

Publication Draft Local Plan: Focused Consultation

Public Participation Report

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67240 - Ray Bradshaw [12898]	Object	<p>I think this plan is unsound and not justified as it is trying to embed a large area of agricultural land into a separate commercial site which is already owned by Severn Trent and WDC. It seems that the rural fields are being reclassified as commercial land purely due to their proximity to existing commercial sites. These sites needs to be considered separately and not as a whole.</p> <p>There is more than adequate commercial land available in this part of S W Warwick on the Tournament Fields site which has been available but not taken up for about 10 years. There is obviously no further demand for commercial land here. If anything there is a demand for further housing land now that the Bovis and Bellway developments on the Chase Meadow site are nearing completion. Why designate further land for commercial use when only further housing space is needed?</p> <p>With so much development in this area there is a need to keep green pasture land to provide an "oxygen lung" for the Longbridge villagers and Earls Meadow and The Peacocks residents. I think commercial development of this land could well take the air pollution over the EU limits in view of the proximity of the heavy M40 traffic.</p> <p><i>I would like to see the present pasture land designated as a green field site to preserve it for the future.</i></p>	<p>The land would be utilised for B1, B2, B8 uses and would be similar to business parks elsewhere in the district. The land is currently owned by Severn Trent Water, Warwick District Council and a third party. The land is not being allocated purely due to its proximity to other commercial sites. There is a call for land which is close to the major road network and this site is very convenient on that respect. It is also close to other facilities and could utilise land which may not be suitable for other uses such as residential due to the proximity of the sewage works and noise from the M40. The site is proposed for the full range of B class uses to allow flexibility in the supply of employment land. The operation of the sewage works will not be affected, Severn Trent are one of the landowners putting forward the site for employment uses. It is acknowledged that take up of employment land at Tournament Fields has been slow however this has coincided with the recent recession and national trends of poor take up. The site is now seeing increased interest and development. The Local Plan must provide sufficient employment land to meet the needs of the District throughout the 15 year plan period. Additional employment land needs to be allocated above that included in the employment land supply (including land already available at Tournament Fields). There are evidence base reports on the website with regard to noise and odour, ecological and archaeological aspects of the site. These all show the site to be suitable for commercial use.</p>	Not required
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67249 - Baginton, Bubbenhall, Stoneleigh and Ashow Parish Council (Mrs Past Maddison) [13079]	Object	<p>We conclude that the Atkins Study, commissioned in November 2013 by the Coventry and Warwickshire Local Enterprise Partnership (CWLEP), does not provide a robust evidence base and associated policy recommendations to assist in the preparation of CWLEP's Strategic Economic Plan. In fact, quite the reverse. It is not legally compliant, it does not comply with the duty to cooperate and it is not sound.</p> <p>It is not positively prepared, it is not justified, it is not effective and it is not consistent with national policy. The Gateway site should be removed from the emerging Local Plan.</p> <p>A Regional Employment Study has been commissioned on behalf of the LEPs within the West Midlands area. Consequently, the findings of this Study should be considered alongside that of the regional sites study when available. Therefore, this Study cannot be considered as conclusive.</p> <p>If such a regional employment site were justified, it should be considered as part of a future review of all Local Plans in the CWLEP area when several alternative sites could be compared and tested by proper Environmental Impact Assessments and Sustainability Appraisals before allocating any one particular site.</p> <p><i>Changes to Plan:</i> <i>The Gateway site should be removed from the emerging Local Plan. A Regional Employment Study has been commissioned on behalf of the LEPs within the West Midlands area. Consequently, the findings of this Study should be considered alongside that of the Regional Sites Study when available. It follows, quite independently of what is said above, that this Study cannot be considered as conclusive. If such a Regional Employment Site were justified, it should be considered as part of a future review of all Local Plans in the CWLEP area, when several alternative sites could be compared and tested by proper Environmental Impact Assessments and</i></p>	<p>It is important that any study assessing employment land requirements takes into account market signals. That is why relevant stakeholders within the business community were consulted, these were selected from each local authority area. This information was used to gather qualitative information on what the local business community is experiencing to consider alongside the quantitative projections. The job creation figures for each scenario were calculated using standard employment densities based on the floor space projections.</p> <p>The purpose of the study was not to assess the merits of retaining or removing the site from the green belt. The report was undertaken to identify the need for sub regional employment land and having established a need looked at the current supply of employment land in each authority area and potential sites available. It did not undertake a full planning assessment of the sites but noted which were within the green belt.</p> <p>The report identified there was both a quantitative and qualitative need for employment land within the sub regional boundary. Paragraph 5.9 states 'In order to remain competitive at the regional, national and international levels, Coventry and Warwickshire should maintain an attractive and competitive portfolio of sites, especially in terms of larger sites that could meet the needs of the identified growth sectors. The sub-region must remain in a position that enables it to respond to emerging challenges and opportunities like the ambitious plans for UK Central which lies just outside the sub-region's boundaries'.</p>	Not required

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<i>Sustainability Appraisals before allocating any one particular site.</i>				
67265 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>Schools</p> <p>The County Council has a statutory duty to ensure sufficient school places and this includes Academies within its planning. We seek assurance and certainty regarding the deliverability of supporting school infrastructure to meet the growth of the Local Plan and in particular that these matters are prioritised in the R123 list.</p> <p>Delivering the Local Plan</p> <p>The CIL Guidance published by the Government in June 2014 states that a Charging Authority, should be able to explain how their proposed rates will contribute towards the implementation of the relevant plan, and support development across their area.</p> <p>Consequently, we welcome discussions regarding the delivery of the Local Plan and governance arrangements for passing on CIL monies to the County Council to enable us to deliver identified infrastructure in a timely manner.</p>	<p>The CIL report will deal with the full range of charging and will give an explanation as to how this will contribute to provision. The CIL will be subject to consultation in the near future and certainly before the Local Plan is submitted to the Secretary of State. School provision is a major concern and will be recognised as such through CIL charging although it may not be possible to meet the full financial requirement in this way.</p> <p>Reference should also be made to the infrastructure delivery plan.</p>	Not required
67263 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>The County Council seeks assurance that the cumulative impacts of Warwick District and Stratford on Avon District growth requirements are properly accommodated in both local plans. It is essential that a joint robust mechanism is considered to implement these cross border issues. One solution would be that joint and common infrastructure requirements are reflected in the respective Infrastructure Delivery Plans without "double dipping". Nevertheless, this is a matter for both Planning Authorities to agree a mechanism for implementation of its policy mechanism.</p>	<p>The Council has met regularly with Stratford DC and Warwickshire CC (Transport) to consider the cumulative impacts of development across the two districts. The cumulative strategic transport study explored the impacts on the transport network and this provides important evidence regarding the mitigation required. This in turn is reflected in the Council's IDP which sets out all the infrastructure requirements and indicates likely funding sources. This IDP will be subject to ongoing revisions, including revision arising from ongoing discussions with SDC and WCC as we move from planning to the delivery of infrastructure. A key part of this will be developing and delivering the implementation mechanisms.</p>	
67257 - Bellway Homes [12981]	Support	<p>This representation relates to land at Cubbington identified under policies H25 and H26, which is identified in the Draft Local Plan for housing and is proposed for removal from the Green Belt. Bellway fully accepts and supports the need for strategic allocations to meet an appropriate housing requirement. The comments on H25 and H26 above make it clear that further sites will need to be identified to meet such an appropriate dwelling requirement</p>	Support noted	Not required

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67165 - Kingswood Residents Group (Professor Leslie Clark) [7676]	Support	The Kingswood Residents' Group is supportive of the current Warwick District Council Local Plan and does not wish to amend its previous representation on the May 2014 version.	Support noted. No response required	Not required

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2 Proposed Amendments				
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67179 - A.C. Lloyd Homes Ltd [5684] 67181 - Deeley Group Ltd [11623]	Object	It is considered that this is an appropriate opportunity to amend the Plan period of 2011- 2029. It is considered that the plan period should be extended from 2029 to 2031. <i>Paragraph 2- Proposed Amendment - should include a change to the plan period. This should be extended to cover the period until 2031 as this will make this part of the plan sound as it will conform with the provisions of NPPF which requires plans to cover an appropriate time period, preferably a 15 year time horizon.</i> <i>Paragraph 2 - Proposed Amendment should include a change to the plan period and the text should read:</i> <i>'It is proposed to amend the time period of the Local Plan from 2011-2031. The plan is not expected to be adopted before summer 2015 and NPPF expects plans to run for at least 15 years from the date of adoption. Given that the current Local Plan expired in 2011 and many data sources (including population projections and the Joint Coventry and Warwickshire SHMA) are based at 2011 and run to 2031, it is more logical that the plan period be changed from 2011-2029 to 2011-2031.'</i>	Paragraph 157 of the NPPF says the Local Plan should be drawn up over an appropriate time scale preferably 15 years... The Local Plan has been prepared over an appropriate timescale, particularly as the whole plan period is 18 years and the plan includes a commitment to an early review if necessary.	
67171 - MR PETER WILSON [12176]	Support	I am in support of the amendments.	Noted.	
67264 - Warwickshire County Council (Monica Fogarty) [12790]	Support	Comments on the proposed policy changes It is for the District Council to determine and explain the sustainable deliverability of the Local Plan and in particular in relation to the changes for the proposed Europa Way sites. For clarification I refer to proposed changes to: Para DS9; DS11; D14; and Policies Map: 2 Leamington, Warwick and Whitnash - amend remove employment allocation E1 at Land North of Gallows Hill.	Comments noted.	

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67261 - Warwickshire County Council (Monica Fogarty) [12790]	Support	<p>Strategic Highways impacts assessment update The County Council is undertaking further assessment work for impacts to test the impacts of the focused changes, and what transport mitigation is required as a result. We intend to submit this information to the District Council later this month as a final iteration of the Strategic Transport Assessment.</p> <p>Highways and Transportation matters</p> <p>The County Council has worked in partnership with the District Council to identify the transport impacts and mitigation requirements relating to the WDC Local Plan. A series of Strategic Transport Assessments (STA) have been undertaken, STA4 represents the latest full assessment of the Preferred Options; further addendum work has been completed to identify impacts pertaining to the focused changes to the Draft Local Plan, and the implications these have for transport mitigation and the Infrastructure Delivery Plan.</p> <p>The STA work has identified broad areas which require mitigation schemes, as identified in the attached image (n.b. some isolated schemes will fall outside these broad areas). The attached image contains a plan identifying the Strategic Transport broad locations and a revised schedule for the associated infrastructure.</p> <p>The schemes identified through this process have been developed to a stage appropriate to the level of strategic modelling assessment and mitigate the impacts of Local Plan transport demands to a level deemed to be acceptable. A complete, current list of mitigation requirements identified in STA4/STA4 addendum is attached. This forms the latest position in terms of highway mitigation requirements to inform the Infrastructure Delivery Plan.</p> <p>It should be acknowledged that the schemes proposed within the STA modelling have not been subject to any detailed design, costing or safety review at this stage. Furthermore, it should not be assumed that the schemes recommended through the studies are fixed and will be delivered in the form described within the reports. Rather it is intended that the schemes proposed are outline schemes which may change through further optimisation and detailed design that will precede their delivery. Scheme development will be informed through both the planning process for individual sites and through scheme development undertaken by the County Council. This position is documented with the STAs and acknowledged by the District Council.</p>	Comments noted.	

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67229 - Mrs Melanie Lindsley [13065]	Support	The Coal Authority has no comments to make on the focused changes proposed.	Noted.	

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3 Updated Evidence

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67255 - Joanna Illingworth [2066]	Object	<p>The Coventry & Warwickshire Strategic Employment Land Study Final Report (October 2014) does not justify the designation of land near Coventry Airport as an employment site.</p> <p>In the first place it ignores the site's status as green belt land, even though paragraph 5.22 of the report states that "The most obvious constraint is the Green Belt, which the Government has made clear remains a priority to protect against from built development. This affects a large part of the sub region and places as a premium on those areas or sites that are not protected."</p> <p>The Report gives excessive weight to the demands of the Coventry and Warwickshire Enterprise Partnership. The CWEP does not have the authority to determine the allocation of employment sites in Warwick District. It is merely one body, along with county and neighbouring authorities, with whom the local planning authority has to work regarding business needs. (NPPF Paragraph 160.) It should be noted that certain members of the CWEP, e.g. Coventry City Council and the previous Chairman, are also owners of the Gateway site.</p> <p>The Strategic Employment Land Study Final Report says that the Gateway "demonstrates a high degree of strategic policy fit". This ignores national and local restrictions on developments in the green belt. The first Warwick District Draft Local Plan, i.e. the Draft that went out to public consultation, specifically stated that the Gateway site retain its green belt status. Without proper consultation the 2014 Revised Draft Local Plan removed the site from the green belt. The only reason for this breach of due process is the local planning authority's wish to justify an application that is currently being considered by the Planning Inspectorate. In a circular argument the Report also uses the existence of a planning application as a reason for supporting the Gateway as a strategic employment site, as when it says that "Extensive work has already taken place in terms of the planning for the development of the site".</p> <p>The logic of the Report, and of this section of the Revised Draft Local Plan, is that planning policies are being shaped to meet the needs of the Gateway site and its owner. It ought to be the other way round.</p>	<p>The purpose of the Strategic Employment Land Study was not to assess the merits of retaining or removing the site from the green belt. The report was undertaken to identify the need for sub regional employment land and having established a need looked at the current supply of employment land in each authority area and potential sites available. It did not undertake a full planning assessment of the sites but noted which were within the green belt. All sites over 6 hectares were assessed in terms of the potential suitability to meet the requirement both in terms of the size and type of need. Criteria considered for all sites were; access to amenities, accessibility by public transport, accessibility to strategic transport network, links to areas of high unemployment, neighbouring uses, relationship to strategic corridor, suitability of site for targeted growth sectors, suitability of site for intended use.</p> <p>The findings of the study supported the Council's view that the site is an important sub regional employment site. It identified a shortfall in employment land in the sub region over the plan period and identified this site to be key in meeting this need. The site is supported by the LEP and is a priority site in the SEP, the NPPF requires that local authorities must work in partnership with the LEP and adjacent local authorities to provide for employment land needs. The Council consider that the employment benefits deriving from the site (including the potential for significant job creation to support areas of deprivation) justifies the exceptional circumstances to justify release from the green belt.</p> <p>The Council considers that consultation on the Publication Draft is an appropriate period in which to</p>	No change required
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67180 - A.C. Lloyd Homes Ltd [5684] 67182 - Deeley Group Ltd [11623]	Object	The Local Authority have not based their housing requirement on the most up to date evidence base, in particular with regard to the SHMA update and its requirement to consider detailed local evidence regarding economic growth prospects.	<p>The 2013 Joint Coventry & Warwickshire SHMA (JSHMA) carried out 2 projections to test what level of population and housing growth would be required if the projected employment growth (using Experian Economic Forecasts) were to materialise and the increase in jobs would match the requisite increase in new homes. The first projection (PROJ A) assumed no increase in commuting and concluded that 702 new homes per annum would be required. If current levels of commuting were to continue (PROJ B) then 669 homes per annum would be required. However the study emphasises the fact that:</p> <ul style="list-style-type: none"> * at District level economic forecasts are not that reliable * the relationship between housing and jobs is complex * economic forecasts do not take into account double-jobbing * commuting patterns and employment rates can change over time <p>The JSHMA Addendum, carried out in 2014 in response to the new ONS 2012-based projections, looked at economic forecasts from both Cambridge Econometrics and Experian. These showed jobs growth increases for Warwick District of 20.9% and 11.8% respectively which demonstrates how volatile such forecasts can be. If these forecasts were to met by the requisite number of homes, this would lead to a need for 933 and 653 new homes per annum. It is the Council's view that since such forecasts are considered to be unreliable, it would be potentially harmful to attempt to meet the higher range. The Council's housing requirement currently falls between these two figures which is a sensible approach given the inherent uncertainty of future economic and employment growth. The housing requirement will meet an increase in employment of 12.9%.</p> <p>National Planning Practice Guidance does not recommend that the housing requirement should be adjusted to meet economic forecasts per se. Rather, it suggests that they can be used to test scenarios and also that if any particular issues are highlighted, then these may be addressed by the location of new housing and infrastructure</p>	No change required

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	<p><i>It is considered that paragraph 3.1 should be amended to read:</i></p> <p><i>"Since the consultation on the Publication Draft Local Plan, the Council has now published the Joint Strategic Employment Land Study. Alongside this, an addendum to the Joint Coventry and Warwickshire SHMA has been produced entitled '2012-based Sub National Population Projections and Economic Forecasts: Implications for Housing Need in Coventry and Warwickshire . An updated version of the Strategic Housing Land Availability Assessment (SHLAA) has also been published to include some changes and additional sites which were omitted at the time of the consultation, the specific document is entitled 'SHLAA Amendments July 2014'."</i></p>	<p>development. The flexibility inbuilt into the housing figures, and the treatment of the housing requirement as a "minimum" will help to allow the provision of more homes if required.</p>	

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67250 - A C Lloyd Homes Ltd and Northern Trust [6105]	Object	<p>1 These representations relate to paragraph 3.1 of the Focused Consultation document.</p> <p>2. The focused changes fail to take account of an updated Strategic Housing Market Assessment September 2014 (SHMA update) produced by G L Hearn on behalf of the Joint Coventry and Warwickshire Authorities. This is an addendum to the 2013 SHMA. Failure to take account of this evidence results in the Local Plan being unsound and demonstrates a failure to comply with the Duty to Co-operate.</p> <p>3. The Framework advises LPAs to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing (OAN) in the housing market area, as far as is consistent with the policies set out in the Framework. They should also prepare a SHMA to assess their full housing needs , working with neighbouring authorities where housing market areas cross administrative boundaries. The scale and mix of housing should meet household and population projections, taking account of migration and demographic change, addressing the need for all types of housing, including affordable housing, and catering for housing demand. The starting point for establishing the OAN is the latest demographic projections, but adjustments may have to be made to take account of economic and housing factors, including market signals and affordability.</p> <p>4. The Local Plan in its present form is unsound in that, contrary to the stated intent of the document, the housing requirement fails to meet the full objectively assessed need for market and affordable housing: a serious and fundamental flaw in the soundness of the Local Plan, which, if the Plan is submitted on this basis, cannot be remedied through modification. The Council should review its evidence as to the full, objective assessment of housing need in order to inform the preparation of the Local Plan. The Council contends that it will meet in full its own objectively assessed housing needs. We submit that, on the evidence, this is not the case.</p> <p>5. The Framework/PPG set out clearly the govt. priority that housing needs are met in full. The imperative to meet objectively assessed need has been considered in the High Court (Gallagher Estates Limited & Lioncourt Homes Ltd v Solihull MBC [2014] EWHC 1283 (Admin)). In his Judgment, Mr J Hickinbottom was clear that the Framework: "requires plan makers to focus on full objectively assessed need for housing, and to meet that need unless (and only to the extent that) other policy factors within the NPPF dictate otherwise" (paragraph 97). The High Court found that the plan in question could not be considered sound because: "it is</p>	<p>The 2013 Joint Coventry & Warwickshire SHMA (JSHMA) carried out 2 projections to test what level of population and housing growth would be required if the projected employment growth (using Experian Economic Forecasts) were to materialise and the increase in jobs would match the requisite increase in new homes. The first projection (PROJ A) assumed no increase in commuting and concluded that 702 new homes per annum would be required. If current levels of commuting were to continue (PROJ B) then 669 homes per annum would be required. However the study emphasises the fact that:</p> <ul style="list-style-type: none"> * at District level economic forecasts are not that reliable * the relationship between housing and jobs is complex * economic forecasts do not take into account double-jobbing * commuting patterns and employment rates can change over time <p>The JSHMA Addendum, carried out in 2014 in response to the new ONS 2012-based projections, looked at economic forecasts from both Cambridge Econometrics and Experian. These showed jobs growth increases for Warwick District of 20.9% and 11.8% respectively which demonstrates how volatile such forecasts can be. If these forecasts were to met by the requisite number of homes, this would lead to a need for 933 and 653 new homes per annum. It is the Council's view that since such forecasts are considered to be unreliable, it would be potentially harmful to attempt to meet the higher range. The Council's housing requirement currently falls between these two figures which is a sensible approach given the inherent uncertainty of future economic and employment growth. The housing requirement will meet an increase in employment of 12.9%.</p> <p>National Planning Practice Guidance does not recommend that the housing requirement should be adjusted to meet economic forecasts per se. Rather, it suggests that they can be used to test scenarios and also that if any particular issues are highlighted, then these may be addressed by the location of new housing and infrastructure</p>	No change required

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		<p>not based on a strategy which seeks to meet objectively assessed development requirements nor is it consistent with the NPPF" (paragraph 101). At paragraph 91, Mr J Hickinbottom confirmed that: "in plan making, full objectively assessed housing needs are not only a material consideration, but a consideration of particular standing with a particular role to play".</p> <p>6. As the legal cases make clear OAN is the full requirement for housing before taking account of any policy aspects which may constrain that figure.</p> <p>7. The figure needs to take into account household projections, unmet need, vacancies, second home requirements, the housing generated by the economic requirements of the District, market signals, and also the housing to be provided to meet requirements of other authorities that cannot be met in their areas.</p> <p>8. The OAN seeks to ensure that all aspects of future housing are taken into account. Once the OAN is determined, it is then appropriate to determine if the Authority can accommodate that figure. Are there constraints such as Green Belt, AONB etc? The extent of constraints, which would also include views about journeys to work etc, and how that impacts on the OAN, is an aspect that is fully considered through the Examination of the Local Plan as part of the consideration of soundness of the plan in respect of both the economic and housing aspects.</p> <p>9. This approach to the assessment of OAN has been recently endorsed at the Cheshire East Local Plan Examination where the Inspector in his interim views on the compliance/soundness of the submitted local plan strategy confirms the need to take account of 3 levels of assessment i.e. demographic projections with adjustments made for economic and housing factors, including market signals and affordability</p> <p>10. The approach to be adopted should be consistent with the Framework/PPG. The PPG is not policy but guidance to assist in explaining further elements set out in the Framework.</p> <p>11. It is appropriate in the context of future housing requirements to look at economic considerations and some other aspects including market signals. The PPG notes that it is correct to take economic forecasts into account is a regular part of consideration of housing figures as noted most recently at the Cheshire East Local Plan Examination.</p>	<p>development. The flexibility inbuilt into the housing figures, and the treatment of the housing requirement as a "minimum" will help to allow the provision of more homes if required.</p>	

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		<p>12. In Warwick District the emerging Local Plan housing requirement figure of 12,860 dwellings 2011 - 2029 cannot be considered as being the 'correct' figure to use - in terms of it being based on the most up to date evidence in the context of paragraph 159 of the Framework and guidance in the PPG.</p> <p>13. Paragraph 2.20 of the WDLP states: 2.20 The Joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) (2013) objectively assessed the future housing needs of the Housing Market Area and the six local authority areas within it. Warwick District aims to meet its Objectively Assessed Need for housing by providing 12,860 new homes between 2011 and 2029.</p> <p>14. The Joint SHMA was produced in 2013. It is not up to date. Moreover, in September 2014, the SHMA update was published as noted above.</p> <p>15. As a starting point, the SHMA update states at paragraph 5.13 that:</p> <p>The core demographic projection set out in this report thus indicates a need for around 4,000 homes per annum across the HMA between 2011-31. This is based on the 2012 SNPP and models household formation rates using a 'part return to trend' methodology (as shown in Figure 6). This can be compared to the Joint SHMA which indicated a need for 3,750 homes per annum. We would consider that provision of 4,000 homes per annum represents a minimum assessment of full housing need across the HMA over the 2011-31 period.</p> <p>16. In essence it is an update to the 2013 SHMA which takes account of new population projections and the latest economic forecasts. It notes that based purely on the 2012 population projections the need for housing goes down in Warwick District. They are based on migration figures purely relating to the recession.</p> <p>17. The document however, goes on to take account of the latest economic projections and notes that utilising these and taking account of market signals would indicate a need for 825 to 886 dwellings per annum in Warwick (16,500 to 17,720 dwellings 2011 to 2031- Figure 12). As the document notes, this is based on higher net migration than anticipated in the 2012 population projections. This is a reasonable assumption because of the problems with the migration rates utilised by the 2012 population projections</p>		

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	<p>18. The addendum gives consideration to household projections and overlays economic forecasts; and considers the interplay between demographic projections and affordability. In summary, the report concludes that 4,000 dwellings pa across the HMA is a minimum figure. When considering the impact of economic forecasts the report states:</p> <p>5.24 Two economic forecasts have been considered in this report. The Experian econometric forecasts result in a modelled need for 3636 - 4066 homes per annum to 2031. This is below the level of need identified based on the 2012 SNPP. A higher level of housing need is generated in the scenario based on the Cambridge Econometrics' forecasts. The modelling indicates that in this scenario, 4546 - 5084 homes per year would be needed in the HMA. The lower end of the ranges shown is based on the 'Part Return to Trend' approach to modelling household formation and a continuation of existing commuting patterns. The higher end assumes that there is a 1:1 relationship between growth in jobs and residents in employment at a local authority level and that household formation rates for younger households aged 24-34 return by 2031 to the levels shown in the 2008-based Household Projections (as set out in Figure 14).</p> <p>5.25 We would consider that the higher end of this range is unlikely, as given the functional links between areas and the demographic dynamics of the HMA (in particular with a young population structure and projected population growth in Coventry) it is reasonable to assume that there will continue to be a level of commuting between the different authorities in the HMA; and as we have set out it seems unlikely that we would see a full recovery in household formation rates, particularly in the City of Coventry, to the levels shown in the 2008-based household projections.</p> <p>19. At present, WDC have not provided any consideration of the implications of the SHMA update as part of the current focused consultation exercise. This is very surprising as in addition to the Focused Consultation, the Council has published two further pieces of evidence which were used to formulate the Publication Draft Local Plan, but which were unavailable for publication at the time. These are: * Coventry & Warwickshire Strategic Employment Study October 2014 * Strategic Housing Land Availability Assessment (SHLAA) Amendments July 2014</p> <p>20. The Council is inviting representations to the Publication Draft Local Plan in light of these more recently published documents. No</p>		

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		<p>representations are invited in respect of the SHMA update.</p> <p>21. It is noted that paragraph 2.66 of the Strategic Employment Study October 2014 (SES) states, incorrectly in our view: 2.66. An update to the Joint SHMA has been undertaken to take account of the most recent ONS projections. Whilst this could affect distribution of housing need across the sub region (subject to Duty to Cooperate discussions), the impact in terms of the total housing requirement across the housing market area is relatively small and therefore we do not consider that it affects the findings of this study'</p> <p>22. It is also noted that the SES utilises the Cambridge Econometrics Employment forecasts as a basis for its assessment.</p> <p>23. At present therefore, the WDLP is not consistent with paragraph 158 of the Framework and the PPG. There is no evidence in terms of housing that demonstrates that the Council's approach is consistent with the Framework or PPG in terms of calculating OAN. Indeed this point is highlighted in paragraph 5.27 of the SHMA Addendum which states:</p> <p>5.27 In developing local plans, we would advise local authorities to consider how the housing evidence matches their evidence regarding economic prospects, and to adjust as appropriate their conclusions regarding assessed housing need to take account of their detailed local evidence regarding economic growth prospects. The alignment of housing provision with evidence regarding future economic growth potential within plans is required by Paragraph 158 in the NPPF.</p> <p>24. Having regard to the evidence available, commissioned jointly by Warwick DC, it is essential that consideration should be given to a revision of the OAN for the district. On the evidence available, this should be based on the SHMA Update Figure 12: Housing Need per Annum based on Cambridge Econometrics Forecasts, 2011-31. This relates to the 4546 p.a. figure for the HMA referred to above in paragraph 2.8. For Warwick District this would result in an OAN figure of 825 p.a. or 14,850. It should be noted that separate and duly made and unresolved representations have been made to previous stages of the Local Plan regarding the inappropriateness of the plan period i.e. it should be 2011 - 2031.</p> <p>25. It should be noted that the assessment above takes no account of need that may arise in Warwick District to accommodate the unmet OAN from Birmingham.</p>		

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>26. Additionally the WDLP in its current form fails to provide an adequate explanation of the extent to which it has complied with the duty to co-operate with neighbouring authorities, in particular in terms of the Housing Market Area. This point is highlighted at paragraph 5.31 of the SHMA update which states:</p> <p>5.31 In line with Paragraph 158 within the NPPF, Councils will need to ensure that their strategies for housing and economic growth align with one another. The authorities working together could, taking account of economic evidence, housing land availability and potential investment in infrastructure, consider an alternative distribution strategy for housing to encourage sustainable travel patterns. The Planning Practice Guidance supports this.</p> <p>27. Accordingly, it is considered that WDC has not provided an objective assessment of the housing needs of the housing market area as required by paragraph 47 of the Framework and the PPG. The emerging WDLP is fundamentally flawed in this respect. In the absence of evidence that WDC has taken account of the SHMA update, it is evident that the current proposed level of growth is unsound.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67187 - Bubbenhall Parish Council (Mrs Jane Fleming) [4485]	Object	<p>The Atkins report commissioned November 2013 doesn't provide a robust evidence base and associated policy recommendations to assist the preparation of CWLEP's Strategic Economic Plan. If a need for more employment site(s) were identified, it should assess suitability of potential sites and provide appropriate recommendations. Too wide a range of assumptions and techniques has been used to estimate future employment land requirements to make this Report reliable. Gateway should be removed from the emerging Local Plan. A regional employment study has been commissioned on behalf of W Mids. LEPs. Findings should be considered alongside regional sites study when available.</p> <p><i>The Gateway should be removed from the emerging Local Plan.</i></p> <p><i>A regional employment study has been commissioned on behalf of the LEPs within the West Midlands area. Consequently, the findings of this study should be considered alongside that of the regional sites study when available. Therefore, this report cannot be considered as conclusive.</i></p> <p><i>If such a regional employment site were justified it should be considered as part of a future review of all Local Plans in the CWLEP area when several alternative sites could be compared and tested by proper environmental impact assessments and sustainability appraisals before allocating any one particular site.</i></p>	<p>The Joint Employment Land Study supported the Council's view that the site is an important sub regional employment site. It identified a shortfall in employment land in the sub region over the plan period and identified this site to be key in meeting this need. The site is supported by the LEP and is a priority site in the SEP. The Council consider that the employment benefits deriving from the site (including the potential for significant job creation to support areas of deprivation) justifies the exceptional circumstances to justify release from the green belt. The report was undertaken to identify the need for sub regional employment land and having established a need looked at the current supply of employment land in each authority area and potential sites available. All sites over 6 hectares were assessed in terms of the potential suitability to meet the requirement both in terms of the size and type of need. Criteria considered for all sites were; access to amenities, accessibility by public transport, accessibility to strategic transport network, links to areas of high unemployment, neighbouring uses, relationship to strategic corridor, suitability of site for targeted growth sectors, suitability of site for intended use.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67239 - Baginton Parish Council (Mr Phil Clark) [12995]	Object	<p>Coventry and Warwickshire Strategic Employment Land Study -</p> <p>General. We note that this report has been issued as "final" three times. This gives Councillors the impression that others are unduly influencing its content and conclusions.</p> <p>Section 3. This section invalidates the report in our view as the list referred to in Appendix A comprises organisations with vested interests in the development, rather than taking the considered views of Parish Councils, local residents and local enterprises.</p> <p>Section 4. This section is based on a number of assumptions which in our view are questionable and lead to inappropriate conclusions. In particular, the job forecast is wholly unreasonable as it grossly overestimates job creation compared with other documents and representations previously made.</p> <p>Section 6. This section is fundamentally flawed for many reasons, such as, but not limited to the following:-</p> <p>A. The SELS claims that the Gateway sites satisfy strategic sites criteria despite the fact that the sites are all in the Green Belt, B. The site by site analysis ignores the fact that planning policy such as Green Belt may influence the provision of employment sites, despite the fact that this was acknowledged in section 5 point 5.2.2</p> <p>C. There is no rail link, D. There is poor amenity provision, E. It has proven negative environmental impact, F. Access requires extensive highway improvements, G. There are plans for improvements to railway network to the North of the city and it is the North of the City of Coventry and North Warwickshire where there is most socio-economic need. This is not even recognised in the report's conclusions</p> <p>Section 7. This section fails to recognise key strategic sites in the periphery of the CWLEP area such as Blythe Valley</p> <p>Business Park and the development site at Gaydon. The report overstates claimed demand and understates supply.</p>	<p>In accordance with National Planning Policy Guidance it is important that any study assessing employment land requirements takes into account market signals. That is why relevant stakeholders within the business community were consulted, these were selected from each local authority area. This information was used to gather qualitative information on what the local business community is experiencing to consider alongside the quantitative projections. The job creation figures for each scenario were calculated using standard employment densities based on the floor space projections.</p> <p>The purpose of the study was not to assess the merits of retaining or removing the site from the green belt. The report was undertaken to identify the need for sub regional employment land and having established a need looked at the current supply of employment land in each authority area and potential sites available. It did not undertake a full planning assessment of the sites but noted which were within the green belt.</p> <p>It is acknowledged that there is no rail link serving the site and therefore it does not strictly meet the definition of a Regional Logistics site as set out in the RSS. However the Regional Logistics Study forming part of the RSS phase 2 revision evidence implied that around 30% of demand in respect of large scale B8 floorspace was likely to be met by non RLS site with no rail link. Whilst the RSS has been abolished the evidence underpinning it remains a material consideration.</p> <p>The report identified there was both a quantitative and qualitative need for employment land within the sub regional boundary. Paragraph 5.9 states 'In order to remain competitive at the regional, national and international levels, Coventry and Warwickshire should maintain an attractive and competitive portfolio of sites, especially in terms of larger sites that could meet the needs of the identified growth sectors. The sub-region must remain in a position that enables it to respond to emerging challenges and opportunities like the ambitious plans for UK Central which lies just outside the sub-region's boundaries'.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Sustainability Appraisal</p> <p>The assessment demonstrates that the vast majority of criteria for this site are negative impacts. This is not acceptable.</p> <p>Conclusion</p> <p>In conclusion, the new information is in the view of Councillors fundamentally flawed in a number of key areas, so should not be given any weight in argument for the Gateway. Indeed the errors and omissions and flawed conclusions in the report serve to further reinforce our view that the Gateway is inappropriate development of the Green Belt, with no very special circumstances. The Local Plan therefore remains fundamentally flawed in this respect and the Gateway development must be removed.</p>	<p>In relation to environmental impact and in particular biodiversity it was demonstrated through the Gateway application that no net loss of biodiversity (and indeed some enhancement) could be achieved as part of developing the site. It was agreed that off site contributions could be secured through developer contributions and Natural England were happy with this approach. Public amenity space would also be provided through the development of the site.</p> <p>The representations to the Sustainability appraisal will be addressed separately in the final report.</p>	
67242 - Coventry & Warwickshire Development Partnership [6458]	Support	<p>We have seen the Publication Draft Local Plan: Focused Consultation and have no specific comments on the contents of the document.</p> <p>No doubt these amendments are being proposed in the context of the Atkins Report which concluded that the Coventry and Warwickshire Gateway is the most important strategic employment site to deal with Coventry and Warwickshire's needs over the Plan period.</p> <p>We represent the Coventry and Warwickshire Development Partnership which is the vehicle that will deliver the Coventry and Warwickshire Gateway scheme. We trust that, notwithstanding these proposed changes, the Council remains committed to the Coventry and Warwickshire Gateway project in line with its Local Plan policies.</p>	Noted	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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DS6

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67271 - Barwood Strategic Land II Limited [9441]	Object	<p>These representations must be read in conjunction with those submitted by HOW Planning in response to the Warwick Local Plan 2011-2029 Publication Draft consultation, submitted in June 2014.</p> <p>The objections raised in June, which demonstrate that the Plan is unsound, still stand and as detailed in the accompanying representation forms relate specifically to draft policies DS4, DS6, DS7, DS10, DS11, DS19 and DS20.</p> <p>These representations have been prepared to specifically respond to the publication of the Coventry and Warwickshire Strategic Employment Land Study (ELS) October 2014, which is a key part of the Council's evidence base underpinning the emerging Plan. It is understood that the Council in the preparation of the Publication version used the emerging ELS (March 2014) to inform the Plan, however presumably at the time the ELS had not been finalised and certainly it was not publically available.</p> <p>Barwood appointed specialist consultancy Peter Brett Associates (PBA) to carry out an independent assessment of the Study, in order to establish the key implications for the housing market area. A report by PBA is attached, however in summary it is clear that if the local authorities accept the findings and recommendations of the ELS, then a significantly increased amount of housing will need to be delivered over and above the Strategic Housing Market Areas demographic scenarios if the economic strategy is to be delivered. There would need to be compelling reasons to justify why the recommendations of the report might not be followed.</p> <p>The ELS and in particular its recommendations have implications which go to the heart of the emerging Local Plan and have a specific bearing on draft policy DS6: Level of Housing Growth and DS20: Accommodating Housing Need Arising from Outside the District.</p> <p>Previous work undertaken by PBA, presented in Barwood's June representations, highlighted that the Council had underestimated its proposed level of housing growth and therefore that draft policy DS6 is unsound. The recommendations of the ELS only serve to support PBA's findings.</p> <p>Draft policy DS20 sets out that in the event that unmet housing need arising outside the District needs to be met within the District, then a review of the Plan will be carried out.</p> <p>Barwood's previous representations highlighted the shortcomings of this policy, but the Council's approach is undermined further with the recommendations of the ELS clearly pointing towards the need for additional housing across the HMA. The likelihood therefore of additional housing being needed in the District is increased by the ELS</p>	<p>The 2013 Joint Coventry & Warwickshire SHMA (JSHMA) carried out 2 projections to test what level of population and housing growth would be required if the projected employment growth (using Experian Economic Forecasts) were to materialise and the increase in jobs would match the requisite increase in new homes. The first projection (PROJ A) assumed no increase in commuting and concluded that 702 new homes per annum would be required. If current levels of commuting were to continue (PROJ B) then 669 homes per annum would be required. However the study emphasises the fact that:</p> <ul style="list-style-type: none"> * at District level economic forecasts are not that reliable * the relationship between housing and jobs is complex * economic forecasts do not take into account double-jobbing * commuting patterns and employment rates can change over time <p>The JSHMA Addendum, carried out in 2014 in response to the new ONS 2012-based projections, looked at economic forecasts from both Cambridge Econometrics and Experian. These showed jobs growth increases for Warwick District of 20.9% and 11.8% respectively which demonstrates how volatile such forecasts can be. If these forecasts were to met by the requisite number of homes, this would lead to a need for 933 and 653 new homes per annum. It is the Council's view that since such forecasts are considered to be unreliable, it would be potentially harmful to attempt to meet the higher range. The Council's housing requirement currently falls between these two figures which is a sensible approach given the inherent uncertainty of future economic and employment growth. The housing requirement will meet an increase in employment of 12.9%.</p> <p>National Planning Practice Guidance does not recommend that the housing requirement should be adjusted to meet economic forecasts per se. Rather, it suggests that they can be used to test scenarios and also that if any particular issues are highlighted, then these may be addressed by the location of new housing and infrastructure</p>	Not required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>recommendations and there can be no assurance that the Council's approach will translate to the HMA's unmet housing requirements being provided for.</p> <p>In summary, as set out in the attached representation forms, it continues to be Barwood's firm opinion that the Council's new Local Plan cannot be considered sound unless fundamental amendments are made as detailed in these representations and those submitted in June.</p>	<p>development.</p> <p>The flexibility inbuilt into the housing figures, and the treatment of the housing requirement as a "minimum" will help to allow the provision of more homes if required.</p>	
67305 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>Despite the fact that the current 'focused consultation' does not mention the SHMA Addendum, this document is a significant addition to the evidence base since the previous WDC consultation. Its findings are relevant to many aspects of the draft Local Plan. The JSHMA Addendum fails to address the caveats ONS make about their projections. The projections simply indicate what might happen if past trends were to continue, and they take no account of future policy changes. The value of the SHMA Addendum is therefore limited. assumptions about headship rates are questionable. It might have been better to await the 2012-based household projections rather than second guess them. The consultants decided to ignore 'unattributable population change' (the difference between ONS estimates and the 2011 census population figure). This decision could have had the effect of overestimating future population. The SHMA Addendum does not articulate its assumptions about vacancies, second homes, sharing, concealed households and institutional population, all factors that will affect future levels of housing need. The report looks at two economic forecasts that vary significantly. But no preference is suggested. Further conflicting market signals means there are no clear conclusions. the assessments show housing need for the HMA varying from 3,270 to 3,981 per annum. However it then alights on a figure of 'about 4,000 per annum' and goes on to treat this as a minimum. The new evidence does not provide a robust evidence base for the proposed policies in the emerging WDC Local Plan.</p> <p>CPRE's original response on Policy DS6 regarding housing growth of June 2014 remains applicable.</p>	<p>Whilst the updated ONS projections indicate that the District's objectively assessed need is lower (see Joint SHMA addendum), this is not the case for the HMA as a whole. In line with the NPPF and the Duty to Cooperate, the Council is committed to working with other Councils in the HMA to ensure the whole of the Housing Market Area's needs are met. For this reason the Council contends that the District's Housing Requirements should remain at 714 dwellings per annum.</p>	Not required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67234 - The Warwick Society (James Mackay) [3080]	Object	<p>In the draft Plan, Policy DS6, para 2.20 remains unsound because it is even less justified by the evolving evidence than it was in June 2014. The Joint SHMA Amendment published in September 2014 with the title '2012-based Sub-National Population Projections & Economic Forecasts: Implications for Housing Need in Coventry & Warwickshire' did not reflect the reduction of 29% in the population of the District in 2031 that the ONS now projects. It also maintains the unsupported projection of a substantial fall in average household size.</p> <p>Both these defects in the basis of the draft Plan were fully explained in our representation of 27 June 2014. Between then and the publication of the 'Focussed Changes', in the light of that and many other similar representations, the Council has had the opportunity to update the Plan to reflect the significant change in the evidence supporting it. It has not done so, and the Plan continues to propose the allocation of some 4,900 plots on greenfield land, unjustified by evidence and contrary to the NPPF.</p>	<p>Whilst the updated ONS projections indicate that the District's objectively assessed need is lower (see Joint SHMA addendum), this is not the case for the HMA as a whole. In line with the NPPF and the Duty to Cooperate, the Council is committed to working with other Councils in the HMA to ensure the whole of the Housing Market Area's needs are met. For this reason the Council contends that the District's Housing Requirements should remain at 714 dwellings per annum.</p>	Not required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>DS16</i>				
67272 - Mr Robin Fryer [7457]	Object	<p>The Atkins study is not an objective inquiry into land available in Coventry and Warwickshire. It repeats previous reports by comparing existing sites with commercial planning consent with an area of green belt without consent. It fails to compare with other green belt sites to the north and west of Coventry which have the same green belt status as Baginton and could be made as major employment sites. The Meriden Gap, Coundon Wedge and open land south of the M6 are all much closer to areas of deprivation. The Atkins report makes reference to high levels of worklessness in Binley and Willenhall wards but this not equate to the City Council's figures. The proposed site is too far from the areas in greatest need, Foleshill, Nuneaton and North Warwickshire. Report does not explain how these areas which have the lowest rates of skilled workers will benefit from the presence of high tech design and research facilities. There is already an unbalance of workers in the area, development of the site will make it worse. The report states that accessibility by public transport is good however this relies on improvements being made a claim which could be made for any site. The level of commuting to the site would not be sustainable development. The fundamental problems in locating the site in the small village of Baginton have not been addressed by the report It is in opposition with the Governments stated aims of reducing the need to travel, to reduce energy consumption, to reduce CO2 emissions and creating sustainable communities. The current local plan proposals do not identify a sub region but identify the site to be necessary to meet sub regional needs. The term is confusing and the only defined plans are those which form the disbanded RSS which sought to stop the outflow of workers from urban centres to surrounding rural areas . The RSS recommended that new development should be away from Warwick District and into regeneration zones. The County Council incorporated this aim into its own Structure Plan. The RSS is used as the evidence base for the logistics park however this concluded that sites for warehouses must be served by road and rail at a transport hub. The Atkins report does not address the lack of a rail connection. The claim that the logistics park is part of the automotive supply chain is unsupported and counter to recent evidence which indicates a shift eastwards to the Birmingham / Black Country urban region.</p>	<p>The study considered all available sites over 6ha in each local authority area. This included committed sites with planning permission as well as other sites being promoted as available for development, including the wider list assessed by G L Hearn as part of the consideration of the Gateway application. The report notes that the Gateway site is located close to Coventry which is one of the sub-region's key areas of need for new jobs and regeneration along with the focus for much future population and labour supply growth.</p> <p>The purpose of the study was not to undertake a full planning assessment of the impact of developing employment in this location. Considerations such as the impact on Baginton and sustainable transport linkages would be considered through future planning applications and assessed against policy DS16.</p> <p>It was acknowledged that there is no rail link serving the site and therefore it did not strictly meet the definition of a Regional Logistics Site as set out in the RSS. However the Regional Logistics Study forming part of the RSS Phase 2 Revision evidence base implied that around 30% of demand in respect of large scale B8 floor space was likely to be met by non RLS sites which do not have rail facilities. Whilst the RSS has been abolished the evidence base underpinning it remains a material consideration.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67236 - Mr David Ellwood [13071]	Object	<p>Considers that the SELS is neither objective or independent and that its function is to support the LEP's decision to make "Coventry and Warwickshire Gateway" its flagship development site in the LEP area and its statement that "Without it [the LEP] cannot achieve its purpose. The study was revised three times after the SEP was published and after the first of those the author changed. It seems that over six months was spent after publication of the SEP ensuring that the Study, a purpose of which was to assist in its preparation, had taken it into account. The treasury and BIS acknowledge that the Government's plan for Britain's sustainable, long-term economic growth is not to be done at the expense of the green belt. Atkins highlights this however overlooks this obvious constraint in taking into account the final choice. A fundamental reason why the Study's findings and conclusions have no credibility. the LEP has said that, if the proposed Gateway development does not go ahead, it (the LEP) cannot achieve its purpose. An Employment Land Review update by G L Hearn for North Warwickshire cited the Black Country and Southern Staffordshire - Regional Logistics Site Study. This recognises that the arising demand is capable of being satisfied by any location in the Midlands which is well served by road and rail. It need not be specifically satisfied within the Black Country/South Staffordshire area, let alone within a particular local authority. The proposed Gateway development site is not served at all by rail. Despite the claims made on behalf of the Applicant at the Public Inquiry, the majority of the deprivation and unemployment in Coventry and the surrounding area is in North and North East Coventry and in Nuneaton and Bedworth to the North East of Coventry. That is why the Coventry-Nuneaton Regeneration Zone was identified for that area in the now abolished Regional Spatial Policy. It is on the opposite side of Coventry from the Gateway site, with the consequent inconvenience, cost and carbon footprint of travel to work at Gateway.</p> <p><i>The removal of the removal of the Coventry and Warwickshire Gateway proposed development site from the Green Belt.</i></p>	<p>The Council do not consider that the report is flawed, the purpose of the study was not to assess the merits of retaining or removing the site from the green belt. The report was undertaken to identify the need for sub regional employment land and having established a need looked at the current supply of employment land in each authority area and potential sites available. It did not undertake a full planning assessment of the sites but noted which were within the green belt.</p> <p>The report notes that the Gateway site is located close to Coventry which is one of the sub-region's key areas of need for new jobs and regeneration along with the focus for much future population and labour supply growth.</p> <p>It was acknowledged that there is no rail link serving the site and therefore it did not strictly meet the definition of a Regional Logistics Site as set out in the RSS. However the Regional Logistics Study forming part of the RSS Phase 2 Revision evidence base implied that around 30% of demand in respect of large scale B8 floor space was likely to be met by non RLS sites which do not have rail facilities. Whilst the RSS has been abolished the evidence base underpinning it remains a material consideration.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67303 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>The consultation process is flawed as the policies that are dependent on the SEP are not justified and the focussed change consultation is too narrow in scope to address this (no mention of the SHMA Addendum). This means the proposals are unsound and are not justified.</p> <p>the recommended scenario of the Employment Land Study is based on CWLEP prediction of jobs. It therefore depends on a circular argument since the SEP was based on the ELR. Different scenarios yield hugely different employment land requirements and this is not adequately explained. The recommended scenario is significantly higher than Experian's used in the JSHMA addendum.</p> <p>the proposed approach is predicated on unsubstantiated claims that City Deal will yield 8,800 new jobs. So the employment land requirements are recommended for no better reason than it is what the CWLEP would like to see.</p> <p>On the supply side, invalid discounts/reductions are applied to employment land and also fails to take account of the 100ha site at Gaydon.</p> <p>The selection criteria for evaluating strategic employment sites omits green belt - meaning these sites are precluded from the presumption in favour of sustainable development. Direct rail connection is also omitted from the criteria - important for logistic sites. Site Appraisal Assessment Methodology depends on very selective and short-sighted measures. This highly questionable methodology results in good assessments for sites in the south of the area regardless of how ill-served they are by public transport from the area of greatest socio-economic need in the north.</p> <p>Based on its methodology, the SELS claims that "Coventry and Warwickshire Gateway (Zones A and B) in particular satisfies all the strategic sites criteria." This amazing claim is despite the fact that:</p> <ul style="list-style-type: none"> * It is in the Green Belt; * Access requires extensive off-site highway improvements; * There is no direct rail link; * There is serious contamination; * There is currently poor provision of facilities and amenities; * There is currently poor public transport accessibility to the site; * At best, there would be only moderate access to A roads (from Zone A in particular); * Emergency access (to Zone A) is very restricted in a cul-de-sac passing directly adjacent to Coventry Airport's runway end; * It is not in the north of the CWLEP area where socio-economic 	<p>To reflect that predicting future employment land requirements is not exact the report considered four scenarios in order to reflect range of future prospects. Two were based on Cambridge econometrics projections which are routinely used in predicting future requirements. The baseline plus growth scenario was based on the City Deal proposals to deliver 8,800 new jobs in the sub region by 2025.</p> <p>It is acknowledged that there is significant variation between the scenarios and the recommended scenario is different to that used in the JSHMA addendum. The justification for the sub regional site is not just based on quantitative need but there is a qualitative case for providing such a site in the Coventry and Warwickshire area where proactive economic growth, diversification and investment is being promoted by the LEP. There is evidence of need for technology focused B1 floor space reflecting investment in research and design in the sub region particularly through the two universities as well as evidence of demand from major manufacturing investors. Taking account of both qualitative and quantitative need is in line with the NPPG.</p> <p>Expansion proposals at Gaydon were taken into account whilst assessing the supply of employment land (page 29) however as the proposed allocation for JLR identifies a range of other uses besides those within Class B, eg. marketing, conference, education and leisure related to the company's activities the potential land take associated with these uses is not yet known.</p> <p>It was acknowledged that there is no rail link serving the site and therefore it did not strictly meet the definition of a Regional Logistics Site as set out in the RSS. However the Regional Logistics Study forming part of the RSS Phase 2 Revision evidence base implied that around 30% of demand in respect of large scale B8 floor space was likely to be met by non RLS sites which do not have rail facilities. Whilst the RSS has been abolished the evidence base underpinning it remains a material consideration.</p> <p>The purpose of the study was not to undertake a full</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>need is greatest; * It has negative environmental impact.</p> <p>Twelve of the SELS's Potential Strategic Employment Sites are identified as being a good match to the CWLEP's strategy, all offering good alternatives to the Gateway. Additionally, key strategic sites on the periphery of the CWLEP area, such as DIRFT, the MIRA Enterprise Zone and Blythe Valley Business Park, are omitted without justification. Put simply, there is no shortage of alternative sites.</p> <p>The recently published version of the SELS has clearly been written with a view to providing, for the already 7-month-old SEP, post-hoc justification for a stream of questionable assertions and heroic assumptions in the SEP, which reflects long-held aspirations. The SELS is nowhere near good enough or cohesive enough to meet even that very limited objective. Its many technical weaknesses and its inherent bias mean that it cannot be taken seriously as an independent assessment of the need for, and supply of, employment land in the CWLEP area. It does not provide a valid justification for development of the Gateway site.</p>	<p>planning assessment of the impact of developing employment in this location or consider the merits of removing or retaining the site in the green belt. Considerations such as the impact on Baginton, provision of public transport, access to facilities and amenities and impact on the natural environment would be considered through future planning applications and assessed against policy DS16 as in the case of the recent Gateway application.</p>	
<hr/>				
<i>SHLAA</i>				
67282 - Mr T Edsall [13086]	Object	<p>Map 26 - Lowsonford</p> <p>RE: SHLAA - Land Adjoining Whitehouse Farm, Lapworth Street, Lowsonford.</p> <p>Request for land in attached drawing included within the local plan for residential development.</p>	<p>The Village Settlements Hierarchy Report (June 2013) classifies Lowsonford as a Small & Feeder Village. This reflects its small size and limited local services as well as its limited access to services elsewhere. The Local Plan Publication Version categorises the village as a "Limited Infill Village" and identifies the limits of the built up area of the existing settlement in terms of the village boundaries. The site, which is the subject of this representation, does not lie within the existing built up area of the village.</p> <p>The Council does not accept that this site should be considered as a housing allocation due to its unsustainable location on the edge of a small feeder village.</p>	
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67270 - Mr Edward Walpole-Brown [7504]	Object	<p>the Local Plan is unsound because of the scale and distribution of housing and selection methods used for appraising individual sites. Insufficient regard has been given to the benefits site R073 can deliver and that the selection process is not sufficiently reflective of sustainability issues.</p> <p>It is a naturally contained site bordered by existing development on the west and roads to the north and south. It provides the opportunity to improve the character and integrity of Hatton Green. The SHLAA amendments give no particular regard to the benefits the scheme could bring. The community would benefit from car parking associated with the church, providing extra land and facilities for the well subscribed primary school, providing car parking. Considers that impact on the character and integrity of the village is overstated. Mindful of the need to screen the Grade II listed Church, providing landscaping and parking between the Church and site would be of benefit to all. Overall disagree with the SHLAA assessment that the site is unsuitable.</p>	<p>The Council has carried out research into the hierarchy of settlements in the District. This examined a range information including Census statistics, access to services, the aspirations of local communities and local housing needs surveys. The outcome was a Settlement Hierarchy where settlements were categorised into a hierarchy according to the scores achieved according to the aforementioned criteria (see Village Settlement Hierarchy Report June 2013)</p> <p>The report showed that Hatton Green was considered to fall within the category of "Small and Feeder Villages". The village population at the time of the 2011 Census was just 212 and there were 85 dwellings. Public transport was poor (buses on Wednesday and Saturday only) and although there was a Primary School, Church and Village Hall within easy access, there was no shop or other facilities within the village.</p> <p>The site, the subject of this objection, has a capacity of about 150 dwellings. This would more than double the size of the existing village and would require an access off either Hockley Road or Birmingham Road, away from the existing village core. The Council takes the view that a development of this size adjacent to a small village with poor public transport and limited day-to-day services would lead to unsustainable development; have a detrimental impact on the integrity of the village and a harmful impact on the Grade II* listed Church of Holy Trinity.</p> <p>The Council did not pursue further any substantial greenfield sites in unsustainable villages. However, where there was clear evidence of local housing need or the local community had aspirations for housing growth, the Council did pursue options where this would lead to clear benefits for the community. The Hatton Parish Plan, published, in February 2013, indicated strong opposition to new housing development unless it accorded with Green Belt policy and protected the Green Belt. There was, however, some support for small scale developments to meet specific needs such as homes for older people, self build projects, starter homes and shared ownership/ rented homes but only if the proposal supported sustainability</p>	No change

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>The allocation of sites previously submitted at Hatton Green should be revisited and preferred in preference to others which are being allocated. Hatton Green is an excellent location and should provide for a high degree of housing allocations as the benefits that site R073 could bring are significant and so it should be preferred in preference to the site at Hatton Park.</i></p>	<p>objectives.</p> <p>The Council contends that even if it did further assess the qualities of this site, it would be difficult to justify the removal of the site from the Green Belt given the unsustainable nature of the location and the important role played by this area of open land within the setting of Hatton Village and the listed Church of Holy Trinity. The Local Plan has allocated a site for about 80 new homes at Hatton Park, just over a mile from the site at Hatton Green. Hatton Park is assessed as a Secondary Service Village in the Village Settlement Hierarchy Report and as such is a more sustainable location.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67243 - Lenco Investments [1165]	Object	<p>The Council has not responded proactively to the SELS, which should have included a strategy for supporting sustainable growth in the Coventry and Warwickshire area. As required under Article 5(i) of the Strategic Environmental Assessment Directive (SEA Directive), where an environmental report is prepared, the responsible body should undertake an assessment of the likely significant effects, accounting for reasonable alternatives.</p> <p>In response to the 2014 SHLAA additional evidence was submitted detailing the suitability of Land south of Baginton relating to landscape impact, and air and noise pollution. The Council have not responded to this in updating the SHLAA or revised assessment of the deliverability of the site. It has therefore not been in the public domain as a reasonable alternative. The SHLAA and SA should be iterative documents responding to new evidence. Land at South Baginton should have been considered as an appropriate Sustainable Urban Extension to support the arising need for housing in Warwick District and the need arising from the Coventry Gateway site. The Council has made a number of major amendments to the Draft Local Plan, which includes the redistribution of housing and employment sites. RPS considers that there are a number of changes which have not been subject to the SA process and therefore have not been drafted in line with the SEA Directive. In addition to including new employment sites, the Council has deleted three from the Draft Local Plan and included provision for additional housing on two previously identified sites.</p> <p>The Council is right to appraise the recently included sites within the plan, however the Council should also have appraised the likely sustainability impacts of removing sites for employment and adjustments made to housing sites. The development of the Local Plan should, at every stage of development, be complemented by a SA. This Focussed Consultation is not adequately supported by an SA of these changes. To date, the Council's SA is incomplete and legally noncompliant. The Local Plan cannot therefore be adopted until these changes are made. In the Focussed Consultation the Council have decided to remove three potential employment allocations, totalling 19.7 hectares to be replaced by an allocation for 11.7 hectares. It is unclear why the Council have responded to the shortfall of employment land set out in the SELS by removing additional employment land from the Draft Local Plan.</p> <p>The Gateway site has been subject to an SA which recorded a number of negative scores against the Council's SA Objectives.</p>	<p>The Council took into account additional technical information provided in respect of odour and noise in preparing the 2014 SHLAA and changed the assessment from the 2012 report from not suitable to suitable in part. This conceded that some development could take place towards the north eastern part of the site subject to high quality landscape and design and satisfactory mitigation in relation to noise, odour and contamination. The Council feels there is still insufficient evidence that all the constraints could be mitigated on the wider site. With respect to noise whilst it is agreed that the current levels of noise could be potentially mitigated current operations at the airport are the lowest that they have ever been and that there was no guarantee that they would not increase again. This could take place without planning permission and in this event the mitigation proposals put forward by the site promoter would be inadequate.</p> <p>The landscape assessment undertaken on behalf of the Council identified the site as being of high landscape value where development would have significant impact. Development of the site would take the form of a finger of development into open countryside, away from the built up area of Baginton with a poor physical relationship to the existing village. The site has not been subject to sustainability appraisal as it was not considered to be suitable due to the numerous constraints, leading to uncertainty regarding achievability</p>	No change needed

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>RPS does not believe that this assessment fairly reflects the cumulative impacts of development, which could enhance a number of scores in the appraisal. Slight negative scores have been recorded against SA Objectives relating to sustainable transport and the reduction in the need to travel. The Council justify this in terms of the walking distance to the site from Coventry Railway Station, 3.5 miles from the site. This is an unreasonable indicator, which does not consider where the likely workforce will be coming from. Page 69/70 of the SELS acknowledges that there is a high level of worklessness within 3km of Zone B of the CG site. Not only is the development expected to increase the levels of employment in the area but it can facilitate sustainable forms of transport, as 3km is considered an acceptable distance to travel to work by either walking or cycling. RPS also considers that the appraisal should be undertaken in the context of strategic housing allocations. Land South of Baginton as a sustainable housing site on the edge of Coventry, which would complement the proposed development at CG. This would provide housing along with local community facilities in a prime location, within easy access of a range of employment types. Considered together, this would support increases to the SA scores, creating positive outcomes for sustainable transport, the reduction in the need to travel and access to services. There is strong support for the CG site to proceed and Warwick District need to look seriously at suitable locations to support the employment growth at the Sub-Regional site. Land south of Baginton has been never been considered as a potential strategic allocation by the Council. As RPS have identified, the site is suitable, available and achievable for development and therefore constitutes a reasonable alternative site. The Council are mandated under the SEA Directive to consider all potential reasonable alternative sites in the development of the Local Plan.</p> <p><i>RPS object to the legitimacy of the Focussed Consultation, which fails to account for the requirement to undertake a SA of all strategic changes in the Draft Local Plan and again fails to consider Land south of Baginton as a SUE, despite evidence supplied to the Council demonstrating the deliverability of the site.</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67275 - Mr George Cooper [4918]	Object	Would like land identified in red on attached plan at Pinley Acres, Pinley Green as to be additionally considered for independent siting of a 3 bedroom property. This is in addition to the proposal already made for adjoining land of 2.5 acres to residential use.	This location was assessed as being unsuitable because it is not well related to the village of Pinley Green and has poor access by public transport to the towns. Further, Pinley Green is classified as a "Very small village or hamlet" in the Council's Village Settlements Hierarchy Report of June 2013. As such it is not considered to be a sustainable location with very limited access to jobs, services and public transport.	No change
67276 - GM & PR Davison [3193]	Object	Permission already given for 735 new homes on Europa Way/Myton Road whilst plan still being consulted upon. Allocation of land to south of Warwick and Leamington results in loss of countryside, rural setting and high grade agricultural land. Previous restraint orders being ignored. Severe road congestion will become worse with resulting impact on air quality. ONS numbers being ignored. Developers argue there is no five year land supply when there is and they are ignoring constraints. Benefits to building on brownfield sites for 'affordable housing' and local builder interest over greenfield sites for national housebuilders maximising profit. Residents views ignored in favour of developers arguments. Planning is not fulfilling its role in deterring development.	The site is considered suitable in SHLAA following a reasonable planning assessment. Housing land is needed as demonstrated the SHMA and this is considered to be a suitable site to deliver it. Traffic impacts have been assessed through the Strategic Transport assessments and these demonstrate that impacts can reasonably be mitigated. Whilst there will be a loss of agricultural land, the benefits of residential development are considered to outweigh this, in line with the National Planning Policy Framework.	
67419 - Leek Wootton & Guy's Cliffe Parish Council (Mr Colin Smith) [8385]	Support	The Parish Council wishes to record its continued general support for the local plan. However given the recent introduction of Land to the east of Warwick Road (adjacent to the Cricket Club) into the SHLAA the Parish Council wish to register their opposition to further incursions into the greenbelt separating Kenilworth from Leek Wootton.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>HS3</i>				
67324 - Leamington Society (Mrs Marianne Pitts) [5967]	Object	<p>The recent Petition, followed by Council debate and resolution have high-lighted the very special nature of St. Mary's Lands and this was after previous Local Plan consultation.</p> <p>Why Draft Plan is incomplete</p> <p>We note that the draft supports the principle of designating an LGS (as provided for in NPPF).</p> <p>HS3 suggests that local communities may designate through Neighbourhood Plans. But many communities are not proposing neighbourhood plans (eg Leamington Town Council) and adjacent spaces may relate to either several or to no neighbourhood plans. The NPPF states (para 76) that an LGS "should be designated when a plan is prepared or reviewed" so now is the time for designation, not left as vague possibility.</p> <p>There will be few spaces appropriate for LGS status within the WDC area. But we suggest two notable spaces which could and should be designated in the text of the Local Plan. They are :-</p> <p>St. Mary's Lands</p> <p>This is demonstrably special to the local community, as indicated above, and not just to those living immediately adjacent. It also fulfils most of the possible criteria. We support this designation as a unique space within the District.</p> <p>Welch's Meadow and east as far as the canal (and old railway line)</p> <p>This land, bounded to north by River Leam and south by A425, is certainly close to and special for the local community. It meets various criteria including tranquillity close to the town, richness of wildlife, and recreational value for many walkers.</p>	<p>It is considered most appropriate for any Local Green Space designation to be put forward through neighbourhood plans. Whilst some local communities may not be preparing a Neighbourhood Plan this does not preclude this occurring in future. Furthermore it is considered that other policies in the Local Plan provide sufficient protection at a strategic level for the green spaces referenced.</p>	
<i>DS11</i>				
67539 - Environment Agency (Becky Clarke) [6581]	Object	<p>A level 2 SFRA is required. The site lies adjacent to the Saltisford Brook, further investigation which may include Hydraulic Modelling will need to be undertaken to establish whether a fluvial flood risk exists to the site from this source. No Flood Zones currently exist in this location.</p> <p>All built development including drainage features should be sited outside of the 100 year climate change fluvial outline.</p> <p>The Flood Risk assessment (FRA) must demonstrate that safe access to and from the site can be achieved for emergency vehicles up to and including the 100 year climate change fluvial event.</p>	<p>A flood risk assessment was undertaken as part of planning application W/14/0951 (for 101 dwellings). The EA indicated that they were happy with this FRA and although the application was withdrawn, the Council considers that this is sufficient evidence to demonstrate that the site can be allocated for housing within the Local Plan with resulting in flood risk that cannot be mitigated.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67511 - The Warwick Society (James Mackay) [3080]	Object	<p>Further work carried out by Warwickshire County Council and its consultants has failed to resolve the inadequacy of the phase 4 Transport Strategy. Its effect, with the proposed development on greenfield land, will be to increase congestion and worsen air quality in Warwick and Leamington town centres. The Plan remains unsupported by a sustainable transport scheme. On this ground too it fails, therefore, to comply with the NPPF.</p> <p>The damage done to the historic environment by the inadequacy of the transport strategy and its 'mitigation' measures remains unresolved. No Heritage Impact Assessment of the Transport Strategy and its 'mitigation' (of traffic flows, not of environmental impact) on Listed Buildings and the Conservation Area of Warwick Town Centre has been carried out. The recent response of English Heritage to a planning application for the demolition of a 1960s house² in the Conservation Area demonstrates the threat to the character of the Conservation Area and its Listed Buildings should the proposed 'mitigations' be carried out. They would, at Bridge End, Castle Hill, St John's, Eastgate, and probably at Northgate, cause immediate visual damage. In the longer term, the economic impact of failing to protect and enhance the settings of buildings affected by increased traffic throughout the town centre would place at risk the maintenance and condition of over two hundred Listed Buildings. Again, the failure of the Plan to comply with the requirements of the NPPF for the historic environment is a deficiency of the 'Focussed Changes'.</p>	<p>The impacts of the transport mitigation on the historic environment have been considered and schemes have been adapted to address this (such as Castle Hill). The Council has been in discussion with English Heritage on these points and hopes to reach agreement with EH on all points of concern regarding the historic environment.</p>	
67273 - Mr Clive Narrainen [2002]	Object	<p>The land north of Kenilworth and South of Coventry (Kings Hill) should be allocated to meet the needs of both Warwick and Coventry</p> <p><i>The land north of Kenilworth and South of Coventry (Kings Hill) should be allocated to meet the needs of both Warwick and Coventry</i></p>	<p>This land is green belt and currently there are no exceptional circumstances to justify the release of this from the green belt</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67235 - Mr Richard Simmons [13070]	Object	<p>1) Ref: H06 The A46 is a key route forming the connection between the M6, M1 and the M40. The massive infrastructure improvements at Tollbar Roundabout (Baginton Coventry) and the widening of the A45 connection to A46 is a clear indication that the Ministry of Transport expects traffic load on this road to increase very substantially.</p> <p>The 'current' road noise between housing in Glasshouse Lane/Birches Lane , Kenilworth and the A46 is about on the limit of comfortable noise acceptability. Sports pitches are ideal for filling this noisy void as currently the case.</p> <p>Drawing a convenient line along the A46 simply to limit 'urban sprawl' cannot make for good planning. The Council has first duty to 'care' for its people. By building up to the boundary of the A46 the Local Plan sentences new inhabitants to a life of noise and pollution hell and distress; no doubt the developers will shove all of the affordable housing nearest to the motorway. If they were newts and badgers they would be shown more respect.</p> <p>2) Ref: ED2 Running along the South side of Crewe Lane is an Arboretum planted by Mr. Field the former owner of Southcrest Farm. He has labelled every tree with a brass disc. Please exclude this strip from ED2 and place a blanket TPO on these trees.</p> <p>Housing Generally: Kenilworth Golf Club has survival worries about HS2. To allocate this even noisier land for Housing would be bad planning for occupants.</p> <p><i>Plan Modifications proposal:</i></p> <p>1) Ref: H06 Limit H06 new housing to the Southern end of 'Thickthorn' North of E2. Open a new housing area in a ribbon behind Rounds Hill, Fishponds Road and John O'Gaunt. This land is Greenbelt as is H06 but represents a far more pleasant and healthy place for your residents to live their lives. The Doctors Surgeries and Hospitals will be less busy with stress, asthma, depression cases! The cost to nature, ecology and loss of Greenbelt is 'neutral'.</p> <p>2) Ref: ED2 If the North area of ED2 was allocated to relieve the golf club from the effects of HS2 nearly running through three golf holes then this would be good planning for the future. The golf club land gained could be used for B1 B2 industrial.</p> <p><i>The lost land from current ED2 could then be gained by taking school parking and sports pitches right up to the A46.</i></p>	<p>The Strategic Transport Assessments undertaken to support the Local Plan have identified a package of mitigation measures to enable development at Thickthorn to come forward.</p> <p>The SHLAA assessments for the east of Kenilworth have identified with appropriate mitigation noise constraints can be overcome.</p> <p>It is not considered necessary to amend the boundary of ED2 in order to afford protection to the trees proposed. This will be examined in detail through any planning application process.</p> <p>The area of land suggested as an alternative for development, to the West of Kenilworth is not suitable due to the importance of the Green Belt in this area.</p> <p>ED2 has been allocated for necessary education infrastructure.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67540 - Barwood Strategic Land II Limited [9441]	Object	<p>These representations must be read in conjunction with those submitted by HOW Planning in response to the Warwick Local Plan 2011-2029 Publication Draft consultation, submitted in June 2014. The objections raised in June, which demonstrate that the Plan is unsound, still stand and as detailed in the accompanying representation forms relate specifically to draft policies DS4, DS6, DS7, DS10, DS11, DS19 and DS20.</p> <p>These representations have been prepared to specifically respond to the publication of the Coventry and Warwickshire Strategic Employment Land Study (ELS) October 2014, which is a key part of the Council's evidence base underpinning the emerging Plan. It is understood that the Council in the preparation of the Publication version used the emerging ELS (March 2014) to inform the Plan, however presumably at the time the ELS had not been finalised and certainly it was not publically available.</p> <p>Barwood appointed specialist consultancy Peter Brett Associates (PBA) to carry out an independent assessment of the Study, in order to establish the key implications for the housing market area. A report by PBA is attached, however in summary it is clear that if the local authorities accept the findings and recommendations of the ELS, then a significantly increased amount of housing will need to be delivered over and above the Strategic Housing Market Areas demographic scenarios if the economic strategy is to be delivered. There would need to be compelling reasons to justify why the recommendations of the report might not be followed.</p> <p>The ELS and in particular its recommendations have implications which go to the heart of the emerging Local Plan and have a specific bearing on draft policy DS6: Level of Housing Growth and DS20: Accommodating Housing Need Arising from Outside the District. Previous work undertaken by PBA, presented in Barwood's June representations, highlighted that the Council had underestimated its proposed level of housing growth and therefore that draft policy DS6 is unsound. The recommendations of the ELS only serve to support PBA's findings.</p> <p>Draft policy DS20 sets out that in the event that unmet housing need arising outside the District needs to be met within the District, then a review of the Plan will be carried out.</p> <p>Barwood's previous representations highlighted the shortcomings of this policy, but the Council's approach is undermined further with the recommendations of the ELS clearly pointing towards the need for additional housing across the HMA. The likelihood therefore of additional housing being needed in the District is increased by the ELS recommendations and there can be no assurance that the Council's approach will translate to the HMA's unmet housing requirements being provided for.</p> <p>In summary, as set out in the attached representation forms, it</p>	<p>The Council considers the JSHMA and its addendum provide a sensible and sound basis for the housing requirement taking account a range of possible employment projections. The JSHMA Addendum, carried out in 2014 in response to the new ONS 2012-based projections, looked at economic forecasts from both Cambridge Econometrics and Experian. These showed jobs growth increases for Warwick District of 20.9% and 11.8% respectively which demonstrates how volatile such forecasts can be. If these forecasts were to met by the requisite number of homes, this would lead to a need for 933 and 653 new homes per annum. It is the Council's view that since such forecasts are considered to be unreliable, it would be potentially harmful to attempt to meet the higher range. The Council's housing requirement currently falls between these two figures which is a sensible approach given the inherent uncertainty of future economic and employment growth. The housing requirement will meet an increase in employment of 12.9%.</p> <p>The NPPG states that local authorities should provide for the right quantity of housing and for employment provide for both the quantitative and qualitative need. The housing need set out in the JSHMA Addendum is consistent with the likely change in job numbers and is derived from this NPPG compliant methodology. Noting the reference to qualitative need in the NPPG it is however reasonable to provide a choice of employment sites which have the potential to deliver aspirational growth (as set out the SEP and the JELR). The JELR justifies this quantum of employment land based on aspirational employment growth taking account of the pro growth objectives of the CWLEP. It is however uncertain whether this level of employment growth will be achieved. In this context planning for a rational and soundly based housing growth makes sense and is consistent with national guidance. The Council is committed to reviewing the Plan if employment growth exceeds the JSHMA Addendum forecasts.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		continues to be Barwood's firm opinion that the Council's new Local Plan cannot be considered sound unless fundamental amendments are made as detailed in these representations and those submitted in June.		
67230 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.	Noted	
67245 - H E Johnson [13074]	Support	Landscape and Visual Report attached to representation in support: The proposed extended allocation offers an excellent opportunity to accommodate approximately 12.4 ha of sustainable residential settlement expansion accommodating approximately 400 dwellings, comprehensively contained within a new Green Infrastructure framework of structural broadleaved woodland, wetland SUDS, and interconnecting cycleways and footpaths. Working with the undulating topography of the area, and building upon the existing retained network of hedgerows, hedgerow trees and woodland, the new residential neighbourhood can be subdivided into discrete but interconnected parcels, each with accessible greenspace on their doorstep. Structural woodland planting along the higher south eastern and eastern slopes of the local landform will deliver effective filtering of views towards Lillington from the wider countryside beyond, whilst at the same time connecting The Runghills wood across to Newbold Comyn Park. Combined with the planned demolition of the currently intrusive high rise developments set within Lillington, there is potential to create a much more sympathetic urban/rural interface than currently exists.	The representation to the SHLAA amendment assessing the extended site is noted. Richard Morris Associates has provided landscape advice to the Council over a number of years which has guided the choice of strategic development options. The Council considers this is robust and credible evidence which supports its choice of sites. Furthermore the Council are of the opinion that exceptional circumstances cannot be justified for extending development into the Green Belt as suggested, over and above what is necessary in the allocation as proposed by the Council.	No change required

Representations

Nature Summary of Main Issue/Change to Plan

Council's Assessment

Action

DS19

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67488 - Jaguar Land Rover [12653]	Object	<p>The Strategic Employment Land Study identifies Fen End as a key Strategic Employment Allocation providing 10ha of existing employment land within the District. The SELS Update provides numerous references to the automotive industry being seen as a key growth sector that will drive the demand for strategic employment sites in the short, medium and longer term. Fen End is now owned and operated by Jaguar Land Rover and has significant potential to provide further advanced facilities to further strengthen the District's role in the automotive sector. The Council has revised the Green Belt boundary as part of the emerging Local Plan. The policy sets out 13 sites which are to be removed from the Green Belt which includes land in the vicinity of Coventry Airport (sub regional employment site) and the University of Warwick. We object to the draft policy on the basis that the Fen End site, which has been identified as an important investment site in the Updated SELS is not included as a site to be removed from the Green Belt. It is considered that the Fen End site as a whole together with the extant planning permission does not make a significant positive contribution to the Green belt as set out in para 80 of the NPPF. It is considered that this site does not perform any of the functions of including land within the Green Belt for the following reasons; * The site is contained by strong defensible boundaries.</p> <p>There is no potential for urban sprawl;</p> <p>* The allocation of the site would not cause the merging of neighbouring towns;</p> <p>* There would be no future encroachment into the existing countryside as the site is contained by the test track, part of which which runs along the south east boundary of the site;</p> <p>* The allocation of the site for employment uses associated with Jaguar Land Rover would not impact on the character of historic towns; and</p> <p>* The allocation of the site for employment would not have a detrimental impact on urban regeneration as the Council has already clearly identified the site as an important Strategic Employment Site and the need to release suitable sites from the Green Belt. In order to ensure that draft Policy DS19 is 'sound' the entire Fen End site should be removed from the Green Belt to ensure that the site's future use is secured and that future development of employment generating uses are not restricted.</p> <p><i>In light of the above comments, it is considered necessary, in order to plan positively for sustainable development on the site and make the plan 'sound', that draft Policy DS19 is amended to exclude the Fen End site from the Green Belt along the existing defensible site boundaries. This will ensure that the site is 'future proofed' for future economic development, in line with Paragraph 20 of the NPPF which states "to help achieve economic growth, local planning</i></p>	<p>Honiley Airfield remains entirely within the Green Belt. It is considered that the wider area within which the site is situated performs an important function in the green belt and the purposes of including land within it.</p> <p>The purpose of both the Joint Green Belt Study (2009) and the partial Green Belt and Green Field Review (2013) was to examine green belt around potentially sustainable locations and settlements principally to meet housing needs. Therefore, given the location of Honiley Airfield it was not within the scope of the assessment.</p> <p>Amending Green Belt boundaries is not required as it is considered that policy MS2 and existing national policy is sufficient to enable the necessary development at this location.</p>	

Representations**Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action**

*authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century".
A plan illustrating our suggested revised boundaries is enclosed at Appendix B of this representation.*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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MS2

Representations	Nature Summary of Main Issue/Change to Plan	Council's Assessment	Action
67491 - Jaguar Land Rover [12653]	<p>Object</p> <p>Jaguar Land Rover welcome the identification of the Former Honiley Airfield as a key employment site in the District which plays an important role in the local, sub-regional and national economy. Draft Policy MS2 sets out that in the case of the Former Honiley Airfield there may be very special circumstances to justify further development. Furthermore, the policy states that the range of uses will be restricted to the automotive and motorsport industries and employment associated with these industries. Within the policy, the Council has acknowledged that the site has an important role in delivering the aims of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP), in relation to the growth of manufacturing, particularly in the long term through the implementation of the planning permission. Within the explanation text of the policy, paragraph 3.153 sets out that some small scale development will be necessary adjacent to the test track to assist in operations, but that the Council will ensure that the openness of the Green Belt is maintained. An automotive and research related employment site such as Fen End needs to ensure that it can adapt quickly to external forces such as technological advances and changes in market demand. It is crucial that the site is expanded to create confidence to attract investment. This employment site has the potential to contribute to the aims and objectives of the Coventry and Warwickshire LEP. It is considered that the Council as a minimum re-examines the boundary of the MDS to include the test track as part of the overall site. It would be more appropriate, however, to go further than this and seek to remove the entire site out of the Green Belt to ensure that the site's future use is secured and that future development of employment generating uses are not restricted by the Green Belt or MDS allocation</p> <p><i>In light of the above comments, it is considered necessary, in order to plan positively for sustainable development on the site and make the plan 'sound', that the proposed MDS boundary is increased in order to include the test track as part of the overall site. (See our suggested proposed MDS boundary amendment at Appendix C). It is also considered that the following policy is included in relation to the Former Honiley Airfield:</i></p> <p><i>Former Honiley Airfield:</i></p> <p><i>The Council support further appropriate development on the airfield site in principle. The very special economic circumstances of the Former Honiley Airfield are recognised and the planning policies in respect of the site are intended to positively plan for the consolidation and appropriate expansion of existing activities. This should be demonstrated, by bringing forward comprehensive</i></p>	<p>The Council recognises the importance of the site for the sub regional economy. However it is not considered appropriate to remove the site from the green belt. The green belt fulfils an important function in this area and it is important that the development of the site is carefully managed in this context. The unique relationship between the employment buildings and the test track is recognised however the test track plays an important role in maintaining the openness of the green belt and in the Council's opinion does not constitute previously developed land. The Council would seek to resist any development of the test track and therefore it is not included within the boundary of the major site. National policy no longer provides for major developed sites in the greenbelt therefore Policy MS2 seeks to expand upon the framework for considering such proposals in the NPPF. The Council considers that the reason justification to the policy sets out why there may be justification for the very special circumstances to allow development in the green belt. It is however agreed that the policy could be more positive in relation to the site by adding an additional sentence to paragraph 3.152 and deleting the statement in the policy relating to the restriction of uses.</p>	<p>Add additional sentence to paragraph 3.152 after '...noise attenuation' to state 'In this context it is considered that significant employment generation relating to the role the site has in meeting the objectives of the LEP and proposals set out in the City Deal may justify very special circumstances in assessing further proposals for the site'</p> <p>Delete last sentence of the policy.</p>

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>proposals in the production of a Masterplan Supplementary Planning Document (SPD) to determine the key principles of land uses, layout, design, phasing, infrastructure and mitigation.</p> <p>The Council will support and encourage the development of appropriate uses at the former Honiley Airfield in order to stimulate new economic growth, skills and opportunities and to enhance and maintain the function an automotive and research based site. Any appropriate development and expansion of the former Honiley Airfield will be given positive consideration. The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Land at the Former Honiley Airfield will be made available to enable the expansion of Jaguar Land Rover (JLR) to meet the business needs for uses that can include:</p> <ul style="list-style-type: none"> * Research, design, testing and development of motor vehicles and ancillary related activities; * Other advanced engineering technologies and products; * Offices; * Low volume manufacturing and assembly operations; * Development of associated publicly accessible event, hospitality, display, leisure and conference facilities and marketing infrastructure; * Automotive education and training including ancillary accommodation; * The upgrade, redesign and potential extension of the existing vehicle track; * The provision of appropriate car parking across the site and within the centre of the track for product vehicles, employees, contractors and visitors; * The provision of a new roundabout and associated access; * The potential provision of a suitable access to the centre of the track via a bridge and/or tunnel to allow safe car and transporter movements to enable the centre of the track to be utilised effectively for automotive purposes; * The provision of a batch and holding area to accommodate vehicles from other JLR sites; * The provision of security measures around the site. 		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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5 Other amendments to the Publication Draft Local Plan

1 - DS9

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67177 - Wm Davis and Hallam Land Management [13030] 67201 - Wm Davis and Hallam Land Management [13030]	Object	<p>Representations have been made to the proposed deletion of the employment allocation on this site (known as Land North of Gallows Hill) on the basis that it is not justified, in that it is not the most appropriate strategy when considered against the reasonable alternatives and the associated evidence; hence the Plan is not sound. Not only is the site to the north of Gallows Hill eminently suitable site for employment purposes but as such, it should form an intrinsic part of the sustainable urban extension to the south of Warwick.</p> <p>The proposed employment site has not been assessed as part of the SELS. It is therefore impossible to contrast and compare its suitability for this purpose. In particular it is considered that the site's proximity to a number of heritage assets necessitates a Heritage Assessment.</p> <p>it is not considered that the allocation of the land at Stratford Road for employment purposes is sound as it is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>At the time that the assessment of available sites in each local authority area was carried out as part of the SELS the Land at Stratford Road had not been proposed as an alternative allocation.</p> <p>A series of technical and environmental reports have been prepared to assess the suitability of the site for development. In terms of market attractiveness the site is well located to the strategic highway network adjacent to junction 15 of the M40 and is therefore well suited to meet the needs of a range of B class uses. It has the capacity to provide for a range of users including larger occupiers of which the District is experiencing increasing demand. Most recently there has been increased demand and take up for sites due to a more realistic appraisal of land values, the increase in demand of occupiers and a willingness of landowners to undertake deals. A number of longstanding undeveloped sites are now subject to planning applications indicating prospects for employment land take up are good. Land at Stratford Road will form an important part of the employment land portfolio to meet this need.</p> <p>A baseline heritage and archaeological study has been undertaken for Land at Stratford Road which indicates that there are no significant constraints however, further work will be needed to consider in detail how the proposed development can be designed to be integrated into the historic landscape and ensure any impact is minimised.</p> <p>The site South of Gallows Hill was ultimately excluded from the allocations following representations from English Heritage and others indicating that the impact of this site on the setting of heritage assets (particularly Castle Park and the Warwick Castle) should be more carefully considered. As a result the Council undertook a detailed Heritage Settings Assessments and this concluded that the land is not suitable for development and would have a negative impact on the significance of the heritage assets and that suitable mitigation could not be achieved. Given that the Council is able to meet its housing requirement without allocating this site, the public benefits of development would not outweigh the harm caused</p>	No change required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p><i>If the Local Plan is to enable the delivery of sustainable development in accordance with the policies in the Framework, the employment allocation at 'North of Gallows Hill' should be retained and instead the additional housing which the Council clearly considers should be allocated on land to the south of Warwick, should be provided on land to the south of Gallows Hill.</i></p> <p><i>Without the comparable evidence, and hence justification, it is not considered that the proposed allocation at Stratford Road is required. Further it has been argued that the deletion of the employment allocation on land north of Gallows Hill and its re-designation for housing is not sound. If this change does not proceed there is no reason to identify additional land for employment purposes.</i></p> <p><i>As a consequence no changes to the Plan are required and the only modifications which are sought are those the subject of previous representations; namely, the allocation of land to the south of Gallows Hill for housing</i></p>	by development.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67248 - Mr & Mrs Preston / Barwood Developments Ltd [13076]	Object	<p>Land at Tournament Fields was allocated for employment in the 1995 Local Plan, one parcel of this (Capco Land) has recently been granted planning permission for residential development. In consequence the amount of employment land at South West Warwick is now less than the original proposal (by 2.3 ha). Progress in developing Tournament Fields has been slower than anticipated. It is considered that a key factor has been the marketing orientation of the site towards Class B1 development and other compatible employment uses, rather than being planned from the outset, for Class B1(c), B2 and B8 developments that relate well to the quality of access to the strategic highway network. Land to the East of Stratford Road has the propensity to be developed for a range of industrial and logistics buildings, for occupiers that are seeking high profile locations along the M40. When the existing occupancy of Severn Trent Water is taken out of the allocated land area the amount of new employment land does not reinstate the land lost for employment as a consequence of the recent grant of planning permission and changed allocations from employment to housing. It is contended that the provision of new employment land equates to 8.3 ha (11.7ha allocated - STW land 3.4ha) whereas the land lost to housing including the Capco site is 14 ha. The allocation should be extended to an area amounting to 26 hectares. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. The larger site would take into account infrastructure costs of developing the site improving development viability. The current allocation cuts through the farm holding run by the Webb family leaving two fields to the south of the allocation with no potential agricultural value. If the Council is concerned that an excess of employment land will be provided the additional area could be identified as an employment reserve site.</p> <p>It is anticipated that that roadways in the allocation would be maintained as private roads rather than adopted public highways, avoiding problems of on street parking. The landowners object to the proposed gypsy and traveller site on land adjoining the employment allocation. This site is served by a private farm drive which is not of sufficient width for two vehicles. If it has been contemplated that access for the Gypsy and Traveller site is to be gained through the employment site, such an arrangement would conflict with the objective of maintaining the development as a</p>	<p>The use of the Capco land (which was part of the original employment allocation at South West Warwick) for residential development has already been taken into account in the preparation of the Local Plan. This was removed from the supply when planning permission was granted and does not form part of the remaining land at Tournament Fields reviewed as part of the Employment Land Review Update (May 2013).</p> <p>The boundary of the area allocated amounts to 13.4 hectares and within this area the Council is allocating 11.7 hectares for employment. The land currently used by Severn Trent is not all operational therefore even if a proportion was subtracted from the site to calculate net gain in employment the site would be capable of meeting the required amount. In addition the 66 hectares of employment land provided for in the Local Plan includes an allowance of 16 hectares for flexibility in supply above the net requirement over the plan period. The Council are of the opinion that allocating the larger site would represent a significant oversupply in the employment land above this. This could compromise the delivery of other employment sites in the portfolio.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>private estate</p> <p><i>A criteria based policy could be introduced into the Plan that held back the additional area of land put forward from being developed until a stated proportion of the allocated site is committed for development. It enables the developer to plan for and install highways, drainage and services infrastructure to serve the entire site, it enables the developer to market the potential availability of additional land that has been identified in the Local Plan for employment use and the whole site can be master planned from the start.</i></p>		
67241 - CPRE WARWICKSHIRE (Mr Mark Sullivan) [5992]	Object	<p>CPRE Warwickshire opposes the allocation of a new large employment area east of the A429 Stratford Road, Warwick, and deletion of the site off Birmingham Road next to the A46 / A4177 junction.</p> <p>The existing location is suitable for employment, being adjacent to other employment land and isolated from any services suitable for a residential area. It would be car-served development with no obvious public transport or cycle access. It lies between the town cemetery and the A46, and is used as car parking and access to a large employment area. If the car parking is not required it should be used for new industrial buildings (B1(v) or B2 Use Classes).</p> <p>The proposed employment land would be between the Stratford Road and the River Avon. It was formerly in part a nursery and can be used again for horticulture.</p> <p>The proposal for 11.7 ha of B1 and B2 uses would extend the urban area of Warwick southwards and bring new development close to the River Avon. To the east of the Avon is Warwick Castle Park, with only a few low-lying fields between the proposed site and the edge of the Grade I Park.</p> <p>The effect would be an undesirable spread of the South West Warwick development eastwards across the Stratford Road and into the green wedge of countryside that reached up to the historic town from the south.</p> <p><i>Delete this Major Amendment to the Publication Draft Local Plan as unsound.</i></p>	<p>The Council considers Land north of Gallows Hill is still suitable for employment given its proximity to new housing, its access to the transport network and synergies with other employment sites in the area. However since the Publication Draft Local Plan was produced land at Stratford Road has been made available and the Council has reassessed options for providing employment land to meet the needs of the district over the plan period. The Land at Stratford Road is considered to be a suitable alternative to Gallows Hill releasing land on that site for housing and other uses.</p> <p>It is considered that development could be sufficiently planned and landscaped to avoid any visual impact. A landscape assessment of the area has been undertaken which confirms this.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67238 - Mr John Berkeley [13031]	Object	<p>Longbridge is currently designated a Rural Area, protected from inappropriate development that would destroy its character and is not essential to meet local needs. Under the Council's Rural Area Policies, development is restricted to that which is provided specifically to meet the needs of the local population. New employment development is only permitted under strictly limited circumstances, where this is small in scale and low intensity or, once more, can be demonstrated to meet a local need. Removal of the protection of Rural Area status has been proposed, not on the basis of the needs of the local area or population, but simply because land previously designated for employment elsewhere in the District has now been allocated for other purposes. Large-scale changes to the A46 have been necessary to improve traffic flow on the A429 and the J15 roundabout and employment use of the Longbridge fields would once again create congestion. The primary route into the historic county town should not be allowed to become an employment 'corridor' with commercial development on both sides of the A429. Finally, with Tournament Fields, directly opposite the proposed site, still very largely undeveloped after 14 years with 700,000 sq ft of space currently advertised as available, it is patently obvious that there is more than sufficient employment land already allocated and available to meet future needs.</p> <p><i>The vast majority of the proposed area should remain agricultural land, with any essential development restricted to the zone currently occupied by the District Council itself.</i></p>	<p>To provide the right type and location of employment land to meet the needs of the District over the plan period it has been necessary to consider greenfield sites. In certain cases these will provide better employment sites than some existing previously developed employment land which is unlikely to be suitable to meet modern business practices and is therefore proposed for alternative uses.</p> <p>As part of the Strategic Transport Assessment Addendum 2014 the County Council has considered the impact of this allocation on the strategic transport network and concluded that any impact could potentially be mitigated by a change to the signals at Junction 15 of the M40 subject to detailed modelling by the Highways Agency. The Highways agency have since completed this modelling and are in agreement with this conclusion.</p> <p>A baseline heritage and archaeological study has been undertaken which indicates that there are no significant constraints however, further work will be needed to consider in detail how the proposed development can be designed to be integrated into the historic landscape and ensure any impact is minimised.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67285 - Mrs Emma Norris [13088]	Object	<p>Traffic - Increased traffic levels causing intolerable jams up to the M40 roundabout during rush hour. This would need to be vetted by the Warwick district highways department.</p> <p>Use - The commercial use is described only as B class. It does not define whether B 1, B2 or B3 use which are very different commercial uses. If developed the site needs to be properly landscaped and restricted primarily to B 1 use i.e. office use. Also there should be height restrictions on any buildings to be erected.</p> <p>Sewage Works - The site is next to the sewage works and may be affected by those works.</p> <p>Not needed - There is plenty of available commercial land on the other side of the Stratford Road. This has been available for many years but remains unused and unallocated at present.</p> <p>Green land - At present this land is mostly open green fields with all the fresh air benefits that it brings to this area.</p> <p>Entrance to Warwick -It is important to keep the main tourist route into Warwick looking open and pleasant to maintain tourism for the future.</p>	<p>As part of the Strategic Transport Assessment Addendum 2014 the County Council has considered the impact of this allocation on the strategic transport network and concluded that any impact could potentially be mitigated by a change to the signals at Junction 15 of the M40 subject to detailed modelling by the Highways Agency. The Highways agency have since completed this modelling and are in agreement with this conclusion.</p> <p>The site is proposed for the full range of B class uses to allow flexibility in the supply of employment land.</p> <p>The operation of the sewage works will not be affected, Severn Trent are one of the landowners putting forward the site for employment uses. It is acknowledged that take up of employment land at Tournament Fields has been slow however this has coincided with the recent recession and national trends of poor take up. The site is now seeing increased interest and development. The Local Plan must provide sufficient employment land to meet the needs of the District throughout the 15 year plan period. Additional employment land needs to be allocated above that included in the employment land supply (including land already available at Tournament Fields).</p>	No change required
67278 - Mrs Joyce Knight [13083]	Object	<p>Europa Way more suited to employment as it is on the edge of Warwick with access to the road network. Commercial land is still available at Tournament Fields. The Stratford Rd site would add to congestion and to traffic noise in the area. There would be increased demand on the sewage works which is unable to control odours. - this needs to be mitigated.</p> <p>Close to a landfill - site may be contaminated.</p> <p>Visual impact is very important as this is an important entry in to Warwick. There should be adequate noise barrier including sympathetic landscaping.</p> <p>The height of buildings should be restricted to reduce visual impact and uses should be restricted to B1 to reduce impact on noise, pollution and visual amenity</p>	<p>The Council considers Land north of Gallows Hill is still suitable for employment given its proximity to new housing, its access to the transport network and synergies with other employment sites in the area. However since the Publication Draft Local Plan was produced land at Stratford Road has been made available and the Council has reassessed options for providing employment land to meet the needs of the district over the plan period. The Land at Stratford Road is considered to be a suitable alternative to Gallows Hill releasing land on that site for housing and other uses.</p> <p>It is considered that development could be sufficiently planned and landscaped to avoid any visual impact. A landscape assessment of the area has been undertaken which confirms this.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67246 - Mr & Mrs D Webb [13075]	Object	<p>Land at Tournament Fields was allocated for employment in the 1995 Local Plan, one parcel of this (Capco Land) has recently been granted planning permission for residential development. In consequence the amount of employment land at South West Warwick is now less than the original proposal (by 2.3 ha). Progress in developing Tournament Fields has been slower than anticipated. It is considered that a key factor has been the marketing orientation of the site towards Class B1 development and other compatible employment uses, rather than being planned from the outset, for Class B1(c), B2 and B8 developments that relate well to the quality of access to the strategic highway network. Land to the East of Stratford Road has the propensity to be developed for a range of industrial and logistics buildings, for occupiers that are seeking high profile locations along the M40. When the existing occupancy of Severn Trent Water is taken out of the allocated land area the amount of new employment land does not reinstate the land lost for employment as a consequence of the recent grant of planning permission and changed allocations from employment to housing. It is contended that the provision of new employment land equates to 8.3 ha (11.7ha allocated - STW land 3.4ha) whereas the land lost to housing including the Capco site is 14 ha. The allocation should be extended to an area amounting to 26 hectares. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. The larger site would take into account infrastructure costs of developing the site improving development viability. The current allocation cuts through the farm holding run by the Webb family leaving two fields to the south of the allocation with no potential agricultural value. If the Council is concerned that an excess of employment land will be provided the additional area could be identified as an employment reserve site.</p> <p>It is anticipated that that roadways in the allocation would be maintained as private roads rather than adopted public highways, avoiding problems of on street parking. The landowners object to the proposed gypsy and traveller site on land adjoining the employment allocation. This site is served by a private farm drive which is not of sufficient width for two vehicles. If it has been contemplated that access for the Gypsy and Traveller site is to be gained through the employment site, such an arrangement would conflict with the objective of maintaining the development as a</p>	<p>The use of the Capco land (which was part of the original employment allocation at South West Warwick) for residential development has already been taken into account in the preparation of the Local Plan. This was removed from the supply when planning permission was granted and does not form part of the remaining land at Tournament Fields reviewed as part of the Employment Land Review Update (May 2013).</p> <p>The boundary of the area allocated amounts to 13.4 hectares and within this area the Council is allocating 11.7 hectares for employment. The land currently used by Severn Trent is not all operational therefore even if a proportion was subtracted from the site to calculate net gain in employment the site would be capable of meeting the required amount. In addition the 66 hectares of employment land provided for in the Local Plan includes an allowance of 16 hectares for flexibility in supply above the net requirement over the plan period. The Council are of the opinion that allocating the larger site would represent a significant oversupply in the employment land above this. This could compromise the delivery of other employment sites in the portfolio.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>private estate</p> <p><i>A criteria based policy could be introduced into the Plan that held back the additional area of land put forward from being developed until a stated proportion of the allocated site is committed for development. It enables the developer to plan for and install highways, drainage and services infrastructure to serve the entire site, it enables the developer to market the potential availability of additional land that has been identified in the Local Plan for employment use and the whole site can be master planned from the start.</i></p>		
67253 - Jaguar Land Rover [12653]	Object	<p>Concern proposed allocation could prevent expansion of Longbridge Sewage Treatment Works. STW have indicated to Jaguar Land Rover that these the sewage works at Longbridge will need to be upgraded and expanded in order to accommodate the additional needs of the District (and neighbouring authority areas) over the plan period. This includes the proposed development at Gaydon / Lighthorne Heath (within Stratford District) incorporating 3,000 dwellings and 100 ha of land to facilitate the expansion of Jaguar Land Rover at Gaydon over the plan period. These would both be feeding into the local sewerage system. Therefore object to the allocation unless it can be demonstrated any necessary future expansion of the treatment works will not be impacted on.</p> <p><i>In allocating land at Stratford Road, Warwick (Reference E4) for employment uses, Jaguar Land Rover seek assurances that the proposed employment allocation would not impact on the ability to expand the existing sewage treatment works in the future. This is particularly relevant as Severn Trent Water has already indicated to Jaguar Land Rover that expansion of the sewage works would be required in order to cope with the new proposed development at Gaydon / Lighthorne Heath (within Stratford District) including 3,000 dwellings and 100 ha of land to facilitate the expansion of Jaguar Land Rover at Gaydon. This objection would be withdrawn if it is able to be demonstrated that the proposed allocation of Land at Stratford Road, Warwick as an allocated employment site will not have any effect upon the ability to expand and grow the existing sewage treatment works in order to deliver the capacity required to serve new homes and jobs over the plan period.</i></p>	Severn Trent who are one of the landowners releasing the site have not indicated that development of the site would compromise the ability of the sewage works to accommodate the additional needs of the District over the Plan period.	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67283 - Mrs Lynne Butler [13000]	Object	<p>Dangerous turn onto farm track, the allocation would increase the risks of a serious incident. Roads are very busy at peak times, and would increase the risk of walking and cycling along stratford road.</p> <p>There are not details in the plan about what commercial use would constitute. The local environment could be put at risk.</p> <p>The rural feel of the approach to Warwick is part of what makes the place special this will be lost.</p> <p>The site is designated asa level 3 for Flood risk and there are often strong smells from the sewerage works close by. I really don't think it is a suitable place for people to live.</p>	<p>As part of the Strategic Transport Assessment Addendum 2014 the County Council has considered the impact of this allocation on the strategic transport network and concluded that any impact could potentially be mitigated by a change to the signals at Junction 15 of the M40 subject to detailed modelling by the Highways Agency. The Highways agency have since completed this modelling and are in agreement with this conclusion. Appropriate sustainable transport provision would need to be integrated into the design of the scheme.</p> <p>The land is allocated for the full range of B class uses to allow flexibility in the supply over the plan period and to reflect the sites position in close proximity to the strategic road network.</p> <p>The impact of development on landscape and ecology has been assessed (and is published on the Council's website) and evidence of how the scheme has been designed to minimise impact would need to be submitted as part of a planning application for development on the site.</p> <p>A flood risk assessment has been undertaken and is published on the Council's website. This concluded that any flood risk could be adequately mitigated to allow development. An odour assessment has also been carried out which indicates that the Gypsy and Traveller site could be accommodated on the site in the area identified.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67512 - The Warwick Society (James Mackay) [3080]	Object	<p>The proposal to allocate greenfield land at Longbridge for employment use, and part of it as a Gypsy & Traveller site, is unsatisfactory. This land represents, on a very small scale, the informal 'green belt' of the ancient hamlet of Longbridge. The harm done to the setting of the hamlet by the adjacent M40 and its junction makes it all the more important, not less, to protect the remaining green setting, and to maintain as far as possible the rural approach to the historic county town.</p> <p>Considerable allocated employment land remains undeveloped on the other side of the Stratford Road, near to the proposed site. There is therefore no evidence of demand for further employment land in this area. The proposed Gypsy & Traveller site would not provide satisfactory amenity for its occupants.</p>	<p>The Council is satisfied that the site could be developed without compromising the landscape and setting of Warwick. It is acknowledged that take up of employment land at Tournament Fields has been slow however this has coincided with the recent recession and national trends of poor take up. The site is now seeing increased interest and development. The Local Plan must provide sufficient employment land to meet the needs of the District throughout the 15 year plan period. Additional employment land needs to be allocated above that included in the employment land supply (including land already available at Tournament Fields).</p> <p>A baseline heritage and archaeological study has been undertaken which indicates that there are no significant constraints however, further work will be needed to consider in detail how the proposed development can be designed to be integrated into the historic landscape and ensure any impact is minimised.</p>	No change required
67373 - Mr Paul Allin [13129]	Object	<p>It is hard to see why there is a need for additional employment land, given the site's proximity to Tournament Fields which even 15 years after commencement, still has a lot of capacity left to fill. Longbridge is a Rural Area that is supposed to be protected from development which is not absolutely necessary.</p> <p>If this site goes ahead there would be oppressive industrial developments on both sides of the A429 - one of the busiest routes into historic Warwick town centre and Warwick Castle which is used daily by the many visitors and tourists that are the lifeblood of much of the town's industry.</p> <p>Vacant industrial sites (like Tournament Fields currently is, and the new site is likely to be) lying empty year upon year are simply not good for the town's image.</p>	<p>It is acknowledged that take up of employment land at Tournament Fields has been slow however this has coincided with the recent recession and national trends of poor take up. The site is now seeing increased interest and development. The Local Plan must provide sufficient employment land to meet the needs of the District throughout the 15 year plan period. Additional employment land needs to be allocated above that included in the employment land supply (including land already available at Tournament Fields). A heritage assessment has been carried out which indicates - EXPAND following advice from Alan and English Heritage.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67251 - Dave Cooling [9263]	Object	<p>The council proposal is flawed in that it states the land is predominately brown field, when it is not - over 30 acres of this land is greenfield, and identified as green space in the existing local plan</p> <p>* There is no need for new employment land when the existing site of Tournament Fields (approved in 2000) is still far from fully sold / developed, and at the rate of development to date, will still have capacity well beyond 2025</p> <p>* The land is adjacent to at least two significant listed properties, and this will adversely affect their standing, in an area of historical significance, as identified by Warwick County Council.</p> <p>* Development of the land for employment will result in a significant increase in traffic on the A429 - main artery route into Warwick. Only recently the A46 flyover was built at huge expense to reduce traffic in this area, and ease congestion, and yet already traffic queues have started to return to this area, and if this land is developed (along with that at Tournament Fields already so earmarked) then the traffic congestion will mean significant delays getting into and out of Warwick, which will significantly affect the Tourist industry and existing businesses.</p> <p>* This land is the last, attractive, area of green on the run in to Warwick, and is identified as greenfield on the existing local plan - for the overall appeal of Warwick to those visiting it should remain so.</p> <p><i>There already exist many brownfield sites that are not yet developed within the WDC area, that should be used before any encouragement is give to destroying green fields</i></p>	<p>The Council is not suggesting that the proposed allocation is a brownfield site. It is recognised that with the exception of existing Severn Trent operations the majority of the proposed site is green field. It is acknowledged that take up of employment land at Tournament Fields has been slow however this has coincided with the recent recession and national trends of poor take up. The site is now seeing increased interest and development. The Local Plan must provide sufficient employment land to meet the needs of the District throughout the 15 year plan period. Additional employment land needs to be allocated above that included in the employment land supply (including land already available at Tournament Fields).</p> <p>A baseline heritage and archaeological study has been undertaken which indicates that there are no significant constraints however, further work will be needed to consider in detail how the proposed development can be designed to be integrated into the historic landscape and ensure any impact is minimised.</p> <p>As part of the Strategic Transport Assessment Addendum 2014 the County Council has considered the impact of this allocation on the strategic transport network and concluded that any impact could potentially be mitigated by a change to the signals at Junction 15 of the M40 subject to detailed modelling by the Highways Agency. The Highways agency have since completed this modelling and are in agreement with this conclusion. It is considered that the site could be adequately planned and landscaped to reduce any visual impact on the approach to Warwick.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67233 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>This stretch of the Stratford Road is a surprisingly understated and pleasant entrance to Warwick from the M40. It's positive characteristics should be recognised to inform strategic landscaping and moderate highway works which may be required to facilitate any future development.</p> <p>The proposed allocation is adjacent to Longbridge Manor, a Grade II* listed building with circa 14/15 century origins. The Manor is served to the south by a pleasant 'rural' lane and entrance. Development immediately to the east will affect its significance. Opposite the site is the Old House and its ancillary barn, both Grade II listed buildings. Beyond to the east are the Warwick Castle Park (Grade 1) and Warwick Conservation Area.</p> <p>Unfortunately there appears to be no evidence to demonstrate a consideration of how the proposed allocation site contributes to the significance of these designated heritage assets, particularly Longbridge Manor (NPPF Paragraph 129). Neither is there evidence to demonstrate where development may be inappropriate because of its positive relationship to adjoining heritage assets (NPPF Paragraph 157), or how harm might be avoided (NPPF Paragraph 152). The commentary in the SA is rather rudimentary and dismissive, failing to provide an accurate or reasonable assessment of the impact of future development.</p> <p>The selection of sites for development needs to be informed by the evidence base and the Plan should avoid allocating sites which are likely to result in harm to the significance of heritage assets. Where adverse impacts are unavoidable and justified, in accordance with the NPPF, the Plan should consider how that harm might be reduced and any residual harm mitigated. This could include measures such as a reduction of the quantum of development, avoiding locating development within a particular part of the site, ensuring reinforced strategic landscaping, and limiting the height and volume of development.</p> <p>Without such evidence Warwick DC cannot assert that the allocation and the amount of development proposed (11.7ha) can be delivered without causing harm to heritage assets of national importance contrary to explicit legislation and national planning policy. Consequently I remain concerned that the Local Plan as proposed is unsound.</p> <p>It is important to note that:-</p> <p>- great weight should be given to an assets conservation and the</p>	A heritage assessment has been undertaken - Awaiting feedback from Alan and English Heritage	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>more important the asset, the greater the weight to the assets conservation there should be (NPPF Paragraph 132);</p> <p>- special regard must be given to the desirability of preserving the setting of a listed building (S66, Planning (Listed Buildings and Conservation Areas) Act 1990;</p> <p>- development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Paragraph 129).</p> <p>Following the ruling in Barnwell Manor Wind Energy Limited v East Northamptonshire District Council, English Heritage, the National Trust and the Secretary of State for Communities and Local Government [2014] EWCA Civ 137, considerable importance and weight should be given to the desirability of preserving the setting of a listed building. Less than substantial harm does not equate to a less than substantial planning objection. There is a presumption that preservation is desirable.</p> <p>Further analysis is therefore vital. I would strongly recommend the application of The Setting of Heritage Assets (English Heritage, 2011).</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67244 - Severn Trent Water [1180]	Object	<p>Land at Tournament Fields was allocated for employment in the 1995 Local Plan, one parcel of this (Capco Land) has recently been granted planning permission for residential development. In consequence the amount of employment land at South West Warwick is now less than the original proposal (by 2.3 ha). Progress in developing Tournament Fields has been slower than anticipated. It is considered that a key factor has been the marketing orientation of the site towards Class B1 development and other compatible employment uses, rather than being planned from the outset, for Class B1(c), B2 and B8 developments that relate well to the quality of access to the strategic highway network. Land to the East of Stratford Road has the propensity to be developed for a range of industrial and logistics buildings, for occupiers that are seeking high profile locations along the M40. When the existing occupancy of Severn Trent Water is taken out of the allocated land area the amount of new employment land does not reinstate the land lost for employment as a consequence of the recent grant of planning permission and changed allocations from employment to housing. It is contended that the provision of new employment land equates to 8.3 ha (11.7ha allocated - STW land 3.4ha) whereas the land lost to housing including the Capco site is 14 ha. The allocation should be extended to an area amounting to 26 hectares. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. Provision would be made for a landscape buffer of some 30 metres along the southern boundary of the site with the M40. This extended site area will replace the land 'lost' from employment development through development control decisions and proposed residential allocations. The larger site would take into account infrastructure costs of developing the site improving development viability. The current allocation cuts through the farm holding run by the Webb family leaving two fields to the south of the allocation with no potential agricultural value. If the Council is concerned that an excess of employment land will be provided the additional area could be identified as an employment reserve site.</p> <p>It is anticipated that that roadways in the allocation would be maintained as private roads rather than adopted public highways, avoiding problems of on street parking. The landowners object to the proposed gypsy and traveller site on land adjoining the employment allocation. This site is served by a private farm drive which is not of sufficient width for two vehicles. 3.8 If it has been contemplated that access for the Gypsy and Traveller site is to be gained through the employment site, such an arrangement would conflict with the objective of maintaining the development as a</p>	<p>The use of the Capco land (which was part of the original employment allocation at South West Warwick) for residential development has already been taken into account in the preparation of the Local Plan. This was removed from the supply when planning permission was granted and does not form part of the remaining land at Tournament Fields reviewed as part of the Employment Land Review Update (May 2013).</p> <p>The boundary of the area allocated amounts to 13.4 hectares and within this area the Council is allocating 11.7 hectares for employment. The land currently used by Severn Trent is not all operational therefore even if a proportion was subtracted from the site to calculate net gain in employment the site would be capable of meeting the required amount. In addition the 66 hectares of employment land provided for in the Local Plan includes an allowance of 16 hectares for flexibility in supply above the net requirement over the plan period. The Council are of the opinion that allocating the larger site would represent a significant oversupply in the employment land above this. This could compromise the delivery of other employment sites in the portfolio.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>private estate</p> <p><i>A criteria based policy could be introduced into the Plan that held back the additional area of land put forward from being developed until a stated proportion of the allocated site is committed for development. It enables the developer to plan for and install highways, drainage and services infrastructure to serve the entire site, it enables the developer to market the potential availability of additional land that has been identified in the Local Plan for employment use and the whole site can be master planned from the start.</i></p>		
67247 - Natural England (Jamie Melvin) [7527]	Support	The proposed allocation of land at Stratford Road, Warwick does not appear likely to impact on designated site or landscape and we therefore see no need to amend the comments we made during the previous consultation period.	Noted	No change
67562 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.	Noted	No change required
67259 - Save Warwick (MR DAVID WILLIAMS) [4506]	Support	We see no objection to the employment allocation off the Stratford Road.	Noted	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67267 - Bishop's Tachbrook Parish Council (Sean Deely) [9194]	Support	<p>It is a better employment location than Europa Way because it is immediately adjacent to the M40 junction 15. This would minimise any resultant traffic on Warwick Town Centre. The Europa Way employment location would have added significant additional employment related traffic on both Warwick and Leamington as well Europa Way itself and Greys Mallory roundabout and the links to junctions 14 and 15 on the M40. The modification is better as it reduces traffic congestion, air quality in the towns, traffic noise to the new residential areas and global CO2 emissions.</p> <p>b) It releases land on the 2 sites for residential use and in the case of Opus 40 increases the amount of brownfield utilised in the Urban area.</p> <p>c) It improves compliance with Strategic Policies DS3 (b), (c), (e) & DS4 (a) & (c).</p>	Noted	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67460 - Warwickshire County Council [13081]	Support	Supports deletion of employment allocation from Land North of Gallows Hill, Warwick and the addition of an 11.7ha employment allocation on Land at Stratford Road, Warwick. Previous representations and supporting market assessment produced by Savills did not dispute the need for employment land within Warwick District over the next Plan period, but they did highlight that Warwick District would see good demand from local advanced manufacturing companies and that there are few existing sites available for industrial and distribution uses which have the necessary good accessibility to the local and national road network and are adjacent to compatible uses, in accordance with the 'market signals'. The previous representations also objected to the lack of an assessment of potential alternative employment sites, the impact on the Grade II Listed Heathcote Hill Farmhouse, the difficulties in physically linking any employment development on the Land North of Gallows Hill to the adjacent Technology Park and the impact of such uses on the wider adjoining proposed residential uses. As such the employment allocation was not considered to be deliverable. The Coventry and Warwickshire Strategic Employment Land Study does not overcome the lack of justification for employment allocation E1. Land at Stratford Road already benefits from normal services, previous employment use, vehicular access by means of an existing roundabout, good access to the A46 and Junction 15 of the M40, as well as existing bus and cycle routes, and which would not require major infrastructure to make it developable in the short term, would take account of both market and economic signals (as required by NPPF paragraph 158). The analysis demonstrates that a suitable and indeed preferable site to the WCC Land North of Gallows Hill exists, which can overcome the delivery, master planning and ownership constraints to employment development associated with the WCC Land North of Gallows Hill site. it would appear to be chronologically logical to give the replacement employment allocation at Stratford Road the allocation reference 'E1' rather than the proposed reference 'E4' to reflect the intention of PMA1 to delete the previous allocation references E1 and E3	Noted. The Council considers Land north of Gallows Hill is still suitable for employment given its proximity to new housing, its access to the transport network and synergies with other employment sites in the area. However since the Publication Draft Local Plan was produced land at Stratford Road has been made available and the Council has reassessed options for providing employment land to meet the needs of the district over the plan period. The Land at Stratford Road is considered to be a suitable alternative to Gallows Hill releasing land on that site for housing and other uses.	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67269 - Highways Agency (Mrs Lisa Maric) [12807]	Support	<p>Previously the Highways Agency commented that the addendum to the Strategic Transport Assessment identified that the proposed employment allocation will result in severe queuing at M40 Junction 15 (Longbridge Island) and that further detailed assessment of the impact on M40 Junction 15 was required before the Agency could take a view on the proposed allocation.</p> <p>The Highways Agency has now undertaken its own assessment of the likely impact of the allocation on the operation of M40 Junction 15 and is satisfied that the additional traffic queues and delays that would arise from the allocation could be managed without causing severe congestion, by the traffic control system at the junction, perhaps with some adjustments.</p> <p><i>Highways Agency can now accept the employment allocation in principle. Any Site Specific Policy for this employment site will need to make clear that development proposals will need to be supported by an appropriate level of transport assessment, in line with relevant policy and guidance and also by effective Travel Plan provisions, in line with Policy TR2 of the Publication Draft Local Plan. Similarly that development here will need to be delivered in parallel with any necessary infrastructure, as set out in Policy TR3 to the Local Plan. In order for the Plan to be sound, it is important that this assurance is provided, and that any infrastructure requirements are reflected within the related Infrastructure Delivery Plan.</i></p> <p><i>We anticipate that if mitigation is needed to modify the traffic control system at M40 J15 it may have to be funded through developer(s) contributions and implemented through a Highways Act s278 Agreement. However, it is anticipated that this would be a relatively modest cost for the size and nature of the proposed site</i></p>	Noted	No change required
67227 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	Supportive subject to sufficient improvements to the highways infrastructure.	Noted	No change required

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>	
2 - DS11 (H01)	67252 - Leamington Society (Mrs Marianne Pitts) [5967] Object	<p>The Draft Plan allocates housing to site H01 and, with the removal of the employment allocation, increases that from 1190 to 1300 dwellings.</p> <p>We argue elsewhere (3. Updated evidence) that WDC has over-provided in total housing provision within its Draft Plan. However if sites in this area are to be allocated to housing it is perverse to remove the specific community hub element from such large new settlements. (The added NB that these uses "will still be required" smacks of a hasty afterthought to cover a dubious fix).</p> <p>To replace it with a football stadium will introduce disturbance of extra traffic, noise and lights on match days. To badge it with the contrived title "Community stadium" is absolutely no substitute for vital community facilities and services in daily use as listed in the original Draft Plan.</p> <p>The future residents of these houses will not be given the chance to object to this large independent structure in the middle of their suburb or to the absence of local retail, community and medical facilities, which will not be built unless planned for in advance.</p> <p><i>If so many housing sites are to be allocated in this area it is perverse to remove the specific community hub element from such large new settlements, which were included in the original and were therefore deemed necessary. Sites for community and medical centres should be in the Local Plan from the start. The "Community Stadium" is no such thing and is absolutely no substitute for vital community facilities and services in daily use as listed in the original Draft Plan.</i></p> <p><i>A football stadium in the centre will introduce disturbance of extra traffic, noise and lights on match days. Whatever the motivation, which appears to be a deal to contrive a gypsy site on Harbury Lane, this is a retrograde proposal being slipped in at the eleventh hour.</i></p> <p><i>The football stadium proposal should be withdrawn and the original plans adhered to.</i></p>	<p>The proposals still include a full range of community facilities for the sites to the west of Europa Way including a primary school, community centre, local convenience store, and medical centre.</p> <p>Land for the Community Stadium is allocated to enable the provision of better facilities for an important local club. This will be brought forward only in cooperation with the football club and landowner. Efforts will be made to ensure community use of the facility is maximised. The impact of the stadium of residential amenity will be carefully managed through design and layout. Traffic impacts have been considered and can be accommodated. It should be noted that land for this use was allocated in the publication draft. the focussed change simply proposes a slightly different location.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67274 - graham leeke [1921]	Object	<p>The proposed siting of the stadium is not viable. It will not contribute to a strong competitive economy. There is no business plan and it assumed that a developers will build it which will divert funds from important community infrastructure. There is already an adequate stadium so the facility is not needed.</p> <p>The existing ground can be upgraded at a much lower cost and impact and could be done in a way that brings economic benefits. This would be more consistent with the NPPF.</p> <p>The proposed location of the stadium will exacerbate congestion and will encourage intense periods of additional traffic flow which could be a problem if these overlap with activity at the Technology Park. This could be a particular problem with other commercial activities proposed for the site. Combined with air pollution impacts, the proposal is contrary to Policy TR2</p> <p><i>Reallocate E1 for 8ha of employment land</i></p> <p><i>Retain existing football facility at the New Windmill Ground and set aside funding to upgrade it in line with NPPF para 73</i></p>	<p>The proposed location of employment at Stratford Road is considered to be sound and is appropriate in meeting the requirements of business.</p> <p>This amendment then allows for additional residential land, and improved community facilities including a stadium to benefit a local club. This further allows for a potential Gypsy and Traveller site at Harbury Lane. It is therefore considered that the overall benefits of the amendments make this a preferable options in comparison to the publication draft</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67308 - Bishop's Tachbrook Parish Council (Sean Deely) [9194]	Object	<p>The number of dwellings stated of 1,300 does not reflect the capacity of the site released. If 8ha of employment land is released and a community stadium is located on 3 ha then 5 ha is available for additional housing. The local retail, medical and community facilities, including 4 football pitches and a running track that is available for community use, are already allocated at the southern end of the recently approved 735 dwelling proposal. Hence working on 35 dw/ha, $5 \times 35 = 175$ to add to the declared 1,190. Hence 1,365 dwellings could be expected. 35 dwellings per ha is the density accepted for market homes. However, 40% of the site should be affordable homes. To be affordable a density of 50 dwellings / ha can provide a perfectly spacious layout for affordable homes particularly where one and two bed dwellings provide a reasonable part of the mix, as is shown in countless examples around the country. The affordable and market homes should be mixed, giving a better distribution of open space.</p> <p>If 1,190 homes are built at 35 dw/ha As the current part of the Local Plan, they will occupy 34 ha. If 5ha. are added to that, then 39ha are available. If market homes are built at 35 dw/ha and affordable homes at 50 dw/ha, then the capacity of the whole site west of Europa Way is 1,550 dwellings. (60% of 1,550 = 930, at 35dw/ha requires 26.572ha and 40% of 1,550 = 620, at 50 dw/ha requires 12.4 ha. Total land requirement = 39 ha.)</p> <p>Proposed "Community Stadium and associated uses". This is described elsewhere as a 5,000 seat stadium with conference and other facilities to make it financially viable together with associated parking and other external facilities. Bishop's Tachbrook parish council OBJECT to the location of such a development as inappropriate for this area west of Europa Way which is designated for over 1500 houses. It is out of scale with new garden suburb residential development and the massing of a stadium of this nature will be an unacceptable intrusion. A stadium designed for and occupied by a professional football club conflicts with</p> <ul style="list-style-type: none"> * the interests of families growing up in this new residential area and * the traffic implications when match days coincide with normal peak times would be totally unacceptable on Gallows Hill and the roads around Warwick, Leamington and down to the Motorway which are already overloaded before any new housing is built * light and noise pollution from evening and night time games that would be disruptive to the residents; * problems of pedestrian and vehicular movements within the housing complex as crowds seek to get to the stadium. <p>Current trends are to move stadia away from residential areas, not to put them close to new garden town suburbs.</p>	<p>The Council has used the same approach to calculating the potential site capacity for dwellings on the land released as it has done elsewhere in the plan. This has proved to be reasonably accurate even allowing for 40% affordable housing.</p> <p>The proposed stadium is compatible with surrounding uses as long as care is taken in the design and layout of both the housing and the stadium. the opportunity to bring forward proposals for these at the same time allows this to be done effectively. Impacts on traffic have been considered and this can be managed within the network.</p> <p>The costs of constructing the new stadium will be met by the Football Club and will not impact on infrastructure contributions. It is accepted that the new stadium will impact on the quantum of housing that can be delivered in the area. But this is not significant in the context of the whole local plan (approximately 75 dwellings) and it is considered that the benefits the proposal brings outweighs this.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>The proposal appears to be uncosted and the costs will be high in</p> <ul style="list-style-type: none"> * land costs (even if county land, it must be accounted for at alternative use value that could go to the County if released for housing) and <p>Current trends are to move stadia away from residential areas, not to put them close to new garden town suburbs.</p> <p>The proposal appears to be uncosted and the costs will be high in</p> <ul style="list-style-type: none"> * land costs (even if county land, it must be accounted for at alternative use value that could go to the County if released for housing) and * construction costs for the stadium, pitch(es) facilities (Stadium ground not normally used for training so additional training area is likely to be necessary), parking * running costs that are unlikely to be met by gate income even if there are conference and other facilities attached. <p>These decisions should not be made without a well costed business plan without which the club could get into serious financial difficulties and the District Council would not be able to bail them out. The Ricoh Arena in Coventry is an example of what can happen.</p> <p>d) If the stadium is moved to this location, it will take land that could be used for housing, moving the housing further out towards the valued landscape of the Tachbrook Valley. The net car travel miles from housing and pitch activity will increase. This does not comply with the NPPF either for protection of the natural environment, protection of best & most versatile agricultural land</p>		
67204 - Mr Peter Lamb [3491]	Object	<p>WDC is ignoring the revised downward requirement in housing numbers resulting from the updated ONS projections and the lack of any need to allocate housing provision for Coventry, since this has not been requested. This is a serious omission and this Consultation provides an opportunity for the plan to be revised to reflect realistic (much lower) housing numbers in all land parcels being considered. There seems, therefore, to be no requirement to increase the housing numbers in this particular area - rather, they need to be reduced or removed altogether.</p> <p><i>Housing numbers in this, and other, areas need to be reduced or removed altogether in order that the overall plan should comply with the current ONS projections and actual needs of the district.</i></p>	<p>Whilst the updated ONS projections indicate that the District's objectively assessed need is lower (see Joint SHMA addendum), this is not the case for the HMA as a whole. In line with the NPPF and the Duty to Cooperate, the Council is committed to working with other Councils in the HMA to ensure the whole of the Housing Market Area's needs are met. For this reason the Council contends that the District's Housing Requirements should remain at 714 dwellings per annum.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67231 - Mr Stuart Oldham [3480]	Object	<p>A) Insufficient evidence in policy of compliance with Duty to Co-operate with neighbouring authorities as part of a sub-regional approach to needs assessment and proposed land use allocations relating to:</p> <p>A) Insufficient evidence in policy of compliance with Duty to Co-operate with neighbouring authorities as part of a sub-regional approach to needs assessment and proposed land use allocations relating to:</p> <p>1) Sites for employment & housing</p> <p>2) Sites for gypsies & travellers</p> <p><i>Amend the following in relation to Land West of Europa Way, H01 Infrastructure requirements and other uses: add "Community Stadium and associated uses, including possible permanent site for Gypsies & Travellers"</i></p> <p><i>Add new site under Urban Brownfield: H39 - Opus 40, Birmingham, Warwick Add "reallocated for residential use, including possible permanent site for Gypsies & Travellers; the 100 dwellings is a maximum figure"</i></p>	<p>The G&T sites allocations are being considered through the production of a separate DPD. The Council has considered locating G&T sites as part of existing housing allocations, but is of the view that such an approach could undermine delivery of much needed housing sites. Alternative options are therefore preferred and will be brought forward.</p>	
67322 - English Heritage (Mr Rohan Torkildsen) [205]	Object	<p>English Heritage acknowledges the potential for development to the north of Gallows Hill /west of Europa Way, but the implications of a stadium on Castle Park and the intermediate historic landscape must be appreciated, as should the consequences of accommodating additional traffic through the town. I will avoid repeating again the reasons why evidence to inform the principle and form of allocations is required. Needless to say I consider further work is necessary.</p>	<p>Detailed assessment regarding the impact of the proposed stadium on Castle Park and the historic environment has been undertaken and the proposed mitigation will influence the layout and design of the stadium and associated uses.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67461 - Warwickshire County Council [13081]	Object	<p>Supports proposal to increase the quantum of housing within the 'Land West of Europa Way' greenfield site allocation (H01), to reflect the removal of employment allocation E1. However the proposed increase in the housing capacity of the allocation from 1,190 dwellings to only 1,300 dwellings is not considered to be properly justified. No land area figures are quoted for the increase in the education land allocation or for the size of the sports stadium allocation. However, on the basis of the boundaries drawn on the amended Policies Map 2, we estimate there to be an overall net gain in residential land at H01 of c.6.5ha. This in itself would be expected to deliver an increase of c.160-180 dwellings. Therefore a housing allocation for H01 of at least 1,350 dwellings is considered to be more appropriate. Supports deletion of employment land and considers that the allocation of land at Stratford Road for employment uses would represent a more appropriate alternative, which is positively prepared, justified, effective. Acknowledges the potential for accommodating a community stadium however it is not currently supported by a sufficient evidence base to assess whether there are alternative locations for accommodating the stadium, or to demonstrate that the proposals are technically feasible within the demarked area on amended Policies Map 2, or whether sufficient funding is available to viably deliver the facility, or even whether Leamington Town FC (who will have responsibility for the stadium) is fully supportive of the relocation site. On this basis the proposed community stadium element of the allocation is not currently considered to be justified or positively-prepared and therefore not sound. WCC understands that work is underway to address these concerns and WCC accordingly wishes to reserve the right to comment further as and when the various outcomes become available. As an additional minor point, WDC needs to adopt consistent terminology within the Local Plan. PMA2 refers to "Community Stadium and other uses", PMA3 refers to "Community Stadium and associated uses" and PMA7 refers to "Sports stadium and associated facilities". Without consistency in referencing and without clarity being expressed as to what WDC is seeking and how this can be applied in practice, then the Local Plan is not considered to be effective in this regard.</p> <p><i>WCC wishes to reserve the right to comment further on any additional material or information produced or made available to justify the stadium allocation as and when it becomes available, so that it can review whether the proposed allocation is properly justified.</i></p>	<p>Support for the relocation of the employment land to Stratford Road is noted. The housing yield from the additional land has been calculated in the same way as for other sites within the Local Plan. However, it should be noted that the housing numbers applied to a specific sites should not be seen as a specific target and that the proposed housing number for a site should be viewed as approximate.</p> <p>It is noted the WCC are reserving their position regarding the Stadium. Discussions regarding this are on-going and are expected to be resolved prior to the submission of the Local Plan</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67321 - Royal Leamington Spa Town Council (Mr Robert Nash) [219]	Support	Supportive subject to sufficient improvements to the highways infrastructure.	Noted	
<i>3 - DS14</i>				
67232 - Europa Way Consortium [197]	Object	Opposed to the proposal for a new Community Stadium and "associated uses" on Land at Myton/West of Europa Way. Whilst the District Council and other stakeholders may wish to see Leamington FC relocate their existing stadium, the Consortium is not aware of any detailed proposals for, or evidence base to support a new 'Community Stadium' at this location. The site for the stadium is not only in a location which we feel would raise amenity concerns for existing and future residents, due to visual impact, noise and traffic, but it is also proposed is in a location which is at odds with other policies in the Draft Local Plan, in particular Policy CT1 which encourages such facilities to be located in town centre locations.	The proposal for the Community Stadium is identified in the Warwick District Playing Pitch Strategy as priority specific action to address capacity issues for football and provide addition artificial grass pitch provision as well as supporting the needs and development requirement of community football pyramid teams. The relocation of the stadium is being proposed within the Plan because the football club have indicated an interest in moving and the area of land identified is being made available through financial negotiations between WCC and WDC.	The proposed community stadium is considered to be consistent with Policy CT1 clause (a) and is therefore consistent with the policies of the Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67175 - Mrs Beatrix Law [6092]	Object	<p>Sports stadium inappropriate in a residential area because of</p> <ul style="list-style-type: none"> - noise pollution - light pollution - additional traffic in residential area - intrusion into views of Grade 1 Listed Castle Park <p>The community need cannot be met by a prescriptive, perimeter controlled football stadium but should be provided for by means of a lower key sports/social facility offering a wide range of sports and recreational activities which are accessible 24/7 for all sections of the community self run by the community.</p> <p><i>I don't think I am qualified to respond to this other than to say if the officers accepted the ONS figures recently published the housing requirement of approx 8,000 has now been met. My understanding is that Our neighbours are not asking Warwick for houses. If these two points were accepted by your officers, the 5 year housing supply which was just under 5 years at the PI on 16/9/2014, has probably now been met recent passed planning application culminating in passing the King Henry V111 application off Myton Road recently.</i></p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p> <p>The impacts of the stadium on nearby residential areas can be mitigated through careful layout and design. As both the housing and the stadium will be planned for together, there are opportunities to do this in a coordinated way.</p> <p>Issues regarding housing need are dealt with elsewhere, but the Council contends that evidence of the Joint SHMA Addendum indicates that 714 dwellings per annum is still justified.</p>	
67173 - Mr & Mrs Ben & Anne Orme [9695]	Object	<p>I object to the provision in this revised local plan for a new sports stadium on farmland fronting Gallows Hill. The stadium will have a damaging effect with regard to light pollution, increased traffic on already over-crowded streets and the fact that it will be a visual eye-sore detracting from the historic surroundings of the parkland setting.</p> <p><i>It would be better to relocate such a stadium to the proposed country park south of Harbury Lane.</i></p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable.</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67226 - Warwick Town Council (Mr Derek Maudlin) [1059]	Object	<p>However, the Town Council would not support the football ground being relocated to a site on farm land off Gallows Hill.</p> <p>The sports stadium will impact directly on the residential development of the area and Leamington Football Club does have expectations of moving up in the football leagues and will want to build a stadium with parking etc. commensurate to those hopes and expectations.</p> <p>In the interests of present residents and future residents the Town Council considers that the proposal should be resisted and removed from the Plan for the following good planning reasons:</p> <p>i) A football stadium will have a damaging impact on the residential amenities of the residential area.</p> <p>The loss of amenity will derive from on street parking, traffic movement, possible high levels of spectators through the residential areas, particularly on Saturdays and evenings and which will not be acceptable to residents.</p> <p>ii) Attendees at the games and those going to and from the games will create noise nuisance.</p> <p>iii) The grandstand stadium and associated works including the pylons for flood lighting, will be visually intrusive.</p> <p>iv) The flood lighting will without doubt be a source of light pollution to residents whenever lights are required for games or training.</p> <p>v) The intrusion of the stadium buildings and pylons will be exacerbated by their location on a prominent hill top and this will intrude upon views from Warwick Castle and the Collegiate Church of St Marys. A consideration supported by the Planning Inspectorate, as demonstrated by the recent appeal decision.</p> <p>A stadium development would be most obtrusive, not only effecting the landscape from the Castle and Church, but also impacting on the Grade I listed Castle Park and the landscaped approach area to Warwick, which the Planning Authority have in the past been protected, but now appear ready to abandon.</p> <p>To prevent an excessive visual or other dominance of an area by a sports stadium the Government's advice is that any sports stadium should be judged on high standards not only of design and landscaping but also on siting. It is also expected that a sports</p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable.</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p> <p>The impacts of the stadium on nearby residential areas can be mitigated through careful layout and design. As both the housing and the stadium will be planned for together, there are opportunities to do this in a coordinated way.</p> <p>The exact design and format of the stadium are under discussion, but it is the Council's ambition that the stadium be available for community use. This location will enable the stadium to be combined with a range of community uses including community sports. In this context locating the stadium close to residential areas has the potential bring significant benefits.</p>	

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>stadium would have high levels of community support for its development. To locate a stadium at the proposed location would not meet the criteria regarding siting or community support.</p> <p>The open space area will be lost to the community forever and the area is an open space warranting protection in its own right. However, a sports stadium will not only will it impact on the immediate and local residential area, but also a stadium will impact on the historic landscape of Warwick.</p> <p>Furthermore, the impact of a football ground in a residential area is fully known to the District Council for there is the comparatively recent example of the Brakes Ground being relocated.</p> <p>The Government's Planning Policy statements do not contemplate a football stadium as part of a provision of a new area of open space, in connection with the provision, and in association with residential development and the use of land for public sport and outdoor recreation. No value is being placed on those green areas of Warwick, but only the possible financial interest of the club and the need for a Gypsy and Traveller Site, rather than the views of the whole community and the impact of a football stadium on the community.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67237 - Hugh Furber [423]	Object	<p>A relatively large open space for a football stadium will have a damaging impact on on-street parking and tidal movements of traffic from teams and spectators through the residential area.</p> <p>Noise pollution</p> <p>Physical and visual intrusion of grandstands/lighting pylons</p> <p>Light pollution from the floodlighting</p> <p>Proposed Country Park a better location where the stadium can contribute to the viability of the open space and be less intrusive to neighbours.</p> <p>The proposal would result in a reduction of the numbers of houses leading to more Greenfield land take.</p> <p>The stadium is on a prominent hilltop intruding into views from Warwick Castle and St Mary's Church.</p> <p>It would impinge on the approach to Warwick which has been protected by the District Council.</p> <p>Inappropriateness of a professional football club being located in a purely residential area.</p> <p>There is a perfectly adequate football ground at Harbury Lane. Any contribution the council makes represent lost opportunity for investment in other infrastructure which benefits the local community at large.</p> <p>The community need cannot be met by a football stadium, but should be provided for by means of a lower key sports/social facility.</p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p> <p>The impacts of the stadium on nearby residential areas can be mitigated through careful layout and design. As both the housing and the stadium will be planned for together, there are opportunities to do this in a coordinated way.</p>	
67312 - Mr Stuart Oldham [3480]	Object	<p>Insufficient evidence in policy of compliance with Duty to Co-operate with neighbouring authorities as part of a sub-regional approach to needs assessment and proposed land use allocations relating to:</p> <p>1) Sites for employment & housing</p> <p>2) Sites for gypsies & travellers</p> <p>B) A flawed search and assessment process for gypsies & travellers sites, resulting in the selection of sub-optimal sites/locations as preferred options</p> <p><i>Amend to read "Allocation of Land for a Community Stadium and associated uses, including possible permanent site for Gypsies & Travellers"</i></p>	<p>Cooperation has taken place with neighbouring authorities regarding a range of factors including housing and provision for gypsy and traveller sites. It is not possible to provide for Warwick District's G&T south requirement in neighbouring areas. The land being provided for the stadium has been assessed as suitable for that use. The plan therefore proposes to allocate it.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67462 - Warwickshire County Council [13081]	Object	<p>Acknowledges potential for accommodating a community stadium within the area of 'Land West of Europa Way' marked on the amended Policies Map 2 with black shading (reference DS14), and will be taking this into account in its planning application proposals for the Land North of Gallows Hill. the proposed community stadium allocation is still not supported by sufficient evidence base justification to assess whether there are alternative locations for accommodating the stadium or to demonstrate that the proposals are technically feasible within the demarked area on amended Policies Map 2, or whether sufficient funding is available to viably deliver the facility, or even whether Leamington Town FC (who will ultimately have responsibility for the stadium) is fully supportive of the relocation site. the final form of words used in the Plan refers to 'associated uses' or 'associated facilities', in order for Policy DS14 to be effective, WCC considers that either the policy wording or the supporting text needs to explain what it would anticipate being 'associated' with a stadium, to provide the policy with more certainty. WCC considers the disaggregation of the proposed medical centre, local retail facilities and community meeting place requirements for the Land West of Europa Way greenfield allocation away from the previously-proposed single 'Community Hub' provision to a more flexible provision within the site, as set out under PMA3, to be a more appropriate way of delivering these specified community facilities, if they are required.</p> <p><i>Changes to Plan:</i> WCC wishes to reserve the right to comment further on any additional material or information produced or made available to justify the stadium allocation as and when it becomes available, so that it can review whether the allocation is properly justified. WCC also considers that Policy DS14 should state that if the allocated stadium site is not required for stadium purposes then it should be deemed acceptable for housing, as an extension to the current H01 housing allocation.</p>	<p>It is understood that subject to acceptable financial outcomes, WCC is prepared to make the land available for a stadium. The plan therefore proposes to allocate it for this use.</p> <p>It is accepted that if the stadium proposals provide unviable, the land could be suitable for housing. In light of this the policies map shows this as a potential housing allocation covered by Policy DS11</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67228 - Mallory Court Hotel [9590]	Object	<p>Whilst the Focussed Changes appear narrow in terms of revised allocations, the implications of those proposed changes are wider and encompass matters of relevance to gypsy and traveller provision, by virtue of the inclusion of the Community Stadium in DS14 which may facilitate the release of the current Leamington Football Club ground for a gypsy and traveller site and release of additional employment land together with a new gypsy site at Stratford Road.</p> <p>We have significant concerns with the following aspects of the emerging Local Plan:</p> <p>1.4.1 Soundness of inclusion of Community Stadium within draft Policy DS11 Site: H01 and amendment to "Allocation of Land for a Community Stadium and associated uses" for draft Policy DS14;</p> <p>1.4.2 Compliance with the Duty to Co-operate in the context of Gypsies and travellers Accommodation Needs (draft Policy H7 and supporting paragraphs);</p> <p>1.4.3 Consistency with National Policy in relation to Gypsies and Travellers (draft Policy H7 and supporting paragraphs); and</p> <p>1.4.4 Soundness of provisions relating to Gypsies and Travellers (draft Policy H7 and supporting paragraphs).</p> <p>The revised allocation to include a Community Stadium within draft Policy D14 is considered unsound as it is not based on any evidence to suggest a Community Stadium is required and there appears to be no consideration as to whether, if a Community Stadium was considered to be needed, alternative sites have been considered and discounted.</p> <p>It is surprising that the emerging Local Plan deems it necessary to make provision for a Community Stadium at such a late stage in its progress. There appears to have been no reference to a Community Stadium within the early draft of the Local Plan and there appears to be no evidence base to suggest any need or requirement for a Community Stadium. Whilst previous paragraph 2.63 referenced a "small stadium", this is clearly significantly different to a "Community Stadium" (hence the need for the draft allocation to be amended). In such circumstances, there appears to be no evidence whatsoever which identifies whether a requirement for a Community Stadium has been explored or to suggest its impacts have been properly</p>	<p>The proposal for the Community Stadium is identified in the Warwick District Playing Pitch Strategy as priority specific action to address capacity issues for football and provide additional artificial grass pitch provision as well as supporting the needs and development requirement of community football pyramid teams. The relocation of the stadium is being proposed within the Plan because the football club have indicated an interest in moving and the area of land identified is being made available through financial negotiations between WCC and WDC.</p> <p>In this context, an SA of options is not required as there are no alternative sites being made available and the assessment needs only to consider whether the site is suitable or not.</p> <p>It is not the case that the Community Stadium has only been considered at this stage. The Publication Draft Local Plan made provision for a Community Sports Complex in policy DS14 and paragraph 2.63 clearly indicates that this could include a sports stadium. The proposals in the focused change therefore represent a relatively minor departure from policy DS14 in the Publication Draft.</p> <p>The relocation of the stadium is not justified on the basis of meeting the needs of Gypsy and Travellers. However, should the football club relocate, there seems to be evidence to support the provision of a G&T site in this location should the opportunity present itself.</p> <p>The financial arrangements involved in delivering the football are only of relevance to the local plan in as far as the Plan needs to be able to demonstrate deliverability. Whilst the details of any land deals have yet to be finalised work is being carried to demonstrate how this could work to demonstrate that the proposals are deliverable.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>assessed.</p> <p>It is very difficult to understand the basis and justification for this significant amendment at a late stage in the process, especially given the lack of evidence base which indicates any need or requirement for a community stadium. Any justification arising from a desire to relocate Leamington FC to enable the release of its current ground for draft allocation GT04 in the emerging Sites for Gypsies and Travellers Plan, is considered wholly unsound and outside of the matters that should properly be taken into account in including a new allocation in an emerging plan. In this regard, we attach a copy of a recent leaflet circulated by the football club to its members which sets out some concerning "agreements" between the Council and the football club such as:</p> <p>3 "The proposed site is being offered free of charge and will be leased to Leamington Football Club for a period of not less than 150 years. A peppercorn rent (very small payment) will be paid for the duration of the lease. A community stadium of not less than 5000 capacity with mandated requirements will be erected upon the site. Leamington Football Club will have sole ownership and responsibility for the site, stadium and facilities. All revenue for the stadium will go to Leamington Football Club. All administrative and financial management will be the responsibility of Leamington Football Club"</p> <p>It would appear that the Stadium is proposed to be erected and then that both the Stadium and the site is long leased to the football for no cost other than a peppercorn rent. Once the football club have received the stadium, the club receive all revenue for the stadium</p> <p><i>Return to previous draft of DS14 and removal of reference to Community Stadium in DS11: H01</i></p>		
67164 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>We object to the football stadium to the north of Gallows Hill within the WCC site. It is in a very prominent location where the stands and lighting columns associated with a stadium would intrude into and adversely affect the integrity of the historic landscape to the south that forms an attractive entrance to Warwick - a conscious C18 design by the Earl of Warwick.</p> <p><i>Relocate the Stadium to a less intrusive location. Ensure either by a specific allocation or by committing to include a landscaping strip alongside the northern edge of Gallows Hill up to its intersection with Europa Way in a form which effectively continues the existing strip along the frontage of Warwick Technology Park</i></p>		The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67206 - Mr Peter Lamb [3491]	Object	<p>1) A football stadium is an inappropriate development within a proposed residential area, and there is no obvious justification for moving it from Harbury Lane.</p> <p>2) The site is in a prominent position where its stands and floodlights would scar the skyline as seen much of the surrounding area, especially the outlook from the castle.</p> <p>3) All of the Warwick area would be seriously affected by increased traffic and associated parking/exhaust pollution issues.</p> <p>4) Noise/light pollution from floodlights do not seem to have been considered.</p> <p>5) It is likely that community amenities and other facilities would be curtailed if this development went ahead.</p> <p><i>A stadium should not be built in this location. The status quo with the existing site would seem to be far more satisfactory, but if a move is insisted upon then the proposed Country Park to the South of Harbury Lane would seem to be a much better, and less intrusive/damaging location.</i></p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p> <p>The impacts of the stadium on nearby residential areas can be mitigated through careful layout and design. As both the housing and the stadium will be planned for together, there are opportunities to do this in a coordinated way.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67309 - Bishop's Tachbrook Parish Council (Sean Deely) [9194]	Object	<p>Proposed "Community Stadium and associated uses". This is described elsewhere as a 5,000 seat stadium with conference and other facilities to make it financially viable together with associated parking and other external facilities. Bishop's Tachbrook parish council OBJECT to the location of such a development as inappropriate for this area west of Europa Way which is designated for over 1500 houses. It is out of scale with new garden suburb residential development and the massing of a stadium of this nature will be an unacceptable intrusion. A stadium designed for and occupied by a professional football club conflicts with</p> <ul style="list-style-type: none"> * the interests of families growing up in this new residential area and * the traffic implications when match days coincide with normal peak times would be totally unacceptable on Gallows Hill and the roads around Warwick, Leamington and down to the Motorway which are already overloaded before any new housing is built * light and noise pollution from evening and night time games that would be disruptive to the residents; * problems of pedestrian and vehicular movements within the housing complex as crowds seek to get to the stadium. <p>Current trends are to move stadia away from residential areas, not to put them close to new garden town suburbs.</p> <p>The proposal appears to be uncoded and the costs will be high in</p> <ul style="list-style-type: none"> * land costs (even if county land, it must be accounted for at alternative use value that could go to the County if released for housing) and * construction costs for the stadium, pitch(es) facilities (Stadium ground not normally used for training so additional training area is likely to be necessary), parking * running costs that are unlikely to be met by gate income even if there are conference and other facilities attached. <p>These decisions should not be made without a well costed business plan without which the club could get into serious financial difficulties and the District Council would not be able to bail them out. The Ricoh Arena in Coventry is an example of what can happen.</p> <p>d) If the stadium is moved to this location, it will take land that could be used for housing, moving the housing further out towards the valued landscape of the Tachbrook Valley. The net car travel miles from housing and pitch activity will increase. This does not comply with the NPPF either for protection of the natural environment, protection of best & most versatile agricultural land and unnecessary increased car miles, so it is not a sustainable development.</p> <p>e) If the land is used for housing instead, then the capacity of the land west of Europa Way increases to 1,670. (60% of 1,670 = 1002, at 35dw/ha requires 28.64ha and 40% of 1,670 = 668, at 50 dw/ha</p>	<p>The impact of the Stadium on Castle Park and the historic environment has been assessed and subject to careful siting and design any impacts are considered to be acceptable</p> <p>The traffic impacts of the stadium have been assessed are given the times of day that the stadium will be busiest, and it is expected that the additional traffic can be accommodated on the network.</p> <p>The impacts of the stadium on nearby residential areas can be mitigated through careful layout and design. As both the housing and the stadium will be planned for together, there are opportunities to do this in a coordinated way.</p> <p>Light and noise pollution is can be resolved through careful planning, with floodlighting focused on the pitch to avoid leakage and the stadium can be separated from the residential area by the spine road</p> <p>The running and build costs of the stadium are not an issue for the Local Plan. The Plan's role is to allocate the land for this use. To this end the proposal has been assessed as suitable. The Plan makes sufficient provision for housing without relying on the land being provided for the stadium.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		requires 13.36 ha. Total land requirement = 42 ha.)		
<i>4 - DS11 (H39)</i>				
67310 - Bishop's Tachbrook Parish Council (Sean Deely) [9194]	Support	Bishop's Tachbrook Parish Council SUPPORT this amendment for the reasons set out in our response to Reference 1 paragraph (b) and Reference 2 & 3 paragraph (e).	Support noted	
<i>5 - Policies Map - E1</i>				
67463 - Warwickshire County Council [13081]	Support	Warwickshire County Council (WCC) supports the proposed amendment to Policies Map 2 (Leamington, Warwick and Whitnash) to remove employment allocation E1 from Land North of Gallows Hill, in conjunction with the removal of references to employment allocation E1: Land North of Gallows Hill from Policies DS9 and DS11. WCC contends that the removal of employment allocation E1 is justified, positively-prepared and based on recent evidence. Please refer to the WCC response to PMA1 and PMA2 for further information.	Noted	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67448 - Europa Way Consortium [197]	Support	<p>Supports removal of land allocated for employment in the Publication Draft at Land at Myton / West of Europa Way. Whilst the site does sit adjacent to Warwick Technology Park (WTP), there are no existing pedestrian or vehicular links between the two and, given existing development on WTP and local topography (WTP sits in a 'bowl'), there is no recognised prospect of any being established in the future. Therefore we strongly disagree with previous suggestions that having employment in this location would serve as a natural extension the existing Technology Park.</p> <p>Contentends that there will not be the market for additional employment land in this part of the District, during the first phase of the Plan. An argument supported by the Council's recent decision to grant planning permission for housing on allocated employment sites, including a site located opposite off Heathcote Rd/ Harbury lane. A delay in the take up of employment land on the Strategic Site it could have a detrimental impact on the wider proposed urban extension, in particular the delivery of new infrastructure including a proposed spine road which would link Gallows Hill (road) with Europa Way (A452). The spine road is not only proposed as a public transport (bus) route, but would provide convenient pedestrian and cycle access for those children from the Warwick Gates area who currently attend Myton School or would attend the School in the future.</p> <p>A major employment allocation at this location would also generate significant traffic movements and therefore would be detrimental to opportunities to secure safe and convenient pedestrian and cycle access to Myton School for children in the wider area, but in particular those from Warwick Gates and the planned urban extension south of Harbury Lane.</p> <p>A major employment allocation at this location is considered incompatible with residential proposed on the same site. In particular the amenity of residents is likely to be compromised in terms of visual impact, noise and traffic especially at peak periods.</p> <p>General Industrial (B2) employment is considered incompatible with B1 uses and clearly at odds with the Council's stated reason for allocating employment in this location (paragraph 2.32). Having B2 on the same site as B1 will dissuade most high-tech office based companies from investing in the site because they would be concerned over the type of neighbouring employment use which might come forward at a later stage.</p> <p>The southern end of Land West of Europa Way commands an elevated position compared to land to the north, west and south. It is therefore considered that the visual impact of large offices will be harder to mitigate than 2 to 3 storey houses which offer more</p>	<p>Noted. The Council considers that the land north of Gallows Hill is still suitable for employment given its proximity to new housing, its access to the transport network and its synergies with other employment sites in the area however the alternative option at Stratford Road will allow the delivery of a stadium and other community benefits at Gallows Hill.</p>	No change required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		flexibility in terms of mitigating their visual impact through the physical arrangement of units/ roof lines and tree planting throughout the site and other screen planting.		
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<i>6 - Policies Map - H01</i>				
67207 - Mr Peter Lamb [3491]	Object	<p>WDC is ignoring the revised downward requirement in housing numbers resulting from the updated ONS projections and the lack of any need to allocate housing provision for Coventry, since this has not been requested. This is a serious omission and this Consultation provides an opportunity for the plan to be revised to reflect realistic (much lower) housing numbers in all land parcels being considered. There seems, therefore, to be no requirement to increase the housing numbers in this particular area - rather, they need to be reduced or removed altogether</p> <p><i>Housing numbers should be reduced to reflect the current projections for the district, by incorporating the current smaller ONS predictions and removing the unnecessary allocation for Coventry's needs.</i></p>	<p>The Council contends that the proposed housing numbers are justified in light of the Joint SHMA Update which shows the HMA's housing requirement is slightly higher when taking the most recent ONS population projections in to account. In this context the Council must consider the Duty to Cooperate.</p> <p>Site H01 is therefore justified as for housing</p>	
67449 - Europa Way Consortium [197]	Object	<p>No change has been made to the housing allocation at Land at Myton / West of Europa Way on Policy map 2. Policies Map: 2, in both the Publication Draft and Focused Consultation versions of the Local Plan depicts all of the Land at Myton/West of Europa Way (Strategic Site) as being allocated for residential, with other land use allocations overlapping, such as those for employment, community hub/stadium and/or education. The Policies Map should not have the same area of land allocated for different land uses unless a dedicated mixed-use scheme is proposed, which, in this case, it is not.</p> <p><i>It is recommended that Policies Map: 2 is amended to only show Land at Myton/West of Europa Way allocated for housing and education.</i></p>	<p>With the exception of the stadium/community hub (which it is proposed to show on policies map 2) the remainder of the land to the west of Europa Way is shown for housing and education. Other uses within this area (such as community facilities and open space) are ancillary to the main allocation.</p>	
67260 - Save Warwick (MR DAVID WILLIAMS) [4506]	Object	<p>There should be a landscaping strip alongside Gallows Hill to stop visual intrusion of housing into the historic landscape to the south.</p>	<p>This point is understood and is important particularly to mitigate the impact of the stadium. The suggestion will be considered further in the development brief for this area</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67256 - Warwickshire County Council [13081]	Support	Warwickshire County Council (WCC) considers that the proposal to amend housing allocation H01 to allow for increased housing development within the areas not required for stadium and education use is justified on account of the fact that the site is in a sustainable location on the edge of the urban area, outside of the Green Belt, with good access to Warwick and Leamington town centres and a range of existing retail, employment, education and other community uses and has consistently been promoted for a residential-led allocation throughout the Local Plan preparation process (and the Core Strategy before that) and assessed favourably through the associated Sustainability Appraisals and landscape evidence.	Support noted	Not required
<i>7 - Policies Map - DS14</i>				
67450 - Europa Way Consortium [197]	Object	For reasons set out in our response to Proposed Modification reference # 3, the Europa Way Consortium does not support the allocation of Land at Myton/West of Europa Way for a sports stadium and therefore requests that the allocation is deleted from Policies Map: 2 Land at Myton/West of Europa Way	See Response to Rep ID 67232 under section DS14 in this report.	
67208 - Mr Peter Lamb [3491] 67455 - Warwickshire County Council [13081]	Object	<p>WDC is ignoring the revised downward requirement in housing numbers resulting from the updated ONS projections and the lack of any need to allocate housing provision for Coventry, since this has not been requested. This is a serious omission and this Consultation provides an opportunity for the plan to be revised to reflect realistic (much lower) housing numbers in all land parcels being considered. There seems, therefore, to be no requirement to increase the housing numbers in this particular area - rather, they need to be reduced or removed altogether.</p> <p><i>A sports stadium should not be built in this location as it is a totally inappropriate development in a proposed residential area.</i></p>	Whilst the updated ONS projections indicate that the District's objectively assessed need is lower (see Joint SHMA addendum), this is not the case for the HMA as a whole. In line with the NPPF and the Duty to Cooperate, the Council is committed to working with other Councils in the HMA to ensure the whole of the Housing Market Area's needs are met. For this reason the Council contends that the District's Housing Requirements should remain at 714 dwellings per annum.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>8 - Policies Map - ED1</i>				
67452 - Europa Way Consortium [197]	Object	<p>The boundary for the Major Education Allocation' (DS12) on Land at Myton/West of Europa Way is incorrect on Policies Map: 2 in both the Publication and this, the Focused Consultation, Draft versions of the Local Plan. Historically the Consortium has been informed by WDC and Myton School that 9.18 hectares (22.3 acres) of land is needed south of the existing school boundary to deliver the proposed new Education Campus. To help facilitate this, the Consortium and WCC-Property (who own the adjacent site) have agreed to safeguard the following: 2.06 hectares (5.4 acres) on County Council held land with the balance 7.12ha (17.3acres) being safeguarded by the Consortium. These respective areas and proposed amendments to the policy boundary are shown on the attached plan and align with Illustrative Masterplan for outline planning applications Land at Myton (Application No. W/14/1076; approved 5/12/14) and Land North of Gallows Hill (Application No. W/14/0967).</p> <p><i>Amend the Major Allocations (DS12) boundary on Policies Map: 2 so that it aligns with the land safeguarded for education on the Illustrative Masterplans for Land at Myton (Application No. W/14/1076) and Land North of Gallows Hill (Application No. W/14/0967).</i></p>	Proposed amendment accepted.	Amend policies map to reflect revised allocation educational uses at Myton as set out in the Illustrative Masterplans for Land at Myton (Application No. W/14/1076) and Land North of Gallows Hill (Application No. W/14/0967).

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67456 - Warwickshire County Council [13081]	Object	<p>Warwickshire County Council (WCC) supports the proposed amendment to Policies Map 2, as set out in PMA8, to amend ED1 to include the additional area for education to the south of the existing boundary, as this is in accordance with the approach discussed with Myton School and the Europa Way Consortium, who own the land to the north, with respect to the boundary of the Myton School education land expansion to the east of the existing Myton School site. The proposed southern expansion of the education allocation is broadly consistent with the land for education use shown on the masterplan for the outline planning application WCC currently has pending consideration for its 'Land North of Gallows Hill' site. However WCC objects to the wording of the proposed amendment. WCC considers that PMA8 should also acknowledge that in order for Policy DS12 and the associated education allocation on Policies Map 2 (ED1) to be positively prepared and effective, and to avoid the land allocated for education use from being unnecessarily sterilised, the wording within the associated Policy DS12 should state that if the site is not required for education purposes then allocated education land should be deemed acceptable for housing, as a further extension to the current H01 allocation.</p> <p>Changes to Plan:</p> <p><i>Policy DS12 and the associated education allocation on Policies Map 2 (ED1) should state that if the site is not required for education purposes then allocated education land should be deemed acceptable for housing, as a further extension to the current H01 allocation.</i></p>	The Policies Map 2 shows the land allocated for housing with the yellow hatching continuing across the area allocated for education. This is supported by Policy DS11. No change is therefore required.	
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<i>9 - Policies Map - E3</i>				
67564 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	<p>The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.</p>	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>10 - Policies Map - H39</i>				
67513 - The Warwick Society (James Mackay) [3080]	Support	Welcomes the allocation of this brownfield land for housing.	Noted	
67565 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.	Noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>11 - Policies Map - E4</i>				
67262 - Environment Agency (Becky Clarke) [6581]	Object	<p>Modification includes the addition of a new site allocation Ref: E4 Land at Stratford Road Warwick. Size 11.5ha and Uses B Class.</p> <p>This site is partially within Flood Zone 3. A level 2 Strategic Flood Risk assessment (SFRA) should be undertaken by a suitably qualified technical expert or engineer.</p> <p>The floodplain in this location is derived from generalised modelling techniques, any development proposed on this site will need to be supported by hydraulic modelling to confirm the extent of the appropriate developable land and inform the design and layout of the development.</p> <p>Where culverted watercourses pass through or boundary the site, opportunities must be sought for de-culverting for flood risk management purposes. Any culverts which remain a blockage risk to this site will require further modelling to ascertain the risk areas associated with culvert blockage. Mitigation measures must be integrated within the design and layout of the development.</p> <p>This is in addition to the requirements as outlined within FW1 Section 5.127 Urban Drainage: Section FW2 Sustainable Urban Drainage. In addition to adhering to the requirements set out in the above policy, opportunities should be explored within the development boundaries to reduce the existing run off rate to the greenfield rates of discharge in line with the emerging local plan.</p>	<p>Agreed. A level 2 SFRA is required to address any issues arising from existing and potential future flooding conditions on site.</p> <p>An initial consultants report suggests that fluvial flooding can be contained if required by utilising part of the land for a balancing pond or similar solution.</p> <p>The details of such attenuation will be required to accompany a planning application.</p>	
67563 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	<p>The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.</p>	Support noted	Not required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
67457 - Warwickshire County Council [13081]	Support	Warwickshire County Council (WCC) supports the proposed amendment to Policies Map 2 to include a new employment allocation on Land at Stratford Road, in association with the removal of Publication Draft Policy E1: Land North of Gallows Hill, on the basis that the proposed allocation is considered to be positively prepared, justified, effective and consistent with national policy. Please refer to WCC's response to PMA1 for further details of WCC's support for this new allocation.	Support noted. No response required	Not required
<i>12 - Policies Map - Urban Area Boundary</i>				
67459 - Warwickshire County Council [13081]	Support	For consistency with the other proposed strategic allocation around Warwick and Leamington, and to facilitate the delivery of development at the proposed new employment allocation at Stratford Road, Warwickshire County Council (WCC) considers that it would appear sensible and appropriate for the Urban Area Boundary to be amended, as proposed in the Publication Draft Local Plan Focussed Consultation document, to include the new employment allocation at Stratford Road.	Support noted.	
67566 - Coventry and Warwickshire Local Enterprise Partnership (CWLEP) [13068]	Support	The Warwick District Council Publication Draft Local Plan: Focused Consultation document maintains the volume of employment land proposed during the Plan period and increases the volume of proposed housing land - this is supported by CWLEP. CWLEP would be happy to continue to work with Warwick District Council to ensure that land identified for housing and employment opportunities is brought forward for development as part of the implementation of the Local Plan. In particular the CWLEP is happy to assist with collaborative working across the sub region to achieve high quality outcomes for existing and future communities.	Support noted.	