

## **Local Plan Preferred Options 2012**

# **Report on the outcomes of Public Consultation (Part 1)**

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### **1. Introduction**

- 1.1. This Part 1 report has been prepared to provide a summary of the representations made in relation to the 2012 Local Plan Preferred Options consultation.
- 1.2. The outcomes from this consultation have been used to help to shape the Council's 2013 Revised Development Strategy. For this reason the scope of this report is limited only to those areas covered within the scope of the Revised Development Strategy.
- 1.3. Part 2 of the Report on the outcomes of the Public Consultation will cover the representations made in relation to policy areas such as Retailing and Town Centre, Climate Change, Transport and Green Infrastructure and will be prepared to help shape the submission draft Local Plan.
- 1.4. The tables in Section 3 of this report summarise the representations received on a range of topics and sites and provide a response from the Council as to how each point has been (or is being) addressed.
- 1.5. Full details of the representations received in relation to this consultation are available on the Warwick District Council website at [Preferred Options Consultation](#)

### **2. Consultation Representations Statistics**

- 2.1. The table below provides a statistical summary of the representations received. It should be noted however that the planning system does not place weight on the quantity of responses received in relation to a site or an issue, but rather gives weight the strengths of the arguments put forward.
- 2.2. In addition to the individual representations received, the Council has received two petitions. One was signed by 2,036 people objecting to proposed development on the site north of Milverton. The other was signed by 238 people objecting to proposed development on the site at Loes Farm.

<b>Preferred Option</b>	<b>No. Of Reps</b>	<b>% Support</b>	<b>% Object</b>	<b>Other Comments</b>
<b>Overall</b>	<b>5950</b>	<b>23</b>	<b>77</b>	
Level of Growth	475	3	97	
CIL/Infrastructure	209	75	25	
Broad Location of Growth	423	18	82	
<b>Distribution of Housing (Sites)</b>				
• Myton Garden Suburb	199	4	96	
• South of Gallows Hill/The Asps	220	1	99	
• North of Milverton	577	1	99	Plus 2036 names on a petition
• Blackdown	505	1	99	
• Whitnash East	27	22	78	
• Woodside Farm	96	3	97	
• Red House Farm	11	55	45	
• Warwick Gates Employment Land	15	33	67	
• Loes Farm	214	1	99	Plus 238 names on a petition
• Fieldgate Lane/Golf Lane	22	36	64	
• Thickthorn	81	25	75	
• Category 1 Villages	109	26	74	Largest response from Hampton Magna and Radford Semele.
• Category 2 Villages	232	10	90	187 of these from Norton Lindsey
• Brownfield Land Sites	60	58	42	
<b>Policies</b>				
• Gypsy & Travellers Policies	53	43	57	
• Housing policies (excluding distribution, sites and G&T)	198	41	59	
• Economy policies	90	23	77	
<b>Other Policy Areas:</b> the policies listed below are not covered in this report but will be reported in full in the next Report of Public Consultation				
Retailing and Town Centres	74	51	49	
Built Environment	69	35	65	
Historic Environment	69	52	48	
Climate Change	78	35	65	
Inclusive, Safe and Healthy Communities	58	47	53	
Transport Policies	224	26	74	
Green Infrastructure	111	55	45	
Green Belt Policies	210	12	88	
Culture and Tourism	50	64	36	
Flooding and Water	35	51	49	

### 3. Summary of Representations and the Council's Response

- 3.1. The tables below summarise the representations received on a range of topics and sites and provide a response from the Council as to how each point has been (or is being) addressed.

**TABLE 1: PO1 Preferred Level of Growth**

PO 1 Preferred Level of Growth	
Consultation Comment	Response
<b>The preferred option is not in line with public opinion</b>	
The Preferred Option does not represent the preferences expressed by the majority of people in the 2011 Issues Consultation (i.e. Scenario 1)	Whilst this is true, the requirements of the NPPF (backed up by Inspectors at a number of Examinations in Public) are that we must plan for "objectively assessed growth" and any failure to do so will lead to our Local Plan being found unsound. Evidence from Examinations in Public is that public opinion tends to carry little weight in this area.
Public opinion not surveyed in reaching this level of growth	The 2011 consultation did consult the public on alternatives for growth – the Preferred level of growth lies between the medium and high levels in the consultation. However for the reason explained above, the option proposed does not align with the majority of public opinion
<b>The Implications of the Preferred Level of Growth</b>	
The preferred level of growth is not sustainable	The NPPF defines sustainable development. The Preferred level of growth meets the requirements of the NPPF. There are sustainability issues associated with the social and environmental impacts of this level of development but these are addressed through the policy framework and infrastructure plan.
The level of growth will encourage in-migration from Europe or elsewhere in the UK and not address local housing shortages	The Preferred Level of growth takes account of inward migration in to Warwick District using well established forecasting models including potential economic growth and adjusted data looking at past trends.
This level of growth will affect the attractiveness of the area for tourism and lead to development of Grade 2 agricultural land and land in the Green Belt	The impact on tourism will depend on how and where development is brought forward. As green field land is required to meet the level of growth there will inevitably be an impact on agricultural land. However, in Examinations in Public elsewhere, this issue has tended to carry little weight. With regard to Green Belt the issue raises specific concerns and the Council's Revised Development Strategy has sought to balance the need to bring forward development whilst minimising potential impacts on the Green Belt
This level of growth will harm historic inner parts of Warwick and Leamington, threaten the quality of life and have significant environmental impacts	Any such adverse impacts on the historic environment would be a concern. It will be important to bring forward development in a way which minimises impacts.
This level of growth will not meet the vision	The vision has a number of facets which need to be balanced. However a key element of the vision is to facilitate the growth of the economy and provide for a growing population. The evidence supporting the Preferred Options suggested this would be

	achieved.
Providing more jobs leads to the need for more houses and this leads to the need for more jobs – a continuing cycle	The economic base of the area is changing and there continues to be strong pressure for population growth in the area. Attempting to standstill in terms of either the economy or population is likely to lead to stagnation and in the long run economic decline as investment moves elsewhere.
High level of growth not necessarily better for the area	As acknowledged previously, there are social and environmental impacts associated with high levels of growth and these need to be carefully managed. However as the NPPF requires us to plan for growth, it suggested that we should be proactive in trying to bring forward development which minimises negative impacts rather than taking a passive approach
There is no evidence of a connection between the economic health of the District and the number of houses built	There is evidence that these factors are linked – see, for example, the 2012 SHMA. Subsequent evidence (December 2012 report on Economic and Demographic Forecasts) underlines this.
The level of housing will simply encourage commuting to London, Birmingham and elsewhere	The proposed number of houses seeks to keep the number of local jobs and economically active people in balance. We cannot control commuting, but ensuring this balance is maintained will maximise the opportunities for people to live and work locally.
The preferred option is not sufficient to support the increased growth in jobs and so homes will need to be provided in adjoining areas	The level of growth has been reviewed in December 2012 to reassess the impacts of the Census data and new economic forecasts.
<b>Objections suggesting the Level of Growth is too high</b>	
Preferred level of growth is too high	We need to plan for objectively assessed growth
Level of growth at odds with the ageing demographics of the population	The population projections take account of changing demographics including the projected increase in the older population
Level of growth ignores guidelines for development in Green Belt	Development in the Green Belt can be justified if there are exceptional circumstances. If growth cannot be accommodated outside the Green Belt the need to meet objectively assessed growth levels through use of Green Belt land would be justified.
The level of growth represents an over provision of 1370 (19.6%) - remove “buffer” from the growth level	This is true and has been done to allow for various contingencies. The final plan will not include a buffer of this size.
In present economic climate, the level of growth is unrealistic	The population and economic forecasts within the evidence base suggest it is realistic
Level of growth should take account of existing commitments, possible reduction in demand for student accommodation and the effect of changes in housing benefits	Existing commitments are taken in account as are changes to student population. The possible impact of housing benefits will be included within the 2013 Joint Strategic Housing Market Assessment
There is no need for so many more houses – properties are standing empty at the Pottertons site and Chase Meadow is very slow to be built out	Empty properties and other commitments are taken in to account in assessing the requirement. The current pace of the housing market is also taken in to account in future projections
The number of homes is excessive bearing in mind the number of empty properties and infill sites	See above
A maximum of 300 homes per annum is the most that could be sustained	The evidence suggests that the District has the need and capacity (including environmental and transport) for significantly more than 300 per annum.
Both Options 1 and 2 are too high	See above

Housing Needs Assessment and inward migration figures are false and assumptions wrong	The Council has employed a firm which is recognised as having in depth experience and expertise in economic and demographic forecasting. The migration assumptions are based on a recognised methodology that has been found sound at Examinations in Public in other parts of the country
High level of growth designed to maximise New Home Bonus	The New Homes Bonus Scheme is not a planning consideration and has not been taken in to account in preparing the Preferred Options
Suggested levels of growth: Suggestions from zero new homes to 800 per year or a more flexible approach to the requirement	The evidence available at the time the Preferred Options were prepared suggested that 600 homes per annum was a reasonable level. Since then a further study has suggested that, if anything, this figure is too low.
<b>Objections suggesting the Level of Growth is too low</b>	
Preferred level of growth is insufficient	The evidence available at the time the Preferred Options were prepared suggested that 600 homes per annum was a reasonable level. Since then a further study has suggested that, this figure is too low and the Revised Development Strategy suggests an interim figure of 12,300 homes.
Level of growth should be linked to the growth of the economy	There are strong links between the level of growth and economy in the forecasting and the proposed level of growth in both the Preferred Options and Revised Development Strategy takes the economic implications in account
A higher growth level is needed if the affordable housing need is to be met	It is not possible to plan fully for all the affordable accommodation that the District requires over the next 15 years, as a policy requiring over 40% is likely to unviable. and to provide for all the affordable requirements suggested in the SHMA would need a huge over supply of market housing with consequent environmental impacts
Option 2 should be supported	This level of growth, based on economic projections, is not considered to be the most sound starting point.
Level of growth should be based on employment growth and seek to reduce commuting to work	There are strong links between the level of growth and economy in the forecasting and the proposed level of growth in both the Preferred Options and Revised Development Strategy takes the economic implications in account. Planning to balance the number of jobs with the working age population seeks to reduce commuting
Does not meet the full, objectively assessed need for market and affordable housing	The evidence available from the 2012 SHMA suggests it does. Updated evidence in December 2012, suggests that the figure need to increase to 12,300
Suggested levels of growth: Suggestions from zero new homes to 800 per year or a more flexible approach to the requirement	The evidence available at the time the Preferred Options were prepared suggested that 600 homes per annum was a reasonable level. Since then a further study has suggested that, if anything, this figure is too low.
<b>Concerns about the Evidence</b>	
There is insufficient justification for this level of growth	The Council has employed a firm which is recognised as having in depth experience and expertise in economic and demographic forecasting. The migration assumptions are based on a recognised methodology that has been found sound in other parts of the country. The 2012 SHMA provide extensive evidence to justify this level of growth. However changing economic forecasts and new Census data has meant the forecasting was updated in December 2012.
Level of growth at odds with the ageing demographics of the population	The population projections take account of changing demographics including the projected increase in the older population

There is no guarantee that economic growth will follow housing growth	This is true, but the two are connected and the NPPF requires us to plan to meet objectively assessed growth
Preferred growth levels not supported by past trends	Past trends have at times exceeded this level of growth and have at other times been below this level of growth. 600 houses per year is realistic if compared to past levels of growth
Level of growth should be linked to the growth of the economy	Agreed. Both the Preferred Option and the Revised Development Strategy have taken the economy in to account in arriving at a figure. The current state of the economy is not expected to continue for the whole plan period.
The level of growth is not based on a Strategic Housing Market Assessment, only a District-wide one, so cross-boundary housing need has not been addressed	Although the SHMA did consider in and out migration and commuting and therefore took account of changes in neighbouring authorities, this is accepted. WDC is now participating in a Joint SHMA across the Coventry Housing Market Area.
In present economic climate, the level of growth is unrealistic	The current state of the economy will inevitably change during the whole plan period.
Calculation in Strategic Housing Market Assessment is based on out of date information and estimates	The data has been updated to take account of new economic forecasts, new demographic forecasts from ONS and the census data.
Level of growth should take account of existing commitments, possible reduction in demand for student accommodation and the effect of changes in housing benefits	Existing commitments are taken in account as are changes to student population. The possible impact of housing benefits will be included within the 2013 Joint Strategic Housing Market Assessment
Past performance is no guide to the future	Whilst past trends cannot be relied upon as the only source of data in predicting the future, they are a factor which we have taken in to account.
Council should take a longer view to mid-century	No population forecasts can ever be entirely accurate as they rely on assumptions. The longer the period of time, the more assumptions have to be made and therefore the greater the risk that they will be inaccurate. Planning beyond a 15-20 year period is therefore not likely to be productive.
Inadequate work in translating population growth into household growth	The methodology uses headship rates and the latest available information on trends in household sizes. This method is considered to be sound.
Strategic Housing Market Assessment indicates a higher level of growth than the preferred option	There are projections within the SHMA that indicate higher levels of growth. However these are economic driven figures. Projections which are based on past trends indicate the Preferred Option was justifiable based on the data available at the time
Forecasting a level of growth is not an exact science so the level should be monitored and adjustments made accordingly	Noted. Annual monitoring during the Plan period will address this.
The preferred option figure was influenced by a decision made on "550 homes on new allocated sites" before all the evidence was available	This figure was put forward based on the draft SHMA and provided sufficient flexibility to be able to meet a number of the draft SHMA projections. Had the figure not been justifiable from the evidence, the Preferred Options would not have been developed in the way it was.
Sustainability Appraisal suggests a higher level of growth is equally sustainable	Noted. However higher growth will require more sites which will negatively impact on sustainability.
Strategic Housing Land Availability Assessment suggests that land is available to meet a higher growth level	Noted. There is land available, but much of this is in the green belt and would require exceptional circumstances. Even where land is outside the green belt, there are significant development constraints
A higher growth level is needed if the affordable housing need is to be met	It is not possible to plan fully for all the affordable accommodation that the District requires over the next 15 years, as a policy

	requiring over 40% is likely to unviable and to provide for all the affordable at 40% would lead to a huge over supply of market housing with consequent environmental impacts
Option 2 (700 homes p.a.) has been dismissed without good grounds	This level of growth is based on economic projections and is not considered to be the most sound starting point as the Planning Inspectorate seem to place more emphasis on trends based projections.
Unclear how the three scenarios relate to the assessment of housing need in the SHMA	The three scenarios were put forward prior to the SHMA being undertaken. There is therefore no direct relationship.
Level of growth should be based on employment growth and seek to reduce commuting to work	There are strong links between the level of growth and economy in the forecasting and the proposed level of growth in both the Preferred Options and Revised Development Strategy takes the economic implications in account. By planning to balance the number of jobs with the working age population we are seeking to reduce commuting
No account taken of recent changes in workforce away from manual to blue & white collar/professionals/academics	The employment projections which have been used to adjust the population projections take account of forecast changes to the local economy including looking at which sectors are likely to grow and which to decline.
Level of growth based on numerous assumptions which could be false	It is true the projections are based on assumptions and that these may not ultimately be accurate. However they are reasonable assumptions at this stage and provide the most robust evidence available.
The period on which the trend based projection is based may not be representative of the future	See above
The 2011 Census results show that the baseline population figure used was too high	The figures have been adjusted to take account of the 2011 census in the study undertaken in December 2012
The level of growth is at odds with 2008 ONS household projections for the District	This is true, but the 2008 ONS projections were based on trends from the previous 5 years when growth had been at a peak. Updated information in the census and 2011 ONS projections show that this trend is unlikely to continue in to the future
Population growth 2001-2011 is 0.8% per annum. This is only 400 homes per year	The population projections need to take a range of factors in account and although previous trends are important they are not the only factor (e.g. changing headship rates, employment and economic growth, ONS projections and CLG household projections also need to be considered.
Plan fails to mention the number of unemployed people who would take new jobs without needing new homes	This is factored in to the economic-led projections in the SHMA and in the December 2012 Update report
SHMA provides projections and matches homes to jobs but there is no discussion around whether this is the most desirable figure	The NPPF requires that our Local Plan meets objectively assessed requirements. As long as there are suitable sites available to deliver this, it leaves little scope to consider whether this is "desirable"
Para 5.18 incorrectly states that only 11,410 potentially suitable sites have been identified. The figure should be 13,385 (SHLAA page 11, table 2)	Noted
No evidence as to why there is insufficient capacity to meet the full needs identified in the SHMA	Noted. The proposed level of growth meets the trend based level of growth proposed in the SHMA.
SHLAA is unsatisfactory piece of evidence – provides no assessment of infrastructure costs	Infrastructure costs were not part of the SHMA's scope. The viability and deliverability of the whole plan does require an understanding on infrastructure costs. This is being worked on



	separately through the CIL scheme and Infrastructure Delivery Plan (see for example the phase 3 Strategic Transport Assessment)
Jobs forecast is pure speculation	Whilst employment forecasting is based on a range of assumptions which mean its accuracy will always be open to debate, the model used by GL Hearn for Warwick is a well-respected forecasting model and provides high quality data
Population growth is now levelling off – less students living in the District	Both student population and the general population are forecast to grow in the future. The current “levelling off” reflects the housing moratorium and recent economic stagnation
Past growth levels have been higher than county and regional averages and this should not need to continue	The forecasts suggest that growth is likely to continue to exceed regional levels of growth.

**TABLE 2: PO2 Community Infrastructure Levy**

PO 2Community Infrastructure Levy	
Consultation Comment	Response
<b>CIL: Summary of Matters Raised in Objections</b>	
The draft plan does not explain what the levy is or how it will operate	This is explained in the Preliminary Draft Charging Schedule which has been produced alongside the Revised Development Strategy
More detail on how CIL will be delivered is required in the plan	This is explained in the Preliminary Draft Charging Schedule which has been produced alongside the Revised Development Strategy
The Council is keen to develop Green Belt land because the development profits will be higher and also the subsequent CIL and Council tax revenue	This is not the case and indeed many of the proposed green belt sites have been taken out of the Revised Development Strategy
It is not clear what CIL is or how it will be calculated	This is explained in the Preliminary Draft Charging Schedule which has been produced alongside the Revised Development Strategy
All revenues and spending should be capped at the 2012 level for the next ten years	This is not a Local Plan issue
Concerns that CIL charges will have a detrimental effect on design specification levels, local infrastructure will be supported from increased numbers of rate payers	CIL is designed to contribute towards an infrastructure funding gap. It can only be levied where it is viable to do so. The CIL Viability study shows that residential development in Warwick is viable and has the potential to contribute significantly to the funding gap.
Maximum levy is achieved by building new homes where the demand/ prices will be highest (north Leamington) this should not be the main influence for housing at this inappropriate location	This is not a factor in influencing where development will be located.
CIL is not a silver bullet and should not be an encouragement to build more housing than the locality needs	The level of housing growth is determined by objectively assessing housing needs. CIL has not been and will not be an influence on this.
Development should not be subject to a scale of obligations that threaten viability	CIL will only be levied where it can be demonstrated that it is viable to do so.
If CIL is to be used it should be ring- fenced to	The CIL scheme requires this. It will not be possible to absorb

pay for the necessary infrastructure and not be 'absorbed' in the Council's budget for non-specific issues	CIL levies in to the Council's general fund
<b>Summary of Matters Raised in Support: CIL</b>	
CIL would enable raised funds to be spent where they are of most benefit rather than being tied to specific developments as under the present system	This is a potential benefit of CIL
Should be enforced – too often developers don't appear to fulfil their commitments to infrastructure	Once in place, CIL should be simpler to draw money from and as a result easier to enforce
Supportive of CIL , however NPPF states that sites should not be subject to excessive obligations and policy burdens	CIL will only be levied where it can be demonstrated that it is viable to do so.
CIL costs to developers should take account of normal costs of development and mitigation and provide competitive returns to willing landowner and willing developer to enable development to come forward	CIL will only be levied where it can be demonstrated that it is viable to do so, taking account of land values
CIL is welcomed but it is vital that full and appropriate infrastructure provision is made in advance of development wherever possible.	It is accepted that the timing of infrastructure in relation to development is vital. The CIL scheme will help this. The Infrastructure Delivery Plan needs to address this to ensure that developers, infrastructure providers and WDC as the CIL Charging Authority, work closely together
Consideration should be given as to how CIL might be used to fund public realm , heritage assets on the heritage at risk register	It is unlikely that this would be a justifiable use of CIL unless it relates to the mitigation of the impacts of development on heritage assets
If CIL is to be used it should be ring- fenced to pay for the necessary infrastructure and not be 'absorbed' in the Council's budget for non-specific issues	The CIL scheme requires this. It will not be possible to absorb CIL levies in to the Council's general fund
There are concerns how CIL may be administered locally and believes that the use of such funds must be done in negotiation with local (Town and Parish) councils	At least 15% of CIL will be available to Town and Parish Councils. The different tiers of local government will have to work closely together to coordinate CIL spending
CIL is supported however the Council needs to ensure that CIL payments do not overlap with S106 developer contributions. There will need to be clarification about what is to be covered by CIL	The CIL scheme will clarify which infrastructure will be covered by CIL and which by Section 106
A comprehensive consultation process will need to be completed in the publication of the Council's CIL programme	Agreed. This a requirement of adopting a CIL Scheme
CIL monies should be spent/ used on programmes determined by the Council along with parish councils and not those prioritised by the developers	Agreed. The different tiers of local government will have to work closely together to coordinate CIL spending
The charging rates will have to be supported by an appropriate evidence base and subject to public participation / consultation	Agreed. The CIL viability study provides the evidence base for this. The initial consultation period will run from 14 <sup>th</sup> June to 29 <sup>th</sup> July 2013.
The document does not refer to the New Homes Bonus which could be used to provide a revenue stream for affordable housing	The New Homes Bonus Scheme and the priorities for spending it are not matters for the Local Plan.

CIL appears to be a good scheme but if margins are tight and developers can't afford to fund the entire required infrastructure then where does the balance of the funding required come from?	The balance of funding will come from traditional sources such a national grant and finding sources and local authority capital budgets.
CIL offers important new opportunities but also presents major challenges. It requires a new set of relationships between District and County Councils and other partners to draw up and agree CIL, but to create a long-term stable framework for them to be implemented over many years	Agreed.
<b>Summary of Suggested Changes to the Plan: CIL</b>	
Kenilworth Society suggests the consideration of the removal of CIL charges on the Kenilworth development	The CIL viability study shows that residential development in Kenilworth is viable and can contribute to the CIL scheme. This is reflected in the Preliminary Draft Charging Schedule
The development industry can assist the local planning authority and other stakeholders in formulating a robust CIL and this expectation of co-operation should be added to the policy	The development industry can assist in providing advice, but the final decisions on how CIL money is spent will lie with the local authorities.

**TABLE 3: PO3 Broad Location of Growth**

PO3Broad Location of Growth	
Consultation Comment	Response
<b>Strategy – Distribute Growth across the District</b>	
The approach to distribute development has not been justified (where is the evidence?) and does not provide an exceptional circumstance for Green Belt development.	Justification for the distribution of development was provided in paragraphs 7.8 – 7.15. The point about exceptional circumstances is noted. Further work has been carried out in this respect particularly with regard to the capacity of “edge of urban” sites outside the Green Belt to accommodate development. This additional evidence is taken into account in the Revised Development Strategy.
The plan does not distribute development evenly according to local need and as a result there is a disproportionate impact of development on some communities (e.g. Warwick).	The distribution of development must take into account land constraints such as sites of natural or historic importance; the location of the existing Green Belt; sustainability credentials; and land availability as well as local need.
The approach should involve even wider dispersal across the district on smaller sites, focusing on sustainable development rather than try to placate developer interests. This will have the additional advantage of encouraging development led by smaller local firms rather than national housebuilders.	The sustainability appraisal suggests that sites on the edge of the urban area are generally more sustainable than rural sites. The approach is to focus development on the most sustainable sites, taking into account issues such as the Green Belt and the natural and historic importance of particular areas.
Numbers proposed for Warwick are excessively high (disproportionate) and will cause transport infrastructure problems.	The distribution of sites takes into account the location of the Green Belt and suitability and availability of sites across the District. The Strategic Transport Assessment shows that this level of increased traffic can be accommodated through improvements to the existing network.
Proposed growth in villages is too low and is leading to pressure for more development in Warwick.	The sustainability appraisal suggests that sites on the edge of the urban areas are generally more sustainable than rural sites. Villages lack the necessary facilities and services, as well as public transport, to support levels of growth beyond those necessary to meet local needs. Further, much of the rural area is situated in the Green Belt. The

	approach is to focus development on the most sustainable sites outside of the Green Belt where possible.
Warwick has grown by more than twice the national average over the last 11 years – it should not therefore be taking such a high proportion in the future.	National planning policy requires local authorities to meet projected levels of growth.
Go back to the locations proposed in the emerging Core Strategy.	Evidence from new studies has demonstrated that additional development to the south of Warwick and Leamington, in locations similar to those in the Core Strategy, can be accommodated without undue harm to landscape character and the transport network.
No clear reason why approach from previous local plans has been changed. These sought to focus development on brownfield sites, regeneration of urban areas and limited growth in villages.	The availability of brownfield sites within the existing urban areas is limited and not sufficient to accommodate future growth. The Revised Development Strategy aims to further promote the availability of brownfield sites.
Creation of new villages should be considered.	The sustainability appraisal indicated that this would not be the most sustainable pattern of development
Development should be focused to the south of the towns where new housing is close to the main employment areas and better infrastructure exists.	Evidence from new studies has demonstrated that additional development to the south of Warwick and Leamington, in locations similar to those in the Core Strategy, can be accommodated without undue harm to landscape character and the transport network.
The garden towns proposals do not make major urban extensions any more palatable.	Noted
Distributed growth will stretch the lines of communication for emergency services and police in particular.	Emergency services and the police are consulted on the plans and if appropriate new infrastructure to accommodate their needs will be included
Focus should be on small urban sites with higher densities.	The Revised Development Strategy does places a greater emphasis on these sites, but there are only a limited number of possible sites available.
PO3 should state a preference for allocating land outside the Green Belt	The Revised Development Strategy addresses this point
Focusing development on the edge of urban areas is fundamentally at odds with avoiding coalescence. Instead development could be focused around Hatton Park.	There are tensions relating to coalescence, which the Revised Development Strategy has tried to address. Hatton Park is not considered to be a particularly sustainable location and is located within the Green Belt.
Instead of urban extensions, we should look at a small new town of approx. 10,000 units either east of Coventry or close to the A46/M40 junction or around Hatton.	The sustainability appraisal indicated that this would not be the most sustainable pattern of development
The 4 alternative options details in table 7.3 are more consistent with the NPPF than the preferred options – although more should be done to set out the pros and cons of these options.	The Revised Development Strategy provides a further set of options. The pros and cons of these are set out in the sustainability appraisal
<b>General Comments</b>	
New development areas need to align with concept of sustainable development and not all the proposed sites do this.	The Sustainability Appraisal shows the extent to which the proposals align with sustainable development. The Revised Development Strategy seeks to provide for a more sustainable pattern of growth
New development to the south of the Towns could use Leamington Retail Park as an additional town centre, thus complementing the other town centres.	Whilst the retail facilities at the Retail Park can provide useful services for the new development, their expansion is not supported as this is likely to undermine rather than complement existing town centres.
New development to the north of towns will undermine the vitality of town centres – especially retail	Unless the development is accompanied by significant retail development (which is not proposed), the evidence suggests that edge of urban development will help to support existing town centres.
The Council has allowed a contingency of 1300 and further contingency is included in the low densities proposed for some sites. This allows the Distribution of Growth – especially in the Green Belt - to be revised.	Noted
The surplus should be used to reduce Green Belt	The Revised Development Strategy proposes less Green Belt

releases	development
Cross boundary issues should be more carefully considered to explore how the District could accommodate unmet need from other areas.	This will be explored following the completion of the Joint SHMA
Habitat data needs to be updated to take account of WCC's new model which looks at Habitat Distinctiveness and Connectivity.	WCC ecology will be consulted on all sites
Productive farmland should not be used for development – we need agricultural land to produce food and reduce reliance on imports.	Productive farmland is important but the national planning policy places more weight on the need to bring forward suitable sites to meet development needs
There are technical flaws in the way transport modelling has been done. This has led to an inaccurate view of how the location of growth will impact on congestion. No limit has been placed on queue lengths. If it is, the locations for growth may well be different.	The technique and assumptions involved with the Phase 2 and 3 strategic transport assessments has been changed.
More should be done to bring empty properties back in to use before allocating new land for development.	The Council's Empty Homes Strategy 2011-2014 sets out a strategy and an Action Plan.
In previous consultations there has been strong objection to further development to the south of Warwick. These proposals are therefore not supported by the public.	This is accepted, but Green Belt restrictions make it difficult to find alternative options capable of meeting the required level of growth.
Using the term "edge of urban area" is misleading. Really this is development into rural areas and the wording of PO3 should be changed to reflect this.	This point is understood, but edge of urban is terminology that is used widely and to introduce alternative terms may cause misunderstandings
We should make the most of what we have (rich heritage, natural beauty and some need for regeneration) rather than building more in open countryside.	There are not sufficient sites within our urban areas to accommodate the required level of growth. Development on green field sites is therefore needed
The Garden Towns concept is flawed as the densities are too low and result in more land needing to be allocated than necessary. Densities of 100 to 200 should be achievable.	Densities of over 50 dwellings per hectare (dph) are extremely hard to achieve even within urban areas and particularly when demand for flats is low (as it is projected to be over the Plan period). Densities over 40 dph are rarely appropriate within urban extensions due to the impact they have on open space requirements and the character of the area. Further, land needs to be set aside for sustainable urban drainage systems. There is a balance to be struck between making the best use of land and other issues such as providing sufficient open space, providing for sustainable drainage systems and making adequate provision for car parking.
It would be better to free up land in urban areas by sinking multi storey car parks below ground. This additional land could be used for higher density housing.	The cost of sinking car parks in to the ground is likely to be prohibitive
Some areas proposed are within flood plains	Flood risk has been and will continue to be taken in to account is selecting sites and bringing forward development in a way which mitigates the risk.
Sustainable patterns of development need to take account of wildlife corridors.	Noted
The SHLAA and the assessment of sites should include a full assessment of impact on the historic environment – including undesignated sites and historic landscapes.	Historic environment is taken in to account in selecting sites. This is one of the reasons why The Asps and Loes Farm are not in the Revised Development Strategy options.
Selection of sites seems to reflect developer preference rather than good planning.	Developers' preference is not taken in to account in selecting sites. However sites do need to be suitable, available and deliverable. It is the private sector which will develop sites and if sites are not considered to be deliverable by house builders, then it would not be appropriate to include them.
Distribution of growth should be informed through detailed environmental testing to ensure	Environmental impacts are considered in selecting sites and in undertaking the sustainability appraisal.

safeguarding of the environment	
Table 7.2 adds up to 8330 not 8360 as present.	Noted
Para 7.15 is an invitation to landowners to neglect their land in the hope that this will increase their chances of getting planning permission.	In this context, the “quality of land in the Green Belt” refers to quality in terms of the 5 reasons for including land in the Green Belt. It does not refer to landscape quality since the purpose of the Green Belt is to prevent urban sprawl.
Some sites allocated in the plan are unlikely to be delivered during the plan period. The inclusion of a flexibility allowance is therefore essential.	It is expected that all sites will be deliverable within the Plan period
The current infrastructure cannot cope with the level of development proposed.	Infrastructure improvements will be required to support development
Traffic congestion will increase as a result of these proposals.	Highway improvements will be required to support development
Even outside the Green Belt landscapes, habitats, access and scenic views are important (NPPF). Use of green land will destroy habitats and recreational land	There are also opportunities to enhance wildlife and recreational opportunities as a result of development (for example proposals for Whitnash Brook and the Tach Brook Country Park
The NPPF also makes it clear that the economic and other benefits of the most versatile agricultural land should be given weight.	Agreed, but this does not override the need to identify sites to accommodate growth.
Proposals are damaging to the countryside, amenity and landscape. They also use valuable agricultural land at a time when food is needed.	See above. Also a landscape study has been undertaken (November 2012) to show how impacts on the landscape could be mitigated
Edge of urban developments encourage car usage	This is likely to be true, but these locations tend to be more sustainable than other options because existing bus services can be extended and improved and residents have access to schools, jobs and services by public transport. Further, there are opportunities to provide local services on-site such as primary schools, convenience shops and health facilities. Proposals will also be accompanied by sustainable transport options to reduce car use.
There are sites where planning permission has been granted but the development is not complete (e.g Pottertons). This indicates that there is no need to use greenfield sites and productive agricultural land.	There are not enough brownfield sites available within the urban area to accommodate the District’s growth requirements
The windfall allowance needs further justification	A technical paper has been produced to update the windfall allowance proposed in the Revised Development Strategy
We are concerned at the inclusion of Map 2 in the full document, which appears to include land not shown in the preferred options Map 4.	Map 2 only shows potential SHLAA sites (in other words possible options) and not the actual development proposals
The large allocations will attract large developers who can enact s.106 agreements which any future outline permission will require. The scale of these allocations will squeeze out any opportunities for local businesses or future school leavers, with large firms tendering the supply of goods and labour outside the area.	This is not an issue that can be taken in to account in selecting sites. It is intended that the Plan will identify a range of sites – both large and small – to better enable delivery
<b>South of Warwick (and Whitnash and Leamington)</b>	
Sites to the south of Warwick and Leamington were considered suitable for development in the emerging Core Strategy. They are surely therefore still suitable now.	The Revised Development Strategy includes these sites
No robust evidence has been put forward as to why more development could not be accommodated to the south of the towns.	The Revised Development Strategy includes these sites
There are areas of the district that are not Green Belt and which have scope for development with minimal impact on landscape, access, habitats and Green Belt.	The Revised Development Strategy includes these sites

Sites outside the Green Belt to the west and east of the towns have not been fully considered and need to be exhausted before Green Belt land is put forward.	Sites to the west and east of the towns are either in the Green Belt (to the west) or are heavily constrained (eg by gas pipelines etc to the east)
The high pressure gas pipelines should not be a significant barrier to growth in those areas.	These are a significant constraint and are very expensive to mitigate. This makes sites impacted by the pipelines unviable and therefore undeliverable
Locating development close to employment and retail will aid regeneration.	Agreed
Development south of the river will inevitably lead to more traffic in areas that are constrained by limited river crossings.	This is true, but the transport mitigation package suggests the growth can be accommodated within the existing (improved) network
The exclusion of the area to the south of Harbury Lane from the Preferred Options has not been adequately explained.	The Revised Development Strategy includes these sites
If current proposals continue it will lead to the development of Warwick all the way up to the M40 which will have a huge impact on infrastructure and the urban form of the town.	The Revised Development Strategy includes a Country Park along the Tach Brook which is designed to provide permanence to the southern edge of the towns – at least in that section. In addition, the proposals for Asps are not included in the Revised Development Strategy.
Warwick's historic centre will be affected by these proposals – especially increased traffic resulting in congestion and air pollution.	This is a concern that will need to be mitigated as far as possible in the final development proposals. The transport proposals accompanying the Revised Development Strategy seek to limit traffic through Warwick Town Centre.
Countryside to the south of Warwick will be lost forever.	Noted, but there are insufficient brownfield sites to accommodate all the development which is required to meet our needs.
Building on the edge of Warwick will reduce distance to Coventry to such an extent that it will encourage car commuting as use of public transport will not be practical or will be more time consuming. Public transport proposals will therefore have no impact.	Public transport initiatives will have some impacts. The transport modelling suggests that there will continue to be commuting to Coventry, but this is not likely to increase significantly as a result of these proposals.
Grove Farm is a better site than the Asps and East Whitnash and should be included.	Further research regarding the landscape and transport impact of developing these sites has concluded that land at the Asps should remain open due to its value as a backdrop to the historic Warwick Castle Park but that development at Grove Farm could be accommodated without undue impact on landscape and transport infrastructure. The impact on landscape and natural heritage at Whitnash East could be mitigated by ensuring a sufficiently wide barrier between development and the Whitnash Brook. The Revised Development Strategy, therefore, includes Grove Farm and a smaller development area at Whitnash East, but excludes the Asps
<b>Kenilworth</b>	
The proposals do not allocate enough development to Kenilworth – it contains 17% of current households but provides for only 9% of the growth in the Preferred Options. The SHMA identifies a need for 111 house pa in Kenilworth, but the Preferred Options only provide 42pa. It also fails to address Kenilworth's need for significant amounts of affordable housing and fails to recognise that Kenilworth is well located for employment areas in and around Coventry.	Constraints such as the Green Belt and Kenilworth Castle restrict the potential for high levels of development in and around Kenilworth. The Thickthorn site provides sufficient opportunities for the town to meet some of its housing and employment needs.
<b>Coventry and the Gateway</b>	
The Gateway should be considered in deciding where to locate housing and would support proposals to develop some to the north of Leamington.	The Gateway is a sub-regional employment site. Its impact therefore is much wider than Warwick District. Whilst it has therefore been considered as a factor in where to locate development, it is not an overriding reason to locate development in any particular location. There are constraints to housing

	development in the area such as noise from the A45 and the airport as well as ground contamination. These are less of an issue in relation to employment development.
If the Gateway goes ahead, there will be a need to focus housing in closer proximity to the jobs created there. Housing for the Gateway should not be distributed across the District.	See above
Housing associated with the Gateway should be provided in Coventry as this is where the majority of employees will live.	See above. The Joint SHMA will consider the extent to which houses associated with the Gateway should be located in Coventry.
There is no explanation for why a regional investment site is being considered jointly with Coventry.	This is explained further in the Revised Development Strategy
More student accommodation should be provided in Coventry to free up family housing in south Leamington.	Policies to control the concentration of student accommodation, particularly in central and south Leamington, will be included in the Local Plan. The Plan cannot restrict further student housing in Leamington, but it can ensure that it is located in areas which have limited impact on local amenity.
Development should be focused north of Leamington and Kenilworth towards Coventry where growth in jobs is likely to occur. Locating housing to the south will increase cross-town journeys.	Most of the local jobs are to the south of Warwick and Leamington (Tachbrook Park, Technology Park etc). Housing can be justified close to these areas. The M40/A46 will provide a route to Coventry which bypasses Warwick and Leamington
Coventry should be included in the list of settlements in para 7.9 and sites allocated accordingly.	Whilst this point is understood, the southern edge of Coventry is heavily constrained by Green Belt and the City Council have indicated they would not support development in this location
There are many more suitable sites in the SHLAA than presented in the preferred options. Sites should be chosen to reflect existing populations (proportionate), including on the fringe of Coventry at Baginton and Westwood Heath and to minimise car usage	The southern edge of Coventry is heavily constrained by Green Belt and the City Council have indicated they would not support development in this location
<b>North of Leamington and the Green Belt</b>	
The proposals do not distinguish between Green Belt and non-Green Belt land. This should be a fundamental part of the strategy for the broad location growth.	The Revised Development Strategy provides more differentiation between Green Belt and non-Green Belt sites. In the Revised Development Strategy, Green Belt sites are only included where exceptional circumstances can be justified.
Too much development is proposed in the Green Belt on the edge of the towns – Green Belt development should be limited to 20% of the total	Further research relating to transport and landscape issues have indicated that development in the area around Harbury Lane to the south of the towns, outside the Green Belt, can accommodate development without seriously impacting on landscape value, transport infrastructure and the gap between the towns and Bishops Tachbrook. The Revised Development Strategy reduces Green Belt allocations to approximately 17% of the allocated sites
Exceptional circumstances for Green Belt development have not been justified and cannot be justified.	Further research relating to transport and landscape issues have indicated that development in the area around Harbury Lane to the south of the towns, outside the Green Belt, can accommodate development without seriously impacting on landscape value, transport infrastructure and the gap between the towns and Bishops Tachbrook. The Revised Development Strategy proposes a different distribution of development with less development (17% of allocated homes) in the Green Belt. Green Belt sites are only included where exceptional circumstances can be justified.
There are suitable non-Green Belt sites available and these should be used in preference to Green Belt sites (e.g. south of Leamington and Warwick). These are close to employment and retail.	See above
Except in Kenilworth, Green Belt sites should not be used.	See above
Green Belt should be preserved for future generations - it is a valuable asset to the area and adds to the character of the towns.	See above



In the Green Belt Study, the areas identified for consideration for development are not necessarily suitable for development and other factors such as historic and natural environment and quality of agricultural land are also important and exceptional circumstances still need to be justified.	See above
Green Belt policy has been effective for decades – why change it?	See above
Building in the Green Belt does not have public support (60% of respondent in previous consultation opposed development in the Green Belt).	See above
The plan should do more to promote the development of previously developed sites in the Green Belt rather than greenfield sites.	See above
Major urban extensions in the Green Belt, along with infrastructure (roads) are not the most sustainable form of development for the district as there are less environmentally sensitive options available.	See above
Removing the surplus provision of 1400 houses would enable the north Leamington Green Belt sites to be omitted	See above
The historic and environmental importance of areas to the north of Warwick needs to be given more weight (in accordance with the NPPF) – particularly in comparison with areas to the south of the Town.	The historic and landscape issues relating to Loes Farm have been instrumental in this site being omitted from the Revised Development Strategy
Proposed densities should be increased to take pressure off Green Belt land	There is a balance to be struck between densities and providing a high quality environment which is in keeping with the character of the surroundings
Need to plan new towns rather than constant extending in to the countryside. The proposed approach will lead to our towns becoming too large – people need access to the countryside.	There are no suitable locations in the District for new Towns. The sites proposed in the Revised Development Strategy have been appraised for sustainability including recreation and access.
Green Belt should not be used for employment purposes when there are employment units, and land available across the District, that is not being used.	The employment land available in the District needs to be refreshed to ensure it meets the needs of the future economy. Only where exceptional circumstances can be justified is employment land included within the Green Belt
Proposals for Thickthorn and north of Leamington are in direct conflict with the Council's own policies on the Green Belt as set out in PO16	In the Revised Development Strategy, Green Belt sites are only included where exceptional circumstances can be justified. There is a significantly reduced amount of development proposed in the Green Belt in the Revised Development Strategy. Regarding Kenilworth, there are no non-Green Belt sites available to meet the town's needs for housing and employment.
The Green Belt between Leamington and Kenilworth is particularly significant for separation, historic character, recreation, health and wellbeing, natural beauty and access. Proposals in this area erode this.	In the Revised Development Strategy, Green Belt sites are only included where exceptional circumstances can be justified. Regarding Kenilworth, there are no non-Green Belt sites available to meet the town's needs for housing and employment.
The countryside around Leamington is under threat for HS2 and is less good quality to the south. We should retain the valuable areas of landscape to the north.	Whilst there are areas of high quality landscape to both the north and south of the towns, the Green Belt means that development to the north is more constrained. The Revised Development Strategy therefore proposes more development to the south, outside of the Green Belt.
<b>Rural Areas and Villages</b>	
Piecemeal development in villages is unsustainable and harder to support with infrastructure	Village development will be focused on those villages with services to support development
Extra development in villages will place extra strain on the very limited infrastructure they have – for instance traffic congestion, school capacity, availability of rural jobs	Proposals for village development will take account of infrastructure capacity to ensure local infrastructure can accommodate the growth. In some cases development will help to maintain existing services.
More development in villages will lead to greater	Whilst village development is general less sustainable than urban

reliance on the car. This is not a sustainable form of development.	and edge of urban development, some growth in villages is justified to maintain existing services.
There is scope for more housing at Hatton Park.	In the Revised Development Strategy Hatton Park has been identified as a Secondary Services village with capacity to support an additional 70-90 houses.
Distributing 10% of development to rural areas seems arbitrary and seems motivated by the decision to “share the pain”, especially as these villages lack facilities to support sustainable development	Whilst village development is generally less sustainable than urban and edge-of-urban development, some growth in villages is justified to support existing local services. The proportion allocated to villages reflects the services available and initial sites assessments
Decision to identify the 5 category 1 villages for 100 homes is arbitrary and the distinguishing characteristics of these 5 villages in comparison with other villages or urban areas are not explained.	Further work has been carried out to justify a revised village hierarchy with four levels of settlement according to services and the size and nature of the settlement.
The proposals would mean loss of identity and character in villages – especially to the West of Warwick – just because there is a desire to avoid coalescence.	Development will be brought forward in locations and in ways which respect the character of villages and especially the Conservation Areas.
There are missed opportunities at Bubbenhall and Baddesley Clinton.	In the Revised Development Strategy, these village have both been assessed as “Small and Feeder Villages” and as such will not be allocated any development sites
The distinction of category 1 and 2 is too simplistic and unnecessary. Development proposals in villages should be assessed individually	Further work has been carried to justify a revised village hierarchy with four levels of settlement according to services, size and nature of the settlement.
Consider significant expansion of existing villages or develop a new village	The Revised Development Strategy proposes some growth in the most sustainable villages
The proposal for 30-80 houses in Category 2 villages is too high and is in excess of local need.	Further work has been carried out to justify a revised village hierarchy with four levels of settlement according to services and the size and nature of the settlement.
All villages - including those which are not category 1 and 2 - should have some development to sustain the population and provide opportunities for young people. PO3 needs rewording to ensure this allowed for	Further work has been carried out to justify a revised village hierarchy with four levels of settlement according to services and the size and nature of the settlement.
Categorisation of villages for target numbers of houses is wrong. This approach is mismanagement and will lead to proposals that are inappropriate for the villages concerned.	Further work has been carried to justify a revised village hierarchy with four levels of settlement according to services, size and nature of the settlement.
Many of the villages proposed for development are within the Green Belt and exceptional circumstances have not been justified.	A Green Belt review is being carried out to assess village Green Belt boundaries
Large villages are not part of the character of the District and should not be planned for.	The proposals do not seek to significantly change the character of any of the villages
Many of the villages proposed for development are along the A4177/B4439 corridor which lacks facilities to support sustainable development.	Further work has been carried to justify a revised village hierarchy with four levels of settlement according to services, size and nature of the settlement. Access to services is a key element in this
Why have villages to the north and east of the District not been included?	The Revised Development Strategy has revisited the hierarchy of all the villages, including those to the north and west of the District
We should focus more development in villages as this will remove pressure for major new suburbs and will help provide affordable housing and sustain facilities in villages	Whilst village development is in general less sustainable than urban and edge of urban development, some growth in villages is justified to support existing local services. However, higher levels of growth would not be appropriate because of the lack of public transport and other facilities.
We particularly support the identification of Bishops Tachbrook as suitable for housing allocations.	Noted
<b>Coalescence</b>	
The proposals state an intention to avoid coalescence	This remains the intention of the Revised Development Strategy
Proposals are the thin end of the wedge that will ultimately lead to the merging of Warwick, Leamington	The Revised Development Strategy proposed a reduced amount of Green Belt development. Green Belt protection outside the areas

and Kenilworth	proposed for development will continue to be restricted
Ultimately these proposals could lead to merging with Coventry as we develop more roads	The Revised Development Strategy proposed a reduced amount of Green Belt development. Green Belt protection outside the areas proposed for development will continue to be restricted
<b>Brownfield Sites</b>	
More development should be focused on brownfield sites within urban areas and town centres. The NPPF says this should be prioritised over greenfield sites using a sequential test, yet the plan has not done this.	The Revised Development Strategy includes provision for over 1000 houses on Brownfield sites. These sites have been prioritised ahead of greenfield sites
The Plan needs to be flexible throughout the 15 years so that if brownfield sites become available, these are prioritised over Greenfield sites even if the Greenfield sites have been allocated.	The Plan includes an allowance for windfall sites which are mainly expected to be brownfield as they become available
More brownfield sites are likely to come forward and traditional industrial areas move out of the town. This could be given more focus.	The Revised Development Strategy includes proposals to allow 450 houses on consolidated employment areas.
It is inappropriate to destroy Green Belt when there is an abundance of brownfield sites available just a few miles away in Coventry	The brownfield sites in Coventry are part of the land supply to meet Coventry's development requirements
Only brownfield sites should be acceptable and as some sites with planning permission have not been built out, it is questioned as to why greenfield allocations are required at all.	There are insufficient brownfield sites to meet the District's housing requirements.
<b>Phasing</b>	
Phasing is unnecessary. If the sites are suitable and sustainable it should be immaterial when they come forward and this should be left to the market	The purpose of phasing to ensure that the land supply is not developed-out too quickly thereby ensuring that there is land supply available for the last 5 years of the Plan.
The proposed phasing should not act as a cap or a break on housing delivery. If infrastructure is available or can be provided in parallel with the development then delivery should not be restricted	The purpose of phasing to ensure that the land supply is not developed-out too quickly thereby ensuring that there is land supply available for the last 5 years of the Plan.
Phase 1 and 2 should be focused on brownfield sites only.	In general, we would seek to bring forward brownfield sites early in the plan period. However, the supply is insufficient to meet the needs up until 2024.
Phase 3 sites may not be needed if a flexible approach is taken. The least appropriate sites and those sites where it is hardest to deliver infrastructure should therefore be put in phase 3.	Noted
Phasing development as indicated in the Preferred Options will hamper the delivery of proven affordable housing need – phasing should not be controlled through the Plan.	The purpose of phasing to ensure that the land supply is not developed-out too quickly thereby ensuring that there is land supply available for the last 5 years of the Plan.
<b>Summary of Matters Raised in Support</b>	
Support larger sites on the edge of urban areas as these can be supported more easily by infrastructure and are more sustainable.	
Approach to distributing development across the district at the same time as avoiding coalescence makes sense (subject to meeting the principles of the NPPF).	
Distributing development across the District is the right approach because it leads to small impacts on a number of places rather than large impacts.	
Support the approach to phasing, but phase 1 should be focused on brownfield sites only.	
Greenfield land will be required given that there is so	

little brownfield land available	
Support approach to village development in the Green Belt. The identification of boundaries around villages should be included in the Local Plan.	
More development in villages and rural areas would support infrastructure and services in villages and in some cases may help revitalise some services which have been lost. This will also take the pressure off the urban fringe.	
Support Green Belt releases to the north of Leamington as it will rebalance the urban form, reduce pressure on the infrastructure in the south of the towns and will enable more effective transport planning.	
Garden suburbs approach will address concerns that urban extensions will damage the rural setting of towns.	
Distributed development helps a range of settlements to expand (e.g. Kenilworth), providing opportunities for these to remain vibrant and sustainable communities with a better housing mix (starter units for young families and units for older people wanting to downsize).	
Phasing should be informed by the potential to make best use of existing infrastructure	
Limited development in villages is supported as long as it is in accordance with the Parish Plan and Parish design Statement	
<b>Summary of Suggested Changes to the Plan</b>	
No development in the Green Belt – these should be kept permanently open.	Green Belt development will only be included where exceptional circumstances can be justified
The Green Belt land to the north of Leamington performs well in relation to the 5 purposes of Green Belt	These sites are not included in the Revised Development Strategy
Switch the location for housing development from north Warwick and Leamington to south Leamington, Whitnash and Bishops Tachbrook, and if necessary the Finham area as per the former Core Strategy.	The Revised Development Strategy proposals are generally in line with this suggestion. The land identified in the Core Strategy at Finham was specifically allocated to meet the needs of Coventry, in line with the Regional Spatial Strategy. This land is no longer available, the Regional Spatial Strategy has been revoked and Coventry City Council have not requested that land be provided to meet their needs.
A sequential test should be applied throughout the 15 years of the plan to ensure that there are not preferable brownfield sites prior to greenfield sites being given permission.	In practice this is difficult to achieve because if developments are to proceed in a timely manner, with adequate infrastructure, developers need an element of certainty. The Revised Development Strategy includes a realistic allowance for windfall sites (as yet unidentified sites on brownfield land).
Location of development should be more focused on the sustainable growth of villages and on the local economy and location of jobs	These suggestions are both included in the Revised Development Strategy
Proposals should distinguish between Green Belt and non-Green Belt land and should focus on minimising development in the Green Belt (some suggest no more than 20%, other suggest none at all is needed)	The Revised Development Strategy does this
Go back to the location proposed in the emerging Core Strategy.	The Revised Development Strategy is more similar to the Core Strategy
Consider creation of new villages or significant expansion of existing village(s)	Not included – not a sustainable pattern of development and difficult to find available, suitable sites
If the Gateway goes ahead, there will be a need to focus housing in closer proximity to the jobs created there.	The relationship between housing and the Gateway has been assessed (December 2012). This suggests the relationship is not all

	that strong
More development should be directed towards Kenilworth to reflect the proportionate size of the town and to deliver the affordable housing the town needs	See comments above
Find more brownfield sites that could be suitable for residential development.	Addressed by the Revised Development Strategy
Make better use of infill sites and garden land	Included within windfall allowance
Development should be focused to the south of the towns where new housing is close to the main employment areas.	Addressed by the Revised Development Strategy
Limit growth in Category 2 villages to reflect local need only.	Villages have been reassessed and new hierarchy developed
Create new settlement to west of Warwick around Hatton Park as this area has excellent transport links, including by train and cycle as well as being close to employment and services.	Hatton Park has capacity (sites and services) for only limited development
Increase size of recently developed estates rather than changing the character of villages by locating development in villages	Some development proposed for villages to support local services
The approach should involve even wider dispersal across the district on smaller sites, focusing on sustainable development rather than try to placate developer interests. This will have the additional advantage of encouraging development lead by smaller local firms rather than national housebuilders	The sustainability appraisal suggests that sites on the edge of the urban area are generally more sustainable than rural sites. The approach is to focus development on the most sustainable sites.
Policy PO3 needs rewording so that it aligns with Policy PO4 in relation to categories of villages	Noted
We should look at a small new town of approx 10,000 units either east of Coventry or close to the A46/M40 junction or around Hatton	There are no suitable sites support this approach
Development could be focused around Hatton Park.	Hatton Park has capacity (sites and services) for only limited development
Focus should be on small urban sites with higher densities.	See comments above relating to densities
Build on brownfield sites available in Coventry rather than destroy the greenbelt.	The brownfield sites in Coventry are part of the land supply to meet Coventry's development requirements
Coventry should be included in the list of settlements in para 7.9 and sites allocated accordingly.	The housing requirement is set at a level to meet the needs of settlements in Warwick District. At present, Coventry City Council has not requested that land is provided in this District to meet the needs of Coventry.
Include Grove Farm and remove Whitnash East and the Asps.	Grove Farm is included in the Revised Development Strategy, the Asps is not
Working backwards a revised development strategy from a net provision of new dwellings of 4836. LESS the rural allocation which can be increased by 1140 with a further 650 accommodated at major brownfield sites in Bubbenhall, Baddersly Clinton and Baginton. Giving a rural total of 1970. LESS the sites on the edge of Kenilworth, 770. This reduces the requirement for large sites on the edges of Warwick, Leamington and Whitnash to 2100 new dwellings, significantly relieving the pressure that the preferred options is placing on high quality rural land.	This pattern of development is not considered to be as sustainable as that proposed in the Revised Development Strategy. The level of growth implied in this suggestion is insufficient to meet the District's requirements

# TABLE 4: PO4 Distribution of Housing (General)

PO4: Distribution of Sites for Housing	
Consultation Comment	Response
<b>Summary of Matters Raised in Objections</b>	
<b>DEVELOPMENT STRATEGY</b>	
Should only pursue schemes that meet the need of local people.	We are required to provide for the objectively assessed housing requirements of the District. This must include projections relating to in-migration. If we plan only to meet the needs of local people the Plan will be found unsound
The Preferred Options relies too heavily on windfalls which is inconsistent with the plan-led system.	A technical paper has been produced to justify the windfall allowance propose in the RDS
Urban fringe development sites appear to have been selected without a proper explanation as to why.	This is justified in the sustainability appraisal which identifies this as a more sustainable form of development
The proposals amount to a divide a rule tactic pitting different communities against one another – housing should be concentrated in urban areas to avoid this.	The RDS includes provision for over 1000 houses on Brownfield sites. These sites have been prioritised ahead of greenfield sites. There are insufficient sites to meet all our needs on brownfield sites
Distributing development is not in the NPPF	Noted
The plan ignores utilising existing brownfield sites.	The Revised Development Strategy maximises brownfield development. But There are insufficient sites to meet all our needs on brownfield sites
<b>Green Belt</b>	
Building on the green belt will alter the character of the District	Green belt development will only be proposed where exceptional circumstances can be justified
The SHLAA has been inconsistent in its considerations of the benefits of some sites over others. It does not fully consider the value of the North Leamington Green Belt.	The SHLAA considers suitability, rather which sites a preferred
The Local Plan Places Greater importance on policies in the Regional Spatial Strategy than the National Planning Policy Framework. If greater weight had been given to the NPPF, the North Leamington Green Belt would not be considered as suitable.	The RSS has now been revoked and the Revised Development Strategy proposes a different approach with fewer green belt sites.
No exceptional circumstances to develop in the Green Belt.	Green belt development will only be proposed where exceptional circumstances can be justified

What has changed between the 2009 Core Strategy and the Preferred Options in terms of the decision to develop Green Belt sites.	Concern about coalescence and infrastructure in the south – but these have now been addressed in the Revised Development Strategy
There is available land outside the green belt. Therefore the proposed development sites within the green belt are not justified.	The Revised Development Strategy takes account of this.
<b>Alternative General Areas</b>	
The low level of housing growth around Kenilworth contrary to expansion plans at the Gateway and the University of Warwick.	Kenilworth is constrained by the Green Belt and has limited employment within the town
It would make more sense to develop around Warwick Parkway Station and the proposed station around Kenilworth.	These areas are in the green belt and like all green belt sites would need exceptional circumstances to justify their inclusion
What steps are the council taking to get empty homes back into use?	The Council's housing department addresses this issue and an allowance has been made for this in the housing requirements
Development should not be located in the north of Leamington but to the south where the majority of current employment opportunities exist.	The Revised Development Strategy takes account of this.
Support an amended option 2 as set out in Table 7.3 rather than the Preferred Option as this give a better geographical spread. However less development in east of Milverton and more development east of Kenilworth would improve option 2. Also more development south of Harbury Lane.	Some of these proposals are included in the Revised Development Strategy.
There is too much concentration to the south of Warwick (especially along Europa Way) and in Bishops Tachbrook area (3250 homes – over 30% of the total). This is not a balanced distribution and will cause traffic congestion.	It is accepted that development is focused in this area. This mainly due to it being outside the green belt. The Traffic studies show that the highway network can accommodate this growth with the right mitigation
Half of the proposed development is on the south side of the district, given that most of the new employment opportunities are to the north (e.g. Gateway) commuting will increase.	It is accepted that development is focused in this area. This mainly due to it being outside the green belt. There are also extensive employment areas south of Warwick.
A high proportion of development to be located in Warwick and yet little in the villages.	It is accepted that development is focused in this area. This mainly due to it being outside the green belt
<b>Villages</b>	
There should be no blanket spreading of housing across the villages – each must be viewed individually.	The proposed village hierarchy has been developed following a detailed review of the attributes of every village
There is no justification for the allocation of 500 homes to category 1 villages and it is therefore not clear how this will achieve sustainable development	These villages can accommodate growth due to the range of services available. The proposed level of growth can help support services and facilities in villages thereby supporting sustainability.
<b>Design and Development Briefs</b>	
Definition of development briefs needs to be clarified. They should not be formally adopted as this will hold up progress.	Noted. The final approach to this will be addressed in the submission draft plan

Garden suburbs will lead to low density sprawl, unnecessary land take and unsustainable transport.	Densities are not necessarily lower than other layouts. A balance needs to be struck between land-take and the quality of design.
There is potential for damage to the character of neighbourhoods and adjacent sites on infill sites without design guidance to achieve the best outcomes. This can mean less development on greenfield sites outside of existing towns.	Developments will be expected to achieve high quality design taking account of the Garden Towns prospectus
<b>Specific Sites - additions</b>	
<u>Land west of Warwick</u> : King Henry VIII Endowed Trust will work with stakeholders to bring forward development on its site to the West of Warwick.	This has been assessed and is restricted due to access and flooding constraints
<u>Oaks Farm, Kenilworth</u> should be included in the allocated sites. It has not been objectively assessed and smaller pockets of development to the west of Kenilworth could be justified as it is closer to retail and other facilities. This should be reconsidered looking at the land closest to the urban boundary.	This would represent an intrusion in the green belt without any natural boundaries to limit expansion
<u>Land at Crewe Lane, Kenilworth</u> : inclusion of more than one area at Kenilworth enables housing needs of the town to met through better provision of choice. Could be developed without prejudice to the green belt and is close to school at retail. Could initially develop land closest to urban edge and retain open land.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
<u>Land at Clinton Lane Kenilworth</u> : Potential to yield 300 units adjacent to residential area. Little impact on amenity of adjoining, minimise travel to work and meets sustainability criteria.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
<u>Land at Fernhill Farm, Rouncil Lane, Kenilworth</u> : surrounded on three sides by housing. It is incongruous that this is green belt and request that it is removed from the green belt.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
<u>Land at Dunns Pitt Farm, Hollis Lane, Kenilworth</u> : could provide a small amount of housing with limited infrastructure costs. Could enhance the community and assist in meeting housing growth requirements	The justification regarding the location for housing growth is set out in the Revised Development Strategy
<u>Land at Hatton Station and Hatton Park</u> : three sites available for development. These could be phased to reduce impact and to allow growth on sites adjacent to villages	This land is being explored as one of the options for villages sites
<u>Land South of Baginton</u> 50ha of land should be included as a strategic development site, close to the Gateway and close to the Coventry urban area with good transport links and could support cross border needs.	This would represent an intrusion in the green belt without any natural boundaries to limit expansion
<u>Land at Longbridge</u> Site was put forward in the SHLAA should be included as it is suitable available and achievable.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
<u>Land at Ford Foundry</u> Site could accommodate many houses, flats and amenities.	This is employment land, although land at station approach is included in the Revised Development Strategy



Land to the rear of Northumberland Road – a small additional site submitted capable of coming forward in the first phase of the plan period and yielding 30 – 40 houses.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land at Budbrooke, South of Birmingham Road and North of the Grand Union Canal could be excluded from development and identified as site for housing. It would not prejudice the purposes of the Green Belt. Site is well located in relation to public transport.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land South of Harbury Lane is available and outside the Green Belt, the Council's landscape evidence recognises this as suitable.	This is included in the Revised Development Strategy
Land adjacent to A45/A46 interchange, Baginton should be considered for inclusion as a site allocation. This could yield 250 houses close to the Gateway.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land at Kings Hills, adjacent to Finham should be reconsidered for development as it was in the 2009 Core Strategy. The land is still available.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land at Oak Lea, Howes Lane, Coventry should be allocated for 30 dwellings in phases 1. Removal from the Green Belt from this site would have very little impact on the countryside.	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land north of Common Lane, Kenilworth is outside the Green Belt, is suitable available and achievable for approximately 65 dwellings	The justification regarding the location for housing growth is set out in the Revised Development Strategy
Land at Tournament Fields this 5 hectare site should be allocated for residential development rather than remaining as an existing	This has been assessed in the Employment Land Review and is regarded as high quality land and it is therefore proposed that this is retained as employment land
University expansion means there is increased need for accommodation for students and staff. This should be planned for in the vicinity of the university.	The University's masterplan includes expansion plans in the vicinity of the University
<b>TRAFFIC/INFRASTRUCTURE</b>	
Concern at increase on traffic and objections to placing new roads through countryside, destroying wildlife, green belt, creating noise and visual impact.	There are no new roads proposed in the Revised Development Strategy except where they are needed to provide site access.
<b>Natural Environment</b>	
Whilst housing is important, so is agricultural land. No mention is made of this in the preferred option and it is wrong to have a planning framework driven solely by housing needs.	Productive farmland is important but the NPPF places more weight on the need to bring forward suitable sites to meet development needs
Sites should be determined by landscape and agricultural quality.	A landscape study has been undertaken (November 2012) to show how impacts on the landscape could be mitigated
Locations should focus on reducing the need to travel to minimise CO2 emissions.	This is one of the reasons why many of the sites are focused adjacent to the existing urban areas.
<b>Amenity</b>	
Proposals will have negative impact on Warwick Gates Community	Whilst it will impact on the immediate surrounds of Warwick Gates, there are also opportunities to improve services, facilities and access if development carefully planned
<b>Summary of Matters Raised in Support</b>	
<b>DEVELOPMENT STRATEGY</b>	

The Preferred Options offer a balanced and sustainable proposal – brownfield developments, urban expansion close to employment and revitalising villages. These principles should be retained.	
<b>Site Suitability</b>	
The exclusion of the New Milverton and Binswood allotment sites from the preferred options sites is supported.	
Support for the non-allocation of Leamington Cricket Club as this is one of the few significant sized green spaces left in Leamington Spa.	
Inclusion of Milverton and Blackdown sites is fair when taking into account development spread around the town.	
<b>Villages</b>	
30-80 houses in each category 2 village can be absorbed without changing the local character and can support local facilities and services.	
Baddesley Clinton Parish Council are broadly in agreement with the preferred option and recognise the need for some further development to meet the needs of the District.	
Support from landowners for Hatton as a category 2 village as there is a good range of services and public transport to towns. Green Belt Boundary should be altered to allow development.	
Supportive of approach but concern raised that development in the countryside should not result in conflict between new residents and existing farm businesses.	
<b>INFRASTRUCTURE</b>	
Consideration should be given to the impact development will have on local health infrastructure and it should be planned for with Warwickshire Public Health and the South Warwickshire Clinical Commissioning Group.	
<b>Summary of Suggested Changes to the Plan</b>	
<b>DEVELOPMENT STRATEGY / COALESCENCE</b>	
Take a broader view of the issues underlying the plan to take a more balanced approach between housing need and agricultural land.	We are required to provide for the objectively assessed housing requirements of the District. The Revised Development Strategy maximises brownfield development. However, there are insufficient sites to meet all our needs on brownfield sites, therefore housing development is necessary on greenfield land to meet the District's needs.
Contain the vast majority of new development outside the green belt on one new community with purpose built infrastructure.	No land sufficient for such a proposal has been identified in the SHLAA. Furthermore, it is considered that any such proposal would likely to have a greater impact than the existing Local Plan strategy and be less sustainable.
Increase proposed densities.	Densities are not necessarily lower than other layouts. A balance needs to be struck between land-take and the quality of design.

Convert and build on empty office blocks and factory units, rather than the Green Belt.	The Revised Development Strategy recommends consolidating employment land. A number of poorer quality employment areas in the District may be suitable for redevelopment for other uses. However, this strategy will not meet all of the District's housing needs for the plan period.
Land south of Leamington is available for development and appears a more realistic solution than developing north.	Recent strategic transport and landscape studies have demonstrated that there is capacity for development to be located on sites generally outside of the Green Belt (to the south of Warwick, Leamington & Whitnash). This approach is taken forward in the Revised Development Strategy
Land between Whitnash and Radford Semele should be considered before Green Belt development.	The justification regarding the location for housing growth is set out in the Revised Development Strategy.
Both Radford Semele and Lapworth could be considered taking a substantial level of housing growth in the Garden Suburb style. Both in sustainable locations and could support existing services.	The justification regarding the location for housing growth is set out in the Revised Development Strategy.
Student accommodation should be planned for in the vicinity of the University.	The University's masterplan includes expansion plans in the vicinity of the University.

**TABLE 5: PO4 Land at Milverton and Blackdown**

<b>Land at Milverton / Land at Blackdown</b>	
Responses to these sites have been summarised together to reflect the large number of identical comments being made to each site.	
<b>Consultation Comment</b>	<b>Response</b>
<b><i>Greenbelt Issues</i></b> The following concerns were raised over the lack of justification made for greenbelt development in this area in particular the identification of the very special circumstances:	
It is assumed that it was designated as greenbelt after careful consideration of all factors, why is this original work being ignored? The importance of the greenbelt appears to no longer have any relevance or worth	This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.
The argument that economic growth depends on building upon greenbelt land is not sustainable	
Alternative less environmentally sensitive sites are available which will not encroach on green belt land, the Council's own evidence base shows this. Greenbelt should not be developed ahead of these. There is sufficient brown field land to accommodate any likely growth over the plan period.	
The Council has failed to explain what has changed since alternative non greenbelt sites were put forward in the previous Core Strategy. The previous plan did not include this site.	
The Council has not demonstrated the exceptional circumstances to	

justify development in the greenbelt. Alterations to the greenbelt should only take place in exceptional circumstances.	
That sites south of Leamington are not as attractive to developers does not justify the special circumstances to justify development in the greenbelt. Maximisation of developer profits and political lobbying are not valid exceptional circumstances	
The land fulfils the five purposes of the greenbelt set out in the National Planning Policy Framework (NPPF). The NPPF states that the government attaches great importance to greenbelts and is clear that inappropriate development is harmful to the greenbelt and should not be approved except in very special circumstances. The construction of new buildings in the greenbelt is regarded as inappropriate and the list of exceptions does not include housing. These proposals are contrary to the NPPF	
The green belt assists regeneration by encouraging recycling of brownfield land. It would therefore be better to encourage town centre living by improving the mix of housing and using underground parking. This would make best use of the town centre	
Having to reroute high pressure gas mains is not a planning argument for excluding sites in the south.	
There are other sites and plenty of empty properties which can be developed which are not in the greenbelt.	
<i>General Infrastructure requirements</i>	
The following concerns were raised in relation to infrastructure capacity in the area	
The infrastructure is currently not capable of supporting additional development without the need for further improvements which themselves will require development on green belt land. The sewage system will not be able to cope and water, gas and electricity provision will be under threat. Primary schools in the area are at capacity and will not be able to cope with the increased numbers (i.e. Telford School). It is unlikely that new schools will be built early enough for new families to benefit from them. Historic infrastructure problems should not be repeated.	This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.
Better alternatives exist in financial terms given the associated infrastructure required.	
<i>Transport / Road infrastructure Concerns</i>	
The following concerns were raised in relation to increased traffic and the capacity of transport infrastructure to cope with development in the area	
<ul style="list-style-type: none"><li>The development will result in unnecessary commuting to access services in South Leamington.</li><li>Traffic problems in this area are already severe (particularly on the A452) and it is therefore hard to see how a development could be supported which will increase traffic beyond the capacity of the existing road network and be detrimental to road safety in Old Milverton.</li><li>Development north of Milverton would not be feasible without the construction of the Northern Relief Road. However the road</li></ul>	This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development

<p>will not properly address the transport problems which will cause gridlock on the Kenilworth Road, Rugby Road, and Emscote Road and will have will have significant ecological impacts on the River Avon corridor and the species it supports and increase noise and air pollution. The air quality in this area is better than parts of central Leamington. The relief road is in direct contradiction with the green wedges element of PO15 Green Infrastructure and is not in the interests of discouraging car usage.</p> <ul style="list-style-type: none"> <li>• Traffic flows tend to be north to south rather than east to west. The road will serve no purpose other than to take new home owners quickly on to the A46 and to jobs and shopping opportunities away from our Towns. Building the road at the cost of £28 million is unacceptable and diverts resources from areas where public investment needed.</li> <li>• Turning the A452 between Leamington and Kenilworth into dual carriage way will not help traffic flows, building more homes will simply increase congestion</li> <li>• The Relief road would negatively impact the area towards Guys Cliffe and would create a natural barrier encouraging further development. It would have to be built across the flood plain violating an important nature corridor. The road network south of Leamington could be upgraded at a far lower cost</li> <li>• Traffic modelling is necessary to consider the combined impacts of all development in this area. Congestion at Stoneleigh is already unacceptable at peak times.</li> <li>• Traffic would mainly head South across town up Sandy Lane to the Rugby Road through a village and housing estates with pedestrian access to schools.</li> <li>• The implications for traffic have not been properly considered and there is a lack of provision for pedestrians and cyclists.</li> <li>• Development will require a new road and bridge over the River Avon.</li> <li>• The proposed park and ride is likely to have little impact because of travel habits.</li> <li>• It will generate more traffic on a road popular for walkers, cyclists and joggers, more cars unwilling to slow down would increase the risk of accidents.</li> <li>• Although it is suggested that the development will provide employment opportunities in the locality, the possibility of those living in the area matching the skills of those jobs is unlikely. As the bulk of existing industrial estates are located to the South of Leamington, housing developments to the North will greatly increase the cross-town traffic</li> <li>• Residents are more likely to be employed west of Warwick, at Sydenham, Heathcote or the car plants at Gaydon therefore increasing the need to travel</li> </ul>	<p>to take place.</p>
<p><i>Alternative sites</i> The following sites were identified as alternatives to development in North Leamington</p>	
<ul style="list-style-type: none"> <li>• Despite reports of housing shortage there are a large number of vacant properties &amp; unused buildings without the need to build in green belt</li> <li>• Why build in north Leamington when nothing is planned for Radford Semele?</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites</p>

<ul style="list-style-type: none"> <li>• Developing in South Leamington could improve already overstretched amenities and access to the motorway and improve quality of life for Warwick Gates residents</li> <li>• Brownfield sites should be used first and the numbers on each proposed site should be reduced by at least 20% and by 50% in the category 1 and 2 villages.</li> </ul>	<p>outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>
<p><i>Impact on the character of existing settlements including the potential for coalescence</i> The following comments were made relating to the impact of development on the character of existing areas</p>	
<ul style="list-style-type: none"> <li>• The objective to avoid development in locations which could potentially lead to the coalescence of settlements is stated elsewhere in the document.</li> <li>• This narrow strip of greenbelt is important in preventing urban sprawl by keeping land permanently open, protecting Leamington from merging with Kenilworth and the villages from being absorbed. This will reduce the green lung between towns to less than 1.5miles which provides a benefit to thousands of residents.</li> <li>• To compromise the greenbelt will diminish the Leamington's attractiveness and uniqueness.</li> <li>• Leamington will become a faceless town designed with little or no imagination.</li> <li>• The value of the area should be protected for future generations</li> <li>• Conflicts with garden suburb character of Leamington</li> <li>• The infrastructure required to support the sites will be used to justify further development leading to the coalescence of communities</li> <li>• A well defined boundary does not exist on the western edge enabling future coalescence with Old Milverton. If the greenbelt is built on it will set a precedent and will encourage infilling.</li> <li>• Allowing development here along with other large developments proposed at Gateway, HS2, Stoneleigh Park would destroy the valuable rural environment which maintains the spatial integrity of nearby small villages.</li> <li>• Will spoil the rural character and identity of Old Milverton one of the last surviving villages close to Leamington which has not been absorbed in the greater conurbation as well as the surrounding countryside which needs to be protected. The loss of this land will destroy opportunities for public participation in events such as the local Annual Flower Show and Fete which has existed for 115 years. It is traditions such as these which maintain our local identity and loss of these will diminish all of us.</li> <li>• Would change the whole character of the area so that those living on the edge of the countryside would find themselves living in an urban area.</li> <li>• Will damage the approach to Kenilworth and Leamington all the way to the Saxon Mill and there is a danger that development will result in the coalescence of these areas.</li> <li>• All boundaries from Coventry to Leamington would be obliterated and it would become just one dense housing estate.</li> <li>• The A452 is the only route into Leamington that doesn't require</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>

<p>visitors to travel through large areas of urban sprawl</p> <ul style="list-style-type: none"> <li>• Growth cannot be accommodated by the approach of bolting on big developments and filling in open countryside which will result in areas where people do not wish to live. The scale requires actual new town planning not constant town extending.</li> <li>• Grove Farm was removed from plan to avoid coalescence - what about Cubbington/Blackdown/Old Milverton?</li> <li>• Development could potentially compromise the setting of the Leamington Conservation Area.</li> </ul>	
<p><i>Concerns over the level of housing growth and the Councils proposed strategy for delivering it</i></p> <p>Overall concern was expressed over the justification for the level and broad location of housing growth over the plan period</p>	
<ul style="list-style-type: none"> <li>• The number of homes to be built in the greenbelt appears to be out of proportion with local needs.</li> <li>• Not enough consideration has been given to whether the housing is required and whether people want to move into the area to take up the jobs on offer. In the current economic climate many cannot afford to purchase homes, is it practical to build more?</li> <li>• Feels that the requirement may be too excessive in view of the government's determination to reduce immigration.</li> <li>• It is not clear who the new housing is intended for, many units at the Former Pottertons site are still empty. There was substantial land available at Ford Foundry close to the town centre and all amenities, why was this allowed for retail development.</li> <li>• Are the demand projections that there is a need for 8,000 dwellings accurate when it is apparent birth rates do not reflect this, supported by secondary place availability. The level of growth has not been properly thought through and is based on population growth figures based on the baby boom years.</li> <li>• Questions how the housing figures were reached and why the Council is taking Coventry's overspill. The proposed figures are flawed because they are based on an unrepresentative time period of unusual growth</li> <li>• The level of growth proposed is not justified with facts or by the views of local people.</li> <li>• The whole SHLAA should be reviewed and this site should be removed as a location for development</li> <li>• Because of the overprovision of housing in the plan building in the greenbelt cannot be justified. The plan does not use lower value greenbelt first.</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>
<p><i>Other points</i></p> <p>The following general points were made in relation to the development site</p>	
<ul style="list-style-type: none"> <li>• If HS2 is built there is likely to be strong pressure to in-fill the area between the new development and the railway.</li> <li>• Housing in this location would not serve the enterprise areas north of Leamington.</li> <li>• Allowing out of town retail will further damage Leamington, Warwick and Kenilworth High Streets and independent retailers who are already struggling in the present economy and with the rise of online shopping may not survive.</li> <li>• This is not sustainable development as the sites are not big enough to have their own shops, schools and community</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>

facilities and has no sustainable transport option

- Those wanting to live in a busy part of Leamington full of supermarkets and industrial units would have chosen the south side of Leamington.
- Do not scare people with the notion that if the local plan is not approved it will be a free for all for developers.
- The development does not support the government's policy to empower local people.
- Warwick District is taking a large amount of Warwickshire's share when there are less populated areas to the south of the county where sites would have good access to the M40
- The Council must accept liability for any resulting reduction in land or property values arising from the plan.
- Questions if apartments in the style of town architecture had been considered in place of blanket modern housing.
- Development will go against the views of residents.
- There are no options and it is only a short consultation.
- Concern over the lack of detail in terms of the position of new schools, roads and supermarkets which will require additional use of greenbelt land
- New developments in the rural area should be smaller scale.
- Green spaces have already been lost at North Leamington College and Kingsley School
- Spreading the burden of development is not a sound basis on which to plan. The plan blatantly ignored the views of the public.
- The argument that the potential scale of development on alternative sites south of Leamington could not be achieved is implausible as development is planned in phases.
- Land south of Leamington has existing out of town shopping, access to the town centres and employment opportunities.
- Objects to removing the allotments which will strip people of a resource important for sustainable living, which provides owners with a healthy activity as well as fresh produce and a community spirit.
- The SHLAA does not identify the value of the North Leamington particularly the land between Northumberland Road and Old Milverton. It does not equally consider all sites with more effort going into identifying the benefits of some over others.
- The plan places greater importance on the policies of the Regional Spatial Strategy in comparison to the NPPF.
- There has been no proper publicity or consultation on options making a mockery of the consultation process. A door to door questionnaire is needed
- If Coventry gateway is the reason for developing housing north of Leamington we should still not be encouraging commuter towns but looking at housing solutions near the gateway. The logical place to house workers for Gateway would be old Peugeot site
- There is less demand for retail land due to the growth of internet shopping and this will create further sites for housing
- Development would result in an increase in crime
- 40% of respondents farm will be lost if plan goes ahead but because they are not the landowners compensation will be limited. Finding new land to rent will be difficult
- Raises concern over what work has been done to understand



<p>employment opportunities in the area. Proportion of commercial and office sites could be used for affordable.</p> <ul style="list-style-type: none"> <li>• Suspects that garden city type development is not what will be built.</li> <li>• If areas not included in the preferred options get planning permission on appeal, this could lead to overprovision of housing</li> <li>• Concern that residents of social housing in this location will not have access to facilities</li> <li>• Development in north Milverton would be contrary to the Council's low carbon policies in terms of reducing the need to travel as access to facilities and services is concentrated in the south of the district.</li> <li>• In the future more brown field sites and student houses will become available due to an increase in purpose built developments and nationally a decrease in student numbers.</li> <li>• Newspaper article suggests that Leamington Parkway Station will take up more greenbelt for parking and the station.</li> <li>• The Cheltenham appeal concluded that housing shortage and need did not amount to exceptional circumstances</li> <li>• Density proposed on site would equate to 70 dwellings on a site currently occupied by one dwelling.</li> <li>• 15% to 20% of the site is within Cubbington Parish and the proposal will have a major impact on local infrastructure and facilities.</li> <li>• Large homes should be subdivided, the population demographic is changing so smaller properties for single people and small family units are required.</li> <li>• Development should take account of the natural terrain</li> </ul>	
<p><i>Landscape, ecology / natural environment</i></p> <p>The following comments were made in relation to the landscape, ecology and amenity value associated with the site</p>	
<ul style="list-style-type: none"> <li>• The area is recognised for its natural beauty and historical importance, highly valued by many. Environmental protection and heritage preservation should not be overlooked in urban development</li> <li>• Would involve the loss of valuable amenity land to residents bordering the development</li> <li>• Development would involve the loss of high quality grade 2 agricultural land which is important to ensure the opportunity to provide food locally (as food costs rise) and is counterproductive in terms of ensuring rural productivity.</li> <li>• Does not object to the site altogether, however considers that the number/ scale of houses proposed at this location should be halved to a capacity of 400.</li> <li>• Homes built on either each side of Old Milverton Road will tower over existing houses due to change in levels</li> <li>• The countryside should be protected by recycling derelict land.</li> <li>• Blackdown and North Milverton were identified as high value in the greenbelt study</li> <li>• Land is located within flood zone 3a, a water source protection zone, and is subject to ground water vulnerability. Will involve</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>

<p>construction in the flood plain and will lead to more flooding due to increased run off.</p> <ul style="list-style-type: none"> <li>• This area of greenbelt provides easy access to the Warwickshire countryside for walking, cycling and jogging and other recreational activities. It is an educational resource allowing children to appreciate the beauty of the countryside and makes Leamington an attractive place to live. There is little publicly accessible open space in this area. The loss of this resource is at a time when the government is encouraging people to exercise and pushes the countryside further from the residents of the town denying access to younger people who can't drive and forcing older people into cars to get to good walking areas. It will have an effect on the health of the elderly. Public footpaths on the site are used daily and this would reduce quality of life for the community.</li> <li>• Development will cause significant damage to the many species of wildlife (many of which are endangered) and ecosystems (including hedgerows and trees) which are supported by the land, the impact of which has not been adequately considered. In particular the area is home to protected species of newt.</li> </ul>	
<h2>Summary of Matters Raised in Support</h2>	
<p>No objection if it is proven that development of greenfield sites is absolutely unavoidable</p>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>
<p>This site may be a case where greenbelt policy could be relaxed with limited overall damage whilst providing essential housing land. There would be limited damage to the settlement separation intentions of the Greenbelt policy.</p>	
<p>Support the allocation of the land north of Milverton as a development site and wish to seek an extension to the allocation to include all the land to west extending to the railway line.</p>	
<p>The site is ideal for urban edge development to support housing needs. It would not have a significant impact on the openness of the remaining Green Belt and not result in any coalescence of urban areas; distinct separation between Leamington and Kenilworth remaining unaffected. It has good access to infrastructure, community facilities and amenities, also the road network, the A46, Coventry, Warwick University and the M40</p>	

<p>Concern that concentrating development to the South of Warwick and Leamington may not be deliverable particularly due to the pressure on infrastructure.</p>	
<h2>Summary of changes to the plan</h2>	
<p>Concerns over the level of housing growth</p> <ul style="list-style-type: none"> <li>• The whole SHLAA document and plan should be reviewed and the land in the greenbelt north of Leamington should be removed as a Preferred Option for the location of new development.</li> <li>• White land should be developed</li> <li>• Provide rural areas with better services as available in urban areas (broadband, cycle paths, mains sewage and gas)</li> <li>• A meaningful reduction in growth projections and the number of dwellings required in the plan is needed given we are in recession for the next 10 years</li> <li>• A realistic figure should be reached that can be accommodated within white and brownfield sites south of Coventry without the need for a £28million highway.</li> <li>• An unambiguous and independently-affirmed demonstration of very exceptional circumstances is required for the permission of development in Green Belt</li> <li>• A broad green corridor should be implemented alongside Old Milverton Lane similar to the Kenilworth Road in Coventry to increase safety and retain the rural character</li> <li>• Use the flexibility provided by the 1370 spare houses instead of developing at North Milverton.</li> <li>• A full audit of the area should be undertaken to look at infill rather than extending town boundaries.</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>
<p><i>Alternatives</i></p> <p>The following alternatives were identified as suggested changes to the plan:</p> <ul style="list-style-type: none"> <li>• South Leamington would not result in urban sprawl as there are no large towns and few villages in the vicinity</li> <li>• There are wide open spaces East of Leamington with no risk of joining up with Southam.</li> <li>• An alternative to the present plans would be the development of a new satellite town or village on non-green belt land and with good links to the existing transport infrastructure</li> <li>• The Council should readvertise where all possible sites for development are not just the Preferred Options.</li> <li>• It should be accepted that this area is already overpopulated.</li> <li>• Regenerate the town centres and depressed urban areas, replace old housing with modern higher density accommodation</li> <li>• Reallocate development to non greenbelt land, there are plenty of available brown field sites (e.g Former IBM site, Spinney Hill) and empty properties available.</li> </ul>	<p>This site is not allocated in the Revised Development Strategy. Evidence in the updated strategic transport studies demonstrate that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.</p>

<ul style="list-style-type: none"> <li>• Focus development in the towns within existing unused property and to provide affordable housing. This would increase access to shops and links to public transport, rather than encroaching on greenbelt land that has no links to local shops or local public transport.</li> <li>• Alternative sites could include Glasshouse Lane / Crewe Lane, South of Coventry at Finham, Woodside Management Centre, South of Leamington (i.e. South of Harbury Lane), Glebe Farm, Lillington, Thwaites, Cubbington</li> <li>• The Strategic Transport Assessment Overview Report shows no impact on transport infrastructure South of Harbury Lane</li> <li>• Development in Kenilworth would provide better consistency with the broad option for growth favoured by WDC, the need for a more diverse demographic profile, achieving a better geographical distribution across the district, and provide greater sustainability for developing transport links to the site of regional importance for employment.</li> <li>• There are better sites in South Leamington which were included in the 2009 Core Strategy. These sites have better transport infrastructure to cope with additional traffic with easy access to the M40 and the railway station as well as existing employment opportunities.</li> <li>• There is scope to spread out development within the villages and provide family housing to rejuvenate dwindling rural communities.</li> <li>• Housing to service enterprise zones in the north should be spread out between each of the local villages and a smaller amount of greenbelt should be used closer to the sites where it is needed.</li> <li>• Should extend Blackdown allocation to include 7 acre parcel of land which adjacent property stands on.</li> </ul>	
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**TABLE 6: PO4Fieldgate Lane, Whitnash**

FIELDGATE LANE, WHITNASH	
Consultation Comment	Response
• Topology of land means water gravitates towards Fieldgate Lane. Brook, which is a key element in dealing with the surface water, alongside the road, fills to the top	This is something that can be addressed through the detailed planning application and mitigation measures undertaken
• Development will reduce permeability of the land and run off will happen quickly overtopping the brook and causing flooding	This is something that can be addressed through the detailed planning application and mitigation measures undertaken
• History of sewer overflow and lack of capacity in system	This is something that can be addressed through the detailed planning application with the advice of STW
• Flooding will damage the road and increase	This is something that can be addressed through the

insurance premiums	detailed planning application and mitigation measures undertaken
• Traffic issues around the school in particular and Golf Lane/Heathcote Road junction	WCC has considered what mitigation is required at this junction and throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
• Increased congestion on roads which already suffer peak time traffic congestion into Leamington due to too much housing south of the river	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
• Dangerous road junctions	WCC has considered what mitigation is required at junctions and throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
• Difficulties for emergency vehicles negotiating congested roads	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
• Council has not considered feasibility or deliverability of traffic mitigation measures or the cost of levelling the site and the impact on the scheme's viability	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network which will be funded through a variety of sources including CIL. Viability will be assessed by developers who are willing to progress this site
• Increased pressure on schools and other services/infrastructure	New schools are proposed as part of the southern housing sites. This site will utilise these spaces. Other services and infrastructure will similarly be provided within a Masterplan area
• Local schools have already expanded and have nowhere else to build	New schools are proposed as part of the southern housing sites. This site will utilise these spaces.
• Completely contradicts green wedge/green infrastructure policy	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed
• Enough houses already in Whitnash and Warwick Gates. No more needed	Warwick district has a proven need for a further 12,300 dwellings during the plan period. Green field sites will be needed to meet this need and the most suitable sites to meet this need are located to the south of Warwick, Leamington and Whitnash
• Green belt and green fields would be built on and not protected	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed
• Not in the interests of retaining some character or of existing residents	Design is important and new developments will have to meet good design criteria. New development can also bring with it its own infrastructure and facilities which allows new neighbourhoods to develop without relying on existing provision. This also allows all neighbourhoods to share their facilities increasing the offer to existing residents.
• Assessment of the site in SHLAA does not comply with its primary objectives	The key objectives of the SHLAA, identified in national guidance are to: Assess land availability by identifying buildings or areas of land (including previously developed land and greenfield) that have development potential for housing. Assess the potential level of housing that can be provided

	<p>on identified land.</p> <p>Identify constraints that might make a particular site unavailable and/or unviable for development.</p> <p>Assess which sites are likely to be deliverable and which are likely to be developable.</p> <p>The sites have all been assessed in line with this guidance.</p> <p>The SHLAA is just one piece of work that informs the choice of sites.</p>
<ul style="list-style-type: none"> <li>• Development of the site may have undesired effect on commercial operation of Golf Club through nuisance of stray golf balls and private nuisance actions against the club</li> </ul>	This will be an issue for detailed planning application when site layout can mitigate for this possibility
<ul style="list-style-type: none"> <li>• Loss of green space</li> </ul>	Green spaces will be included in developments and additional space made elsewhere with the development of a new country park to the south of Harbury Lane
<ul style="list-style-type: none"> <li>• High visibility due to topography</li> </ul>	This can be addressed through a detailed planning application where landscaping and layout will be considered
<ul style="list-style-type: none"> <li>• Previous Inspector's report (Local Plan) stated that this site should not be allocated for housing</li> </ul>	The site was not required at that time, but now that development has taken place on sites allocated within that Plan, the need for new housing means that this site is now required
<ul style="list-style-type: none"> <li>• Loss of wildlife habitat</li> </ul>	This will have to be addressed through the detailed planning application and steps taken to ensure that habitat is protected
<b>Summary of Matters Raised in Support</b>	
<ul style="list-style-type: none"> <li>• Housing allocation here would be appropriate given the better transport links on this side of the urban area</li> </ul>	
<ul style="list-style-type: none"> <li>• Site is unconstrained and likely to have higher development capacity than stated</li> </ul>	
<ul style="list-style-type: none"> <li>• Inclusion of smaller deliverable sites in sustainable locations such as this are of strategic importance in meeting housing need in the plan period</li> </ul>	
<ul style="list-style-type: none"> <li>• Assessments have been undertaken which demonstrate that development of this site would not undermine highway safety</li> </ul>	
<ul style="list-style-type: none"> <li>• Landscape review was undertaken that takes into consideration the design and layout and there was no landscape or visual constraints to development</li> </ul>	
<ul style="list-style-type: none"> <li>• Well defined and contained site directly associated with existing residential adjacent</li> </ul>	
<ul style="list-style-type: none"> <li>• Development would not lead to gradual creep of urbanisation in a southerly direction</li> </ul>	
<ul style="list-style-type: none"> <li>• Unlikely to overload existing services, but likely to yield fewer dwellings than stated due to noise from railway line and possibly stray golf balls in</li> </ul>	

southwest corner of the site	
<b>Summary of Suggested Changes to the Plan</b>	
<ul style="list-style-type: none"> <li>• Access to hospitals, police, fire etc, which are all north of the river are only accessible by five extremely busy bridges. Whitnash is not able to absorb further development because of these restrictions. There are unused commercial sites e.g. in Queensway which are far more suitable</li> </ul>	WCC has considered what mitigation is required at junctions and throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
<ul style="list-style-type: none"> <li>• Ensure that the permeability of the field is not altered</li> </ul>	This will need to be addressed through a planning application
<ul style="list-style-type: none"> <li>• The urban sprawl should not be continued any further south. Whitnash has had more than its fair share of housing and further building should be concentrated in between Kenilworth, Warwick and Leamington</li> </ul>	This would lead to coalescence of the towns and encroach into the green belt further
<ul style="list-style-type: none"> <li>• Better locations for the houses exist south of Sydenham and in the Myton suburb</li> </ul>	These areas are included in the development proposals
<ul style="list-style-type: none"> <li>• Consider range of development and supporting infrastructure requirements</li> </ul>	Additional work is being carried as part of the next stage of Plan preparation

## TABLE 7: PO4 Loes Farm

Loes Farm, North of Woodloes	
Consultation Comment	Response
<b>Summary of Matters Raised in Objections</b>	
<b>DEVELOPMENT STRATEGY</b>	
The housing numbers in the plan are too high, this site is not needed	This site is not allocated in the Revised Development Strategy. Recent strategic transport studies have demonstrated that there is capacity for development to be located on sites outside of the Green Belt. Therefore, it is difficult to justify the exceptional circumstances needed to amend Green Belt boundaries to allow development to take place.
Sites such as the Portobello Works have still not been completed, questioning need for greenfield development.	
Should re-locate this development to the Pottertons site which is under utilised	
This site is too far away from employment opportunities and is therefore not sustainable	
Brownfield sites should be used first	
The site was not included in the previous plan (Core Strategy) it is not clear what has changed	In addition, further evidence undertaken since the Local Plan Preferred Options (Options for Future Urban Expansion in Warwick District) has had regard to landscape and the historic environment and recommends that the existing Arden Parkland landscape, including the area of
The proposals will undermine the economic vitality of Warwick which is based on its historic environment and tourism. To surround this by modern housing will diminish the environment and therefore the economy.	

The proposals are likely to impact negatively on the viability of Hinton's Nursery and the proposals for the Guy's Cliffe Walled Garden.	ridge and furrow, should be retained. Furthermore, development of land adjacent to Coventry would impact on registered historic landscape assets.
Does not make sense to destroy this area for a relatively small housing development this land should not be allocated	
Coalescence	
Would threaten the identity of, and lead to coalescence with, Leek Wootton	See Response Above
Development would narrow the gap between Warwick and Kenilworth	
Green Belt	
Should preserve the land as Greenbelt, do not develop Loes Farm	See Response Above
It is not apparent that all other non-Green Belt options have been exhausted therefore this site should remain protected as Green Belt	
Development of this land will go against the reasons for having a Green Belt and will lead to urban sprawl, discourage urban regeneration and will lead to town merging into each other	
The Site fulfils the five purposes of Green Belt.	
Don't build on Green Belt land just because the owners want to sell it – listen to the public	
Objection to 40% of the site being affordable housing	
This development would not accord with the NPPF as it is inappropriate development and should not be built on as the 'very special circumstances' required have not been proven/ demonstrated	
The Green Belt is beneficial to the whole town therefore it should be maintained	
Developing this land would be breaking the law as it does not comply with the NPPF	
Historic Environment	
Would damage the historic environment/ importance of Guy's Cliffe and the Saxon Mill	See Response Above
Impact on designated and undesignated heritage assets. Substantial harm to undesignated assets contrary to NPPF. Detailed analysis of this appears not to have been undertaken. (English Heritage).	
Site has archaeological value including the unique ridge and furrow landscape, which will be destroyed, rather it should be preserved as an historical site.	
Would have a negative impact on a Registered Park and Garden	
TRAFFIC/INFRASTRUCTURE	
If built children from the new development would have to cross Primrose Hill to get to school, this would be very dangerous	See Response Above
Development would increase the risk of surface water flooding, which has occurred in the south east corner	
A detailed and realistic traffic survey should be undertaken that would prove this site to be unacceptable	



Additional traffic onto Coventry Road would cause even more congestion in this locality, particularly in the rush hour (potentially dangerous)	
There is no indication of how access would be achieved, or indeed if it is possible	
Would have an impact on the already poor water pressures at north Woodloes	
Emergency services already at full stretch and the hospital is not adequate to cope with increased numbers	
The additional infrastructure necessary to make this site work would render it unviable	
LANDSCAPE	
Site is on a highly visible slope to develop it would spoil the views across the historic parkland and the aesthetically important approach to Warwick	See Response Above
The rural character of this prominent location should be protected	
This site would mean the loss of land that has a very high landscape value	
Natural Environment	
It is a natural Green Wedge and meets the constraints to development which are set out in PO15 -Green Infrastructure.	See Response Above
New access required would scythe through the ancient hedgerow	
Disregards the Hedgerow Regulations (1997) and the Wildlife and Countryside Act (1981)	
Development at this location would have a significant ecological impact with habitat being lost for birds, reptiles, insects and small mammals as identified in the 2008 habitat assessment	
The Council is ignoring the October 2008 Habitat Survey that states that this area is 'not favourable for development', the huge negative impact on habitat and biodiversity is not appropriate	
There are many species of birds bats and insects (including protected species and habitats) that are of particular value and should be protected from development	
Development would mean the loss of mature oaks	
This land is good quality agricultural land and although the area is questionable in terms of agricultural viability it could and should still be used to grow food. The proposals will make agriculture even less viable on the remaining open land.	See Response Above
Amenity	
Development here would not integrate well with the existing Woodloes estate	See Response Above
Would lead to excessive and unwanted noise levels/ pollution	
Loes Lane is a much loved local resource enjoyed by many cyclists and walkers as well as school children, development would cause an unwelcome and unwanted change to the local area	

Developing beyond the natural barrier/ boundary of Loes Lane would be seriously reduce the amenity value of this area	
Development would cause a deterioration in air quality	
This development will have a negative impact on house prices/ values	
Would lead to the creation of an isolated community with no local shops or amenities	
Would cause an overload of pressure on local schools	
The Millennium Way runs adjacent to the site, an important, well used recreational route.	
<b>Summary of Matters Raised in Support</b>	
<b>DEVELOPMENT STRATEGY</b>	
Land has no footpaths across the site could be well screened with tree planting	See Response Above
Site is well located to employment, Warwick hospital and the rail / strategic road network	
<b>INFRASTRUCTURE</b>	
Site has benefits of several potential access points.	See Response Above
Development could bolster local shops and services	
<b>Natural Environment</b>	
Land is only Grade 3 agricultural	See Response Above
<b>Summary of Suggested Changes to the Plan</b>	
<b>DEVELOPMENT STRATEGY / COALESCENCE</b>	
The Council should resort to the previous Core Strategy approach and not allocate any land in the Green Belt	See Response Above
Should build this development at an alternative location (land opposite Warwick cemetery/ Wedgnock Lane)	
This development would be better located south of Warwick and Leamington in non Green Belt land	
Should deliver a Plan similar to the previous Core Strategy approach (not using Green Belt allocations)	
Locate new housing near to employment opportunities such as at Stoneleigh and the Gateway/ Coventry airport	
The site should not be developed for many reasons (biodiversity, urban sprawl, traffic and related danger issues to name a few) – other more suitable sites should take preference	
A gypsy site would not be appropriate at this location	
Use this area for a park, which would maintain the existing habitats and natural features	
<b>Specific Alternative Sites</b>	
Should re-develop empty premises in the commercial areas of Heathcote, Tachbrook Park and Sydenham instead of Loes Farm	See Response Above
All habitable houses should be occupied across the District before new homes are built	
Alternative sites such as the balance of land at Chase Meadow should be used	

Should use Brownfield sites such as Ridgeway School	See Response Above
Development would be better located at Gallows Hill / The Asps	
Alternative sites should be included such as South of Harbury Lane and surrounding areas; close the Gateway; and more in and around the villages.	
Develop on land on the opposite side to Loes Farm – The Riding School land , which is owned by Warwickshire County Council.	
TRAFFIC/INFRASTRUCTURE	
Keep this area as Green Belt and develop in areas that have the infrastructure to better cope with more traffic	See Response Above
Suggests new development should be located near to railway stations to provide alternatives to use of the motor car	

**TABLE 8: PO4 Thickthorn, Kenilworth**

<b>Thickthorn, Kenilworth</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>DEVELOPMENT STRATEGY</b>	
Number of new homes appears high for the size of the town.	The Strategic Housing Market Assessment (SHMA) 2012, identified Kenilworth's housing needs for the period 2011 – 2031 are approximately 19% of the total for the District. The site at Thickthorn amounts to 10.6% of the sites to be allocated across the District.
Kenilworth has already seen a lot of growth	<p>The National Planning Policy Framework (NPPF) stresses the importance of Local Plans providing sufficient land for development to meet 'their objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits' of doing so.</p> <p>It is not considered that growth in the past, anywhere in the district, should limit the District in providing for its needs in the future.</p>
Kenilworth is already subject to disruption from the expansion of Birmingham & Airport (over flight) and proposed HS2.	
Goes against views of residents, including the development of green belt land and high growth levels	<p>The National Planning Policy Framework (NPPF) stresses the importance of Local Plans providing sufficient land for development to meet 'their objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits' of doing so.</p> <p>Whilst the views of local residents are important in helping shape the Local Plan, there other competing factors that the Council has to take into account when assessing the level of growth and the location of development to meet it.</p>

Concern that the need for housing will override the need for Green Belt	In accordance with the NPPF, the Council committed to upholding Green Belt policy, which broadly restricts development within Green Belt areas. National Green Belt policy also allows for the alteration of Green Belt boundaries to accommodate growth, where 'exceptional circumstances' can be demonstrated. The Council believes that the limited availability of non-Green Belt land within Kenilworth to meet its housing and employment needs means that these 'exceptional circumstances' are in existence.
Thickthorn will be unable to accommodate 770 homes given constraints, infrastructure requirements and Garden Towns densities.	<p>The Council has reconsidered the level of growth for Thickthorn and believes it can accommodate approximately 700 homes. This has taken account of the need for 8 hectares of employment land, other uses required, and the constraints on site.</p> <p>In accordance with the densities set out in the Garden Towns, Villages and Suburbs" prospectus (May 2012), it is considered that the site could be developed in accordance with the "Neighbourhood General" density of 30-35dph.</p>
<b>Coalescence</b>	
Green Belt land which separates Kenilworth from the surrounding area including Coventry and Leamington will be reduced leading to coalescence	The proposals put forward in the Local Plan Preferred Options identified land in the Green Belt to the north of Leamington Spa as well as land at Thickthorn to the South East of Kenilworth. These sites were identified over and above other Green Belt sites as they contributed least to the purposes of green belt, have clear defensible boundaries, and would not lead to coalescence.
<b>Green Belt</b>	
Concern at the cumulative impacts of HS2 and development at Thickthorn and Stoneleigh Park in terms of eroding the Green Belt.	<p>Thickthorn has been allocated as a development site as it contributes least to the purposes of green belt, has clear defensible boundaries, and would not lead to coalescence.</p> <p>The Council is opposed to HS2, and makes no provision of support for it in the Local Plan.</p> <p>Development at Stoneleigh Park has to comply with the NPPF, including policies on Green Belt.</p>
Green Belt should only be considered as a last resort	In accordance with the NPPF, the Council committed to upholding Green Belt policy, which broadly restricts development within Green Belt areas. National Green Belt policy also allows for the alteration of Green Belt boundaries to accommodate growth, where 'exceptional circumstances' can be demonstrated. The Council believes that the limited availability of non-Green Belt land within Kenilworth to meet its housing and employment needs means that these 'exceptional circumstances' are in existence.
Does not comply with NPPF regarding alteration of green belt boundaries, there are alternative sites	In accordance with the NPPF, the Council committed to upholding Green Belt policy, which broadly restricts development within Green Belt areas. National Green Belt policy also allows for the alteration of Green Belt boundaries to accommodate growth, where 'exceptional circumstances' can be demonstrated. The Council believes that the limited availability of non-Green Belt land within Kenilworth to meet its housing and employment needs means that these 'exceptional circumstances' are in existence.
RSS makes no provision for changes to established Green Belt boundaries	The West Midlands RSS has now been abolished. Local Plans should follow guidance in the NPPF regarding Green Belt boundaries, which whilst broadly restricting development does allow for the alteration of Green Belt boundaries to accommodate growth where exceptional circumstances can be demonstrated.

Coventry's Green Belt seems unaffected.	The Council can only allocate land for development within its administrative area. However, the Council has a 'Duty to Co-operate' on strategic planning matters and is currently looking into housing needs, with its neighbours, for the wider Coventry and Warwickshire area.
The site serves all of the five purposes of Green Belt as set out in the NPPF	The Joint Green Belt Study (2009) reported that the Land Parcel site (K5), meets only 3 of the 5 purposes of Green Belt.
<b>Historic Environment</b>	
Contravenes the terms on which the historic Manor lands were put to use	Comments noted.
Consider evident significance of Stoneleigh Abbey and Glasshouse Roman settlement.	Comments noted.
Would need to protect scheduled archaeology and setting of Stoneleigh Abbey Park.	Comments noted.
<b>TRAFFIC/INFRASTRUCTURE</b>	
Many raised concerns over traffic flows in the surrounding roads and the extent of the infrastructure necessary to mitigate this. Traffic is already heavy in the area at peak times on Birches Lane, Warwick Road and Leamington Road and the A46. Signalisation would cause tailbacks.	<p>The Council is taking transport impacts and infrastructure into consideration. So far work has identified two key mitigation proposals:</p> <ol style="list-style-type: none"> <li>1) Offsite works at St John's Gyratory and Thickthorn Roundabout to enable the site to come forward. The St John's Gyratory scheme is a signalisation of the four entry arms onto the junction.</li> <li>2) The proposed scheme for the Thickthorn Roundabout is a signalised roundabout with a new, un-signalised, entry arm to serve the development site to the northwest of the junction. The carriageway either side of the bridges would be widened to 3 lanes with 2 lanes retained on the bridges.</li> </ol> <p>The Council will continue to work with the Local Highways Authority in considering local impacts and detailed mitigation measures as the Local Plan progresses and proposals come forward.</p>
Roads too narrow, windy and dangerous and not capable of being altered.	
Glasshouse Lane is a unique and attractive feature of 1930s period landscaping which should be preserved from junctions destroying it.	
Will increase through traffic through Leek Wootton.	
No access via Thickthorn drive	
Insufficient detail on infrastructure requirements for the site.	<p>The Local Plan Preferred Options (2012) was published alongside a draft Infrastructure Delivery Plan (IDP) which contained details of known infrastructure requirements at that time. Further detail on the infrastructure requirements for this site have been undertaken since then and are within the Revised Development Strategy. Planning for infrastructure is an iterative process and there will be further revisions of the IDP as the Local Plan progresses including estimates of cost.</p>
The site cannot be easily accessed so infrastructure costs will be high	
Social and Health facilities are already oversubscribed	Reorganisation in the health service has made it hard to assess the specific requirements associated with the site. Work is being undertaken to assess existing capacity of local medical centres and from that to assess any additional capacity required.
Will require a police station – which is closed in Kenilworth	<p>Front office services are located in Warwickshire Direct at Smalley Place, Kenilworth. Following refurbishment, a new Safer Neighbourhood Office has been co-located with Warwickshire Direct.</p> <p>The draft IDP identified that Thickthorn, Kenilworth could continue to be served from the existing Safer Neighbourhood Team at Kenilworth Police Station.</p>
<b>LANDSCAPE</b>	

Negative impact on existing countryside	The Joint Green Belt Study (2009) identified the area between the east of the town and the A46 as suitable for further study in terms of development potential, this was largely because the A46 provided a physical barrier to the wider countryside. Furthermore, the landscape assessment of the Joint Green Belt Study recognised the Thickthorn area as being of relatively less quality than other areas on the fringe of Kenilworth.
Natural Environment	
Loss of high quality agricultural land	Thickthorn does include some high quality agricultural land, and where possible local planning authorities should seek to use areas of poorer quality land in preference to land of a higher quality (NPPF para. 112). However, for reasons outlined elsewhere, including overall site suitability and impact on the Green Belt this site is the most preferable within the Kenilworth area.
Negative impact on flora and fauna (including bats, badgers, birds and deer), threaten nearby ancient woodland	The Council recognises the natural environment constraints on site and this should be minimised and where possible enhanced biodiversity, in accordance with the National Planning Policy Framework, section 11. The Revised Development Strategy has recommended a 50m buffer around the Ancient Woodland to protect its biodiversity significance. Any development here would be expected to make the most of existing natural features.
Main migratory route for bats betweenThickthorn and Bullimore woods	
The brook should be preserved for wildlife	
Acts as a natural drainage area when it rains heavily	
Concern at drainage requirements, the brook running to the Avon can barely cope.	The Council has recently undertaken a revised Strategic Flood Risk Assessment (2013) which examines flooding of watercourses and rivers. This has been taken into account when considering development sites.
Amenity	
Will significantly and detrimentally impact on the character as a small town and quality of lif	Comments noted.
Change identity of the town	
Changes nature of approach to Kenilworth and Leamington	
Noise	
On flight paths of Birmingham and Coventry Airports	Comments notes
The noise is impossible to stop owing to the A46 being in a basin and swept up towards Thickthorn and Office buildings will dissipate the sound.	The Council recognises noise as a constraint on this site and development proposals would have to mitigate the effects of this.
Sports Clubs& Recreation	
Unclear where sports clubs will move to, should be within walking and cycling distance and adjacent to the existing town boundary.	No development shall take place on the sports grounds until both clubs have successfully moved. Any relocation site(s) will be in a location accessible to the Kenilworth population and will be an improved provision in terms of quality and/or quantity.
Will result in loss of playing fields which evidence cannot justify – conveniently located for east of Kenilworth and will affect younger people in particular.	
Reduces the recreational value of the area	Comments Noted

Castle Farm must be maintained as public open space and not become property or control of existing sports clubs. Kenilworth is in short supply of accessible public open space.	Comments noted
<b>Employment and Economy</b>	
Concern raised that employment allocation will not be built	The Council has evidence from the Employment Land Study (2013) that there is a need for further employment land within the District. The site at Thickthorn is considered to be a prime location for new employment.
Cost of proposals will increase Council Tax	Not a relevant a planning consideration.
Concern at decrease in house prices	Not a relevant a planning consideration.
Will exacerbate the problem of empty commercial units if more are built	The site can address existing shortages in employment in the town in order to provide more local employment opportunities and create a more sustainable balance between homes and jobs. Kenilworth no longer has the number of employment sites that it once did. In addition, some of the less well performing existing employment sites suffer from being the wrong type to meet Kenilworth's needs and in less attractive locations. The Revised Development Strategy recommends consolidating employment land. A number of poorer quality employment areas in the District may be suitable for redevelopment for other uses including some in Kenilworth.
<b>Sustainability Appraisal</b>	
Sustainability appraisal has not been accurately undertaken and should reflect that Southcrest farm has fewer constraints than Kenilworth	The initial SA has been updated by independent consultants and this will be published alongside the Revised Development Strategy.
<b>Summary of Matters Raised in Support</b>	
<b>DEVELOPMENT STRATEGY</b>	
Broadly support principle of extra housing	
Thickthorn is the only contribution to the growth of the District in Kenilworth	
A46 provides clear limit to growth	
<b>Site Suitability</b>	
Best site in Kenilworth for this purpose	
Concentrating housing in one location provides the opportunity for the right level of infrastructure to support it.	
Allocation is phase 1 is supported as it can be delivered and is not heavily constrained by infrastructure requirements compared to some other sites	
Meets the housing and jobs needs of Kenilworth	
Is better than other land around Kenilworth which has greater environmental value.	

Site has good transport links and also within walking/cycling distance of town centre. Town needs business enterprise including modern office space, will address long standing shortage in the town.	
<b>Green Belt</b>	
Green Belt release is justified to enable Kenilworth to grow	
<b>Masterplanning</b>	
Appropriate masterplan to address transport and educational needs required	
Houses to be no more than two storeys with low running costs and a wide range of low carbon and renewable energy measures considered.	
Employment use should be located alongside A46 for noise attenuation	
Provide tree planting and play areas	
Allotments should be provided.	
A1 retail should be limited to immediate local needs.	
<b>INFRASTRUCTURE</b>	
Ensure drainage is adequate and addresses issues downstream for Ashow.	
Ensure provision of primary school and one stop shop	
<b>Traffic and Transport</b>	
It should bring improvements to transport infrastructure.	
Access to A46 traffic island important.	
Locate road from A46 roundabout to Glasshouse Lane would help alleviate traffic	
Need to ensure traffic congestion on Birches Lane does not worsen	
<b>Natural Environment</b>	
Existing woodland and hedges to be protected and incorporate Rocky Lane	
<b>Sports Clubs</b>	
Alternative sites need to be found for the existing sports clubs	
Kenilworth Wardens support the allocation and will actively participate in masterplanning and their relocation.	
<b>Summary of Suggested Changes to the Plan</b>	
<b>DEVELOPMENT STRATEGY / COALESCENCE</b>	



Too far north with no defensible boundary (Kenilworth Town Council - 1106) should stop at Rocky Lane with Rugby Club relocating to Cow Patch	The northern end of the Thickthorn development sites is bounded by Glasshouse Wood, which provides a sufficient defensible boundary to limit development. Relocating Kenilworth Rugby Club solely to the Cow Patch (where most of their current pitches are) would leave them with insufficient space to play.
Multiple ownership causes uncertainty over deliverability of the site.	Sites within the allocation have all been assessed as achievable within the SHLAA.  There are limited suitable, available and achievable development sites within Kenilworth.
A number of sites need to be identified to ensure deliverability of housing for Kenilworth	
Spread development across the Kenilworth	
Greater communication on the full detail of the plan to a wider audience.	The Local Plan Preferred Options consultation will be proceeded by consultation on the Revised Development Strategy and a subsequent Draft Local Plan. Any specific development proposals will include community consultation.  In addition, Kenilworth Town Council has recently been promoting its Action Plan to its residents.
Comprehensive approach to the development of Thickthorn should be taken to include all developable land to the east of the town. This will enable the retention of existing sporting facilities, expansion of employment uses close the A46 and greater buffers for noise and ancient woodland.	<p>Sites K17 &amp; K19 have been identified as suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>They have not, however, been allocated for development in the Revised Development Strategy. The Council has identified land at Thickthorn for mixed use development to help meet the town's employment and housing needs. Beyond that, strategic housing allocations are identified in the Warwick and Leamington area to meet the District's needs. Given the availability of non-Green Belt land the Council does not currently envisage a need to safeguard further Green Belt land for development beyond the plan period.</p> <p>Both sports clubs are successful with a high level of membership and are consequently constrained by their existing sites</p> <p>The Council has reconsidered the level of growth for Thickthorn and believes it can accommodate approximately 700 homes. This has taken account of the need for 8 hectares of employment land, other uses required, and the constraints on site.</p> <p>In accordance with the densities set out in the Garden Towns, Villages and Suburbs" prospectus (May 2012), it is considered that the site could be developed in accordance with the "Neighbourhood General" density of 30-35dph</p>
Find an area for small new town of approx. 10,000 homes.	No land sufficient for such a proposal has been identified in the SHLAA. Furthermore, it is considered than any such proposal would likely to have a greater impact than the existing Local Plan strategy and be less sustainable.
Development should be more evenly spread across the District.	The Revised Development Strategy reflects the distribution of green belt and suitable edge-of-urban sites across the District
Better sites outside the Green Belt need to be considered first such as land south of Leamington and Warwick would be better suited for new development	Sites to the south of Warwick and Leamington are identified within Revised Development Strategy. However, there is still a need to identify land at Thickthorn.

Empty homes need to be taken into consideration.	The Council has an Empty Homes Strategy which sets out strategic objectives and an action plan. The Council is working with owners to try and bring back empty homes into use.
<b>Masterplanning</b>	
Wishes of local community and impact on existing residents to be considered in any full development.	Comments noted.
Primary school needed and a development brief required along Garden Town layout principles (KTC 1106)	Comments noted
Should be a mix of housing types and sizes.	Comments noted
<b>Historic Environment</b>	
Preserve setting of Thickthorn Manor	Comments noted
<b>Natural Environment</b>	
Provide a buffer to Thickthorn ancient woodland	Comments noted. The Revised Development Strategy recommends a 50m buffer to the Ancient Woodland.
<b>Sports Clubs</b>	
Planning permission should only be granted once sports clubs have found new sites	No development shall take place on the sports grounds until both clubs have successfully moved. Any relocation site(s) will be in a location accessible to the Kenilworth population and will be an improved provision in terms of quality and/or quantity.
<b>Specific Alternative Sites</b>	
Site area should be increased to include land at Southcrest Farm and Woodside Training Centre to reflect housing needs of Kenilworth.	<p>Sites K17 &amp; K19 have been identified as suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>They have not, however, been allocated for development in the Revised Development Strategy. The Council has identified land at Thickthorn for mixed use development to help meet the town's employment and housing needs. Beyond that, strategic housing allocations are identified in the Warwick and Leamington area to meet the District's needs. Given the availability of non-Green Belt land the Council does not currently envisage a need to safeguard further Green Belt land for development beyond the plan period.</p>
SHLAA sites K17 and K19 (Southcrest Farm and Woodside Training Centre) should be taken out of the Green Belt and safeguarded in line with the NPPF as minimum. However, these sites could be developed earlier as part of a comprehensive approach to eastern Kenilworth in conjunction with Thickthorn.	
Question whether the land South of Crewe Lane and east of Glasshouse Lane would be better as less of the land is adjacent to the A46 and traffic would disperse in several directions.	
Small infill development to the west of Kenilworth along Beehive Hill and Coventry Road near the Tennis Club; Rouncil Lane to the rear of Sovereign Close. Space exists to the west of Kenilworth to develop. Western side of Kenilworth, Castle Farm and Sixth Form Centre and SHLAA site K25 (land East of Warwick Road – adjacent to Kenilworth Cricket Club)	The justification regarding the location for housing growth is set out in the Revised Development Strategy.
Expand student accommodation at the University of Warwick.	The University's masterplan includes expansion plans in the vicinity of the University.
<b>TRAFFIC/INFRASTRUCTURE</b>	

More detail on the infrastructure that is required as part of the development.	The Local Plan Preferred Options (2012) was published alongside a draft Infrastructure Delivery Plan (IDP) which contained details of known infrastructure requirements at that time. Further detail on the infrastructure requirements for this site have been undertaken since then and are within the Revised Development Strategy. Planning for infrastructure is an iterative process and there will be further revisions of the IDP as the Local Plan progresses including estimates of cost.
Detailed plans for traffic routes, suggested entrances including the Gatehouse on the A452 and entrances either side of Rocky Lane	<p>The Council is taking transport impacts and infrastructure into consideration. So far work has identified two key mitigation proposals:</p> <ol style="list-style-type: none"> <li>1) Offsite works at St John's Gyratory and Thickthorn Roundabout to enable the site to come forward. The St John's Gyratory scheme is a signalisation of the four entry arms onto the junction.</li> <li>2) The proposed scheme for the Thickthorn Roundabout is a signalised roundabout with a new, un-signalised, entry arm to serve the development site to the northwest of the junction. The carriageway either side of the bridges would be widened to 3 lanes with 2 lanes retained on the bridges.</li> </ol> <p>The Council will continue to work with the Local Highways Authority in considering local impacts and detailed mitigation measures as the Local Plan progresses and proposals come forward.</p>
Upgrade cycle routes, including paving Rocky Lane and dedicated route to the town centre.	
Pedestrian crossing on Birches Lane would be needed	
Assurance that traffic access is not through existing residential streets.	
Further consultation on design and access required.	
The train station is needed prior to development	The Council supports the re-opening the Kenilworth branch line and the development of a new train station to serve Kenilworth. It does not consider that the station is necessary prior to the development

**TABLE 9: PO4 Myton Garden Suburb, (West of Europa Way)**

PO 4 MYTON GARDEN SUBURB (WEST OF EUROPA WAY)	
Consultation Comment	Response
<b>DEVELOPMENT STRATEGY/ COALESCENCE</b>	
If Built Myton Gardens should have its capacity/ number of houses reduced	If developed, the capacity assessments for this site suggest that over 1000 houses could be developed using a layout that is consistent with the Garden Towns Prospectus.
This is a huge development that will destroy the area	The development will lead to a significant change in the area. It is hoped that through good design, the new development will not have a negative impact and could open access in to this area
This development will be for people from out of town who will value the good road / rail links	Development here is to meet the objectively assessed needs of the District including the growth if the indigenous population and in-migrants.
This development will do nothing to reduce local house prices	The proposals cannot control houses prices, but will include a requirement for 40% affordable housing
This is an existing Area of Restraint and should not be built on	The Area of Restraint will be superseded by a new Local Plan. The evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development
Preferred Options do not take account of all available brown field land options therefore the need to build on this land has not been demonstrated	The Revised Development Strategy seeks to identify as much brownfield land as possible.

2011 Census indicates that growth over the last ten years has been slow, this site is not needed	Updated housing projections taking account of the 2011 census suggest that the level of growth proposed in the Preferred Options was too low. This site is therefore needed.
Should not use this site but alternatively bring back into use vacant land / buildings	There is insufficient vacant land available to meet the District's housing needs. The Revised Development Strategy seeks to identify as much brownfield land as possible.
Will have a negative impact on Warwick Gates Community	Whilst it will impact on the immediate surrounds of Warwick Gates, there are also opportunities to improve services, facilities and access if development carefully planned
This area is an important buffer between the Towns	This point is understood. The evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development
Already have a glut of unsold houses	Empty houses and unfinished developments have been taken in to account within the housing requirements
Not enough jobs available for the projected new population if this development is built	The employment projections suggest that the District has the potential grow significantly over 15 years. The Strategy seeks to keep the number of jobs and the number of people of working age broadly in balance.
Will lead to the creation of an amorphous mass / coalescence	This is a green area which is close to the heart of the towns and its development will change the character of the area. However, the evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development
Objects to this site being in phase 1 of development options	We need to bring forward sites within phase 1 to help meet the requirement for a 5 years supply of housing land. It makes sense for the phase 1 sites to be those that are most closely related to the urban areas.
Local Plan should recall/ consider the overwhelming strength of local opinion against this site in previous consultations	This has been noted and taken in to account. However the planning system places more weight on balancing the strength of arguments and rather than number of representations
Warwick has already been subjected to significant growth	Noted. But site and infrastructure assessments suggest that it has the capacity for further growth
This development will further erode the boundary / sense of distinctiveness between Warwick and Leamington	This is a green area which is close to the heart of the towns and its development will change the character of the area. However, the evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development
The site is too extensive and should be reduced in size	The Revised Development Strategy does change the configuration of sites in this area, but does not reduce the overall numbers. The Myton site will be retained as part of this. The evidence suggests that the infrastructure could be developed to cope with the proposed level of development
Large estate could lead to anti-social behaviour	There is no evidence to suggest this would be the case, particularly if the new housing is designed to minimise crime
Development here will threaten existing housing with flooding.	Development will be brought forward in a way which manages the flood risk. There are no insurmountable flooding constraints on these sites
<b>TRAFFIC / INFRASTRUCTURE</b>	
Lack of easy access to Warwick or Leamington via existing bridges consequently traffic chaos already exists	Whilst the river crossings are bottlenecks, the Strategic Transport Assessment suggests that with mitigation measures development of this site could be accommodated on the highway network
Infrastructure cannot sustain the increased numbers	The Revised Development Strategy sets out how infrastructure can be provided to accommodate development here.
Peak time traffic unacceptable in this area of Warwick	The Strategic Transport Assessment suggests that with mitigation measures development of this site could be accommodated on the highway network

Fords Foundry redevelopment will further exacerbate traffic problems in this locality	Once the works relating to the Morrison's Supermarket are completed it is expected that the additional capacity created will mitigate any increase in the number of vehicles.
Development will cause a increased carbon footprint, pollution/ air pollution and traffic chaos on Myton Road	See above. Air quality is a concern which is being addressed through the Strategic Transport Assessments and will be the subject of future studies to ensure transport proposals minimise pollution impacts in AQMA's
The amount of infrastructure required will make this a very urban environment (out of keeping )	It is likely that development here will change the character of the area, but it is hoped that through good design, the new development will not have a negative impact and could open access in to this area
Access into Leamington for both pedestrians and cyclists is wholly inappropriate/ dangerous	The Revised Development Strategy includes proposals to improve the cycling and walking network
Proposed new supermarkets in this area (Aldi/ Morrison's ) will add to traffic misery around Myton Road / Europa Way / Princes Drive if you add the new homes there will be gridlock	The Strategic Transport Assessment suggests that with mitigation measures development of this site could be accommodated on the highway network even taking the supermarkets in to account.
This development will cause a threat of flooding	The river bridges are bottlenecks. However the traffic modelling suggests that with the right mitigation, reasonable traffic flows can be maintained
Infrastructure, schools and health at breaking point.	Development will put pressure on this part of the road network, but this will be addressed through a package of mitigation measures detailed the Transport Assessment Phase 3
Bus services are not good enough to cope with this development	The Revised Development Strategy includes proposals for improvements to bus services and infrastructure
Local drainage system will not cope with this additional development	Flood risk has been taken in to account in selecting sites
Concern over the existing river crossing points to cope with the numbers / volume of traffic	The river bridges are bottlenecks. However the traffic modelling suggests that with the right mitigation, reasonable traffic flows can be maintained
Will cause the loss of good farmland	The loss of farming land is a factor which is taken in to account in selecting sites. However we are required to meet the assessed housing needs of the District and this will inevitably lead to a loss of agricultural land.
Will have an impact on the ability of the emergency services to cope	The Council has consulted with emergency services and are they aware of the level of development proposed. They will take this in to account in their future planning
There would be an imbalance in infrastructure with only some areas provided for.	The Infrastructure delivery plan will seek to ensure all new development is well provided for in terms of infrastructure
Job creation in the north of the District combined with development here will increase cross town journeys and leading to congestion	The Strategic Transport Assessment suggests that this impact would be minimal.
<b>LANDSCAPE /HABITAT</b>	
Oak trees, borders and habitat behind Aragon Drive should be preserved	The ecological survey suggests mature trees should be retained. The retention of specific trees will be considered as part of the assessment of planning applications
Green field sites/ open countryside should be protected at all costs	There will be a loss of countryside as a result of development here. The landscape assessment – including that undertaken in November 2012, have attempted to ensure development is located in areas where the impact in minimised. The sensitivity

	of the landscape to the south of this area is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy
Wildlife and habitat should be preserved	An ecology survey suggests way in which the wildlife impacts can be mitigated (Habitat Audit 2008)

## Summary of Matters Raised in Support

This site should be allocated for housing as there are better transport links on this side of the District	
This site is appropriate for development (as evidenced by its inclusion in the previous Core Strategy Preferred Options)	
Provided the development is justified in economic terms this site represents natural organic growth and has the benefit of being non Green Belt	
This allocation is fully supported, should be for 1250(not 1150) houses and supporting uses.	
There is a recognised over supply of employment land in the District and more suitable sites elsewhere. therefore employment should not be a specified land use on this allocation	
This development would encourage more visitors/ economic investment to the town(south Leamington) as it has good links by road / rail	
Infrastructure is already in place (as opposed to at North Leamington)	

## Summary of Suggested Changes to the Plan

Make any new park and ride system free or very low cost to use	If park and ride goes ahead it will only be successful if it is cheaper and/or quicker/more convenient.
Overall housing numbers should be reduced/ the site is too extensive and should be reduced in size	The Revised Development Strategy does change the configuration of sites in this area, but does not reduce the overall numbers. The Myton site will be retained as part of this. The evidence suggests that the infrastructure could be developed to cope with the proposed level of development
Should delete or reduce this allocation and build on other industrial areas around Kingsway or other brown field sites within the locality.	Where these brownfied sites are available for housing they have been included. Some of these sites are not available and others are required for employment land
Only modest new building should occur to the rear of the existing schools sites off Myton Road plus the completion of the Business Park elements currently under utilised	This would lead to a shortfall in delivering the housing requirement unless alternative sites could be found.
Maintain the Area of Restraint designation and protect this good farmland – do not	The evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development

build here	
The requirement for this site/ new housing should be re-evaluated	The housing numbers have been recalculated in 2012. This new study suggest additional housing is needed.
Development should take place where road improvements are possible and air quality is not so poor	Air quality is a concern which is being addressed through the Strategic Transport Assessments and will be the subject of future studies to ensure transport proposals minimise pollution impacts in AQMAs
Housing should be closer to employment at the Gateway	There are also extensive employment areas to the south of Warwick which this site can serve.
This is a key gap between Warwick and Leamington and should be subject to only very limited development	The evidence suggests that in comparison with many other options, this is a suitable and sustainable site for development
Whole Plan should be withdrawn and re-presented reflecting the views of the population of Warwick	The Revised Development Strategy has been prepared to take account of both public opinion and updated evidence. However, it will not be possible to develop a plan which is not unpopular with some of the local residents
This area should be developed last and protected until alternatives can be found	We need to bring forward sites within phase 1 to help meet the requirement for a 5 years supply of housing land. It makes sense for the phase 1 sites to be those that are most closely related to the urban areas.
<b>TRAFFIC / INFRASTRUCTURE</b>	
Road Infrastructure needs to be radically enhanced (or should build less new homes)	See transport infrastructure proposals in the Revised Development Strategy
Consideration needs to be given about providing a new route into Leamington town centre from the South (possibly by a new road over the railway line just to the west of the railway station linking Myton Road to Adelaide Road) or improve road network by the provision of a new tunnel under the railway near Princes Drive	See transport infrastructure proposals in the Revised Development Strategy
Need to provide more schools/Doctors/shops in tandem with any new housing	This is addressed in the Revised Development Strategy proposals
Should expand Myton school to meet requirements and not build a new secondary school	This option is being considered, alongside the option to build a new school
A new Primary school should be built within this allocation	This is proposed in the Revised Development Strategy

**TABLE 10: PO4 South of Gallows Hill and Asps**

PO 4 South of Gallows Hill and the Asps	
Consultation Comment	Response
<b>DEVELOPMENT STRATEGY/ COALESCENCE</b>	
Land currently separates Warwick and Leamington Spa, this separation would be lost	This area lies to the south of the existing built up area and therefore does impact on separation. However it is recognised that this site is important to the setting of the towns and this is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy
Would cause inconvenience , noise and pollution during construction	Noted. However this is not a factor that can be taken in to account in the Local Plan

Impact on residents would cause a loss of views	The open nature of this area will change if this is developed. The sensitivity of the landscape to the south of this area is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy
Would cause a significant devaluation of current properties in the area	Noted. However this is not a factor that can be taken in to account in the Local Plan
Would impact on Warwick and detract from its tourism potential due to encroachment on the Castle and it's grounds	The impact on the Castle and Castle Park are important factors and this is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy. The northern part of the site will need to be developed sensitively in line with the 2012 Landscape Report
Believes that this development would lead to the unacceptable southerly spread closing the gap between Warwick and Bishops Tachbrook	This are does not directly reduce the gap between the village and towns, but its impact on Bishops Tachbrook is recognised. Preserving a clear gap between the village and the towns remain an important aim for the Local Plan
Concerns that the market would not be able to deliver this level of development in the locality within the Plan period	This point is understood. However there is no solid evidence to support this view and if the housing market improves, then past build rates suggest that this quantity of development is deliverable
The Plan is not just a numbers game it is about building healthy communities we would be better off investing in existing infrastructure across the District	Investment in infrastructure – both existing and new is an important part of the Local Plan and is vital to building healthy communities
Will blight approaches to the historic towns of Leamington and Warwick (and Castle Park)	It is recognised that development in this areas will impact on the setting of the towns and on the Castle. This is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy. The northern part of the site will need to be developed sensitively in line with the 2012 Landscape Report
Will increase urban sprawl	It is correct that development here will increase the expanse of the urban area. However, all the sites on the edge of the urban area will do likewise and the sustainability appraisal shows that these are the most sustainable locations for development
Brownfield sites should be used before agricultural land	The Revised Development Strategy seeks to identify as much brownfield land as possible.
Will lead to coalescence therefore is contrary to the aims of the Plan	This site will not directly lead to coalescence with any neighbouring settlements
Will have a negative impact on the Warwick Gates Community	Whilst it will impact on the immediate surrounds of Warwick Gates, there are also opportunities to improve services, facilities and access if development carefully planned
Notice should have been taken regarding the number of objections to this site in previous consultations	This has been noted and taken in to account. However the planning system places more weight on balancing the strength of arguments and rather than number of representations
Housing should be diverted to next to the Gateway (near to employment )	There are also extensive employment areas to the south of Warwick which this site can serve.
Must delete this site but continue with the Green Wedge through to Castle Park	It is recognised that development in this areas will impact on the setting of the towns and on the Castle. This is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy.
The site is too extensive and should be reduced in size	The Revised Development Strategy does change the configuration of sites in this area, but does not reduce the overall numbers. The evidence suggests that the infrastructure could be developed to cope with the proposed level of development
Large estate could lead to anti-social	There is no evidence to suggest this would be the case,



behaviour	particularly if the new housing is designed to minimise crime
<b>TRAFFIC / INFRASTRUCTURE</b>	
There will be a need for public footpaths and cycleways across this site if it is delivered	Agreed. This is consistent with the Revised Development Strategy
Would lead to a threat of flooding	There are flooding concerns in this area, but by <ul style="list-style-type: none"> <li>a) ensuring the highest level areas of risk are left clear of development</li> <li>b) development is brought forward in a way which mitigates the other risks</li> </ul> these sites can be developed without unduly impacting on flood risk.
Increase in traffic will impact on air quality	This is a concern which is being addressed through the Strategic Transport Assessments and will be the subject of future studies to ensure transport proposals minimise pollution impacts in AQMAS
Increased traffic will cause danger to children on Myton Road	Safety will need to be addressed through the design and management of specific highway improvement works, especially where schools are involved.
There is no mains gas or sewerage infrastructure in place for this site	This can be provided
Due to traffic concerns this allocation should be deleted or reduced dramatically to just employment land (northern part of the site only)	Only the northern part of the site is included in the Revised Development Strategy. However the Phase 2 Strategic Transport Assessment suggested that with mitigation measures development of the whole of this site could be accommodated on the highway network
Will create traffic congestion in Barford (High Street and Church Street)	The traffic modelling has not indicated this.
Would exacerbate the lack of easy access across to Warwick or Leamington via existing bridges	The river bridges are bottlenecks. However the traffic modelling suggests that with the right mitigation, reasonable traffic flows can be maintained
Would cause an unacceptable increase in car journeys between Europa Way, the town centre and the M40	Development will put pressure on this part of the road network, but this will be addressed through a package of mitigation measures detailed the Transport Assessment Phase 3
There would be an imbalance in infrastructure with only some areas provided for.	The Infrastructure delivery plan will seek to ensure all new development is well provided for in terms of infrastructure
Job creation in the north of the District combined with development here will increase cross town journeys and leading to congestion	The Strategic Transport Assessment suggests that this impact would be minimal.
<b>LANDSCAPE / HABITAT</b>	
Housing growth at this location is contrary to the Landscape Assessment(Feb 2009) that says it is not suitable for development	A further landscape assessment undertaken in November 2012 has again suggested that the southern part of this site (the Asps) should not be developed on landscape grounds, but that development on northern part could be mitigated
Large environmental impact from loss of open countryside	There will be a loss of countryside as a result of development here. The landscape assessment – including that undertaken in November 2012, have attempted to ensure development is located in areas where the impact is minimised. The sensitivity of the landscape to the south of this area is one of the reasons why the southern part of this site has been withdrawn from the Revised Development Strategy
New development would damage the habitat and wildlife in this area	An ecology survey suggests way in which the wildlife impacts can be mitigated (Habitat Audit 2008)

Concerned regarding the alarming rate of loss of farming land locally	The loss of farming land is a factor which is taken in to account in selecting sites. However we are required to meet the assessed housing needs of the District and this will inevitably lead to a loss of agricultural land.
The woodland at this site should not be lost to development	Significant areas of established, native woodland will be retained should this site be developed
<b>Summary of Matters Raised in Support</b>	
An alternative allocation to the south of Leamington would be appropriate given the better transport links on this side of the urban area	
<b>Summary of Suggested Changes to the Plan</b>	
Should expand Hatton Park , Warwick Gates and Chase Meadow as an alternative strategy as they already have the main infrastructure in place, this approach would not have such an impact on Warwick as an historic town	
Should develop north of Leamington and Warwick as an alternative strategy	This areas is green belt and would need exceptional circumstances to be justified
No additional housing should be built in this location	
A more acceptable alternative would be to develop more in the urban areas and north of Leamington	Development in the urban areas is supported but there are only limited sites. The area north of Leamington is green belt.
Need to reduce the scale of the proposed development at this location and redistribute the balance to Kenilworth and the western side of Warwick	The areas to the west of Warwick and around Kenilworth are green belt
Delete this site, if additional housing is required then utilise sites with existing transport links/ employment opportunities	The Strategic Transport Assessment shows that this area has reasonable transport links
Should reduce the numbers to be built here and focus on the industrial areas around Kingsway, Jewson's in Milverton, the telephone exchange or garage opposite the Covent Garden car park Leamington	Where these brownfied sites are available for housing they have been included. Some of these sites are not available and others are required for employment land
When housing numbers have been re-calculated correctly it will be obvious that this site is not needed and it should be deleted	The housing numbers have been recalculated in 2012. This new study suggest additional housing is needed. However, environmental constraints have meant that the area known as the Asps is not included in the Revised Development Strategy
Housing should be diverted to next to the Gateway (near to employment )	There are also extensive employment areas to the south of Warwick which this site can serve.
Whole Plan should be withdrawn and an alternative reflecting the thoughts/ opinion of the people of Warwick put in place	The Revised Development Strategy has been prepared to take account of both public opinion and updated evidence. However, it will not be possible to develop a plan which is not unpopular with some of the local residents
<b>TRAFFIC / INFRASTRUCTURE</b>	
Development should only be allowed where there are good direct rail links	These sites have the potential to be linked to Leamington and Warwick Stations

Due to traffic concerns this allocation should be deleted or reduced dramatically to just employment land (northern part of the site only)	Only the northern part of the site is included in the Revised Development Strategy. However the Phase 2 Strategic Transport Assessment suggested that with mitigation measures development of the whole of this site could be accommodated on the highway network
A 30 metre tree belt should be put in alongside Banbury Road from Gallows Hill to Greys Mallory to obscure unsightly housing from road users	The landscape report suggests that screening should be put in place to mitigate development here. This is supported.
Make any park and ride schemes free or very low cost	If park and ride goes ahead it will only be successful if it is cheaper and/or quicker/more convenient.
Provide more schools/ doctors/ shops in conjunction with this development	This is proposed in the Revised Development Strategy
Improve current road system in this area and create alternative routes to relieve bottlenecks	This is proposed within the transport mitigation schemes

**TABLE 11: PO4 Red House Farm, Leamington**

RED HOUSE FARM	
Consultation Comment	Response
<ul style="list-style-type: none"> <li>Green belt</li> </ul>	In exceptional circumstances, green belt sites may be considered for development. In this particular case, development has the potential to provide regeneration benefits for the Lillington area by providing a wider mix of housing (including private market housing), new opportunities for the existing population to access open space, and additional customers for local shops and community services. The development could also boost job creation in this area in the construction sector.
<ul style="list-style-type: none"> <li>Highest point in town, visible from south east giving high visual impact</li> </ul>	The urban edge of Lillington in this vicinity is abrupt, and sensitive new development has the potential to soften this edge, particularly if suitable landscaping and planting is incorporated. The development has the opportunity to provide significant areas of open space for the benefit of both residents of the new homes and the wider local population.
<ul style="list-style-type: none"> <li>Drainage if built on top fields. Terrain fairly level but definite trend of land to slope away south/south eastwards towards River Leam and most easterly part of site falls through 2 x 25 foot contours. Foul and surface water sewers would drain across farmland rather than into existing Lillington sewers. Will these be installed or pumped to existing sewers? Recent flooding in Lillington as drainage overloaded. Although alleviation schemes completed/planned, will sewers cope with additional houses? Entirely new system needed with added expense/inconvenience which should be borne by owner of farm</li> </ul>	This is a matter for a detailed planning application, but the development would offer the opportunity to improve the drainage system in the area.

Summary of Matters Raised in Support	
<ul style="list-style-type: none"> <li>Site is directly adjacent to the existing urban area of Lillington and this would result in the natural expansion of the settlement</li> </ul>	
<ul style="list-style-type: none"> <li>Site is a sustainable location with good transport links</li> </ul>	
<ul style="list-style-type: none"> <li>Existing southern boundary is shielded by a tall hedgerow, thus development at this location would result in sustainable development in accordance with NPPF</li> </ul>	

**TABLE 12: PO4 Warwick Gates Employment Land**

Warwick Gates Employment Land	
Consultation Comment	Response
<b>DEVELOPMENT STRATEGY / COALESCENCE</b>	
Development of site would create urban sprawl	Extending the existing urban areas is the most sustainable way of accommodating growth. It is considered that the development can be designed to minimise impact using the garden town principles.
Sites proximity to Warwick Technology Park is well located to encourage the clustering of industries and expansion of the knowledge based employment sector	It is considered that this would be better achieved via an extension to the technology park on land adjacent to the north of Gallows Hill or land opposite south of Gallows Hill.
Housing development will have a negative impact on the Warwick Gates community	It is likely that the infrastructure and transport improvements provided as part of the development of the South sites will benefit the residents of Warwick Gates.
Site should only be used as a last resort when all other brownfield sites have been fully utilised	The Council has sought to utilise all brownfield options for locating housing before allocating greenfield sites. This is explained in detail in the Revised Development Strategy.
<b>TRAFFIC / INFRASTRUCTURE</b>	
Will add to traffic chaos caused by lack of easy access to Warwick and Leamington via existing bridges	The pressure on existing bridges is acknowledged however modelling suggests that this can be addressed through a package of mitigation measures detailed in the Transport Assessment Phase 3.
Will put pressure on strained existing services	The Council has set out the infrastructure requirements needed to accommodate development of the 'South sites' in the Revised Development Strategy.
Object because the site does not include for the provision of a new school that is much needed to give a sense of community to this area and the existing Warwick Gates development	The Council has set out the infrastructure requirements needed to accommodate development of the 'South sites' in the Revised Development Strategy. These include the provision of three primary schools and one secondary school.
This development will put a burden on existing infrastructure including emergency service	The Council has set out the infrastructure requirements needed to accommodate development of the 'South sites' in

	the Revised Development Strategy. The Council has consulted with the emergency services, they are aware of the level of development proposed and will take this into account in their future plans.
<b>Summary of Matters Raised in Support</b>	
	Comments are noted
The scale of the development is appropriate for the location	
Provided the growth figures are substantiated this site represents a natural organic growth opportunity	
This site should be utilised as it is not Green Belt	
This land has remained undeveloped as employment land therefore it would not be unreasonable to change the allocation to residential (at the latter part of the plan period if demands require it)	
<b>Summary of Suggested Changes to the Plan</b>	
Do not build on this land brownfield sites should be used before Greenfield allocations Site should be deleted from Policy PO4 and maintained for employment uses	The Council has sought to utilise all brownfield options for locating housing before allocating greenfield sites. This is explained in detail in the Revised Development Strategy.
Must Improve current road system and create alternative routes	A full package of transport mitigation measures is detailed in the Transport Assessment Phase 3.
Make any Park and ride scheme free or very cheap	This is noted
Must provide more schools/ doctors / shops in tandem	The Council has set out the infrastructure requirements needed to accommodate development of the ‘South sites’ in the Revised Development Strategy.

**TABLE 13: PO4 Whitnash East (South of Sydenham)**

WHITNASH EAST	
Consultation Comment	Response
• Is it really required?	The housing figures prove the need and this site is considered to be suitable, available and deliverable
• Only necessary if one supports higher housing projections	The evidence supports the housing projections
• Last remaining green space in Whitnash	Green space will be provided within the development with a substantial buffer around the Local Nature Reserve along the western boundary of the site and additional open space in a new country park to the south of Harbury Lane
• Loss of individual community of Whitnash	Not necessarily; just a bigger community which will bring with it new facilities which will be of benefit to all residents
• Congested narrow roads. Will increase peak	WCC has considered what mitigation is required throughout

traffic on Golf Lane due to pupils being dropped off. Large proportion of traffic likely to travel under railway bridge on Fieldgate Lane going towards Heathcote and M40, schools, town centre and supermarkets. These roads will not be able to cope	the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
<ul style="list-style-type: none"> <li>Includes ancient Iron Age settlement that should not be abutted by housing</li> </ul>	This is something that can be addressed through the detailed planning application and mitigation measures undertaken
<ul style="list-style-type: none"> <li>Area known to flood being part of brooks flood plain in dup of the valley with brook fed by underground springs. Decreasing permeability by building will result in increased flow into drainage brook downstream on the west site of the railway. This will cause water to back up into Fieldgate Lane and result in flash flooding</li> </ul>	This is something that can be addressed through the detailed planning application and mitigation measures undertaken
<ul style="list-style-type: none"> <li>Will cause unnecessary urban sprawl</li> </ul>	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed. Once sites within the towns have been exhausted, the next place to search is on the edge of the urban area. Inevitably this will result in the expansion of the urban area
<ul style="list-style-type: none"> <li>Local facilities already struggling to cope. Pressure on primary school places. Pressure on emergency services. Poor water pressure. New infrastructure must be built in parallel</li> </ul>	WCC have given advice on primary school provision which includes the need to look at catchments and extending existing schools Agreed. Infrastructure is important and will be put into place as part of the development and wider developments throughout the district
<ul style="list-style-type: none"> <li>Potentially uneconomic due to substantial infrastructure needs</li> </ul>	Funding will be available from developers and other sources and through CIL
<ul style="list-style-type: none"> <li>Scope and nature unacceptable on aesthetic grounds</li> </ul>	The design of the development will be very important and will be taken into consideration through the detailed planning application
<ul style="list-style-type: none"> <li>Detrimental effect on wildlife</li> </ul>	There will be a substantial buffer around the Local Nature Reserve along the eastern boundary of the site to reduce the impact
<ul style="list-style-type: none"> <li>Where will the access be?</li> </ul>	This will be the subject of a planning application
<ul style="list-style-type: none"> <li>Moving Campion School will cause increased travel and loss of a community facility to Sydenham residents</li> </ul>	Campion school will remain at its present location, but part will need to be located elsewhere on the site to accommodate the access road to the new development
<ul style="list-style-type: none"> <li>Contrary to NPPF (Ch 15 and sub-section 15.8)</li> </ul>	Development has to be directed to areas outside the green belt and although previously developed land is to be preferred there is not a constant supply so green field sites are proposed to make up that shortfall. The majority of land outside the green belt is to the south of Warwick, Leamington and Whitnash
<ul style="list-style-type: none"> <li>Access would destroy traffic-free footpaths leading to network of countryside paths</li> </ul>	New footpaths can be included within the development and existing footpaths maintained elsewhere on the site with better access to both the urban area and to the countryside
<ul style="list-style-type: none"> <li>Railway and higher land provide clear boundaries that need to be respected</li> </ul>	Agreed. This will be considered through a detailed planning application
<ul style="list-style-type: none"> <li>Not a healthy environment in which to live</li> </ul>	This will be dealt with through a detailed planning application

due to pollution	
<ul style="list-style-type: none"> <li>Not fair to keep building in same places</li> </ul>	Development has to be directed to areas outside the green belt and although previously developed land is to be preferred there is not a constant supply so green field sites are proposed to make up that shortfall. The majority of land outside the green belt is to the south of Warwick, Leamington and Whitnash
<ul style="list-style-type: none"> <li>Woodside Farm included but owner says it is not for sale</li> </ul>	This is not a planning issue
<ul style="list-style-type: none"> <li>Why are commercial sites not being redeveloped instead?</li> </ul>	Where there is capacity, commercial sites are examined and a windfall element included in the housing projection figures, but there are insufficient of these sites to meet demand
<ul style="list-style-type: none"> <li>Risk of coalescence with Radford Semele and Bishops Tachbrook</li> </ul>	There is the opportunity to reduce the coalescence risk with strong new boundaries, particularly to the east of the site where the Local Nature Reserve and brook form a natural boundary
<ul style="list-style-type: none"> <li>No rented social housing accommodation where greatest need is evident. Houses make money and buy to rent is a sound business proposition</li> </ul>	The affordable housing element will be required by this development at a rate of 40% as with other sites
<b>Summary of Matters Raised in Support</b>	
<ul style="list-style-type: none"> <li>Appropriate location given the better transport links on this side of the urban area</li> </ul>	
<ul style="list-style-type: none"> <li>Support only if properly evidenced that building on rural land is inevitable</li> </ul>	
<ul style="list-style-type: none"> <li>Sensible access off large roundabout near Asda store. Essential that the location of the access route via school grounds to prevent traffic problems elsewhere</li> </ul>	
<b>Summary of Suggested Changes to the Plan</b>	
<ul style="list-style-type: none"> <li>Indemnify residents of Fieldgate Lane against any costs arising from flood damage or increased insurance premiums from increased risk</li> </ul>	This is not a planning matter. Flood risk will be dealt with through a detailed planning application
<ul style="list-style-type: none"> <li>Show the location of access roads, new schools and health centres</li> </ul>	This will be dealt with through a detailed planning application
<ul style="list-style-type: none"> <li>No development of this site</li> </ul>	The site is needed to meet the housing land requirements
<ul style="list-style-type: none"> <li>More effort needed to find sites in towns e.g. instead of Clarendon Arcade</li> </ul>	There is a finite amount of land available in the towns and land is therefore required on green field sites to make up the shortfall
<ul style="list-style-type: none"> <li>If used, this site should be developed at a much reduced density so that proper protection can be afforded to environmental assets</li> </ul>	Densities are considered on a site by site basis to take account of constraints and assets

<ul style="list-style-type: none"> <li>Move the proposed development to Phase 3 to allow mature consideration of the above proposals by all interested parties and ultimately remove this area from the list of preferred options. To compensate for the loss of potential housing, replace this preferred option by the highest in the list of those considered but which was excluded from the preferred option list. Alternatively, spread the housing around the area, including villages, by making a small increase to the individual allocations</li> </ul>	This development could come forward during phases 2 and 3 as it requires relocating and rebuilding part of the school. A limited number of houses are proposed for the villages
<ul style="list-style-type: none"> <li>Indicate a broad swath on bank of brook to continue Wildlife Reserve and green linear park to the southernmost extent of Whitnash East development</li> </ul>	A substantial buffer around the Local Nature Reserve along the western boundary of the site and additional open space in a new country park to the south of Harbury Lane
<ul style="list-style-type: none"> <li>Consider range of development and supporting infrastructure requirements</li> </ul>	Additional work is being carried out during the next stage of Plan preparation
<ul style="list-style-type: none"> <li>Note comments regarding housing figures and implications for site selection</li> </ul>	Noted

**TABLE 14: PO4 Woodside Farm**

WOODSIDE FARM	
Consultation Comment	Response
Risk to residents and motorists of accessing dangerously fast and busy Harbury Lane/Tachbrook Road	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
Access could mean destruction of woodland and road widening on dangerous road network. Traffic already an issue from M40, Fosse Way, Tachbrook Road, Harbury Lane and Warwick Gates. Potential increase in accidents	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
Narrow streets congested further during school and office hours. Widening roads would lead to loss of habitats and wildlife and take even more land	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
Overdevelopment when infrastructure, schools in particular, not provided. Schools unable to extend. Infrastructure poor because of development at Warwick Gates. Roads and services unable to cope	As part of a larger development to the south of Warwick and Leamington, new infrastructure, schools and services can be provided. Improvements are proposed throughout the road network
Lack of fundamental community focus, poor resident cohesion, anonymity and anti-social behaviour which will be exacerbated by more homes	This is an opportunity to provide community facilities and encourage new and existing neighbourhoods to participate in community ventures
Contrary to Neighbourhood plans for Bishops	Both Neighbourhood Plans are at an early stage in their



Tachbrook and Whitnash town	preparation and furthermore NPs have to be in conformity with the Local Plan
Housing needs survey indicates lower housing need locally	The housing need will be checked and adjusted if necessary through the next stage of the Plan process. Final figures will then be known and sites to meet that need will be allocated.
Access to all services, hospitals, fire, police etc. via bottleneck bridges. Lack of access to Warwick and Leamington via existing bridges and consequent traffic chaos	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
Public views and history of Woodside Farm examined by government inspector supporting area of restraint has been ignored. Government inspector previously found in favour of no development upon this land – what has changed?	The site was not required at that time, but now that development has taken place on sites allocated within that Plan, the need for new housing means that this site is now required
Just another numbers game without creating healthy communities. Existing residents being failed without adding new. Too many houses already in this area	This is an opportunity to provide community facilities and encourage new and existing neighbourhoods to participate in community ventures
Elevated location would lead to blot on the landscape/high visual impact, visible to all entering Whitnash. Impact on southerly approach to Leamington and Warwick	This can be addressed through a detailed planning application where landscaping and layout will be considered
Land already floods and steep incline would exacerbate situation. Already drainage problems on Fieldgate Lane. Costly stabilisation of land	This can be addressed through a detailed planning application where landscaping and layout will be considered
Green spaces and habitats around Whitnash would disappear forever resulting in loss of wildlife	Added protection can be afforded to the Local Nature Reserves and new buffers and green infrastructure put in place to help mitigate this effect
Underground power cables make site unsuitable for housing or commercial use but lends itself to green space	This can be addressed through a detailed planning application where landscaping and layout will be considered
Putting site in phase one is ploy to railroad development through	It rather reflects the site's suitability, availability and deliverability
Promises made regarding schools, fire police etc when Warwick Gates built but none came to fruition. How can we trust future promises?	Lessons have been learnt and the education issue will be addressed through the new developments
Loss of recreational land	Open space will be included in new developments together with a new country park and green infrastructure
Is there a need for more housing at a time of recession?	Whilst there may currently be a recession, the plan looks forward to 2029 and within that time period the economic climate is expected to improve. With an upturn in the market, new homes will be needed together with employment and all services
Loss of rural character. Loss of farmland	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed
Green belt and fields will not be protected but built upon	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed

Proximity to existing housing	This can be of benefit to both communities since they can each utilise the facilities and services of the other
Loss of quality environment	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed
Possible negative impact on community at Warwick Gates	This can be of benefit to both communities since they can each utilise the facilities and services of the other
Not suitable for elderly or disabled people due to slope of site	This can be addressed through a detailed planning application where landscaping and layout will be considered
Insufficient evidence to show that this site is needed	A robust evidence base shows the need for a number of houses to be built during the plan period. Sites are needed to meet this need and therefore those outside the green belt are to be preferred
No employment provision	New and existing employment opportunities would serve this site, which alone is too small to attract the need for employment provision
Loss of local heritage	This point will be addressed at the next stage of the plan when advice from heritage specialists will be considered as part of the final choice of sites
Risk of coalescence with Bishops Tachbrook, Whitnash and Radford Semele	There is the opportunity to reduce the coalescence risk with strong new boundaries
Would result in urban sprawl which is against NPPF	Whilst previously developed land is to be preferred, there is not sufficient available to meet need, therefore some green field sites are needed. Once sites within the towns have been exhausted, the next place to search is on the edge of the urban area. Inevitably this will result in the expansion of the urban area
All major services are located north of the river and access to these is a problem	WCC has considered what mitigation is required throughout the road network to ensure that traffic flows are not worsened by new developments. Improvements are proposed throughout the network
Any sites near the golf course would be at risk of damage from stray golf balls	This can be addressed through a detailed planning application where landscaping and layout will be considered
<b>Summary of Matters Raised in Support</b>	
Merits in using this site as it extends previously developed land toward a natural boundary (Harbury Lane) and is therefore self-limiting	

# TABLE 15: PO4 – Sites within Urban Area

<b>Sites within the Urban Areas</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>Warwickshire College, Leamington Spa</b>	
Sport England would object to the loss of the 4 court Sports Hall unless it met the test of para 74 in NPPF	Site not carried forward in Revised Development Strategy.
College should stay in town – accessible location for students	Site not carried forward in Revised Development Strategy.
<b>Former Ridgeway School, Montague Road, Warwick</b>	
Sport England would object to the loss of the playing field unless it met the test in para 74 in NPPF	Agree. The site will not be developed unless it can be shown that the site is surplus to requirements for the time period of the Local Plan
Would object to site if development is unsuitable or overlooks neighbouring properties. Montague Road is already congested and further traffic flows would exacerbate this situation.	The site has been reduced in area and will accommodate around 50 dwellings
<b>Leamington Fire Station</b>	
Current site is a good location for a Fire Station – accessible to most areas with a good response time. Any alternative likely to be greenfield or Green Belt.	The current location is restrained and offers little opportunity for expansion. It is within an area of heavy congestion at peak hours, making it difficult to access some areas including the M40 for road traffic incidents.
Concern about the increase in traffic – parking is already difficult in the area. A Waitrose development would be preferred because parking would be provided on site	A housing development here would be required to provide car parking to serve the new residents
Object on grounds of increase in the population density of the area and car parking	The area currently includes a mix of uses and is close to the town centre where population density would normally be higher than the suburbs. A higher density can be supported because people are close enough to a good range of facilities without needing to use a car. Car parking would be provided for the new residents.

<b>Sites within the Urban Areas</b>	
<b>Consultation Comment</b>	<b>Response</b>
The site is of crucial cultural, visual and historic importance. A development of 50 homes would swamp the diverse character of the street which is an exemplar mixed community. Any development would lead to road safety issues and congestion.	The site is contained within Leamington Conservation Area so regard will need to be given to its historic context when considering development proposals. Parking would need to be provided on site to minimise further on-street parking. The mixed use character of the area would not be lost as there are still a number of non-housing uses in the locality.
<b>Leamington Fire Station (continued)</b>	
The central site of the Fire Station should be retained. If the town is to experience a 40% increase in traffic, the Fire Station needs to be central if all parts of the town are to be reached.	The current location is restrained and offers little opportunity for expansion. It is within an area of heavy congestion at peak hours, making it difficult to access some areas including the M40 for road traffic incidents.
<b>Riverside House, Leamington Spa</b>	
There is potential for redevelopment to damage the character of the neighbourhood. This well-treed site contributes substantially to the character of the New Milverton.	Many of the trees are protected by Tree Preservation Orders and much of the site is undevelopable because it is within a flood risk area.

**TABLE 16: PO4 Villages – General Overview**

<b>Villages – General Overview</b>	
<b>Consultation Comment</b>	<b>Response</b>
<b>Summary of Matters Raised in Objections</b>	
<b>Policy and Approach</b>	
The Local Plan must not dictate the type of housing development to villages, but rather should take into account village desires under the Localism act and in parish plans.	<p>The Council has actively engaged with Parish Councils to better understand local housing issues and capacity for growth. This has resulted in the development of a settlement hierarchy report for the villages and the identification of various housing site options and capacity for growth.</p> <p>The settlement hierarchy work identifies supporting growth in the more sustainable village locations, which have better services and facilities or good accessibility to other locations. This work has taken a wider rounded view of the settlements within the district. For smaller settlements, a policy framework will be established to facilitate appropriate levels of growth,</p>
With regards to housing, the local community must be able to determine what is required for local need.	
Council imposes decision which removes greenbelt protection and makes preferences on where to develop further housing.	
Council should work with parishes and residents on any housing proposals and housing should be in-keeping with existing properties.	

Lack of understanding about the process or consultation with regard to rural areas – particularly as no sites have been identified.	subject to a range of important considerations, including Parish Council and RSL support.
Should refer to Parishes rather than villages to allow parishes to use local knowledge to suggest areas.	<p>It is recognised that further work is required on green belt, habitat and landscape impact together with detailed site assessments. This work is ongoing and it is the Council’s intention to consult on village options and green belt changes at a later stage in the process, but before the Submission version of the local plan it drafted.</p> <p>Proposals for village development will take account of infrastructure capacity to ensure local infrastructure can accommodate growth. Whilst it is recognised that village development is generally less sustainable than urban and edge of urban development, some growth in villages is justified to support existing local services.</p> <p>Development will be taken forward in locations and in ways which respect the character of villages, conservation areas and their position in the wider landscape.</p>
Infrastructure Constraints and Capacity	
Classification of villages has been done in a purely arbitrary way, without considering infrastructure limitations.	See Response Above
Providing the necessary infrastructure would be too expensive, totally impossible or unviable	
The effect of building houses in rural areas is to place additional multiple requirements on transport and infrastructure which will not be easy to satisfy.	
Object to expanding housing in smaller villages (Hampton Magna, Hatton park and Shrewley) as it would reduce the quality of life of existing residents already suffering with traffic and overburdened infrastructure.	
Growth will cause a strain on infrastructure, which will vary from location to location – an arbitrary category distinction is too simplistic a measure and growth should be assessed individually	
Sustainability scores indicate some village locations are very poor sustainability scores	
Makes more sense to start again with locations where you can get the infrastructure right from the beginning.	
Organic Village Development and Character	
Do not agree with the need to change village envelopes which have evolved over time.	See Response Above
Significant development in the villages will unacceptably change their character.	
Too many houses proposed for the villages – suggest numbers are calculated on a pro-rata basis.	
Unrealistic proposals for villages – need to maintain community balance and integrity.	
Prioritise brownfield first, then areas close to infrastructure and greenbelt as a last resort.	
Dispersing development around villages will not work.	
Concerns over what has been proposed and whether this is on previously developed land.	
Any growth in the villages should be phased.	
Smaller villages around Leamington are commuter dormitories and the plan will set in motion assimilation into the greater urban area.	
Controlled rural development is required to arrest the decline of rural communities.	
Allocation of new housing in category 1 villages is not in proportion to size and does not take into account history of recent growth.	
The growth of housing in small villages should be phased over the full period of the plan.	
Major Physical Constraints	
Major accident hazard gas pipelines need to be noted for the villages of Radford Semele, Bishops Tachbrook, Shrewley and Leek Wootten.	See Response Above

Selection Approach and Apportionment of Growth		
The suggestion that 850 houses need to be spread across the district in rural locations is arbitrary. The reasoning that the category 1 villages should have 100 houses is inappropriate as each has unique circumstances, there is no more need in these locations as opposed to alternative category 2 and 3 villages, with additional infrastructure these would become less isolated and more socially cohesive.	See Response Above	
The absence of Cubbington, Bubbenhall and Baginton as Category 1 villages seems inconsistent. Cubbington has a range of services and substantial employment opportunities compared with Budbrooke		
Scheme looks like it has been put together to make numbers add up. Why is Cubbington classed as a type 2 village?		
Opportunities to concentrate growth on villages with good transport and road infrastructure.		
Villages to the west of Warwick have marvellous infrastructure with a main rail line.		
Stoneleigh should be included in the list of Category 2 villages for a modest scale of development without adversely impacting upon the greenbelt		
Other villages could be includes on the list with a more even spread – particularly near key employment opportunities (Ashow, Baginton, Bubbenhall and so on).		
Requires a higher level of housing for the villages based upon 10% of 10,903 units (suggested additional housing requirement).		
An assessment of likely housing capacity in each village is required to understand what the housing capacity parameter should be.		
Need for additional homes in villages to support sustainable communities.		
Summary of Matters Raised in Support		
Policy and Approach		
Sensible approach provided no greenbelt land is taken outside the existing village envelope.	See Response Above	
Good opportunity to explore what benefits housing development could bring to each village.		
Broadly support approach to housing distribution as it envisages new housing in the villages.		
Support organic growth of villages as long as the village character is not overwhelmed.		
Support the principle of residential development in Category 1 and 2 villages.		
With regard to category 1, support that the number of houses proposed is made more flexible – 5-00-800 with the actual number and location dependent on consultations.		
For some limited growth in villages.		
Suggest a capacity of assessment of each village should be undertaken		
Locations, Options and Village Envelopes		
Additional housing could be sited in Stoneleigh, Bubbenhall and Baddersley Clinton.	See Response Above	
Market housing allocations should be promoted to ensure a healthy mix of houses to suit young families through to retirement couples.		
Supports the policy in directing new housing to sustainable villages on the basis of a settlement hierarchv.		

Support establishment of new village and green belt boundaries to enable development to come forward – consultation should also include landowners and developers	See Response Above
Agree with need to work with parish councils on re-defining village boundaries to enable development – phased building timetable required to ease residents fear.	
Agree on the need to alter green belt as part of the local plan not any subsequent site allocations DPD.	
<b>Summary of Suggested Changes to the Plan</b>	
<b>Overall</b>	
Allocation of housing needs to be more bottom-up in focus and based upon local need. A more organic growth model is required.	See Response Above
Approach to allocating growth should not be done in an arbitrary way across the villages – attention should be paid to other villages and lesser prioritised locations.	
Infrastructure planning is a priority and should be considered at an early stage in the process. Some locations do not have sufficient capacity for growth.	
Proper attention needs to be paid to conservation areas and the overall landscape and constraint setting of villages in considering development capacity.	

**TABLE 17: PO8 Employment and The Economy**

Employment	
Consultation Comment	Response
<b>Summary of Matters Raised in Objection</b>	
<b>Major Sites and allocations</b>	
<i>Existing employment sites</i>	
Market signals should be taken into account and a more flexible approach to Tournament Fields taken. The eastern half of the employment land could accommodate 196 to 260 dwellings. Disagrees with Council's rationale for proposing committed employment land at Warwick Gates for housing and instead allocating employment land within the strategic site allocation south of Warwick.	<p>Tournament fields is regarded as a good quality employment site which should be retained as part of the District's employment land portfolio. The Employment Land Review Update described it as being in a prominent position with excellent accessibility.</p> <p>It is considered that including the Warwick Gates employment land as part of the residential allocation will allow for a better configuration of uses in this area. It is proposed that additional employment land is provided for in the vicinity of Warwick Technology Park to allow for its expansion. Further justification is set out in the Revised Development Strategy.</p>
Designated employment land must be maintained	The committed employment land at Tournament Fields

despite pressure from developers, Tournament Fields has already experienced this pressure. The employment commitment at tournament fields should be taken forward and shown on the plan.	forms an important part of the District's employment land portfolio and will be protected for B Class uses through the local plan.
Land at Stratford Road has the potential to be used for a variety of employment and commercial uses including C1/C2/D2 and should be allocated for such uses. It is well related to the urban area and public transport and there are no physical or environmental reasons which prevent the release of the site in principle. The sites allocation will support the economic objectives of the Plan and the NPPF and the need to release land to meet the needs of the area.	The committed employment land at Tournament Fields forms an important part of the District's employment land portfolio and will be protected for B Class uses through the local plan. It is however recognised that the policy framework will need to be flexible to respond to changes in demand over the plan period. The detailed policy framework will be set out at the Submission Draft Stage.
<i>New employment land allocations</i>	
Objects to land at Old Milverton and Blackdown being used for employment. Need to ensure that proposals do not lead to more people travelling from outside the district or across town Employers will want the best person for the job even if they live in a different area. Concern that idea of mixed communities unlikely to happen as highly priced housing will be occupied from commuters from elsewhere. Plan does not specify type of employment land proposed	This site is not allocated for development in the Revised Development strategy.
It is better to build on the established employment base in the south of the towns.	It is proposed that land is allocated to allow for the expansion of Warwick Technology Park which will build on the existing success of this employment site.
There is no need for major new employment land, surplus land and buildings come onto the market continuously and can be reused without the need to allocate greenfield sites. There are plenty of alternatives without using the greenbelt	The Council has sought to maximise the use of previously developed land and buildings. However it is important that the portfolio of employment land is of the right type and in the right location to meet projected requirements. The employment land review (ELR) has identified a number of existing areas which fall within this category and could potentially be redeveloped for other uses. To accommodate future employment needs there is a requirement for an additional 15-25 hectares of employment land over the plan period.
There is no shortage of employment land.	The ELR update indicates that there is a shortage of 15-25 hectares of employment land over the next 15 year period. This will be addressed through provision of land in the local plan.
Employment development is not suitable in the Thickthorn area as there is no direct access to the A46 therefore commercial vehicles would have to use residential roads.	It is proposed that there will be direct access to the site from the A46 via the Thickthorn roundabout. The merits for allocating employment land at Thickthorn are set out in the Employment Land Review (ELR) Update and the Revised Development Strategy
Objects that site adjacent to Campbell House, Stratford Road is not allocated for employment development. The odour nuisance associated with the cordon sanitaire has significantly improved, and existing commercial uses have operated without dispute. It would be possible for premises to be	In the absence of detailed technical evidence which proves this to be the case it is the Councils opinion that the existing extent of the cordon sanitaire should remain.



designed to a high level of air tightness. The majority of the site lies within the lowest flood risk area.	
The assumption that that employment needs to be located adjacent to housing is questionable.	It is important that opportunities for employment are located near housing and in sustainable locations to reduce the need to travel.
Large employment sites in the north will provide employment opportunities for the villages which will negate the need for development to serve them.	The provision of a major employment site to the north of the district will primarily serve sub regional needs. It is important that sufficient employment opportunities are also available to meet specific local needs.
It is short sighted to allow sites currently in commercial use to disappear if additional employment is needed. Objects that it is too easy for owners to advertise employment sites at inflated rates then claim there are no takers.	It is important that the right type of employment land is provided to meet the District's needs over the plan period. Certain existing employment sites may not provide this and in such circumstances it may be better to redevelop these and provide alternative provision elsewhere in locations better suited to the needs of the market.
<b>Major existing sites</b>	
Any new development at the Former Honiley Airfield should be restricted to the existing planning consent which has the potential to provide 2000 jobs.	Comment noted, policies on existing employment land will be set out in the Submission Draft Local Plan.
Land designated for major housing south of Leamington is not near major employment sites at Coventry Airport, Honiley Airfield and the University of Warwick.	This is acknowledged however there are a number of existing and committed employment sites to the south of Leamington and Warwick. In addition further employment land provision is proposed in the vicinity of Warwick Technology Park.
Paragraph 8.24 should be rewritten to reflect that the university is not a B Class employment use to which the employment land supply figures should relate. Plan should recognise the contribution of the University to delivering employment growth and supporting knowledge based industries but not providing the employment land supply.	Agreed. The Submission Draft Local Plan will reflect this.
Objects proposed allocation of a proportion of land north of Gallows Hill / West of Europa Way for employment uses. The reference to Myton Garden Suburb in bullet 3 of PO8 should be removed and any land required in the south of Warwick during the plan period should be on land opposite Warwick Technology Park.	The Revised Development Strategy has identified two options for expanding Warwick Technology Park: land adjacent to the north of Gallows Hill and land opposite to the south of Gallows Hill. Further work is needed to consider in detail the merits of each site.
The University campus known as 'Central Campus West' should be removed from the greenbelt.	The policy approach to existing employment sites in the greenbelt will be set out in the Submission Draft Local Plan which will be subject to further public consultation.
Warwick Racecourse, the Former Honiley Airfield and Stoneleigh Park should be recognised in the Local Plan through site specific policies. The MDS boundary at Honiley Airfield should be amended.	The policy approach to existing employment sites will be set out in the Submission Draft Local Plan which will be subject to further public consultation.
<b>Rural Economy</b>	
In analysing the need for employment development the Council should consider recent changes at Haseley Manor, which as an employment site could not attract businesses and is now being redeveloped	The approach to rural employment will be set out in the Submission Draft Local Plan which will be subject to further public consultation.

for housing.	
There is no mention of the rural economy and the need to protect land for food production whilst assisting farms to adapt.	The approach to rural employment will be set out in the Submission Draft Local Plan which will be subject to further public consultation.
There is no reference to the importance of bridleways and cycleways in supporting the rural economy.	The importance of bridleways and cycleways is acknowledged and will be referred to in the Submission Draft Local Plan.
The objectives on supporting a prosperous rural economy in paragraph 28 of the NPPF should be fully taken into account.	Agreed. The Council will be setting out policies on rural employment in the Submission Draft Local Plan which will be subject to further public consultation.
Farm buildings should be converted for residential, employment & retail uses where appropriate as an alternative to greenfield development.	The Council approach to the reuse of farm buildings will be set out in the Submission Draft Local Plan.
Reference to ensuring the growth of appropriate rural businesses and diversification of the rural economy is not backed up by plans to encourage employment in the Category 1 or 2 villages	The approach to employment land provision in rural areas will be set out in the Submission Draft Local Plan.
Plan should include a reference to the relationship between the environment and the economy and that it is essential that these links are maintained and enhanced through the setting of commercial activities and retention of agricultural practices	The Council recognises the relationship between the environment and economy. The submission draft local plan will set out the full policy approach for employment which will be subject to further public consultation.
Canal corridors present an opportunity for environmental improvement and regeneration in urban areas as well as contributing to the rural economy. Acknowledgement of this should be set out in PO8.	This is noted. The Council will be including employment land policies in the Submission Draft Local Plan which will be subject to further public consultation.
<b>Town centres</b>	
The Council should plan positively to build vibrant town centres. The development of appropriate business premises in the town centres should be encouraged and measures are needed to ensure that out of town development which would draw development away from town centres is refused. The decision to massively increase building around Warwick, Leamington and Stratford has caused considerable congestion making the town centres inaccessible. The introduction of on street parking has destroyed Warwick as a shopping centre (only charity and coffee shops remain) and is creating the same in the other towns.	The town centre policies will be set out in the Submission Draft Local Plan which will be subject to further public consultation.
Preserving the environment must take precedence over uncontrolled economic growth	The Local Plan seeks to balance economic, environmental and social objectives to ensure the delivery of sustainable development.
Concern that policies on the evening economy have not yet been published for consultation. It is important that a well considered policy is in place to take account of the needs of residents, visitors businesses and public safety.	This will be dealt with in the Submission Draft Local Plan.
<b>Coventry and Warwickshire Gateway</b>	
Plans for the Gateway site need to be urgently	The Revised Development Strategy sets out the

clarified before the local plan is finalised. A masterplan should be required for the whole site. There needs to be a clear strategy for the site given the considerable impacts of the development on the area which will fuel inward migration. The benefits for Warwickshire are limited. It is likely that this will only generate wealth for those who invest heavily and that jobs will be displaced from other areas. Growth in this context should not be pursued for the sake of it. Objects to the over allocation of housing to meet the needs of Gateway	justification for a sub-regional employment site in the area covered by the Coventry and Warwickshire Gateway planning application.
Development and investment should be concentrated on the regeneration of urban centres, there are suitable brownfield sites in Coventry rather than using greenfield sites such as Gateway.	There is a case for making provision for an area of land the size of the Coventry and Warwickshire Gateway site to meet sub regional employment needs. Evidence suggests that there are no other comparable sites in the area to accommodate this need. The full justification is set out in the Revised Development Strategy
The environmental impacts have not been properly considered, will impact on Tollbar highway proposals, closing Bubbenhall Road and Rowley Road will destroy local rural businesses in Baginton Parish, the provision of a new road west of the runway could pave the way for future runway expansion, there are other large scale employment sites which haven't been considered and the jobs figure is misleading.	The Revised Development Strategy sets out the justification for a sub-regional employment site in the area covered by the Coventry and Warwickshire Gateway planning application.
Need to clarify which authorities the Council has engaged with in undertaking independent research.	The Council has worked with Coventry City Council to understand the economic and demographic implications of the current planning application. The LEP supports identification of the site as a sub-regional employment site.
Objects to the wording that the Gateway scheme has the potential to provide in the region of 14,000 jobs, local plan should refer to jobs provided for WDC area only. Objects to the suggestion that the scheme will facilitate major improvements to the transport network as the Highways Agency has already scheduled major improvements to the Toll Bar End junction and the scheme will only add to transport problems.	The justification for making provision for a sub-regional employment site in the area known as the Coventry and Warwickshire gateway is set out in the Revised Development Strategy.
Paragraph 8.33 detailing the Council's commitment to investigating the Gateway should be reworded.	
There is no mention of the Gateway development which will have a significant impact on the district.	
Supportive of approach to the Coventry and Warwickshire Gateway in the Preferred Option but any allocation should ensure that the site is contributing to the wider social, environmental and economic objectives of sustainable development. There is no justification for the scheme.	
<b>Approach to Employment Land Provision</b>	
Ensuring flexibility in supply	
The wording of the Preferred Option is too restrictive in relation to change of use from B Class. The NPPF states that employment land should not	The policy approach to existing employment land will be set out in the Submission Draft Local Plan which will be subject to further public consultation. It is acknowledged

be protected where there is no reasonable prospect of it being used for that purpose. The current wording of the employment section does not have sufficient regard to market signals and whether land could be better used for a different form of development. More flexibility is needed in the definition of employment uses	that the policy approach will need to be flexible to respond to changing market demand over the plan period.
The authorities own documents show that suitable land is available without the need to violate the greenbelt.	An assessment of the district's employment land has been undertaken, in terms of location and suitability to meet projected employment demand. The proposed approach to locating employment land in the Revised Development Strategy reflects the findings of this.
Policy approach is too inflexible. There should be exceptions to allow existing employment uses to be redeveloped where local residents are in support or where the current use is causing a nuisance or danger.	It is acknowledged that it may be appropriate to allow the redevelopment of existing employment land which cannot meet the needs of employers. The policy approach to existing employment land will be set out in the Submission Draft Local Plan which will be subject to further public consultation.
Level, type and location of employment requirement	
Many industrial units are underused partly because of the economic climate but also because of the shift to office work which requires less floorspace.  Economic development should be solely undertaken within existing industrial areas including Coventry.	Agreed, an assessment of existing employment areas has been undertaken as part of the ELR update. This has identified certain areas where there is potential for redevelopment for other uses.  The Council must ensure employment land and buildings are available within the district's boundaries to meet the need over the next 15 year period.
There is no detail on the types of employment which will be created, where it will be sited and the types of industry the Council wishes to attract. There must be viable work to support housing estates accommodating 2,000 to 3,000 people. There is insufficient detail to support the proposal, the level of employment growth needs to be identified. It is unclear how a housing target based on jobs growth will be justified if a flexible approach to employment land is being taken.	The Revised Development Strategy sets out the overall requirement for employment land over the plan period including the split between B Class uses. It also sets out the intention for expanding Warwick Technology Park . Further details of the Councils objectives for the economy will be set out at the submission stage.
Questions what is meant by employment and whether it includes industry?	For the purposes of allocating land it is intended that this is for B Class uses – B1 (office, research and development), B2 (general industrial) B8 (warehousing and distribution)
The Local Plan should continue to support the computer games and specialist automotive industry.	Agreed these are key sectors which are supported locally and sub regionally through the LEP.
Appropriate levels of employment land should be provided, in the right places, and this should constitute a balanced portfolio of sites to meet as wide a variety of needs and demands as possible.	An employment land review update was undertaken to assess the employment land demand over the plan period. This looked at the supply of existing and committed employment land and the requirements for allocating new employment land. The Revised Development Strategy reflects this.
Only sufficient land to meet the requirements of the commercial needs of the district should be planned for not to attract new industry. Any new development which is permitted should fully maximise the use of the land	The Revised Development strategy makes provision for employment land to meet the projected needs of the district over the next 15 years.

Questions why growth is necessary when investors are the only ones to gain. There should be sufficient opportunity for us all to maintain a level income.	The Revised Development strategy makes provision for employment land to meet the projected needs of the district over the next 15 years.
There is a lack of demand for existing employmentsites, it is questioned why more planned when this is not required.	The Revised Development strategy makes provision for employment land to meet the projected needs of the district over the next 15 years.
The term sustainable is used about 120 times in the Preferred Option report but mostly it is in terms of the economic aspects. Does not believe that large scale destruction of open countryside is sustainable development.	The NPPF is clear that sustainable economic growth should be supported. It is important to ensure the right supply of land is available to meet projected demand over the next 15 years. Whilst every opportunity to maximise the use brownfield land has been taken it is not possible to meet needs without using some greenfield land.
Just need to plan for the ‘need’ rather than what is ‘wanted’	Agreed, the requirement is based on the projected demand over the next 15 year period.
It is questioned whether the additional job requirement takes into account that the ageing population will mean the release of jobs.	It is based on the employment land demand associated with the working age population.
Development based on a need for economic growth per se is unnecessary and unsustainable for a stable economy.	It is important to ensure the right supply of land is available to meet projected needs over the next 15 years.
Plan should consider the cross border impact of infrastructure work and duty to co-operate.	It is agreed that the Council must fulfil its ‘duty to cooperate’ in preparing the plan.
Housing should be located near current employment opportunities	Agreed, the proposed locations for new employment land form part of wider strategic housing allocations at Thickthorn, Kenilworth and South of Warwick, Leamington and Whitnash.
Offices are not needed at Thickthorn, there are already existing premises in Kenilworth .	The ELR update indicates that land at Thickthorn adjacent to the A46 provides a good location for office headquarters to meet local and district wide employment needs over the plan period.
Economic growth is not dependant on inward immigration but can also be achieved by existing residents improving incomes by better productivity, promotion or investment.	Comments noted
Concern that mass immigration together with the relaxation of planning regulations will destroy an environment already near breaking point from overcrowding	
Supporting businesses	
Planning policy should take into account the needs of small businesses, there should be a range of affordable local business premises available to encourage new enterprise and allow existing businesses to grow.	Agreed, it is important that the right supply of employment land is provided. More detailed employment land policies will be set out at the Submission Local Plan stage.
It is noted that gaining planning permission is difficult and better advice is needed for businesses wanting to build or expand their premises.	Noted
A much more detailed economic and financial plan to stimulate and attract business investment is needed first to determine where to build housing. It may be that a new town is needed.	Noted
The plan does not indicate what percentage of the land will be designated as employment land.	The Revised development strategy sets out the locations for new employment land and the amount to be provided

	in each area.
The Council should put in place long term measures to instil optimism in the economy.	Noted
<b>Summary of Matters Raised in Support</b>	
<b>Support for potential allocations</b>	
Supports allocation of part of the Thickthorn site for employment. The land closest to the A46 junction is the most suitable location for such development, to benefit from the locational advantage and reduce traffic flows through the town. Further B1 employment land could be provided at Woodside Training Centre.	Noted
Supports locating employment land south of Gallows Hill close to Warwick Technology Park. An alternative location for park and ride will need to be established and further clarification is needed on the proportion	Noted
Supports allocation of employment land north of Leamington which is consistent with the NPPF. This allocation would ensure business needs are met and address the employment deficit in the north of Leamington. Along with park and ride a mixed residential and employment allocation would contribute towards the creation of sustainable mixed communities.	Noted
<b>Major existing sites</b>	
Supports expansion of employment opportunities on well designed business parks at Stoneleigh and the University. Whilst there is little housing nearby public bus services and road access exists.	Noted
<b>General</b>	
Supports the preparation of the Economic Development and Regeneration Strategy to provide a clear direction for the economic position of the District.	Noted
Welcome proposals to ensure a wide range of employment and the regeneration and enhancement of existing employment areas.	
Welcomes policy that enables growth of rural businesses and supports the diversification of the rural economy	
It is highlighted that sport can be good for the economy	
Supports planning policies to provide a competitive economy for inward investment. A vibrant economy will produce a high quality job offer, raising skill levels in the overall workforce, ensuring the county is productive and competitive.	

Supports objective 1 of the plan as set out in paragraph 4.10 and the economy issues in 8.6 are noted and considered consistent with the LEP 5 year plan	
Pleased that there is a close working relationship with the business community to understand their needs	
Support the aims of the LEP but this does not imply support for a particular location. The skills problem is a matter of educational facilities not the Preferred Options	
<b>Coventry and Warwickshire Gateway</b>	
Support the Local Plan's intention to explore the case for the Gateway site being identified as a site of regional importance. Recognises the need to demonstrate very special circumstances for greenbelt release. This case will be made as part of the planning application.	These comments are noted
Support recognition of the Gateway and identifies the need to deliver appropriate housing and facilities to compliment this growth South of Coventry. This is a reason for the Council to increase housing delivery in accordance with ONS projections and highlights that there is a site at Baginton which could accommodate 1,000 dwellings.	
Understands that the majority of people employed at Gateway will be existing residents of Coventry and Warwick District therefore there is no need to provide further housing for them in Warwick District.	
<b>Summary of Suggested Changes to the Plan</b>	
<b>General</b>	
A moratorium on any further building outside current boundaries and concentration on the development of brown field sites	It is not possible to accommodate the future growth needs of the district without using greenfield land. Justification for this is provided in the Revised Development Strategy.
Sites at Blackdown and Milverton should be removed from the plan for development.	The Revised Development Strategy does not include land at Milverton or Blackdown for development.
Restriction on the type of employment that can be co-located with housing	It is acknowledged that certain types of employment are not suitable next to housing. The environmental health team are consultees on planning applications and therefore would identify any potential noise or odour issues resulting from any proposal.
Concentrate larger developments adjacent to areas of economic regeneration and spread the load in rural areas so it is less noticeable and has a more positive impact	This is noted. The Revised Development Strategy sets out the location for new employment land in the district.
Remove any development on greenbelt sites	The Council has sought to minimise development on greenbelt land. Limited development is proposed at Red House Farm, Lillington to assist with the wider regeneration of the area and at Thickthorn, Kenilworth to

	assist in meeting the employment needs of the town.
The words 'Evening economy' should be included in the headline wording	This will be considered as part of the Submission Draft Local Plan.
The policy needs to be strengthened to ensure that landowners cannot exploit deliberate vacancies and dereliction	Noted
Revisit the strategy for employment considering current trends and in particular that large employers are in decline as many companies are smaller and leaner.	The ELR update has assessed the employment land requirement over the plan period based on economic projections.
<b>Major employment sites and allocations</b>	
A comprehensive approach to locating employment land at Kenilworth is suggested considering Southcrest, Woodside Training Centre and Thickthorn together.	The Employment Land Review indicates that the best location for employment land in this area is in the south west corner of the Thickthorn site adjacent to the A46.
Site specific policies should be included for the Former Honiley Airfield, Warwick Racecourse and Stoneleigh Park to provide more certainty over future development.	The Submission Draft Local Plan will set out the Councils policy approach to major employment sites in the District.
The reference to Myton Garden Suburb in bullet 3 of PO8 should be removed and any land required South of Warwick during the plan period should be on land opposite Warwick Technology Park.	The Revised Development Strategy has identified two options for expanding Warwick Technology Park: land adjacent to the north of Gallows Hill and land opposite to the south of gallows hill. Further work is needed to consider in detail the merits of each site.
Remove land designated for major housing development South of Leamington as the economic argument is unsound.	The justification for allocating housing sites to the South of Leamington, Warwick and Whitnash is set out in the Revised Development Strategy.
Land at Station Approach should be allocated for B1 employment and housing uses	The land is allocated for housing in the Revised Development Strategy. The Council is working with all landowners in the area and there is general agreement that should Stagecoach be relocated residential development is the preferred use for the site.
Allocate land at Campbell House, Stratford Road for commercial uses	In the absence of detailed technical evidence it is the Councils opinion that the existing extent of the cordons sanitaire should remain.
Common Lane Industrial Estate should be regenerated up to 21 <sup>st</sup> century standards	An assessment of the Common Lane Industrial Estate was undertaken as part of the Employment Land Review update. This notes that access is constrained on the site and that there is potential for comprehensive redevelopment.
Address the Gateway Development	The justification for making provision for a sub-regional employment site in the area known as the Coventry and Warwickshire gateway is set out in the Revised Development Strategy.