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RESPONSE TO THE 53 QUESTIONS POSED IN THE SOUTH WARWICKSHIRE LOCAL PLAN STAGE 1 – SCOPING AND CALL FOR SITES CONSULTATION

1. Do you agree that we should prepare a Local Plan for South Warwickshire? If not, why not?

Yes. We note that both the existing Warwick District Local Plan and the Stratford-in-Avon District Core Strategy will remain in place until a new Local Plan for South Warwickshire is formally adopted. However, there is merit in a new Local Plan for South Warwickshire, for consistency of approach over a larger area, provided that the process allows effective public participation, and that this participation includes on any higher-level agreements with adjacent local authorities.

2. Do you agree with our approach of starting with a high-level, strategic part 1 Local Plan? If not, why not?

In part. This new Plan will evolve from the two existing plans referred to above, as circumstances – principally at a national and global level – have changed the Agenda. The challenge of climate change has moved to the fore and needs to underpin this new document in a more robust way than the previous Plans.

We believe that combined with a revised high level approach, both Councils should be cognizant of existing Neighbourhood Plans and incorporate these into their new Plan. This will build the complementary “bottom up” approach to the top down approach demonstrated in your document, The Part 1 Plan should be kept to a reasonable length and avoid supporting text to policies becoming too long, as is the case in the two adopted Plans.

3. Do you agree that the Local Plan should run to 2050? If not, what alternative end date do you suggest and why?

No. The existing Warwick District Local Plan was adopted in 2017 and runs until 2029. The Stratford-on-Avon Core Strategy was adopted in 2016 and runs to 2031. But in under five years a comprehensive replacement of them is under way. The climate change emergency, and changing work patterns as a result of the Covid pandemic, have already changed the way that planning is approached in that short time. The scale of changes over the next three decades to 2050 will on this example be considerable. The SWLP cannot

possibly plan for such a long time ahead, and a much shorter timescale is therefore more appropriate in these circumstances: not beyond 2035. Plans have to be reviewed every five years under current legislation; the SWLP will be replaced well before 2050.

4. Do you agree that this is the right evidence that we need to inform the Local Plan? Is there further evidence that you think will be required?

Your evidence base excludes any reference to Waste Recycling and Landfill Management; these need to be listed. Furthermore, there is no reference to a Tourism Strategy for South Warwickshire, nor to Air Quality Management. Although the document recognises that both Councils have declared Climate Emergencies, it makes no reference to, for example, Warwick District's Climate Emergency Action Plan. This needs to be included.

5. Do you have any comments on the impact assessments that accompany the South Warwickshire Local Plan?

Impact Assessments must be transparent, holistic in approach and robust in measuring achievable outcomes. Timescales for monitoring various impacts should also be included. The tests for the value of impact assessments would be:

- How are you going to measure / assess the Impact of the Plan?
- What corrective action is planned if the actions are falling short?
- How will voters in South Warwickshire be advised of the Impact of this new Plan?

We would add that the current plan consultation document is not consistent with the Climate Change Impact Assessment (see below).

6. Please tell us about specific sites you wish to promote for: (uses listed in question)

CPRE does not advance or promote any sites for any form of development. We would on the contrary question the emphasis placed on the 'call for sites'. Nationally in England, there is now more than enough land with planning permission; there are permissions for over 1 million houses which have not started construction. The consultation volume does not give these figures for Warwick and Stratford Districts; CPRE recommends that existing permissions are used before any further development is considered.

The large number of unimplemented permissions for new build development indicates that the housing permitted is not actually required, and is more use to developers as undeveloped land with permission (land banks), assets that enable them to increase company value and share price.

The call for sites should also seek proposals for tree / hedge planting. Warwick District Council has an existing commitment to plant 160,000 trees, one for each resident. Stratford-on-Avon District Council should be doing the same. The tree-planting necessary in light of the Climate Emergency requires proactive land-use planning in order to ensure that the right trees are planted in the right places. The way the current

consultation is worded leads to the public believing that sites are needed just to provide new jobs and houses, so sites required for tree planting are unlikely to be brought forward. The Plan needs to reflect this need.

7. Do you agree that the South Warwickshire Local Plan should address social isolation and loneliness? How should this be done ?

CPRE suggests that the best way of addressing this social concern is at a local level, where local voluntary / church groups can be very effective. Local grants to assist such organisations should be offered, and Parish and Town Councils are often well placed to assist with such initiatives. Some of the needs identified above, such as improved public transport links and ensuring adequate green spaces and community centres are provided in all new developments can be provided through planning conditions and S106 Agreements, but beyond this local authorities should devote resources to improving and not impoverishing essential services.

8. Do you agree with encouraging connectivity and ensuring key infrastructure is in place to support this? How should this be done?

Yes. Although the consultation document at times recognises the importance of electronic communication as an essential part of connectivity, at other times it seems to equate connectivity with travel. The Covid19 pandemic has accelerated the use of electronic communication as an alternative to travel and this trend must be fully encouraged throughout the plan in order to tackle the Climate Emergency. It also needs to be accessible across all rural areas within South Warwickshire. Currently superfast broadband is only available to those small businesses and individuals in outlying areas who pay the extra costs to BT.

9. Housing types and tenures: Do you agree that the Local Plan should seek to address these issues? If not, what is your alternative? Are there any particular approaches that we should consider?

Yes. On page 21 of your document you state “Warwickshire has... a higher level of homelessness than other areas in the UK”. This would suggest that the current housing supply does not match demand. It is our contention that there is sufficient larger / family style private housing. What is in short supply are affordable homes and family homes available for longer term rental (Housing Association or local authority rented housing).

The nationwide crisis in social housing is due to Local Authorities not building any such housing, over a long period of time. During this period a vast number of tenants have taken advantage of their right to purchase their home after just 5 years’ occupancy – for half its real value. This situation and distortion of the housing market is grossly unfair to those Local Authorities who recognise their responsibility in this area and to individuals who search in vain for a home at an affordable rent. Local Authorities such as Stratford in conjunction with housing associations and the Rural Housing Associations that have delivered housing in Stratford District in the past should re establish their role of

providing rented housing for those who work in their area.

As stated in answer to Q.6 above, we would wish to see the development of all sites where planning permission has been granted for new homes but not built by the developer, prior to granting more permissions. Developers holding land in this fashion should not be granted any further permissions until any lack of completions is appropriately addressed.

It is essential that a robust review of the number and type of housing is undertaken. It is questionable whether South Warwickshire, based on the experience of North Warwickshire, really does need to accommodate an overspill of housing from the Coventry City Council area. The 2021 Census should give a new clear picture and its results must be used. It should be noted that the Statistics Regulator has recommended, at the request of CPRE Warwickshire, a review of the ONS (Office for National Statistics) population projections. The exaggerated population projections for Coventry made by ONS have resulted in projected unmet housing need numbers, leading to a large tract of Green Belt land in the north of Warwick District losing this special status. Nuneaton and Bedworth Council now no longer recognises Coventry's unmet housing need numbers – and we urge the South Warwickshire Joint Plan to do the same.

10. Do you agree that the strategic design principles above should inform directions/ locations for growth? If not, why not?

Section 4.3 of the consultation document equates connectivity with travel. As noted above, improved electronic communication should be given a higher priority than travel in a Climate Emergency. Reducing all motorised transport is essential in order to meet the carbon net-zero target.

11. Do you agree with the emphasis on connectivity? If not, why not?

The emphasis should be on improving infrastructure such as fibre-optic cable to premises and 5G coverage, particularly in rural areas, rather than motorised travel.

12. Do you agree that the Local Plan should seek to explore ways in which the reliance on the private vehicle may be reduced? If not, why not?

Yes. However, this will only work if there is a viable alternative available for people. 'Park and Ride' has not proved viable: one of the two Stratford-upon-Avon P&R sites has closed, the remaining one is poorly used, and the proposed P&R for Warwick and Leamington provided for in the 2007 Warwick District Local Plan was never implemented. Better cycling provision in all the towns of South Warwickshire should be a priority. Smaller buses, which would be better suited to our rural country lanes, could run more frequently and cost effectively than the larger buses currently operating. All of these potential solutions should be thoroughly investigated.

13 . Do you agree that enhancing connectivity and prioritising active and sustainable travel are the best ways to achieve this?

As explained above, the emphasis should be on improving electronic communication instead of motorised travel. Lack of access to frequent public transport, including to schools, renders housing development unsustainable – and increases car dependence.

14 Are there any additional transport issues or priorities you think that the Local Plan should address? Please explain your answer.

The growth in the home delivery model, which really escalated during the covid 19 pandemic, is not likely to disappear, and we should therefore expect to continue to see more delivery vehicles in our towns and on country lanes. If this behavioural change becomes the new norm, then we would ask South Warwickshire Council(s) to work with and through the LGA to ensure that all delivery vehicles are electrically powered to mitigate the carbon footprint of this activity.

15 Do you agree that the Local Plan should seek to improve infrastructure, such as charging points, for electric vehicles and e-bikes?

Yes. Experience has shown that the current approach to provision of EV charging points is not sufficient. Too often, charging points have been provided (e.g. through S106 agreements) but not maintained. Hoping to use an out-of-order charging point is counter-productive in encouraging the use of electric vehicles. It is essential that long-term maintenance of charging points is committed.

16 . Are there any other ways you think the Local Plan could encourage the increased uptake of electric and other low-emission vehicles?

This is not a role for the Local Plan. However, it would be a role for the Local Plan to enable the necessary infrastructure to support such an initiative.

17 Do you agree that the South Warwickshire Local Plan should seek to diversify the local economy by supporting growth in new industrial sectors? If not, what other ways should the Local Plan support economic growth?

We can see no justification for such a policy within the Local Plan. The workplace for many people has changed as a result of the covid-19 pandemic and is forecast to reduce the need for office space, as more people continue to work from home, either full or part-time. There is no justification for local authorities to attempt to 'plan' economic growth; the market will be a better facilitator of new industries within the local economy. The Local Plan should aim rather to enable their success once the market for such new business has been identified and established.

18 Do you agree that new employment opportunities should mainly be focussed in existing employment locations? If not, what other locations should be considered?

Yes. No new allocations of greenfield land for industry should be made. Industrial activity should be confined to existing employment land and to brownfield sites.

19 . Do you agree that the affordability of employment land and premises is a key issue that the Local Plan should address? If not, why not?

The market will determine the value of employment land; the Local Plan can best work to maintain affordability by policies to resist conversion of such land to residential. Where the Local Authority is the landlord, they must be alert to fluctuations in the market.

20 Do you agree that the Local Plan should seek specific opportunities to support small and emerging businesses? If not, what do you suggest?

More and more SMEs are critically dependent on electronic communication so the focus should be on improving this infrastructure, in particular to support the rural economy.

21 Do you agree that the Local Plan should seek to build on South Warwickshire's existing cultural and heritage assets in order to enhance the economy? If not, what alternative do you suggest?

Yes. South Warwickshire is a beautiful area of the county with a rich and varied cultural heritage, which should be preserved and protected. On the whole the owners and managers of these assets will be the best judges of how their appeal can be widened.

The Local Plan's policy towards cultural and heritage assts should be to protect these from harm and deterioration of their settings, by resisting new development that would harm these.

22. Do you agree that the Local Plan should aim to reduce skills 'leakage' and provide greater opportunities for education and training? If not, what alternative do you suggest?

Today's economy requires people to have a varied skill set, as most people will now undertake a number of different roles during their working life. Within the education and training sector there is a need to equip people with generic skills eg IT and the specialist skills required by our larger employers. Connecting and delivering these will be instrumental in maintaining the strength and success of the local economy.

What the consultation volume describes as 'the skills leakage' is a somewhat parochial description of those who have chosen to broaden their career and life experience further afield. Warwick University run a wide variety of the type of courses required as do a series of small private businesses. Their existence could certainly be recognised by both local authorities but valuable resources should not be expended on them.

23 Do you agree that the Local Plan should seek to adapt to the changing role of town centres? What do you suggest ?

Yes. The growth of internet shopping, and the commensurate rise in home delivery services, has changed the shopping experience of town centres. Town centres will need to adapt to this as fewer people will be drawn into town centres for the shopping experience alone. Creative thinking will be required to make our town centres attractive places to visit. These could include: pedestrian only areas, plenty of greenery to make the open spaces attractive, outdoor seating, accessible WC facilities, local artwork, local markets, street entertainment etc.

The Covid19 pandemic has also accelerated the move away from commuting to offices in town centres and towards remote working. The Local Plan must recognise this and enable more flexible use of existing buildings. Rather than building more new housing, the emphasis should be on the re-use of retail and office space for social housing. This approach is consistent with the so-called Densification option, which is the only option consistent with net-zero (see below).

24 Do you agree that congestion and the car-dominance of town centres are key factors to address when considering how town centres can be enhanced? If not, what alternative factors should be addressed?

Yes. Vehicle noise, air pollution and irritated drivers are detrimental to the experience of enjoying the range of benefits that could be offered by traffic-free town centres

WHO Regulations should be adopted on air quality, necessitating regular testing adjacent to schools and known congestion points.

25 Do you agree that the provision of sufficient utilities infrastructure is a key issue for the Local Plan to consider? If not, why not?

This is not a Local Plan matter, for the most part. Most utilities are provided by the regulated private sector, not public authorities, and there is a statutory duty on these regulated companies to provide the infrastructure.

26 Do you agree that the Local Plan should encourage the use of the 'energy hierarchy' in developments, aiming to reduce the use of energy in the first instance wherever possible? If not, what approach do you suggest?

Using less energy is the most beneficial way to reduce our overall carbon footprint. However, to achieve this will require behavioural change as well as technological change. The use of the Energy Hierarchy should not be restricted to new developments, but should be applied to all existing public buildings to maximise its effect. The plan should also encourage the use of the waste hierarchy, for example in construction using recycled aggregates rather than land-won aggregates.

27 Do you agree that it is important to protect natural resources and that mineral resources are extracted before development commences?

Yes, it is essential to protect natural resources. However, extraction of mineral resources

is exploitation rather than protection; the emphasis should be on use of recycled minerals, not on the energy-intensive extraction of minerals from currently open countryside.

28. Is it important to ensure that the development of best agricultural land is avoided wherever possible?

Yes. However, all agricultural land in South Warwickshire is valuable, and its value could be increased by planting hedges, many miles of which have been removed over a number of years. This would have the benefit of reducing soil erosion, absorbing carbon from the atmosphere, reducing flooding, increasing biodiversity and, with sustainable management practice, feeding the population. All of these benefits provided by agricultural land should be maximised and as such we should not be taking any agricultural land, whatever its grade, out of production and building on it – as the environmental benefits are lost. The environmental / carbon absorption benefits of green land reinforce the need for developments to be built on brownfield sites, where the climate change mitigation ability has already largely been lost.

29 Do you agree that development should provide compensatory measures / enhancements to compensate for their impacts (including biodiversity offsetting/ landscape restoration)? Are there any other matters that should be considered?

Yes. Any biodiversity offsetting should be both substantial and sustainable – the climate emergency is now such that tokenism in this area will add to the climate problem, not actively contribute to solving it. Stratford on Avon District has been chosen as one of the areas in which to experiment with this potentially exciting and rewarding idea. Although substantial sums have been removed from developers unfortunately the take up from landowners has been pitiful resulting in a huge biodiversity loss. Theoretically developers are entitled to a return of a proportion of the money paid by them. However many is the instance all over the country where Section 106 agreements are not honoured by developers, often with the tacit approval of the local authority. These are all examples of why the necessary infrastructure should be in place before any housing development begins.

It is not clear in the consultation volume exactly how one can effect such an offsetting arrangement, but we would stress that it needs to be scientifically proven, robust – and above all, enforced.

Too often, offsetting is adopted as the easiest course rather than the last resort. Offsetting can often be the trading of assured destruction now with the hope of benefits at some stage in the future.

30 Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?

Yes. The importance of green areas in absorbing carbon, and therefore acting as a carbon

sink, cannot be under-estimated, and the Local Plan should prioritise greening public areas over concreting them. This should be a condition in any new development and in should be combined with an educational programme for the general public on the importance of green space – of whatever size – in helping to address our climate emergency

31 Do you agree that wherever possible and practical, large-scale developments should also deliver substantive areas of green space (such as country parks etc.)?

Yes. The pandemic has taught us the value of green space to people's mental health and wellbeing, and green space which is accessible to the population, together with wilder areas to encourage biodiversity, should be a condition of all developments, not just large scale ones. Provision of green space is not a justification for allowing development, whatever the offer from the developer, if the location proposed would be harmful to the landscape or is unsustainable development.

32 Is tree planting an important issue that the Local Plan should seek to encourage? How should the Local Plan achieve this?

Yes – absolutely. This should also include hedges, because of their value in enabling biodiversity, limiting soil erosion etc, as described above.

We are disappointed to note that, in your call for sites, you do not refer to sites for tree / hedge planting. In our view this is a grave omission in the Plan. Warwick District Council have an existing commitment to plant 160,000 trees, one for each resident. Stratford upon Avon District Council should be doing the same and protecting our existing woodland against development which is equally important.

In our view this should be a top priority in your new Plan because of the associated carbon offset benefits, as well as the beneficial impact on the general health and wellbeing of the population.

33 Do you agree with the proposed ways in which the Local Plan should tackle climate change? What other ways can the Local Plan help us achieve Net Zero Carbon?

Some of these measures will help but are unlikely to meet the carbon reduction targets in themselves, partly because of the timescale required to implement them and the associated cost. The Plan should not support the generation of renewable energy in the countryside (as is implied on page 52). Wind turbines are intrusive and generate little electricity relative to the harm that they cause to local landscape. Solar panels also harm the landscape, and use good quality agricultural land unless confined to factory and farm building roofs. Anaerobic digesters generate lorry and tractor-trailer traffic on minor roads and thus have impacts that outweigh their benefits.

The Plan makes no reference to removing carbon from the atmosphere, which is just as important a strategy as reducing the amount of new carbon added to it. The proposal to retrofit existing buildings is a good one – but who pays? Tackling climate change and

achieving Net Zero Carbon will require significant green investment and behavioural change – the Plan makes no mention of these essential requirements to achieving this aim.

Handling flood risk is not best done by 'mitigation' measures . Flood risk means that new housing should not be in flood plains or locations which have a record of flooding. The Plan should have a clear policy to resist development on land that has a record of flooding.

34 . Do you agree that flood mitigation should be a major priority for the Local Plan when delivering new housing? How should the Local Plan achieve this?

Handling flood risk is not best done by 'mitigation' measures . The current extent of flood risk (which is serious in some arweas, as noted at page 55) means that new housing should not be permitted in flood plains or in locations which have a record of flooding. The Plan should have a clear policy to resist development on land that has a record of flooding.

Please see our attached case study on the impact of new housing in Welford upon Avon. Planting trees and hedges in appropriate locations will help alleviate the impact of flooding, as some of the water will be held in the root systems. Streams and rivers need to be allowed to wind, rather than be straightened out, as this helps to slow the rate of flow and build up of water.

The water infrastructure needs to be of sufficient capacity to capture all potential flood water – and it goes without saying that such infrastructure will only operate effectively if it is properly maintained.

Water companies used to have a responsibility to maintain rivers and their banks and were given money to do so. It is now left to riparian owners, who do not have any legal obligation to do so. This is a major contributory factor to flooding. Blockages occur, trees fall across the river etc. This impedes the activities of those who use the river for recreation: anglers, canoeists, kayakers etc.

The companies also have a duty to regularly check stretches for water purity enabling them to identify fish stocks and locate sources of water pollution enabling them to take prompt action. It is not apparent that any of these duties are being carried out on a regular basis. It is open to local authorities to exert pressure on water companies to discharge their responsibilities in this area.

35 Do you agree that the provision of health facilities should be a major priority when delivering new housing? How should the Local Plan achieve this?

The statistics revealed in relationship to the existing population are truly shocking and need to be addressed regardless of any further development. In a liberal democracy how does one attack obesity? We do not know the answer but it certainly cannot be ignored. (Yes, if such new housing is necessary.) Future applications for housing development in areas where there are no medical facilities in the vicinity can and must be refused.

How much a Local Plan can do is open to question. Health service providers frequently fail to deliver health clinics and doctors' surgeries despite these being specified and land set aside for them in Site Allocation Plans and in planning permissions. There are regular examples of where the requirement for health facilities set out in Plans have not led to any provision by the NHS.

36 Do you agree that the South Warwickshire Local Plan should look to address congestion in town centres in order to improve air quality?

Yes – absolutely. The impact of poor air quality on the health of the affected population has been medically proven to be detrimental, and so addressing this should be a high priority in this Plan.

The Plan will only succeed in removing congestion from town centres if viable alternatives are provided for residents and visitors. Achieving this objective is also likely to require behavioural change.

37 . Do you agree that the Local Plan should prioritise and support additional guest accommodation in South Warwickshire?

Additional guest accommodation should be achieved through re-purposing unneeded buildings (e.g. redundant offices and shops).

38. Do you agree that the provision of education facilities should be a major priority when delivering new housing?

Current problems with schools underline the importance of building the necessary infrastructure first before any homes are built and imposing that requirement on developers before any new houses are built or occupied.

39 Do you agree that the four overarching principles will deliver the South Warwickshire you want? If not, what changes would you like to see?

The Plan is lacking a vision for the (holistic) environment of South Warwickshire. This area is blessed with a beautiful natural landscape and many attractive buildings. There appears to be no call for them to be preserved or protected. The call is for unrelenting economic growth heedless of its damage to the environment and to climate change. There is a total failure to recognise that these ambitions are totally irreconcilable and that we are currently heading for continuing and growing biodiversity loss. The government proposal of “Build Back Better” and to aim for 'beauty' in buuildings appears to be missing from this strategic vision. To see how insistence on maintaining existing standards of design and building in character can be achieved you only have to cross the boundary in to Gloucestershire. The call to enhance the environment contained within NPPF should be echoed by all local authorities.

40. Do you agree with this approach to establishing visions for those key places identified in the South Warwickshire Local Plan?

Where there is an established housing need it is going to be far easier for it to be accommodated within our existing town centres close to essential services.

What is missing from this section is a vision for green places to accommodate new trees and hedges.

41. Do you agree that these should be the strategic objectives for the Local Plan? Are there any others?

Most of these objectives are sound, but a few would conflict with others. Notably, 'Connecting people to places' would in practice support provision of more road space and encouraging more road traffic.

42 How do you think we should best address the affordability of housing?

It should be obvious by now that relying on an increased supply of houses to improve affordability has failed the large sections of the population which are supposed to be assisted by it. The figure of 'need' for 1,232 houses per year of needs careful examination and the methods of calculation fully exposed. It would appear to contain a good deal of what developers' agents' term 'ambition' and double-counting if unbuilt permissions are being excluded. Are the latest ONS figures being applied? Are existing empty houses being placed in the equation?

The problem of providing affordable homes to buy-and-let should be removed from major developers, who have repeatedly abused their bargaining position as described above and given to local builders working with housing associations and the Rural Housing Associations.

Starting with this 'top-down' figure for number of houses to be built each year provided by government is highly questionable. The provision in the adopted Warwick District Local Plan 2017 to accommodate some of Coventry's requirement for new housing was not justified at the time, and should not be carried forward into the SWLP.

The Consultation states that further technical work is required to assess the size and types of homes required. In the short-term, we reiterate our earlier point that planning permission has already been granted for large numbers of houses which have not yet been built. Is this because they are not required? Building yet more houses, which may not be required, is detrimental to the environment and has a negative impact on our carbon footprint, and so should be avoided unless proven to be essential.

As a result of the pandemic, there is likely to be a significant number of redundant shop and office buildings that could be converted into starter homes / available for rent to low earners – and we would suggest that South Warwickshire should focus on this need, rather than building larger homes in the countryside, destroying valuable greenfield sites and adding to the problem of affordability, rather than addressing it.

43 If we are required to meet housing shortfalls from elsewhere, how best should we accommodate such shortfalls?

Any claimed shortfall requirement arising in another planning authority's area should be challenged. It is now very doubtful whether South Warwickshire, based on the experience of North Warwickshire, really does need to accommodate an overspill of housing from the Coventry City Council area. The 2021 Census should at last give a new clear picture, and its results must be used. It should be noted that the Statistics Regulator has recommended, at the request of CPRE Warwickshire, a review of the ONS (Office for National Statistics) population projections. The exaggerated population projections for Coventry made by ONS have resulted in projected unmet housing need numbers, leading to a large tract of Green Belt land in the north of Warwick District losing this special status. Nuneaton and Bedworth Council now no longer recognises Coventry's unmet housing need numbers – and we urge the South Warwickshire Joint Plan to do the same.

44 Do you agree with prioritising jobs by increasing employment opportunities and therefore potentially increasing the minimum housing requirement for South Warwickshire? If not, what alternative do you suggest

No. Addressing the need for home-working through adequate infrastructure and connectivity should be a priority, particularly in the knowledge economy.

This subject sounds depressingly like developers putting pressure on local authorities to increase the objectively assessed housing need figure for their benefit. The level of unemployment in South Warwickshire is low, and the effects of the pandemic have largely been kept within limits thanks to furlough; there is now a recovery. There is no indication as to how a local authority is going to increase employment opportunities which will only require new housing if they are recruiting from outside the district, a point developers tend to overlook.

45 Are there any locations in South Warwickshire where you have specific infrastructure concerns? Please specify

Rural areas of South Warwickshire should have access to broadband which provides the same speed and connectivity as that provided in urban areas of South Warwickshire.

46 Do you agree with the initial findings of the high-level Sustainability Assessment of the Growth Options? If not, why not?

No comment at this stage; resources and limited time do not permit detailed response on the SA in its present form.

47. Do you agree with the initial findings of the climate change analysis of the Growth Options? If not, why not?

The information offered in the Consultation volume is sketchy on this subject and does not offer any useable conclusions.

48 What is your favourite Growth Option and what do you particularly like about this option?

In the light of the climate emergency, and the need to maintain green space to both absorb carbon and contribute positively to people's mental wellbeing, densification / development on brownfield sites should be prioritised. Sites already granted planning permission should be used before any further development is permitted.

The Policy on Local Service Villages in the current Stratford Core Strategy (adopted 2016) were specifically designed to restrict development to an upper limit over the 7 year period of the plan; and originally development was to be phased. This was a sensible restraint which permitted local builders to carry out the modest additions to existing villages in small numbers: sometimes 1 or 2 a year only in any one village. This restraint was naturally disliked by developers and was soon abandoned by the District Council which gave permissions for many houses in a number of LSVs within a year or two of the Core Strategy's adoption.

On occasion, applications for housing on land lying outside the built-up area boundary of a Local Service Village were refused, but all too often approved on Appeal. By this means the policy in the Core Strategy was gradually undermined. Villages like Newbold-on-Stour and Welford-on-Avon have ended up with up to 140% in excess of their allocation. The total of 'about 2,000 houses' in LSVs was exceeded within a few years from the Core Strategy's adoption. half way through the term. Yet the Core Strategy Inspector in his report stated that more than about 2,000 houses built in LSVs would be unsustainable.

There is no longer any talk of restraint or the need for attendant services or infrastructure. The planning departments of both local authorities seem to be pro-development, against the wishes of the residents of both districts. The experience of the Local Service Village policy in the Stratford Core Strategy underlines how current policy is allowing too much housing, and in the wrong places.

49. What is your least favourite Growth Option and what do you particularly not like about this option?

CPRE Warwickshire opposes all the listed Growth Options A to G. All would appear to lead to greenfield housing development and increased road traffic.

50 . Do you agree that we should be considering densification as part of our Growth Option?

Yes. Densification is the best option and should be a Growth Option in itself. CPRE Warwickshire does not support any of the Options We do not like any of the other options as they will not properly address the issues raised in 48 above

51 Do you agree that we should be considering new settlements as part of our Growth

Option? If so, where in South Warwickshire should they be located?

No. The current 'new settlements' in the Stratford Core Strategy, at Gaydon-Lighthorne Heath and at Long Marston Airfield, are not sustainable locations, were not necessary, and should not be proceeded with further. They were not subject to proper public participation before being selected and the population and household projections on which they are based have since been shown to be excessive.

52 Notwithstanding your preferred Growth Option, do you agree that we should explore growth opportunities in Green Belt locations? If not, why not?

No. Once land in the Green Belt is removed from it and built on, it is lost forever. Again we emphasise the value of green land as a sink for carbon and a positive contributor in tackling our climate emergency – and its demonstrable value in enhancing people's health and wellbeing. To recommend building on environmentally valuable land, in the light of the emergency we face, will contribute to the problem, not address it. It may be claimed that carbon offsetting will be used in such cases. However, this is unlikely to justify such development once the true carbon cost of new buildings and their carbon footprint over their lifetime.

53 Are there any other options or approaches for meeting our development needs within South Warwickshire that we should consider? Please give details.

Please see responses to Q.48 and Q.50.