

Warwick District Local Plan – Revised Deposit Version

Topic Response Analysis

Topic: Chapter 3 Introduction

Summary of matters raised in objections.

1. The core strategy does not properly reflect the Regional Spatial Strategy and more references to this should be made (Coventry City Council – 242/RAA)
2. The introduction should recognise the potential risk of continued urban development. (Leamington Society - 195/RAH)
3. The introduction should recognise the Council's commitment to monitoring changes in the district. (Leamington Society - 195/RAH)

Response of Head of Planning & Engineering to matters raised

1. I consider that the RSS is referred to, including in the spatial strategy. Further references are proposed elsewhere in the Local Plan.
2. I consider that the Local Plan in general, and the spatial strategy in particular, reflect a proper strategic understanding of the need to balance development within urban areas with that in the countryside.
3. Monitoring is an important ongoing activity within the Council and has informed many of the policies in this Local Plan. Where monitoring is particularly important for the implementation of a certain policy (for example SC8a), then this is noted (see paragraph 5.41B). There is no need for a particular mention here.

Recommended revision(s)

1. No change
2. No change
3. No change

Topic: Spatial strategy

Summary of matters raised in objections.

1. Paragraph 3E should recognise where development should be supported within the rural areas (WMIAL – 321/RAC).
2. The spatial strategy should elsewhere give greater recognition to those locations where development should be supported within the rural areas (WMIAL – 321/RAC).
3. Paragraph 3.6F should be less restrictive with regard to the provision of market housing within rural areas. (JG Land & Estates - 322/RAB, Miller Homes – 120/RAJ, Mr. D. Austin – 239/AM)
4. The spatial strategy should give more information on the “urban expansion” development strategy of the Warwickshire Structure Plan. (Leamington Society - 195/RAC, D. Goodyear – 349/RAB, Robin Richmond – 191/RAB).

5. The spatial strategy should not refer to Whitnash as a “main town” (Tesco – 350/RAC).
6. Para. 3.6C should not refer to “all” main shopping development being within the existing town centres. (Tesco – 350/RAC)
7. The spatial strategy is misleading in suggesting that outside of the town centres the district is rural. (Tesco – 350/RAC)
8. The spatial strategy should not refer to policy GD.3 of the Warwickshire Structure Plan since this has a limited life and has been superseded by the Regional Spatial Strategy. (Mr. J. Burman - 222/RAC)

Response of Head of Planning & Engineering to matters raised

1. The policies listed do allow for controlled growth in appropriate cases and it is appropriate that paragraph 3E should reflect this.
2. Although I consider this is already clear, the word “generally” within one of the spatial strategy objectives could be amplified to make this clearer.
3. The approach taken within the spatial strategy and the local plan generally is in accordance with advice in both the RSS and Warwickshire Structure Plan.
4. I do not think that in the context of Warwick District and the levels of growth that are being seen here, that such a reference should be made. The local plan does not have a strategy to expand its present urban area (beyond existing commitments) and to refer to this may suggest otherwise.
5. Whitnash has official town status and as it abuts Leamington then it would appear perverse not to include it as part of the “urban area” of the district for the purposes of the local plan. I agree with the objector that the reference to a “main” town may be confusing as Whitnash is not one of the “main towns” in Warwickshire identified in the Structure Plan.
6. The wording of paragraph 3.6C follows that in the Structure Plan policy TC.1 and TC.2. We do not say that all development should be in town centres, only that all *main* shopping etc. development should be located there.
7. The reference to rural areas follows the sections dealing with the main towns and town centres. I do not consider it to be misleading.
8. Whilst the limited life of the policies in the Warwickshire Structure Plan is recognised, I do not consider there is any essential difference between them in relation to the towns of Warwick District. Leamington is defined in the RSS as an “other large settlement” and Warwick and Kenilworth are reasonably classified as market towns. There are no other settlements within the district that could reasonably be classified in either of these. The approach of the RSS towards directing new development is therefore sound.

Recommended revision(s)

1. Within para 3.6E, insert the words “control, **and where appropriate, support development within** them....”
2. Within the unnumbered paragraph between 3C and 3D, add the wording to support rural communities, **except where development is identified and site specific policies apply.**”
3. No change.
4. No change.
5. Delete the word “main” from the reference to the “four main towns of the district...”between paras 3.6A and 3.6B.

6. No change.
7. No change.
8. No change.

Topic: Objective 1A

Summary of matters raised in objections.

1. This objective should be reconciled with social and environmental objectives (R. Richmond – 191/RAC, D. Goodyear - 349/RAC, Leamington Society – 195/RAD)
2. Paragraph 3.7 should not make reference to employment land within Warwick District being provided to meet the needs of migrants. (Warwick Society – 66/RAC)
3. It should be recognised that other sectors, such as retailing, can contribute to economic growth (Tesco - 350/RAD)

Response of Head of Planning & Engineering to matters raised

1. It is clear from paragraph 3.6 that these objectives need to be read together and balanced and integrated. The need to reconcile economic, social and environmental objectives is therefore implicit in all the objectives, and it is both inappropriate and unnecessary to make such a cross reference here.
2. The Warwickshire Structure Plan does make it clear in policy GD.1 that there is an element of in-migration within the employment figures calculated for Warwickshire. Therefore the statement is correct.
3. Whilst this objective is principally concerned with the requirement to provide 132 hectares of employment land, I recognise that other sources of employment also contribute to economic growth. Mention is made elsewhere of retail and other town centre development, rural development and tourism.

Recommended revision(s)

1. No change.
2. No change.
3. No change.

Topic: Objective 1C (now renumbered as 1B)

Summary of matters raised in objections.

1. This policy needs revision and amendment (Mr. R. Orr 224/RAB, Mr. J Burman 222/RAD)

Response of Head of Planning & Engineering to matters raised

1. No reason is given and therefore I cannot comment on it.

Recommended revision(s)

1. No change.

Topic: Objective 1D (now renumbered as 1C)**Summary of matters raised in objections.**

1. This objective should be reconciled with social and environmental objectives (D. Goodyear - 349/RAD, Leamington Society – 195/RAE, R. Richmond – 191/RAD)
2. There is a need to allocate new land for dwellings as well as provide for windfalls. (J. Biles - 214/RAB, Miller Homes – 120/RAH, Bloor Homes – 119/RAB)
3. The local plan should be making provision for a 10 year supply of land for housing. (D. Austin – 239/RAL, Miller Homes – 120/RAH, Bloor Homes – 119/RAB, JG Land & Estates – 322/RAC).
4. Paragraph 3.12 should be deleted following the approval of the SPD on Managing Housing Supply. (Warwick Society – 66/RAD)
5. The word “acceptable” should be deleted from paragraph 3.12 as this may encourage development that is not necessary (Kenilworth Town Council – 223/RAA).

Response of Head of Planning & Engineering to matters raised

1. It is clear from paragraph 3.6 that these objectives need to be read together and balanced and integrated. The need to reconcile economic, social and environmental objectives is therefore implicit in all the objectives, and it is both inappropriate and unnecessary to make such a cross reference here.
2. The local plan gives evidence that there is no need for further allocations for new housing.
3. Reference in these objections is made to a ministerial statement dating from July 2003 which refers to councils “providing” for a 10 year supply of housing land. I believe that there is no justification for allocating sites up to 2016 for two reasons. Firstly, the process of disaggregating the housing figures in the Regional Planning Guidance has not been undertaken and therefore there is no certainty what Warwick District’s requirement will be up to 2016. Secondly, we have evidence that our current policies (relying as they do on windfall sites) will continue to bring forward adequate sites to meet the general level of any requirements made of us. There is a difference between “allocating” sites for a 10 year period and “providing” for such sites. We believe that the policy framework in the local plan does provide for an adequate level of continued supply of housing sites up to 2016, to the extent that this figure is known at the moment. These policies will need to be reviewed once the disaggregation of Regional Planning Guidance housing figures is known. There is therefore no need to make allocations beyond 2011 at the present time.
4. There is no certainty that the SPD will endure for the life of the local plan and it may be reviewed before 2011. Therefore it is appropriate to maintain the paragraph in the local plan.
5. The policies of the Local Plan, and subsequently the SPD on Managing housing Supply, sets out the definition of what is “acceptable”. There is therefore no need to

define this further here.
<p>Recommended revision(s)</p> <ol style="list-style-type: none"> 1. No change 2. No change 3. No change 4. No change. 5. No change.

Topic: Objective 1E (now renumbered as 1D)
<p>Summary of matters raised in objections.</p> <ol style="list-style-type: none"> 1. PPS6 supports the vitality and viability of town centres therefore the wording of the objective should revert to that in the first deposit version, (Tesco – 350/RAE) 2. This objective should be reconciled with social and environmental objectives (D. Goodyear - 349/RAE, Leamington Society – 195/RAF, R. Richmond – 191/RAE) 3. The core strategy should have a specific reference to the special historic character of each of the town centres. (Ancient Monuments Society – 283/RAA)
<p>Response of Head of Planning & Engineering to matters raised</p> <ol style="list-style-type: none"> 1. The wording of the objective was changed to bring this into line with the Sustainability Appraisal objectives for consistency. The loss of the word “viability” here does not in any way detract from the advice given in PPS6, or the policy approach of the Plan. 2. It is clear from paragraph 3.6 that these objectives need to be read together and balanced and integrated. The need to reconcile economic, social and environmental objectives is therefore implicit in all the objectives, and it is both inappropriate and unnecessary to make such a cross reference here. 3. Elsewhere the local plan makes specific reference to the character of each of the town centres and another core objective refers to protecting the historic environment. I do not feel there is any need for a further reference here.
<p>Recommended revision(s)</p> <ol style="list-style-type: none"> 1. No change. 2. No change. 3. No change.

Topic: Objective 1F (now renumbered as 1E)
<p>Summary of matters raised in objections.</p> <ol style="list-style-type: none"> 1. This objective should make reference to the need to protect the quality of the environment (D. Goodyear - 349/RAF, Leamington Society – 195/RAG, R. Richmond – 191/RAF)

Response of Head of Planning & Engineering to matters raised

1. It is clear from paragraph 3.6 that these objectives need to be read together and balanced and integrated. The aim of protecting the environment is therefore implicit across all the objectives, and it is both inappropriate and unnecessary to make such a cross reference here.

Recommended revision(s)

1. No change.

Topic: Objective 1G (now renumbered as 1F)**Summary of matters raised in objections.**

1. Paragraph 3.15 should make a specific reference to modes of transport “other than the car”. (Warwick Society – 66/RAE)

Response of Head of Planning & Engineering to matters raised

1. The reference to “various transport modes” is clear that modes other than the car are to be supported. This is amplified in objective 3B. I do not consider that there is therefore any need for a further reference here.

Recommended revision(s)

1. No change.

Topic: Objective 2A**Summary of matters raised in objections.**

1. Paragraph 3.16 should make reference to land that is of historic as well as nature conservation value. (English Heritage – 302/RAA)
2. Paragraph 3.16 should be amended to reflect the “urban expansion” option favoured by the Warwickshire Structure Plan. (D. Goodyear - 349/RAG, Leamington Society – 195/RAG, R. Richmond – 191/RAG)

Response of Head of Planning & Engineering to matters raised

1. I agree that it would be helpful to include such a reference for completeness.
2. I consider that the wording of para 3.16 does properly reflect the approach taken in both the Warwickshire Structure Plan and Government guidance on making best use of previously developed land and does not need amending.

Recommended revision(s)

1. To the sentence in para. 3.16 add “...is of nature conservation value *or historic interest* in
2. No change.

Topic: Objective 2B

Summary of matters raised in objections.

1. Reference should be made to “geomorphological” features (Warwickshire County Council – 150/RAA)
2. Paragraph 3.18 should not necessarily expect landscape character to be both protected and enhanced. (Tesco – 350/RAF)
3. Compensation should only be sought where on-site mitigation is not possible. (Environment Agency – 226/RAB)

Response of Head of Planning & Engineering to matters raised

1. Agree
2. I do not agree that it is inappropriate to both protect and enhance landscape character. This is clear in PPS9. I do agree, however, that the sentence needs amending because you cannot protect *and enhance* wildlife features from new development.
3. The policies of the local plan (DP3, DAP3) are clear that there will be cases where both mitigation and compensation are appropriate. The current reference in 3.19 is therefore appropriate.

Recommended revision(s)

1. Add “geological/**geomorphological** features...” to para. 3.18.
2. Amend the final sentence of para 3.18 as follows: “We will therefore protect ~~and enhance~~ the landscape character, geological/**geomorphological** features and wildlife habitats and species of value and acknowledged national, regional or local importance from inappropriate new development in urban and rural locations. **We will aim, wherever possible, to enhance all of these assets.**”
3. No change.

Topic: Objective 2C

Summary of matters raised in objections.

1. Paragraph 3.20 should refer to “buildings and other structures” (English Heritage – 302/RAB)
2. Protection should not be given to non-designated areas. (NFU – 154/RAA)
3. Reference should be made to protection and conservation. (Warwick Society – 66/RAF)

Response of Head of Planning & Engineering to matters raised

1. Agree.
2. It is clear from the policies that appropriate protection may need to be given to non designated areas in accordance with government guidance.
3. Although conservation is mentioned (indirectly) in para3.21, a reference to conservation as well as protection would be helpful in para. 3.20.

Recommended revision(s)

1. Amend wording in para 3.20 to read: designated and non-designated **buildings and other structures** and ...non designated **aspects.**”
2. No change.
3. Amend first sentence of para. 3.20 to read “We recognize our responsibility to protect **and conserve** the historic environment....”

Topic: Objective 2E**Summary of matters raised in objections.**

1. Design is a subjective issue. Seeking excellence could be misconstrued as being an unachievable objective. (Tesco – 350/RAH)

Response of Head of Planning & Engineering to matters raised

1. Whilst I recognize that quality in design is a subjective issue, I see no reason in not seeking excellence in design.

Recommended revision(s)

1. No change.

Topic: Objective 3A**Summary of matters raised in objections.**

1. Para. 3.25 does not recognize that urban and green field development may provide greater environmental benefits in terms of travel rather than access to transport corridors. (D. Goodyear - 349/RAH, Leamington Society – 195/RAJ, R. Richmond – 191/RAH)
2. The objective is inconsistent with PPS6 which states that development should be accessible by a choice of means of transport. (Tesco – 350/RAG)

Response of Head of Planning & Engineering to matters raised

1. I consider that para. 3.25 does reasonably represent the range of requirements that the council has under the overall objective of reducing the need to travel. The issue of ensuring that employment areas are accessible to major residential areas is covered elsewhere in the paragraph.
2. I see no inconsistency with the requirements in PPS6 and the Council having an objective of directing new development to locations that are easily accessible by other transport means.

Recommended revision(s)

1. No change.
2. No change.

Topic: Objective 3C

Summary of matters raised in objections.

1. The reference to “landscape” in para 3.29 implies no development outside of urban areas. This is too restrictive and is not explained. (NFU – 154/RAB, Tesco – 350/RAJ)
2. The amendment to the wording of the objective (to include a reference to climate change) is not reflected in the wording of the paragraphs that follow. If this is an objective of the local plan, many of the policies would need to change. The word “of climate change” should be amended to “on climate change”. (J. MacKay – 199/RAA)

Response of Head of Planning & Engineering to matters raised

1. It is appropriate that landscape is protected however I agree that the current wording may imply that all new development would be resisted. The wording could be clarified to make this clear.
2. I do not agree that paragraphs 3.29 and 3.30 do not support the objective regarding climate change. The policies of the local plan do seek to achieve this objective however are constrained by national legislation and guidance and by strategic planning policy. I do agree that the reference to climate change should read “on”.

Recommended revision(s)

1. Amend last sentence of 3.29 to read: “We will also protect best and most versatile agricultural land and the landscape from *inappropriate* new development.”
2. Amend objective to read: “and reduce the impact *on* climate change”.

Topic: Objective 4C

Summary of matters raised in objections.

1. The objective should make direct reference to social inclusion and accessibility to a range of facilities. (Tesco – 350/RAK)

Response of Head of Planning & Engineering to matters raised

1. These issues are covered under other objectives, notably 4B and 4E.

Recommended revision(s)

1. No change

However, see amendment following objection to an omission in the chapter below.

Topic: Objective 4D

Summary of matters raised in objections.

1. This objective should include a reference to improving standards of amenity.

(Leamington Society – 195/RAK, R. Richmond – 191/RAJ)
<p>Response of Head of Planning & Engineering to matters raised</p> <p>1. I agree that this would be a helpful addition to paragraph 3.34.</p>
<p>Recommended revision(s)</p> <p>1. Amend paragraph 3.34 as follows: “...and is designed to protect and improve standards of amenity...”</p>

Topic: Objective 4E
<p>Summary of matters raised in objections.</p> <p>1. The objective should aim to protect existing and support new facilities, including those relating to health. (South Warwickshire NHS PCT – 341/RAC)</p>
<p>Response of Head of Planning & Engineering to matters raised</p> <p>1. I consider that the objective does do this and whilst health is not specifically mentioned here, it is referred to in policies SC7 and SC7a.</p>
<p>Recommended revision(s)</p> <p>1. No change.</p>

Topic: Chapter 3 Omissions
<p>Summary of matters raised in objections.</p> <p>1. There should be an additional objective to support and promote new and existing leisure facilities (Racecourse Holdings Trust – 303/AA)</p>
<p>Response of Head of Planning & Engineering to matters raised</p> <p>1. I would agree that supporting appropriate leisure facilities is desirable, principally in terms of improving the health and wellbeing of communities, but also in terms of the value to the economy of leisure uses. Objective 4C already makes a reference to this, highlighting both the health and wellbeing, and the economic benefits of leisure facilities. It may be helpful to add a reference in paragraph 3.33 to leisure uses alongside recreation and open space to ensure that this point is made clearly.</p>
<p>Recommended revision(s)</p> <p>1. Amend paragraph 3.33 under objective 4C to read: “...Providing a variety of leisure and recreational opportunities and protecting open space is also essential to promote the health and wellbeing of the community and support social inclusion.....”</p>