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The SWLP Team,
Stratford -on-Avon District Council
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Dear Sirs,

Re: Issues & Options. South Warwickshire Local Plan.

Thank you for consulting on the Issues and Options stage of the South Warwickshire Plan. I am writing on behalf of various clients, small builders and landowners who rarely get an opportunity to influence the forward planning process.

General Points.

Firstly, may I congratulate Warwick and Stratford Councils for continuing to work together on the combined Local Plan, despite the decision of the two Councils not to merge their two authorities after all. There is no doubt that 'South Warwickshire' is a more logical strategic geographical area on which to plan ahead for a Local Plan. A combined plan will also save time for everyone in engaging in what might have been two plans and also saving on Duty to Cooperate liaison between the two,

Secondly, it is impressive that both Councils have continued to press on with the joint review despite the uncertainty at national level on planning reform and especially in the light of the chaotic and confusing Planning Reform consultation paper which was circulated by DLUHC just before Christmas,

Thirdly, and on the other hand, this does raise questions about the future of Stratford DC's own 'Site Allocation Plan' which has already undergone 3 different iterations and, as yet, has not been formally submitted. This is worrying for those landowners and developers (such as two of my clients) who have 2 self-build sites 'marooned' within the latest Preferred Options SAP which apparently still has little weight within the planning system and yet they are promoted those sites at risk.

Company Number 9395504

Vision.

Issue V1. Vision for the plan: My clients positively welcome the vision as set out in the document broadly '*to meet South Warwickshire's sustainable needs to 2050 and where appropriate to reflect unmet needs from neighbouring authorities*'. We also welcome the desire to respond to the climate emergency – but are slightly unclear about what this will mean in the context of the overall vision. This ought to be made more clear in the accompanying text.

Issue V2. Vision for Places: I acknowledge the point that a 'standard' vision for places is probably inappropriate. Each 'place' will no doubt have its own 'Vision'. However, not all places have Neighbourhood Plans and I worry that some places, given the choice, will choose to resist change as a means of protecting their own comfy lifestyles rather than thinking about the future of the settlement or indeed the needs of subsequent generations. Category F settlements in Stratford for example, have a policy which resists any development unless it is 'community led'. This effectively acts as a nimby's charter to enable 'locals' to resist outsiders. It has been applied very effectively in Priors Hardwick recently to stop a sustainable proposal for a single cottage which had previously legitimately gained consent on appeal.

Issue V3. Strategic Objectives: I would broadly accept the strategic objectives, however the objective that '*new development does not cause an increase in carbon emissions*' seems wholly unrealistic. This seems a very high bar to achieve for every application to surmount.

Infrastructure.

Issue I1. Sustainability Appraisal: A sustainability appraisal is a useful but extremely cumbersome tool which tends to be user-unfriendly (in terms of relating the results to reality) and is ultimately based on subjective judgements which tend to ignore the costs of delivery or the quality of the outcome. The SA is incapable of thinking laterally and hence will often point towards standardised solutions. The SA results therefore need to be treated with extreme caution.

Issue I 2. Infrastructure Requirements: It is sensible that Local authorities should think about funding and delivery of strategic infrastructure to support major new development and ensure that this is derived from contributions from land value. However, there is also a need to think about protecting existing services and facilities in established rural communities and to spread development carefully to ensure that shops, pubs, schools and businesses are supported and where possible revived.

There is a clear danger that this Local Plan concentrates entirely on large urban extensions and new settlements so that problems and obligations can then be out-sourced to the private sector at the expense of existing communities – on the basis that the latter can look after themselves. This could be picked up under section 14 which at present just focuses on big-ticket items – like the M40 and HS2.

Issue I 3. Community Infrastructure Levy: Doubtless Stratford DC and Warwick BC will wish to include a CIL (or future IL) system for sourcing development funding, but they will need to; firstly, recognise that CIL funding is only for future development, (not for addressing existing shortfalls in funding), secondly, they need to be explicit and open about how money is spent, and thirdly, they should acknowledge that in practice, CIL does not overcome site specific requirements which may still be required under S106 to release sites. Above all, the Councils need to robustly test the implications of applying a CIL and recognise that smaller builders are not as readily able to support all the onerous infrastructure requirements (including BNG and other levies) which local authorities now expect. SDC and WBC need to pay more than lip service to the concept of supporting SME's.

Issue 1 4. Infrastructure Safeguarding: As mentioned above, protecting and safeguarding infrastructure should go beyond simply reserving land for major strategic projects but also thinking about protecting small scale infrastructure such as shops, pubs, schools and bus services which are the life-blood of so many rural communities. It is of concern that the Local Plan is becoming too 'centralist'.

Issue I 5. Viability and Deliverability: This is a major issue for smaller builders. The Councils will need to judge whether infrastructure expectations are realistic and whether schemes are viable. This will involve generic and specific testing. Too often strategic sites are allocated in order to achieve more expensive infrastructure and services from the value of the land – but by pushing for major strategic items, the level of affordable housing is often reduced. LPA's need to think more carefully about whether large new settlements are a more efficient way of delivering housing rather than established rural communities which are often then simply neglected. (Are new settlements simply a political choice to reduce the scale of objections from established communities and minimising the 'political pain'?)

Distribution Strategy.

Issue S1. Green and Blue Infrastructure: Sometimes there is a tendency for planners to over-complicate issues. Warwickshire is blessed with a wealth of countryside and waterways which clearly needs to be protected and incorporated into new development as 'green and blue Infrastructure' whether as corridors or not. These do not need to be re-invented just integrated where new development is envisaged.

Issue S2. Intensification: Development is better planned at a variety of densities depending on local circumstances. In an urban context, schemes should be designed at a density to support frequent public transport without undermining decent living standards. That may be feasible for new settlements and towns like Warwick, Leamington and Stratford, but is less feasible for the majority of Warwickshire's existing villages. Intensification may work well in some settings but shouldn't result in dense development with small gardens whilst developers are expected to provide large areas of wasteful public space which then have to be managed and maintained. Britain has some of the densest and smallest homes in the world. Planners have an unfortunate habit of pushing for increased housing densities – for other people!

Issue S3. Brownfield Land: It is a popular myth that there are substantial numbers of vacant brownfield sites waiting to be developed and brownfield sites can satisfy the needs for future growth. Recent work by Lichfield's for the LPDF shows that brownfield land is more limited in the regions which have high demand. Further north, brownfield land is more plentiful, but not in areas where people necessarily wish to live. Moreover, high density brownfield development can be more expensive and result in the loss of established buildings and embodied energy. In Birmingham, brownfield development has been targeted, but at the expense of affordable housing. Planning policy already steers development to brownfield land where possible, but this usually means losing industry and commerce which then re-sites on greenfield land on the periphery of towns. Warwickshire's countryside is now covered with distribution depots, especially along the A5 and at motorway junctions. Airfields may be suitable for new villages, but they too often tend to be open and windswept and difficult to develop. It is worth remembering that when PPG3 policy imposed a brownfield-first policy in 2000 (when both Stratford and Warwick Districts had Urban Capacity Studies and moratoria on development), housing delivery fell to its lowest level since the 1st WW. It took the Barker Review and 10 long years to recover. So a more balanced policy is the answer. This solution aligns with S3.2a.

Issue S4. Growth of Existing Settlements: Above all, the Council's should be aiming to provide a portfolio of different sites, in different locations throughout the Districts to meet peoples' many and varied housing needs. However, this aim seems to have become lost in the technical and somewhat 'sterile' analysis of the ideal '20 minute neighbourhood'. Sadly, even when facilities are nearby people will always walk to their destination. Sometimes nuclear and more remote rural settlements are better able to meet the '20 minute neighbourhood' ideal. Villages such as Napton or Stockton, with more minimal services (a shop, school and bus service) tend to have closer communities where shopping, schooling and social activities are all done within the same community. Similarly smaller settlements, such as Priors Hardwick and Priors Marston, with fewer services should not be allowed to wither and die. In every settlement, people may travel outside their village for higher order shopping and services and to meet people elsewhere, but the arrival of the internet and home working has changed people's living patterns so that rural living can be at least as sustainable as urban living. Covid lockdowns have taught us that.

The Sustainability Appraisal (SA) appears to have pre-selected 22 large rural settlements based on their technical perception of a 20 minute neighbourhood. It is very concerning that based on this, the Local Plan could just focus on the narrow range of settlements listed in Table 2 ignoring other suitable settlements elsewhere which could otherwise decline. There is no case for a rural de-population policy and the Local Plan needs to take a fresh look at the concept of sustainability to decide whether more rural settlements can benefit from modest levels of development which will help them survive and thrive. Otherwise, if smaller settlements and smaller sites are ignored, the SME builders will be disadvantaged and will eventually go out of business.

Issue S5. Potential for New settlements: It is clear from the nature and content of the text, that new settlements are the dream of the planners and politicians in Stratford and Warwick. They may have the advantage of:

1. Dealing with the infrastructure issues by passing responsibility onto the developers, and out-sourcing master planning and funding to someone else,
2. Solving housing needs by focusing development in one or two places, reducing the headache of deciding which settlements could take more,
3. Reducing political pressures and the scale of objections from people who would prefer not to have newcomers moving to their precious villages,
4. Raising the profile of the Local Plan by engaging in 'big-picture' planning instead of having to make difficult decisions about specific settlements.

However, although new settlements can have disadvantages:

1. They take decades to develop, much longer than either planners or politicians are often prepared to admit. Targets always slip and the developers are then blamed for poor performance and hoarding land,
2. They are 'resource hungry' since every element of infrastructure has to be provided from scratch and new facilities and services take time to bed in,
3. They mainly satisfy people who are looking for standardised dwellings and cater for the volume builders. The small local builders don't get a look in!
4. They deprive the existing settlements of organic growth meaning that they simply wither and die. The characteristics of the villages change – to elitist enclaves. It is a retro-grade step caused directly by planning policies.

In short, whilst I would accept that one or more new villages could form part of the Local Plan strategy, the advantages and disadvantages need to be properly explored. The potential locations (which are controversial) need to be properly assessed and the effect of new villages (such as F1, F2 and F3) need to be assessed in terms of their effect on existing settlements. Above all, any new settlement should be part of an overall portfolio which relieves pressure from settlements experiencing over-development – not as forming the central plank of housing policy – nor replacing modest development in rural communities. New settlements should be readily accessible by public transport (preferably rail and bus) and realistic in their build programmes. Councils should not fall into the trap of South Worcestershire Councils where well over half of their housing provision is focused on new villages and major urban extensions which have little or no chance of being delivered within the Local Plan timescale.

Issue S6. Green Belts: It is logical that there should be a comprehensive strategic review of green belt boundaries in looking for future development and this will need to occur as part of this Local Plan. In practice however, Government seems to be tightening the scope for green belt review within their national Planning Reform proposals. But in the Local Plans area, several railway stations lie wholly within the green belt and it is sensible that they should be explored as potential settlement locations and not restricted from new development. On the other hand, there are many settlements outside and beyond the green belt which are also suited for new housing lying to the south of Leamington and Warwick.

Issue S7. Refined Growth Options: None of the Growth Options are mutually exclusive. They cannot possibly be. One could not base a planning strategy purely on rail-based development (at one end of the scale) or dispersal (at the other). Most of the potential strategies are in fact variations on a different theme. Clearly any strategy must attempt to provide an 'emphasis' and ensure that the overall level of housing and economic needs are accommodated. In addition, no strategy should leave rural settlements without some growth or allow them to decline. Sadly, existing settlements seem to have got forgotten and the focus is mainly on large scale growth. Against the background of changing patterns of life, where people can now live and work in rural communities without bus services or shops (and where most shopping is delivered rather than conducted face to face) the survival of village communities has become much more important.

Planning should not be erecting barriers to stop sustainable growth. Table 7 which summarises the content of the SA perhaps predictably highlights negative scores for a 'Dispersal Strategy' but does not assess the implications of losing services and the potential effects of rural decline. It therefore needs to be examined much more critically. In looking at the various options, in addition to the physical characteristics of the settlements outlined in Chapter 4 – the connectivity analysis, the landform analysis and the density analysis – the Councils also need to carefully consider:-

1. What are the practical implications of focusing development on rail corridors, bus corridors or employment locations. How many journeys are home/work out of the total movements? What proportion of people travel by train (or could travel by train)? Are there other more practical ways of encouraging use of public transport? What about walking and cycling?
2. What % of people now work from home? What % of residents work at all? Is there sufficient variety of sites and locations to cater for people's needs?
3. What are the social consequences of promoting some settlements and allowing others to decline? Has any assessment of the vulnerability of existing services been undertaken?

Option 1. The suggestion that reliance might be placed on a rail-based strategy is superficially attractive but possibly a high-risk strategy when so few people use trains on a day to day basis. Convincing WCC that the railway from Stratford on Avon to Honeybourne could give some life to this strategy, but this would be hugely expensive. The strategy would be reliant on infrequent services unless the rail companies were committed to boosting their services. Some modal shift to trains might occur but this would rely on people moving to longer distance commuting which is arguably running against the trend. Furthermore, this approach seems heavily reliant on 4 new settlements which would need to be developed simultaneously. This would completely undermine the 'portfolio' test – ie. the need to provide for a broad range of homes of different types in different locations. It would give a virtual monopoly to the volume builders with the smaller SME builders being excluded as development was concentrated in fewer locations.

Option 2. This option makes more sense since it widens the field of locations and enables the use of both trains and buses which are inherently flexible. However, the levels of bus (or rail) service could change at any time – so some clear commitment would be needed from rail and bus companies before committing to this option. Again, this option is focused on bigger new settlements and makes no mention of rural communities. It assumes, naively that because the bus route exists (no matter how infrequent) people will use it for preference – which is unlikely. Clearly a choice of modes is desirable, but more will need to be done in practical terms to persuade people to become regular bus (and/or rail) users. This still focuses too much on big sites and big builders excluding the smaller firms and gives limited choice of housing.

Option 3. This option tries to match housing growth with economic growth (and assumes that people will live close to their jobs). This appears sensible but sadly, in practice, people rarely do. Other matters invariably become more important in choosing where to live and many people now are either retired, not employed or work from home and hence journey to work is not an issue. However, this option is in danger of being road-focused and contrary to the Local Plan's climate change objectives. Again, the strategy seems to focus on new settlements and ignore rural settlements which are the life-blood of Stratford and Warwick Districts.

Option 4. This option is a hybrid from options 2 and 3 and therefore theoretically takes the best of both, but again it ignores rural settlements and will consign many communities to rural decline. Again it seems to focus on new settlements and hence fails the 'portfolio test' of providing a broad range of sites to meet people varied needs. All the blobs are above 500 dwellings and many are up to 5000 dwellings meaning that, as with the other options 1-3, it is overly focused on big schemes to the exclusion of existing settlements and hence is prejudiced against the smaller SME builders and reduces choice.

Option 5. The dispersal option is always rejected by planners (and fails the Sustainability Appraisal Test) because it is assumed that people will travel longer distances on a daily basis. Before rejecting this, the Council's need to consider to what extent people can, need to and in practice will travel if they are retired, not working, or home based. The promotion and protection of rural communities relies on using existing services and facilities efficiently and encouraging modest but organic growth using smaller builders as well as larger volume building companies. Clearly, a dispersed approach is not compatible for mass housebuilding, but rural communities need to grow to survive and thrive and whatever the outcome of the location strategy. They also need to fill in the gaps of any strategy to ensure that their services are used efficiently and they do not wither and die. (The saving of St Lawrence Primary School in Napton in 1997 was a case study in protecting rural services based on a policy of organic growth). Napton, Stockton, Priors Marston and Priors Hardwick should form an integral part of any dispersal strategy.

Issue S8. Small Scale Development outside the chosen growth option: I would warmly support the need to have a 'small-scale' growth strategy to support smaller communities and give SME builders a chance to survive and continue trading. Currently Government and planning authorities are paying lip service to supporting SME companies but still imposing policies which have precisely the opposite effect.

The Stratford DC policy CS15 is drafted so that smaller communities (in Category F) which are not categorised as limited growth settlements cannot accept small scale schemes unless they are 'community-led'. This gives far too much power to local people to resist development through 'parish meetings' which is effectively a 'NIMBY's charter' which tend to operate as parochial 'courts of public opinion' excluding unwelcome outsiders. These are positively archaic and should be replaced. There is no need for an overall limit in terms of the number of houses to be built in rural settlements. A site threshold might be helpful as a guide.

Issue S9. Settlement boundaries: Most settlements have tight village boundaries which are drawn around the outer edge of villages and sometime even through back gardens. As a consequence, settlements have no room to grow and gradually die. Services disappear, shops and pubs close and bus services decline or are withdrawn. Local Authorities through Local Plans or communities through Neighbourhood Plans need to take a longer-term view and review village boundaries to allow them to grow organically, as they did in the past.

Delivering Homes.

Issue H1. Providing the right number of homes. In the absence of a regional, sub-regional or strategic approach to determining housing levels, we are left with the untidy system of calculating housing numbers by Districts (or combinations of Districts), based on demographic, economic and social measures of housing need. As the introduction to this section acknowledges, there is a growing housing crisis in Britain. Government and local authorities are quite deliberately failing to reach the aspiration of 300,000 dwellings per year. The most recent planning reform proposals (influenced by a minority of backbench MP's) will exacerbate this still further by substantially reducing housing provision especially in the areas where housing is most in demand, for example in London and the south-east.

Furthermore, it is misleading and naïve to suggest (as stated on page 100) that the key issue is simply about providing 'affordable homes' and that building lots of 'unaffordable' market homes is not the solution. In truth, no market houses are 'unaffordable' – if they were, they would not be bought and occupied. In practice, Stratford and Warwick Districts are both high value areas and hence house prices reflect those sales values. Subsidised housing, if it is built, either has to be delivered through cross subsidy (from market housing) or paid for through grant aid. The price levels are influenced by the past housing shortfall. Hence it is logical that Stratford and Warwick should allocate higher levels of housing to deliver for both market and affordable occupiers as well as helping to moderate price levels.

The sub-regional figure is relevant but is distorted by the influence of Coventry City where past allocations have been capacity-based and have aimed to focus as much housing as possible within the City (this has then resulted in a backlash when Coventry's green belt boundaries have been reviewed as a consequence). Stratford and Warwick should therefore accommodate a higher share of housing provision to meet the trend-based figure. The precise level will evolve from the discussions emanating from the Duty to Co-operate and the outcome of the HEDNA.

Issue H2. Providing the right type and tenure of housing. Table 10 on page 105 highlights the fact that total affordable need at 547 (Stratford) and 839 (Warwick) is almost as high as the trend-based figure of 868 (Stratford) and 811 (Warwick) from the HEDNA (Table 9). One of these must be wrong or incompatible – otherwise there will be no prospect of resolving housing needs in the two authorities. The two Councils need to take a long hard look at whether they wish to tackle housing shortfalls in Stratford and Warwick through this Local Plan. Against that background, it is naïve to suggest that the price of market housing is not linked to the availability of affordable housing. The more market housing (at lower price levels is delivered) the less will be the pressure on affordable housing. The two are inter-linked.

The identification of up to 4 new settlements will involve a very heavy investment in infrastructure in building communities from scratch. Often affordable housing is sacrificed to build expensive roads and heavy infrastructure. The Councils need to consider whether a high investment new settlement approach is therefore ideal. The solution is therefore to allocate higher levels of housing per se, enforce affordable housing quotas as a priority, introduce pathways to home ownership (for example First Homes and shared ownership which require less subsidy) and seek other tenure options which can relieve affordable housing pressures – for example elderly and extra care accommodation. Whether there are single or separate affordable housing requirements for Stratford and Warwick Districts is irrelevant.

Issue H3. Sizes of homes. In an 'ideal' world, people might choose the size of their home to fit their 'requirements', but that is not how the market works. People buy homes which suit their aspirations, both now and in the future. They judge whether to have a family, to accommodate visitors and guests or how many rooms they need to enable them to work from home. Their decisions are governed by choice, location, surroundings, environment and affordability. Any suggestion that market housing should be controlled by size would be fundamentally flawed. For the affordable sector, it is widely assumed that 'square pegs ought to fit square holes' and so a closer match is expected. Any guidance on this issue can only be advisory. More active policies to incentivise elderly people to down-size may be more worthwhile – but again, moving in one's later years is often disruptive and so may not necessarily be feasible. A better policy approach would be to encourage builders to provide elderly persons accommodation and provide offices and spare rooms within new housing to promote home working which would in turn reduce the need for additional affordable housing and propensity to travel.

Issue H4: Accommodating needs from elsewhere. Birmingham and Coventry cannot guarantee to accommodate all their own housing needs, although the planning reform proposals floated by Government have ‘muddied the waters’ in this respect. Strategic planning is the natural solution to this but sadly the Planning reform proposals are confusing on the scope for cross boundary working. Furthermore the West Midlands mayor has absolved any responsibility for sub-regional planning through the Combined Authority (although it has not stopped him commenting on planning and green belt matters!). The solution to this issue must therefore be resolved through the Duty to Co-operate (or the alignment policy – once the Government has decided what this means).

It is logical that any notional housing needs attributed to Birmingham and Coventry should be provided reasonably close to their boundaries. This would tend to suggest that sites would therefore need to be found either in the green belt and /or mainly in Warwick District. With respect to these residents, it would also be logical for there to be available public transport links to provide the ‘umbilical cord’ to fulfil work commitments and satisfy social relationships. The potential scale of this West Midlands overspill is huge. According to the Birmingham Issues and Options Plan there is currently a 78,415 shortfall plus a 28,000+ shortfall from the Black Country. The text also suggests that Coventry has a shortfall amounting to 1964 dwellings per annum. Clearly it would be preferable to engage in some form of strategic planning so that these pressures can be assessed in a comprehensive way.

Issue H5. Providing Self-build and custom-build plots: The Government has set a duty within the Self-build and Custom-building Act for authorities to deliver self-build/custom build plots. Stratford on Avon (although not having a self-build policy in their Core Strategy) has taken a pro-active approach by allocating specific small sites within their Site Allocations Plan. Other authorities have taken a less pro-active approach and have adopted a quota-based approach by seeking self-build plots as a proportion of larger sites. This is the opposite of what both self-builders or builders want, in view of their polarised objectives. I would recommend that the Councils allocate smallish sites and supplement this with informal self-build plots in smaller settlements. This conforms to **Options H5a and H5c**. We would not favour H5b.

Climate resilience and Zero Carbon

Issue C4. New Buildings. The Government sets building standards through Building Regulations and therefore it would be inappropriate and confusing for the two Councils to come up with a separate sets of standards and would be almost impossible to enforce.

Issue C5. Existing Buildings. The Local Plan should not set unrealistic targets which building owners cannot possibly meet. Local authorities and Government might wish to incentivise property owners to save energy and retrofit improvements. However, it would be unrealistic to require a zero-carbon target which could not have any guarantee of being achieved.

Design.

Issue D3. Designing Adaptable, diverse and flexible places. If authorities wish to create diverse and flexible places, there is no point in imposing fixed density requirements. The clue is in the title! Each area and/or application should be considered on its merits. The appropriate option is therefore **Option D3a.**

Transport & connectivity

Issue T1. 20 minute Neighbourhoods. The aim for '20 minute neighbourhoods' is a desirable 'aspiration' which can be better applied to an urban context but has a different and wider relevance to the rural context, where people often lead more insular lives. The fact that both Stratford and Warwick are largely rural Districts seems to have become forgotten and the analysis seems somewhat 'urban focused'. Yet many nuclear rural settlements with a shop, school and bus service are in fact potentially ideal 20 minute neighbourhoods where shopping, schooling and social activities are all done within the same community.

Issue T2. Sustainable transport accessibility. There is only a limited amount that forward planning can do to generate widespread public transport provision in Warwickshire. Indeed, it could be pointless to frame new development around bus services unless those routes are guaranteed to be secure and relatively frequent. However, more development is likely to protect the frequency of bus services – if necessary supported by subsidy. The Councils should therefore make every effort to strengthen bus and train networks both by policy intervention and through direct subsidy – in the urban and rural areas.

Biodiversity.

Issue B3. Special Landscape Areas. The accompanying text explains that national policy does not encourage Local Landscape designations – but Stratford on Avon DC pressed ahead with them anyway! In Stratford on Avon the existence of the SLA policy is being used (in my specific self-build example) to press for additional checks, further assessments and extra plans which is creating more expense and additional controls. This new Local Plan would seem to be the appropriate opportunity to drop the formal policy and simply refer to the nature of the landscape within the text, rather than conflict with national advice. The solution is therefore **Option B3c.**

Issue B5. Environmental Net Gain. In an ideal world we might all wish to see net environmental gain as a result of new development, but this may be difficult to achieve. The BNG policy is an expensive DEFRA policy which effectively involves a subsidy from homebuyers and developers to rich landowners holding offset land. It is a regressive policy to support the agricultural industry and replace EU subsidies. I would be concerned if the Local Plan set unachievable objectives which then stifled new development through lack of viability. The Councils need to mount a test bed to see whether environmental gain can be achieved before imposing any such policy.

Summary & Conclusions.

I warmly welcome the initiative taken by Stratford on Avon and Warwick Councils to produce the Issues and Options stage of the South Warwickshire Local Plan. However, on behalf of various clients, I have deep concerns about the focus of the proposals – in each of the Options – which propose to build several new settlements which will ‘capture’ the housing numbers but doubtless take many years to deliver – thereby starving development in existing settlements at hence will be the expense of the Districts’ rural communities which will inevitably lose their services and gradually decline.

The Councils need to think again and consider a broader and more balanced portfolio of housing sites which provide housing opportunities for a wider range of home buyers and occupiers. They also need to consider allocating a variety of sites which will require more work and input from a broader range of SME builders and major builders rather than concentrating development in a handful of large settlements controlled by the volume promoters and builders.

I would welcome the opportunity to comment at later stages of the process.

Yours sincerely

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