take precedence. Please see an analysis of the value and contribution of the Green Belt in North Leamington (Supporting Document B uploaded at S12).

One further point we wish to make is that some of the SWLP work that has been undertaken has not been presented transparently, to take three examples:

- I. The Spatial Growth Strategy Workshops which you carried out in June and July 2022 and reported on in September 2022 each involved two exercises to decide the distribution of growth, one with Green Belt development permitted, and one with it not permitted. This means that there will have been numerous explorations of non-Green Belt development, none of which feature in the consultation document. There is a complete lack of visibility or weight given to non-Green Belt development.
- II. The 54% figure cited in favour of Green Belt development is, at best, misleading. This is not a representative figure because the respondents to the first consultation were not a representative sample. The document also fails to mention that 45% of respondents were developers, landowners or businesses (35% developers and 10% landowners according to Consultation Statement January 2022, p275). This suggests that only a small proportion of other respondents were in favour of pursuing growth opportunities. This skew towards groups with a vested interest means that this statistic should not be used as the primary statistic setting the scene for Section 6. More importantly it should not be used in any way as a justification for pursuing this

	<p>strategy.</p> <p>III. There are numerous other commissioned desktop studies and reports which make up the technical documentation. These amount to some 2,250 pages and are incredibly dense but at the same time utilise generic tick box descriptors, lack local knowledge and make extrapolations from uncomprehensive and potentially inaccurate data. They could even be construed as manufacturing a case for justifying exceptional circumstances to develop the Green Belt. Such studies must not be allowed to be used as a justification for development in the Green Belt.</p> <p>In view of all the above, we feel that the premise of the consultation is flawed and that the current process should be halted while the background and options are revisited in light of the national policy direction on the Green Belt.</p>
<u>Chapter 4</u>	
Q-I1	<p>Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.</p> <p>Volume 3, Appendix B of the Sustainability Appraisal is troubling. We have looked closely at the analyses for Royal Leamington Spa North East (B.12) and Royal Leamington Spa North West (B.13) and find a number of statements inaccurate or opaque, for example:</p> <p>B13.4 (page B76) says “This Broad Location is unlikely to lead to coalescence of settlements.” However any development here would subsume Old Milverton and Blackdown into Leamington. It would also take the outskirts of Leamington up to the southern outskirts of Kenilworth, particularly the development at Thickthorn and other sites nearby. This is precisely what the Green Belt is designed to protect against.</p> <p>Also at B13.4 we are told “a minor negative impact on the recreational experience associated with these, and surrounding, footpaths could be expected”. If this site is developed, there will no longer be any recreational experience to be had as the footpaths would become pavements through a housing development. We think it is therefore inaccurate to call this a ‘minor negative impact’.</p> <p>All of our concerns about the analysis in this document apply equally to sites B.12 and B.13.</p>
Q-I2	<p><u>Infrastructure Delivery</u></p> <p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option I2a: Set out infrastructure requirements for all scales, types and location of development <i>If this detail was included within the Part 1 Local Plan then the requirements would be established which apply equally across South Warwickshire.</i></p> <p>Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy</p> <p><i>In this option, the focussing only on infrastructure relating to the growth strategy would mean that requirements in other locations would not be set until the Part 2 plan was adopted. In the interim, the existing Core Strategy and Local Plan policies would be retained, resulting in different approaches across the two Districts</i></p>

<p>Q-I4.1</p>	<p><u>Infrastructure safeguarding</u></p> <p>Should we include a policy to safeguard specific infrastructure schemes within the SWLP?</p> <p>Yes <input checked="" type="radio"/> No Don't Know</p>
<p>Q-I4.2</p>	<p><u>Viability and deliverability</u></p> <p>Please add any comments you wish to make about these specific safeguarding provisions</p> <p>It would not be sensible to safeguard schemes which were not well-thought-through originally, and which are now based on outdated assumptions. The Park & Ride scheme in WDC is one such example. No land should be safeguarded for this site and no likely demand has been demonstrated for such a facility.</p>
<p>Q-I5</p>	<p>Please add any comments you wish to make about infrastructure, viability and deliverability</p> <p>Specifically in response to QI2: Government uses three separate approaches to the provision of the infrastructure needed for development. Without changes in national policies no single approach is possible. A better solution would involve the government leading on the provision of basic infrastructure.</p> <p>More generally: The level of growth and development proposed will have to be accompanied by a clear-eyed analysis of all infrastructure requirements, along with a funded commitment to implementing them fully. Ideally this should include all scales and types of locations to ensure a unified approach across the area. It should also recognise that there will be generalised 'spillover' from growth in particular locations.</p> <p>One important example is the impact of expanded settlements on traffic flow more broadly across the area. Over recent decades the addition of new housing on the edges of Leamington Spa and Warwick has led to increasing traffic congestion both on the north/south and east/west routes. The layout of the towns, (roads, railway lines, rivers, the canal and Warwick park) prevent the construction of any new through routes. The existing cycling infrastructure does not provide easy and safe cross town routes either. Further new housing and other development on the outskirts of the towns will further exacerbate this problem. The alternative is to focus on expanding existing small and larger settlements without the historical constraints faced by more new housing to the edges of the two towns.</p>
<p>Q-S2</p>	<p><u>Intensification</u></p> <p>Please select all options which are appropriate for South Warwickshire</p> <p>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.</p> <p><i>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.</i></p>

	<p>Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes</p> <p><i>In this option, the policy would apply across the whole of the South Warwickshire area. Design codes could still be drawn up for individual character areas, but it would also be prudent to have a more generic intensification design code that applied everywhere else. It may be difficult for this more generic design code to direct the most appropriate forms of intensification across a wide range of localities and architectural styles.</i></p> <p>Option S2c: Do not have a policy which encourages intensification</p> <p><i>This option is likely to mean that fewer intensification schemes come forward, so some land in sustainable locations would remain under-utilised, and resulting in a greater requirement for housing developments on greenfield land. Without a design code, applicants may find it harder to know what would be acceptable in planning terms, and the quality of intensification schemes coming forward may be lower.</i></p>
<p>Q-S3.1</p>	<p><u>Using Brownfield Land for development</u></p> <p>Please add any comments you wish to make about the Urban Capacity Study</p> <p>The examples given in the study are encouraging and a wider-ranging, more detailed exercise should be undertaken to ensure that the “brownfield first” pledge is met.</p> <p>The need to prioritise brownfield development comes across clearly in recent Government policy. The “brownfield first” pledge was most recently reiterated by the Prime Minister in answer to a Parliamentary Question on 6.10.22. Most brownfield sites are sustainable because they are located in areas with train stations and bus routes. It may be necessary to explore meeting the costs of remedial measures from public funds to make the use of these sites viable for developers.</p> <p>Additionally, we support the suggestion of the Secretary of State for LUHC (written statement 6.12.22) to explore setting a lower Infrastructure Levy rate on brownfield over greenfield to increase the potential for brownfield development. This would allow South Warwickshire to reflect national policy and deliver the “brownfield first” pledge by giving substantial weight to the value of using brownfield land. Certain types of intensification in town centres should be supported for example the conversion of unused retail property, including upper floors, to provide housing.</p> <p>In terms of the way that brownfield development is measured, it is important to be specific about the number of dwellings rather than the number of sites. For example, the current Warwick District Plan states that it seeks to maximise the use of brownfield sites with 9% of allocated sites using brownfield land. It does not say what percentage of houses would be on brownfield sites, which might not be very different depending on the size of the brownfield as opposed to greenfield sites.</p>
<p>Q-S3.2</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>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.</p> <p><i>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</i></p>

	<p><i>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.</i></p> <p>Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location</p> <p><i>This option looks to prioritise the redevelopment of all brownfield land irrespective of whether the site is in a sustainable location. Whilst redevelopment of brownfield land is, on the whole, a sustainable approach, locating redevelopment in unsustainable locations can sometimes exacerbate issues within an area, and this is a risk of prioritising all brownfield sites for redevelopment.</i></p> <p>Option S3.2c: None of these</p>
<p>Q-S4.1</p>	<p><u>Growth of Existing Settlements</u></p> <p>Do you think that growth of some of our existing settlements should be part of the overall strategy?</p> <p>Yes No Don't Know</p>
<p>Q-S4.2: p47</p>	<p>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.</p> <p>We responded NO to Q-S4.1 however we would support the development of brownfield sites within existing settlements, for example through infilling, converting existing properties and changing use from commercial and or retail to housing. All can increase the number of housing units without building on greenfield sites.</p> <p>In more general terms, the Settlement Analysis (like the other technical documents) has been conducted 'blind' to whether an area is in the Green Belt or not.</p> <p>Chapter 2, para 2.2, page 6 states that "The premise of the study is to identify the opportunities and constraints for growth in and around the settlements."</p> <p>The analysis then undermines its own premise by ignoring the massive constraint that Green Belt land rightly places upon development: "the analysis has been undertaken irrespective of whether the settlement is within the green belt – it is simply the physical attributes of the settlements."</p> <p>Although it does acknowledge the "strong national policy designation" for Green Belt where "any incursion would require thorough examination and robust justification" the analysis is flawed because this fact is not even mentioned in the analysis of those settlements which are in the Green Belt. In addition, it only analyses the existing settlement, rather than the proposed extension areas, many of which spill into Green Belt land.</p> <p>Finally it is inaccurate to say that "this matter will be explored further in the Issues and Options consultation." It is dealt with only summarily in Section S6 and no consultation question is posed so there is no opportunity for stakeholders to comment directly.</p>

<p>Q-S5.1</p>	<p><u>The potential for new settlements</u></p> <p>Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options</p> <p>There seems little difference in the figures provided for the different options especially in the long-term. Given the many assumptions that must be involved in making these estimates, how significant are these small differences?</p> <p>With regard to new settlements more generally, we have responded NO to Q-S5.2 because we think the process for selecting these sites has been flawed - please see the concerns we raise elsewhere in our response, in particular our answer to Q-V3.2.</p>
<p>Q-S5.2</p>	<p>Do you think new settlements should be part of the overall strategy?</p> <p>Yes No Don't Know</p>
<p>Q-S5.3</p>	<p>In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?</p> <p>Yes No Don't Know</p>
<p>Q-S5.4</p>	<p>If not, what approach would you take?</p> <p>Following the impact of the pandemic on working patterns and commuting, including the large increase in the numbers of people who are now working from home, the future of rail travel seems to be very unclear at the moment. The scaling back of HS2, the under-usage of Kenilworth Station, and lower passenger numbers generally on Chiltern Railways suggests that this should be given careful consideration before shaping a whole strategy.</p> <p>An approach should be adopted that safeguards the Green Belt from further loss while expanding those settlements where land is available with good transport links and which have a range of existing services which can be expanded as needed e.g. retail, education, and health. None of the five strategic growth approaches do this.</p>
<p>S6</p>	<p>REVIEW OF GREEN BELT BOUNDARIES</p>

<p>Q-S7.1</p>	<p><u>Refined Spatial Growth Options</u></p> <p>Please provide any comments you have on the emissions estimation modelling for the five growth options</p> <p>There seems little difference in the figures provided for the different options especially in the long-term. Given the many assumptions that must be involved in making these estimates, how significant are these small differences?</p>
<p>Q-S7.2</p>	<p>For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:</p> <p>Option 1: Rail Corridors</p> <p>Appropriate strategy Neutral Inappropriate strategy</p> <p>Further comments</p> <p>By extrapolating from the description of Option 4 as “balanced” between Green Belt and non-Green Belt, we see that growth in Option 1 is skewed <i>towards</i> the Green Belt. Our fundamental criticism with the Local Plan process is that this should not be happening. Government policy does not require it to happen, and the non-Green Belt options which have been explored (e.g. in the spatial growth workshops) have not been presented here.</p> <p>That said, this could be an appropriate strategy if analysis and forecasting suggests increasing passenger numbers and viable railway services. However this needs to be balanced against the need to protect the Green Belt. For example, it would not be an appropriate response to a ‘Rail Corridor’ strategy to build more houses in North Leamington. This location is more than a 30 minute walk to Leamington train station (or more likely a car journey). Neither would removing land from the Green Belt to build new stations be an appropriate strategy.</p> <p>Furthermore the indicative location north of Leamington would not be appropriate for development because:</p> <ol style="list-style-type: none"> I. It fulfils all five of the stated purposes of Green Belt land. II. It is a valued open space which contributes to the physical and mental wellbeing of a large population on the outskirts of Leamington. III. It is ALC Grade 2 agricultural land, making an important contribution to sustainability and security of food supply. IV. The proposals would lead to a merging of the boundaries of Kenilworth and Leamington. V. Similar proposals were rejected by the Planning Inspector less than six years ago. VI. Development would be skewed away from affordable housing in the centres where people work.

Option 2: Sustainable Travel

Appropriate strategy | **Neutral** | Inappropriate strategy

Further comments

Extrapolating from the description of Option 4 as “balanced” between Green Belt and non-Green Belt, growth in Option 2 is skewed *towards* the Green Belt. Our fundamental criticism with the Local Plan process is that this should not be happening. Government policy does not require it to happen, and the non-Green Belt options which have been explored (eg in the spatial growth workshops) have not been presented here.

That said, Option 2 could be an appropriate strategy if analysis, forecasting and available funding suggests that there will be an improvement in local bus services as well as increased rail passenger numbers and viable railway services.

As with Option 1, this needs to be balanced against the need to protect the Green Belt. For example, it would not be an appropriate response to a ‘Rail Corridor’ strategy to build more houses in North Leamington. This location is more than a 30 minute walk to Leamington train station (or more likely a car journey). Neither would removing land from the Green Belt to build new stations be an appropriate strategy.

Furthermore the indicative location north of Leamington would not be appropriate for development because:

- I. It fulfils all five of the stated purposes of Green Belt land.
- II. It is a valued open space which contributes to the physical and mental wellbeing of a large population on the outskirts of Leamington.
- III. It is ALC Grade 2 agricultural land, making an important contribution to sustainability and security of food supply.
- IV. The proposals would lead to a merging of the boundaries of Kenilworth and Leamington.
- V. Similar proposals were rejected by the Planning Inspector less than six years ago.
- VI. Development would be skewed away from affordable housing in the centres where people work.

Option 3: Economy

Appropriate strategy | **Neutral** | Inappropriate strategy

Further comments

Extrapolating from the description of Option 4 as “balanced” between Green Belt and non-Green Belt, growth in Option 3 is skewed *towards* the Green Belt. Our fundamental criticism with the Local Plan process is that this should not be happening. Government policy does not require it to happen, and the non-Green Belt options which have been explored (eg in the spatial growth workshops) have not been presented here.

That said, Option 3 seems to be the most realistic option for South Warwickshire unless there is a significant shift of mindset and funding in favour of public transport. Under such a strategy the indicative location north of Leamington would still not be appropriate for

development because:

- I. It fulfils all five of the stated purposes of Green Belt land.
- II. It is a valued open space which contributes to the physical and mental wellbeing of a large population on the outskirts of Leamington.
- III. It is ALC Grade 2 agricultural land, making an important contribution to sustainability and security of food supply.
- IV. The proposals would lead to a merging of the boundaries of Kenilworth and Leamington.
- V. Similar proposals were rejected by the Planning Inspector less than six years ago.
- VI. Development would be skewed away from affordable housing in the centres where people work.

Option 4: Sustainable Travel and Economy

Appropriate strategy | Neutral | Inappropriate strategy

Further comments

This is one of only two options that acknowledges the Green Belt. It says that under this scenario less Green Belt would need to be removed and that growth is “balanced” between Green Belt and non-Green Belt. This tells us by implication that growth in the other options is skewed towards the Green Belt. But even under this “balanced” approach, Option 4 would see large areas of land removed from the Green Belt. Our fundamental criticism with the Local Plan process is that this should not be happening. Government policy does not require it to happen, and the non-Green Belt options which have been explored (eg in the spatial growth workshops) have not been presented here.

Whilst the overall aim of Option 4 may be appropriate in an area like South Warwickshire, the indicative location north of Leamington would still not be appropriate for development because:

- I. It fulfils all five of the stated purposes of Green Belt land.
- II. It is a valued open space which contributes to the physical and mental wellbeing of a large population on the outskirts of Leamington.
- III. It is ALC Grade 2 agricultural land, making an important contribution to sustainability and security of food supply.
- IV. The proposals would lead to a merging of the boundaries of Kenilworth and Leamington.
- V. Similar proposals were rejected by the Planning Inspector less than six years ago.
- VI. Development would be skewed away from affordable housing in the centres where people work.

	<p>Option 5: Dispersed</p> <p>Appropriate strategy Neutral Inappropriate strategy</p> <p>Further comments</p> <p>As with Option 4, less Green Belt would need to be removed under this scenario growth, as growth is “balanced” between Green Belt and non-Green Belt. But even under this “balanced” approach, Option 5 would see large areas of land removed from the Green Belt. Our fundamental criticism with the Local Plan process is that this should not be happening. Government policy does not require it to happen, and non-Green Belt options have been explored which have not been presented here.</p> <p>It is also worth noting that this Option would seem to offer the least opportunity for developing affordable housing, which is where the key area of housing need lies.</p> <p>The indicative location north of Leamington would not be appropriate for development because:</p> <ol style="list-style-type: none"> I. It fulfils all five of the stated purposes of Green Belt land. II. It is a valued open space which contributes to the physical and mental wellbeing of a large population on the outskirts of Leamington. III. It is ALC Grade 2 agricultural land, making an important contribution to sustainability and security of food supply. IV. The proposals would lead to a merging of the boundaries of Kenilworth and Leamington. V. Similar proposals were rejected by the Planning Inspector less than six years ago. VI. Development would be skewed away from affordable housing in the centres where people work.
<p>Q-S10</p>	<p><u>Any other development strategy issues</u></p> <p>Please add any comments you wish to make about the development distribution strategy for South Warwickshire</p> <p>We would like to make the following additional points as there was not an option to expand on answers in the relevant sections:</p> <p>(S1) Without the Local Nature Recovery Strategy there is no guarantee that any green or blue corridors identified by SWLP will have a beneficial impact on nature. For this reason we suggest that neither options S1a or S1b are appropriate. It would be better to identify corridors <i>after</i> a strategy has been produced.</p> <p>(S2) Certain types of intensification in town centres should be supported for example the conversion of unused retail property, including upper floors, to provide housing.</p> <p>(S6) The statistical underpinning of this section is flawed. The 54% figure cited in favour of Green Belt development is, at best, misleading. This is not a representative figure because the respondents to the first consultation were not a representative sample. Analysis of respondents on this issue shows that 35% were developers and 10% were landowners or businesses, suggesting that only a small proportion of other respondents were in favour (see</p>

	<p>Consultation Statement January 2022, p275). This skew towards groups with a vested interest means that this statistic should not be used as justification for pursuing this strategy. We are concerned that improper analysis and misleading conclusions may be taken forward and used to provide evidence of exceptional circumstances for developing the Green Belt.</p> <p>Green Belt boundary review does not need to happen (from a policy perspective) and should not happen (from an environmental safeguarding and wellbeing perspective). If it were to happen, it should be part of a strategic West Midlands Review rather than a piecemeal exercise (West Midlands Land Commission, 2017).</p> <p>In view of all of this we argue that the process should be halted and the parameters of the Local Plan shifted so that Green Belt development is not assumed. The non-Green Belt growth options that were explored in Part 1 of the spatial growth workshops should be prioritised and communicated and the wishes of local residents should be listened to.</p>
<p>Chapter 5</p>	
<p>Q-E1.1</p>	<p><u>Growing the South Warwickshire economy</u></p> <p>Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?</p> <p>Yes No Don't Know</p>
<p>Q-E1.2</p>	<p>If your answer to E-1.1 is No, what would be a more appropriate approach to calculating future employment needs for this Local Plan?</p> <p>The HEDNA should be revised using more recent data to better reflect future economic and demographic projections both post-Pandemic and post-Brexit. Data from 2022 is too close to the emergence from the pandemic to provide a reliable trend. Revised data should then be used to inform the choice of spatial growth strategy.</p> <p>This logical ordering does not appear to have been followed in the plan process to date: the HEDNA was published in November 2022 and yet it seems the key direction for the spatial growth strategies were arrived at in September 2022 following the June/July workshops. This clearly places the cart before the horse and calls into question both the reasoning and motivation for publishing options reliant on Green Belt development as a focus for the new local plan proposals.</p>
<p>Q-E2</p>	<p><u>A low carbon economy</u></p> <p>Please select all options which are appropriate for South Warwickshire</p> <p>Option E2a: Include a policy which encourages businesses to be low carbon.</p> <p><i>This could be in terms of their use of materials, promotion of active travel initiatives for employees and the use of clean technologies in construction and in infrastructure delivery, their buildings, transport arrangements, supporting development of clean technology clusters close to innovation areas and identifying sites suitable for material reuse hubs to support a circular economy. The policy could also include prioritisation for businesses looking to use low</i></p>

	<p>carbon infrastructure such as renewable energy. This would be a new policy in response to the need to address climate change as neither Core Strategy or Local Plan currently has a specific policy on this.</p> <p>Option E2b: Do not include a policy encouraging businesses to be low carbon</p> <p><i>It is acknowledged that it could be difficult and costly for some businesses to become greener especially if it involves retrofitting. As there is still a strong emphasis on maintaining a thriving economy, it is important not to discourage businesses to the area.</i></p> <p>Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.</p> <p><i>This would help to brand South Warwickshire as a place where green businesses may wish to locate to. It would be a new policy in response to the need to address climate change.</i></p>
<p>Q-E4.1</p>	<p><u>Sustaining a rural economy</u></p> <p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option E4.1a: Include a policy supporting diversification</p> <p><i>This would set out criteria of how rural businesses and agricultural diversification will be supported. The policy could expand one existing policies and be a combination of what is currently in Stratford's Core Strategy and Warwick's Local Plan.</i></p> <p>Option E4.1b: Do not include a specific policy on diversification.</p> <p><i>This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.</i></p> <p>Q-E4.2: Please select the option which is most appropriate for South Warwickshire</p> <p>Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas</p> <p><i>This would encourage small businesses to be to grow in more rural areas of South Warwickshire which in turn would help to contribute and sustain the local economy.</i></p> <p>Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas</p> <p><i>This would need to be picked up under a much broader policy in relation to diversifying the economy as it is an important part of the economy given the rural nature of South Warwickshire.</i></p>
<p>Q-E10</p>	<p>Tourism</p> <p>Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?</p> <p>Yes No Don't Know</p> <p><i>Whilst Tourism is essential to the vitality of South Warwickshire, there are few aspects of tourism that have an effect on the spatial planning of an area. It is therefore proposed that tourism is addressed fully, within Part 2 of the South Warwickshire Local Plan.</i></p>

<p>Q-E11</p>	<p>Any other economic issues</p> <p>Please add any comments you wish to make about delivering South Warwickshire's economic needs</p> <p>Policies supporting small-scale employment opportunities are particularly important. They would help the development of opportunities in rural areas which in turn would support the diversification of the rural economy, and reduce the need for people to travel for work.</p>
<p>Chapter 6</p>	
<p>Q-H1-1</p>	<p>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?</p> <p>Yes No Don't Know</p>
<p>Q-H1-2</p>	<p>If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?</p> <p>The population growth analysis has been conducted too close to the emergence from the Covid-19 pandemic to generate reliable projections. It should be revisited to provide a better understanding of emerging trends. Following that it should be used in the correct order of process, to inform decision-making rather than being published afterwards to retrospectively justify decisions.</p> <p>Crucially, housing need should just be a “starting point” and local councils should work with their communities to determine an appropriate level. As the Secretary of State for Levelling Up said in his written statement (6.12.22):</p> <p><i>“It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.”</i></p>
<p>Q-H2-1:</p>	<p>What is the best way to significantly increase the supply of affordable housing across South Warwickshire?</p> <p>The current policy of requiring developers to provide 40% of houses that are considered to be affordable has failed to address the need for affordable housing and has contributed to the current housing crisis. Developers are too easily able to avoid this requirement. The way to address the need for affordable housing is for local authorities and housing associations to work together to provide affordable homes.</p>

<p>Q-H2-2:</p>	<p>Please select the option which is most appropriate for South Warwickshire:</p> <p>Option H2-2a: A single South Warwickshire wide affordable housing requirement <i>A single affordable housing requirement across the whole South Warwickshire area would provide a consistent approach across both Districts. This results in the most certainty – for developers, greater certainty in anticipating their costs; and for Councils, greater certainty in anticipating delivery of affordable homes. However, this approach would not reflect variations in value, or variations in affordable housing demand, in different areas of the Districts. This could result in a greater level of challenge on viability grounds in areas with lower house prices, and missed potential for affordable housing delivery in areas with higher house prices.</i></p> <p>Option H2-2b: Separate affordable housing requirements for Stratford-on- Avon and Warwick Districts <i>Separate affordable housing requirements for each District would go some way towards reflecting local requirements and local viability calculations. It would provide a reasonable level of certainty for developers and Councils. However, the District boundaries are unlikely to be the most accurate way of reflecting of variations in value, or variations in affordable housing demand, in different areas of South Warwickshire.</i></p> <p>Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire <i>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.</i></p>
<p>Q-H2-3</p>	<p>How should South Warwickshire best address the specialist needs for older people?</p> <p>(i) Encourage right-sizing, encourage the redevelopment and upgrading of older housing units to meet modern requirements for heat, light, power and accessibility.</p> <p>(ii) Improve infrastructure and facility provision around existing smaller housing stock-units to meet the 20 minute neighbourhood criteria.</p>
<p>Q-H4-1</p>	<p>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?</p> <p>Yes <input checked="" type="radio"/> No Don't Know</p>
<p>Q-H4-2</p>	<p>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.</p> <p>Accommodating shortfalls provides an avenue for avoiding the recycling of industrial and brownfield sites within the greater West Midlands conurbation and encourages the extension of urban sprawl into precisely the area designed to (i) contain it and (ii) encourage sustainable and responsible land use.</p>
<p>Q-H4-3</p>	<p>If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?</p> <p><i>You may wish to refer to the spatial growth options, Green Belt and potential for new settlements sections to help you answer this question.</i></p> <p>Government Policy states that it is not necessary to review and release Green Belt land</p>

	<p>at all. It is a vital resource which is currently undervalued in the SWLP.</p> <p>Releasing land from Green Belt in South Warwickshire to meet housing shortfalls elsewhere creates a false supply as well as irreversible harm to the Green Belt which would set a precedent for continued erosion whenever the need arises.</p> <p>Housing shortfalls should first be directed within the boundaries of the areas within which they are expected to service employment and economy. If further housing needs are required, they should sensitively contribute to local economic growth. In reference to Green Belt and rural areas they should be required to maintain a rural link to encourage rejuvenation of local character and contribute to the future stewardship of those areas or protect their heritage. Expansion of the conurbation would have significant detrimental impacts on the character, environment, biodiversity and national contribution to food production of these areas.</p>
<u>Chapter 9</u>	
Q-W4	<p>Please add any comments you wish to make about a healthy, safe and inclusive South Warwickshire</p> <p>In its list of types of open space, section W4 does not mention public rights of way through the countryside. These are a valued feature of the Green Belt land north of Leamington Spa.</p> <p>In surveys residents say that the open Green Belt location is the thing they value most about living in the area, with benefits for both physical and mental health. It is easily accessible on foot from North Leamington so many people can access the public rights of way across the fields. Use of these footpaths increased markedly during lockdown and has continued since. During lockdown walkers raised over £2,500 for a charity chosen by the farmer to acknowledge the work done in maintaining the access to the countryside.</p> <p>The high quality agricultural land is now farmed by a single modern, established farming business. The combination of this working farm, with its wide range of crops and modern farming equipment working the fields, together with the Victorian farming village at Old Milverton is a significant recreational and educational asset for the population at large.</p> <p>Strategic Objective 5 seeks to “protect what already exists” however each one of the five spatial growth options would remove this highly valued local resource forever.</p>
<u>Chapter 10</u>	
Q-T4	<p>Please provide suggestions for how smart cities technologies could be supported in South Warwickshire</p> <p>Be proactive and ensure that everyone has access to super fast broadband as it facilitates home working which in turn can reduce carbon emissions from commuting.</p>

<p>Q-T5</p>	<p>Please add any comments you wish to make about a well-connected South Warwickshire</p> <p>It is difficult to see how the concept of 20 minute neighbourhoods would work in any proposed new development on the edge of the existing major settlements where these areas themselves do not meet the criteria. Such developments would have to be of sufficient size to include the provision of retail, health, education and employment facilities as well as housing to accord with this concept.</p>
<p><u>Chapter 11</u></p>	
<p>Q-B1</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District <i>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.</i></p> <p>Option B1b: Remove Areas of Restraint designations <i>Remove the Areas of Restraint from Stratford-on-Avon District and continue without them within Warwick District. Open areas of land that serve to preserve the structure and character of settlements will be considered by other means.</i></p> <p>Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District. <i>This option sees a continuation of the current approach. Stratford-on-Avon would maintain its Areas of Restraint and Warwick District continues without this designation. This would result in a disjointed approach.</i></p>
<p>Q-B3</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B3a: Introduce Special Landscape Areas across all of South Warwickshire <i>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.</i></p> <p>Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District <i>Keeping Special Landscape areas within Stratford-on-Avon District and not introducing them within Warwick District would lead to a disjointed approach, but one that maintained the status quo.</i></p> <p>Option B3c: Discard Special Landscape Areas and bolster general landscape policy <i>Discarding Special Landscape Areas within Stratford-on-Avon would bring it in line with the approach of the existing Warwick Local Plan. If this approach were taken forward developments would be considered using a general landscape policy.</i></p>
<p>Q-B5</p>	<p>Please select the option which is most appropriate for South Warwickshire</p> <p>Option B5a: Explore and pursue an integrated Environmental Net Gain Policy <i>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</i></p>

	<p><i>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.</i></p> <p>Option B5b: Explore environmental net gain through separate policies <i>A more targeted, and arguably less flexible approach to Environmental net gain would be to have separate polices for Biodiversity Net Gain, Air Quality, Water Quality and Carbon Capture. With each policy having its own requirements. Each ecosystem service would be viewed and dealt with in isolation, risking a disjointed approach. As per the Environment Act, a minimum 10% Biodiversity Net Gain will be required as part of this approach.</i></p> <p>Option B5c: None of these</p>
<p>Q-B6</p>	<p>Should the South Warwickshire Local Plan introduce Wildbelts designations? Yes No Don't Know <i>Designate areas of Wildbelt across the Local Plan Area to support nature's recovery and the Wildlife Trust's goal to have 30% of our land and sea managed for nature by 2030.</i></p>
<p>Q-B8.1</p>	<p>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 No Don't Know <i>Agricultural land is graded 1-5 according to its quality and versatility for producing a range of crops. The 'best and most versatile' land (grades 1, 2 and 3a) is that which is most flexible, productive and efficient.</i></p>
<p>Q-B8.2</p>	<p>When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?</p> <p><i>If an area is high quality agricultural land, its continuance as such should be prioritised over development. Government policy is clear that food production and farming contributes to sustainable development. In terms of agricultural land quality, areas B12 and B13 (Leamington North East and North West) comprise Grade 2 and Grade 3a agricultural land (except for a minor strip of Grade 3B). The land making up these sites is, therefore, considered to be a scarce resource with a degree of quality. The government seeks to protect against the loss of this land from development. The NPPF is clear that 'Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'.</i></p> <p><i>With the need to improve national food security the plan should include a policy that keeps land grades 1, 2 and 3a under cultivation and not used for other purposes.</i></p> <p><i>There is an opportunity to maximise and regenerate the contribution of Green Belt designated land in this instance. It would work well in conjunction with emerging land stewardship schemes, wildbelts designations and the promotion of biodiversity net gain.</i></p>
<p>Q-B9</p>	<p><i>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.</i> Yes No Don't Know</p> <p><i>Sites of national importance are protected by national policy, so duplication of that policy is not strictly necessary in the SWLP. However, as SSSIs form part of a hierarchy of protection, it makes sense in this case to reference these sites within the plan. The current policy approaches in Stratford and Warwick are broadly similar but not identical. Each policy covers a slightly different selection of non- designated biodiversity or geodiversity assets, and there are</i></p>

	<i>variations in the level of flexibility given for balancing harms against the benefits of development. This option applies the policy to a broad range of non-designated assets, and includes flexibility while providing a high bar intended to minimise adverse impacts on these sites.</i>
Q-B10	<p>Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire</p> <p>Safeguarding of sites would work well in partnership with the SLA approach, wildbelt and other issues above, especially if applied to existing areas within the Green Belt; an area whose contribution to geo/biodiversity is often overlooked as unimportant in the face of development requirements. The opportunities for secondary and tertiary contribution to biodiversity and the impact on human health, wellbeing and agri-environmental productivity could be tremendous.</p>
Chapter 12	
Q-P1.1	<p>Do you agree with the proposed broad content of the Part 1 plan?</p> <p>Yes No Don't Know</p>
Q-P1.2	<p>If no, please indicate why</p> <p>There is a fundamental flaw in the approach that has been taken so far. This means that the Part 1 plan is built on a false premise which assumes that Green Belt development is necessary.</p> <p>This premise is false because:</p> <ol style="list-style-type: none"> I. It is not in line with current Government policy. II. It is not based on a realistic and current assessment of housing need. III. The evidence generated to support the premise is derived from desktop studies which do not reflect local realities or the value placed on an area by a local community. IV. It uses data from the part 1 consultation in a misleading way to suggest local support for Green Belt development. V. It fails to recognise and value the contribution of Green Belt land. VI. It fails to recognise and value the contribution of high quality agricultural land at a time of food insecurity. VII. It gives no visibility or weight to options which would avoid Green Belt development. <p>To reiterate our response to Q-V3.2 we believe that the SWLP planning process should be halted while the background and options are revisited in light of the national policy direction on the Green Belt.</p>
Upload supporting documents	<p>Two documents have been uploaded to the portal and are attached in the email as pdfs.</p> <ul style="list-style-type: none"> • Supporting Document (A) Summary of comments from those using fields during lockdown • Supporting Document (B) Analysis of North Leamington Green Belt sites